

CONSISTENCY OF THE PROJECT WITH THE COMPREHENSIVE PLAN

The proposed PUD and related Zoning Map amendment are not inconsistent with the guiding principles, policies, and goals of the Comprehensive Plan for the National Capital, including the Property's land use designation on the Future Land Use Map ("FLUM") and Generalized Policy Map ("GPM").

A. Purposes of the Comprehensive Plan

The purposes of the Comprehensive Plan are six-fold: (1) to define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) to guide executive and legislative decisions on matters affecting the District and its citizens; (3) to promote economic growth and jobs for District residents; (4) to guide private and public development in order to achieve District and community goals; (5) to maintain and enhance the natural and architectural assets of the District and (6) to assist in conservation, stabilization, and improvement of each neighborhood and community in the District. D.C. Code §1-245(b).

The proposed PUD and Zoning Map amendment will significantly advance these purposes by promoting the social, physical and economic development of the District through the provision of a high-quality development that will increase the housing and affordable supply and improve the surrounding community without generating any adverse impacts.

B. Future Land Use Map

According to the Comprehensive Plan's 2019 Framework Element, adopted by the D.C. Council on October 8, 2019 (Bill 23-01) (the "Framework Element"), the FLUM shows the general character and distribution of recommended and planned uses across the city. *See* Section 200.5 of the Framework Element. The FLUM's "anticipated future land uses... may be the same, or different than, the current land uses. *Id.* at Section 224.4. The FLUM "carries the same legal weight as the text of the Comprehensive Plan" and is "intended to be used in conjunction with the Comprehensive Plan's policies and actions." *Id.* at Sections 200.5 and 227.1.

Each land use category on the FLUM identifies representative zoning districts and states that other zoning districts may apply. The Zoning Commission, in selecting a zone district such as through a PUD or Zoning Map amendment, determines if it is not inconsistent with the Comprehensive Plan. In making this determination for a selected zone district, the Zoning Commission considers and balances the competing and sometimes conflicting aspects of the Comprehensive Plan, including the policies and text; the intent of the FLUM land use category; and the FLUM and GPM. Under the Zoning Regulations, a proposed PUD should not result in unacceptable project impacts on the surrounding area. *Id.* at Section 227.2.

The FLUM and GPM are intended to provide generalized guidance for development and conservation decisions, and are considered in concert with other Comprehensive Plan policies. *Id.* at Section 228.1. The Framework Element states that the FLUM is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements and development standards

for setbacks, height, use, parking, and other attributes, the FLUM is intended to be “soft-edged” and does not follow parcel boundaries and its categories do not specify allowable uses or development standards. By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *Id.* at Section 228.1(a).

The Future Land Use Map is a generalized depiction of intended uses in the horizon year of the Comprehensive Plan, roughly 20 years in the future. It is not an “existing land use map,” although in many cases future uses in an area may be the same as those that exist today. *Id.* at Section 228.1(b). While the densities within any given area on the FLUM reflect all contiguous properties on a block, there may be individual buildings that are larger or smaller than these ranges within each area. Similarly, the land use category definitions describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. The granting of density bonuses (for example, through PUDs or IZ) may result in density that exceed the typical ranges cited in the FLUM. *Id.* at Section 228.1(c). Indeed, the zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the Citywide Elements and the Area Elements. *Id.* at Section 228.1(d).

The designation of an area with a particular FLUM category does not necessarily mean that the most intense zoning district described in that category is automatically permitted. And, even if a zone is not identified in a category, it can be permitted as described in Section 227.2. A range of densities and intensities applies within each category, and the use of different zone districts within each category should reinforce this range. There are many more zone districts than there are Comprehensive Plan land use categories. Multiple zone districts should continue to be used to distinguish the different types of low- or moderate-density residential development which may occur within each area. *Id.* at Section 228.1(e).

As shown on the FLUM attached hereto as Exhibit E, the Site is designated as Intuitional and Local Public Facilities. According to the Framework Element the Institutional designation:

“includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories.” *Id.* at Section 227.18 (emphasis added).

According to the Framework Element, the Local Public Facilities designation:

“includes land and facilities occupied and used by the District of Columbia government or other local government agencies (such as WMATA), excluding parks and open space. Uses include public schools including charter schools, public hospitals, government office complexes, and similar local government activities. Other non-governmental facilities may be co-located on site. While included in this category, local public facilities smaller than one acre-including some of the District’s libraries, police and fire stations, and similar uses may not appear on the

map due to scale. *Zoning designations vary depending on surrounding uses.*” *Id.* at Section 227.17 (emphasis added).

The Framework Element states that the FLUM does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be generally comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area Elements or an approved Campus Plan. *Id.* 228.1(h).

In this case, the proposed RA-2 zone is appropriate for the Institutional and Local Public Facilities designations given the uses, densities, neighborhood context, and FLUM designations in the immediate vicinity. The Site is largely surrounded by the Moderate Density Residential designation on the FLUM, which designation is:

used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in moderate density areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category, although other zones may also apply. *Id.* at 227.6.

Moreover, the surrounding area is largely residential with a variety of housing types and densities including townhomes and apartment homes consistent with the Moderate Density Residential designation. Small scale retail and institutional uses are also interspersed in the surrounding neighborhood, including the three- and four-story rehabilitation facility known as the Transitional Care Center Capitol City, which abuts the Site to the south.

Consistent with these surrounding uses and densities, the Applicant proposes to develop the Site with much needed new affordable housing dedicated exclusively to seniors. Importantly, the Project will be fully consistent with the development standards for a PUD in the RA-2 zone, which is a zone specifically listed as being consistent with the surrounding Moderate Density Residential FLUM designation. The Zoning Regulations specifically state that the RA zones are “designed to be mapped in areas identified as moderate- or high-density residential areas suitable for multiple dwelling unit development and supporting uses.” 11-F DCMR § 100.2. In addition, the RA-2 zone is intended to provide for “areas developed with predominantly moderate-density residential.” 11-F DCMR § 300.3. Indeed, the Zoning Commission has previously approved Zoning Map amendments to the RA-2 zone for properties designated Moderate Density Residential on the FLUM. *See, e.g.* Z.C. Order No. 14-18A for property located at Square 3953, Lots 1-3 (property was rezoned to the R-5-B zone under the 1958 Zoning Regulations, which converted to the RA-2 zone under the 2016 Zoning Regulations). Therefore, based on the foregoing, the Project and proposed RA-2 rezoning are fully consistent with the surrounding

context and land uses and therefore appropriate for the Institutional and Local Public Facilities designations on the FLUM for the Site.

C. Generalized Policy Map

As shown on the GPM attached hereto as Exhibit F, the Site is designated as a Neighborhood Conservation Area, which applies to areas that

“have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map.” See Section 225.4 of the Framework Element.

“The guiding philosophy in Neighborhood Conservation Areas is to “conserve and enhance established neighborhoods but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities.” *Id.* at Section 225.5.

The proposed RA-2 zone and associated Project are not inconsistent with the GPM. The Site is presently vacant and therefore extremely underutilized considering its development potential and location in a mixed-use area with ample public transportation options. The affordable senior housing project will fit in with the residential character of the neighborhood and will not create any stark changes in density compared to existing densities of surrounding properties. As shown in the neighborhood context photographs included as Sheet G05 of the Plans, there is a diversity of land uses and building types and heights in the immediate area, and the Project will be developed in a manner that is compatible with these existing development patterns and will respect the surrounding scale, natural features, and character of the neighborhood. Moreover, as stated above, the guiding philosophy for Neighborhood Conservation Areas does “not preclude development” particularly when new development consists of infill housing that supports the conservation of neighborhood character.

Moreover, the new affordable senior housing is needed to address the city-wide housing need. The Site is perfectly situated to accommodate the proposed new moderate density senior affordable housing in an area that can provide access to opportunities, services, and amenities.

D. Compliance with Guiding Principles of the Comprehensive Plan

The Project is consistent with many of the guiding principles of the Comprehensive Plan for managing growth and change, creating successful neighborhoods, connecting the city, and building green and healthy communities.

1. Managing Growth and Change

The proposed PUD and Zoning Map amendment are consistent with several of the principles for managing growth and change, which “seeks to create and support an equitable and inclusive city.” *Id.* at 219.1. This principle acknowledges that growth “must be managed equitably to support all District residents.” *Id.* at 219.1. The managing growth and change principle also states that “[c]hange 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, food deserts, displacement, and homelessness.” *Id.* at 219.1.

With respect to housing specifically, this principle highlights the importance of “maintaining and enhancing the District’s mix of housing types” and states that housing “should be developed for households of different sizes, including growing families as well as singles and couples, and for all income levels.” *Id.* at 219.3. With respect to development of underutilized, transit-oriented sites, the principle states that “[r]edvelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods.” *Id.* at 219.7.

The Project is fully consistent with these principles. The Project will replace a vacant and underutilized site with a new residential building that will provide approximately 67 new affordable senior housing units in close proximity to public transportation that will greatly assist in addressing the continuing demand for additional housing in the District, including the demand for senior affordable, in the District.

2. Creating Successful Neighborhoods

One of the guiding principles for creating successful neighborhoods is that “[r]esidents and communities should have meaningful opportunities to participate in all stages of planning, policy, public investment, and development decision-making. *Id.* at 220.1. It further states that “[p]ublic 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. *Id.* at 220.18. With respect to housing and affordable housing, this principle states that the “residential character of neighborhoods must be protected, maintained and improved... As the District continues to grow, more residents, and those of varied socio-economic backgrounds, should be accommodated, including the production and preservation of affordable housing, while

using zoning, design, and other means to retain the qualities that physically characterize these neighborhoods and make them attractive. *Id.* at 220.1.

The Project is consistent with each of these principles. The Applicant will work closely with ANC 8A and other affected neighborhood stakeholders to ensure that the Project responds to the neighborhood's current demands and is designed in a style and with public space elements that are prioritized by the community. Moreover, the Project will replace an underutilized vacant site with a new residential development designed in a context-sensitive manner and which is compatible with the height, scale, massing, materials, and architectural styles of other properties in the surrounding area. In doing so, the Project will respect and maintain the residential character of the neighborhood while providing new affordable housing for seniors to age in place.

3. Connecting the City

The Project is consistent with the guiding principles that pertain to connecting the city, which encourage increased mobility and prioritizing investments in transit, "improving connections between different transportation modes, improving safety and security of users of all transportation modes, and increasing system efficiency. *Id.* at 222.1. "Investments in the transportation network must be equitably distributed, prioritize safety, access and sustainable transportation, and balance the needs of pedestrians, bicyclists, transit users, autos and delivery vehicles as well as the needs of residents and others to move around and through the city." *Id.* at 222.2.

The Site is located in a walkable and transit-oriented location, which will allow residents of the Project to take advantage of multiple transportation modes, which is particularly important for seniors who may not own a private vehicle. The Project will also include streetscape improvements that will enhance mobility and circulation around the Site and throughout the neighborhood. These improvements will include new sidewalks, street trees, and other landscape elements that will help to create a safe and inviting public realm. Moreover, access points for the on-site parking and loading areas have been designed to appropriately balance the safety of pedestrians and bicyclists while maintaining ease and convenience for residents and loading deliveries.

4. Building Green and Healthy Communities

The Project is fully consistent with the Comprehensive Plan's guiding principles pertaining to building green and healthy communities. A major component to successfully build green and healthy communities is to establish construction practices that "minimize the use of non-renewable resources, promote energy and water conservation, encourage the use of distributed energy resources like rooftop solar, and reduce harmful effects on the natural environment. *Id.* at 223.4. "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." *Id.* at 223.5.

Consistent with these policies, the Project will incorporate sustainable features and will be designed to be certified under the Enterprise Green Community standards at a level that is the equivalent of Silver certification under the current LEED standards. The Site is located in a mixed-use, walkable neighborhood with convenient access to public transportation and existing infrastructure and services. Moreover, the Project includes a variety of strategies to satisfy the GAR and stormwater management requirements, such as green roof areas, bioretention, and significant new landscaping on the Site and in public space. The Project also includes sustainable design features such as solar panels, energy efficient lighting, high efficiency mechanical systems, and Energy Star appliances. Low flow fixtures, native landscaping, efficient irrigation, healthy materials, and indoor air quality measures will also be provided.

E. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. The Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District of Columbia. 10-A DCMR § 300.1. Because of the role it plays in integrating the policies and objectives of all the other elements of the Comprehensive Plan, the Land Use Element is given greater weight than the other elements as competing policies in different elements are identified and balanced. 10-A DCMR § 300.3.

The overarching goal of the Land Use Element is to ensure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents, institutions, and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries. 10-A DCMR § 302.1. For the reasons discussed below, the proposal is consistent with this overarching goal through its advancement of a number of Land Use Element policies:

1. Policy LU-1.3 Transit-Oriented and Corridor Development

The policies within LU-1.3 recognize the importance of maximizing land use around transit stations and along transit corridors. They encourage the accommodation of growth in a way that minimizes the number and length of auto trips generated and the reduction of household expenses on transportation by providing options for car free living. Moreover, the policies include a preference for the development of diverse housing types, including “both market-rate and affordable units and housing for seniors and others with mobility impairments.” These policies also prioritize attractive, pedestrian-friendly design and well-designed and maintained public open space. Policies encourage convenient and comfortable connections to the bus system, thereby expanding access to the stations and increasing Metro’s ability to serve all parts of the city, as well as a high level of pedestrian and bicycle connectivity between the stations and the neighborhoods around them.

The Project is fully consistent with the goals of transit-oriented and corridor development. The Site is located in close proximity to multiple Metrobus lines, including priority bus routes. The Project will include new pedestrian-friendly and well maintained public open spaces that will improve connections to the bus system and increase pedestrian connectivity overall. The Project is also less than a quarter mile from the Skyland Town Center PUD (the “Skyland PUD”), originally approved pursuant to Z.C. Order No. 09-03 in 2010. The Skyland PUD is currently under construction and is envisioned and approved as a mixed-use “town center” with a mix of residential and commercial uses on approximately 18.7 acres of land. The Good Hope Marketplace, an existing mixed-use commercial shopping center with surface parking and an anchor Safeway grocery store, is located approximately two blocks to the east of the Site at the intersection of Alabama Avenue and Good Hope Road, SE. Moreover, the Project will provide new affordable units and housing for seniors, which will satisfy the District’s desire to provide mobility options for all types of District residents.

2. Policy LU-1.3.4: Design to Encourage Transit Use

The Project has been designed to encourage transit use and help to enhance the safety, comfort, and convenience of pedestrians walking to local Metrobus stops. The Project will incorporate streetscape improvements such as lighting and landscaping to increase safety and security in the neighborhood.

3. Policy LU-1.4.2: Long-Term Vacant Sites

As previously noted, the Site is presently vacant. Therefore, the Project will facilitate the use of the vacant lot that has historically been difficult to develop.

4. Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Consistent with this policy, in designing the Project the Applicant sought to increase the housing supply in the area while protecting the neighborhood character and restoring the environment. The Project satisfies these goals by providing a new residential community dedicated exclusively to affordable senior housing. Doing so takes advantage of the Site’s mixed-use and transit-oriented location to meet the overarching goal of creating a successful neighborhood.

5. Policy 2.1.8: Zoning of Low and Moderate Density Neighborhoods

Consistent with this Policy the proposed Project and associated rezoning will not result in the demolition of housing in good condition or its replacement with a new structure that is out of character with the existing neighborhood.

6. Policy LU-2.1.11: Residential Parking Requirements

Consistent with this policy, the Project provides the minimum number of parking spaces required by the Zoning Regulations, which will adequately meet the demand of the building residents. The parking spaces are located on a surface lot adjacent to the building on the Site and will be appropriately landscaped and screened from public view to maintain an attractive

environment at the street level. The Project has also been designed to minimize interference with traffic flow by locating the curb cut on Wagner Street, which has less traffic density.

7. Policy LU-2.2.4: Neighborhood Beautification

This policy encourages projects to improve the visual quality of the District's neighborhoods. As shown on plans included with this application, the Project is designed to improve the visual aesthetic of the Property and the neighborhood in general. Development of the Property will be a major improvement over its existing vacant condition, particularly because the Project will incorporate new streetscape and landscape elements to enhance the pedestrian experience and improve the visual quality of the surrounding area.

8. Policy LU 2.1.3: Buffering Requirements

Although the Project is not a commercial development, the Project will provide effective physical barriers to avoid adverse effects on surrounding properties. In this case, the buffering will include setbacks, extensive landscaping, screening, building height step-downs and setbacks, and other architectural measures that will avoid potential conflicts.

F. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District's transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comprehensive Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving mobility and accessibility. 10-A DCMR § 400.1.

As described above, the Project will increase the amount of housing available near priority Metrobus corridors, thereby making it easier for District residents to access transit and decrease the need, and associated economic burden, of owning a vehicle. Thus, the PUD is well positioned to advance the policies and goals of the Transportation Element including the following:

1. Policy T-1.1.4: Transit-Oriented Development

The Project is an example of transit-oriented development due to its location adjacent to many major Metrobus routes, including multiple priority bus routes. The project also includes various transit-oriented development-related improvements, including the construction of a moderate-income residential community along a mixed-use corridor that includes bicycle parking and storage areas and pedestrian improvements including new paving, lighting, landscaping, and bicycle racks.

2. Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning

The Applicant carefully considered and integrated bicycle and pedestrian safety considerations in the design of the Project. The Project incorporates secure indoor bicycle parking

and exterior short-term bicycle parking to encourage residents and visitors to travel by bike. The Applicant will also repave the streetscape surrounding the Property according to DDOT's standards, and will otherwise improve the public realm by making new landscape and lighting improvements to enhance the pedestrian experience and general safety of the surrounding area. Together, these physical improvements to the streetscape will encourage bicycle and pedestrian activity and will bring additional revitalization to the area. In addition, all vehicular access to parking and loading for the Project is located on Wagner Street, which will minimize pedestrian and vehicular conflicts.

3. Policy T-2.3.3: Bicycle Safety

This policy promotes increasing bicycle safety through various measures including traffic calming techniques, the provision of public bicycle parking, and enforcement of regulations requiring private bicycle parking. This policy is supported by a Comprehensive Plan action that requires new commercial and residential buildings to be designed with amenities that accommodate bicycle users. The Project is consistent with this policy since it will provide secure indoor bicycle parking and bicycle racks in public space to accommodate and encourage bicycle use by all building users.

4. Policy T-2.4.1: Pedestrian Network

5. Policy T-2.4.2: Pedestrian Safety

The Project will incorporate significant improvements to the public space that will improve the city's sidewalk system to form a network that links residents across the city. Moreover, the proposed improvements will enhance safety and security in the neighborhood and will incorporate new pedestrian amenities that will encourage residents and visitors to walk within and around the Site.

6. Policy T-2.6.1: Special Needs

7. Policy T-2.6.2: Transit Needs

These policies require attention to the transportation needs of all District residents, including those with special physical requirements and trip needs, such as access to medical centers or senior centers. They also encourage the expansion and assistance for transit-dependent groups, including the elderly. Consistent with these policies, the Project will be located in close proximity to numerous Metrobus routes and will therefore be easily accessible for the senior residents and their visitors.

8. Policy T-3.1.1: Transportation Demand Management (TDM) Programs

Consistent with this policy, the PUD will include a strong TDM program that reduces the number of vehicle trips and miles traveled and increases the efficiency of the transportation system.

G. Housing Element

The overarching goal of the Housing Element is to “[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia.” 10-A DCMR §501.1. The Project will help achieve this goal by advancing the policies discussed below.

1. Policy H-1.1: Expanding Housing Supply

The Project is consistent with the overarching policy to expand the housing supply and create successful neighborhoods within the District, as more fully set forth below.

2. Policy H-1.1.1: Private Sector Support

The Project helps meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the approximately 67 new residential units proposed for the Project will be a substantial contribution to the supply of District housing that is in close proximity to public transportation. Moreover, the provision of new housing at this particular location is fully consistent with the District’s land use policies.

3. Policy H-1.1.3: Balanced Growth

This policy strongly encourages the development of new housing on surplus, vacant, and underutilized land in all parts of the city, and recommends ensuring that a sufficient supply of land is planned and zoned to enable the city to meet its long term housing needs, including the needs for affordable housing and higher-density housing. The Project supports these policy goals by developing new moderate-density housing on an underutilized, vacant site in a mixed-use neighborhood. Housing provided on the Property will include affordable housing for seniors to ensure that a sufficient housing supply is provided for District residents at all income levels and stages of life.

4. Policy H-1.1.5: Housing Quality

The Applicant will dedicate 100% of the Project’s residential gross floor area to affordable dwelling units dedicated to seniors earning up to 60% of the MFI. This amount is significantly in excess of the amount otherwise required by IZ. The Project will be constructed of high-quality materials and will include open space and landscaping around the Site. The architecture of the building has been carefully designed to respect the design integrity of adjacent properties and the surrounding neighborhood.

5. Policy H-1.2.1: Affordable Housing Production as a Civic Priority

Consistent with this policy the Project will establish the production of housing for moderate income households, which will support the District in making affordable housing a civic priority.

6. Policy H-1.2.2: Production Targets

The Project will help achieve the District's affordable housing production targets by dedicating 100% of the residential units in the project to affordable senior housing earning up to 60% of the MFI.

7. Policy H-1.2.7: Density Bonuses for Affordable Housing

The Applicant will take advantage of bonus densities afforded by the IZ and PUD regulations to build new moderate income housing at the Site. Consistent with this policy, the affordable housing will be considered a public benefit of the PUD for the purpose of granting density bonuses.

8. Policy H-1.3.3: Assisted Living and Skilled Nursing

Although the Project itself is not assisted living, it will address the need for and help promote the supply, security, and affordability of housing for the elderly.

9. Policy H-1.4.3: Focusing Housing Investments

Consistent with this policy, the Project's affordable senior housing is being developed adjacent to a rehabilitation facility known as the Transitional Care Center Capitol City. This proximity will allow for sustained neighborhood improvement based on the similar demographics and market that the developments share. The presence of this neighborhood partner and anchor institution will create a symbiotic and lasting relationship that will help to improve and strengthen the area.

10. Policy H-1.5.1: Land and Building Regulations

This policy encourages the District's land regulations, including the Zoning Regulations, to enable the production of housing for all income groups and avoid regulations which make it prohibitively expensive or difficult to construct housing. By waiving the PUD minimum land area requirement, the Project is a prime example of allowing for a senior affordable housing development to move forward despite the specific language of the regulations that would otherwise prohibit the construction of housing as a PUD at the Site.

11. Policy H-4.2.2: Housing Choice for Seniors

12. Policy H-4.2.3: Neighborhood-Based Senior Housing

These policies encourage the development of a wide variety of affordable housing choices for the District's seniors, particularly the production of multi-family senior housing. The Applicant's proffer to dedicate approximately 67 units to seniors at 60% MFI is fully consistent with these important policies.

H. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biological resources. This element provides policies and actions on important issues such as restoring the city's tree canopy, energy conservation, and air quality. 10-A DCMR § 600.1. The Project is fully consistent with the policies of the Environmental Protection Element because it incorporates new landscaping, green roofs, energy efficient systems and materials, alternative energy sources, and methods to reduce stormwater runoff. Additionally, the Project has been designed to meet Enterprise Green Community standards at a level that is the equivalent of Silver certification under the current LEED standards. The Project is also consistent with the policies set forth below:

1. Policy E-1.1.1: Street Tree Planting and Maintenance

As part of the Project the Applicant will reconstruct the streetscape adjacent to the Property, which will include the planting of new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value to the public space.

2. Policy E-1.1.3: Landscaping

The Project will also incorporate significant landscaping within and outside of the property line, which will enhance and beautify the streetscape, reduce stormwater runoff, and strengthen the character of the public realm. The Site and surrounding public spaces will have extensive new landscaping that includes new street trees, ground cover, native species, and bioretention areas. The Project will also incorporate green roof areas and other natural elements that will enhance and beautify the streetscape, reduce storm water runoff, and strengthen the character of the public realm.

3. Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff

The design of the building and the surrounding public spaces includes landscaping and green roofs, which will reduce stormwater runoff.

4. Policy E-3.2.1: Support for Green Building

This policy encourages the use of green building methods in new construction, as well as use of green building methods for operation and maintenance activities. The Project is consistent with this policy. As stated above, the Project is designed to Enterprise Green Community standards at a level that is the equivalent of Silver under the current LEED standards.

5. Policy E-4.1.3: Evaluating Development Impacts On Air Quality

This Policy encourages the evaluation of potential air emissions from new and expanded development to ensure that measures are taken to mitigate any possible adverse impacts. The Project is consistent with this goal because it includes a variety of sustainable, environmentally-friendly features that will successfully mitigate adverse impacts on air quality. These

environmental measures include energy efficient lighting, high efficient mechanical systems, Energy Star appliances, and indoor air quality systems, among others. The extensive landscaping and tree planting will also help to absorb carbon monoxide and other pollutants from the air, which is specifically prioritized in this policy. In addition, the Project will comply with all applicable laws and regulations regarding air pollution that may result from project construction.

6. Policy E-4.3.5: Noise and Land Use Compatibility

The Project is consistent with this Policy because it will not establish new land uses that generate excessive noise. The Site will be developed with a residential use devoted entirely to seniors, which is the same use as the surrounding residential neighborhood. The Applicant will also comply with all applicable noise regulations during construction and operation of the building.

I. Urban Design Element

The goal of the Comprehensive Plan's Urban Design Element is to "[e]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces" 10-A DCMR § 901.1. The Project will greatly assist in achieving this Comprehensive Plan goal. The height and massing of building is consistent with the surrounding context, zoning, land uses, and designations on the FLUM. The Project is also consistent with the following policies:

1. Policy UD-2.2.4: Transitions in Building Intensity

Consistent with this policy, the Project will establish a gradual transition between the larger-scale rehabilitation facility to the southwest and the lower density single-family homes to the north and west. For example, the Project's building height steps down in areas closest to the nearest residential neighbors, which helps to relate the building to the lower-scale of the surrounding neighborhood. In addition, the Project includes significant buffering and landscape elements to minimize any potential impacts to the greatest extent possible.

2. Policy UD-2.2.5: Creating Attractive Facades

The proposed building is designed in a manner that avoids large expanses of unarticulated facades through the use of projections, recesses, and a mix of high quality materials. The building design establishes an attractive building pattern at a location that complements the surrounding blocks and extends the pedestrian-scale quality of the streetscape along the public space in front of the Site.

3. Policy UD-2.2.8: Large Site Development

This policy states that new developments on parcels that are larger than the prevailing neighborhood lot size should be carefully integrated with adjacent sites, and that structures on such parcels should be broken into smaller, more varied forms. The design of the Project is fully consistent with this policy. Although the Site is smaller than many surrounding institutional sites

in the neighborhood, it is larger than the single-family lots to the immediate north and west of the Site. However, the building has been broken down into smaller, varied forms with considerable height step-downs, façade variations, and setbacks in areas that are closest to the lower-density single-family homes on smaller lots.

4. Policy UD-2.2.10: Surface Parking

The Project will incorporate new shade trees and landscaping to screen the surface parking area and ensure that the on-site parking is not the dominant element of the street.

5. Policy UD-3.1.1: Improving Streetscape Design

Consistent with this policy, the Project will improve the appearance and identity of 25th and Wagner Streets by incorporating new paved sidewalks, street furniture, bicycle racks, and extensive landscaping in the public space surrounding the Site. The Project also includes a dynamic and visually interested façade along both street frontages. These improvements will greatly enhance the streetscape design and character immediately adjacent to the Site.

6. Policy UD-3.1.5: Streetscape and Mobility

Consistent with this policy, the Project will ensure that the design of the public space adjacent to the Site facilitates connections between different modes of travel, including walking, public transit, bicycling, and driving. Safe pedestrian connections will be created through the redevelopment of the streetscape abutting the Site.

7. Policy UD-3.1.11: Private Sector Streetscape Improvements

As part of the Project, the Applicant will reconstruct the public spaces adjacent to the Property. Doing so will improve sidewalk conditions, incorporate landscaping and pedestrian-oriented amenities, and provide new street trees that will add tree canopy, provide shade, improve air quality, provide urban habitat, and add aesthetic value.

8. Policy UD-3.2.3: Site Planning and Design Measures to Increase Security

Consistent with this policy the Project’s architectural design and overall site plan will minimize security requirements by incorporating extensive landscaping, lighting, visual access, and streetscape elements into the public space. The Project will have a secure entrance, a strong street presence, and will be made of high quality materials that will further contribute to the positive impact on the public realm and improve safety and security. Moreover, redevelopment of the vacant Site with a new residential building will bring additional “eyes and ears” to the street which will help to minimize the potential for crime in the immediate area.

J. Infrastructure Element

The Infrastructure Element provides policies and actions on the District’s water, sanitary sewer, stormwater, solid waste management, energy, and telecommunication systems. Investments

in these systems are essential to the District's future, both to meet the demands of existing users and to accommodate future change and development. 10-A DCMR § 1300.1. The Project is not inconsistent with many of the policies set forth in the Infrastructure Element, including the following:

1. Policy IN-1.2: Modernizing Water Infrastructure

Consistent with this policy, the Project will be required to maintain all public facilities and infrastructure, including water infrastructure, to accommodate future demand generated by the Project. The civil sheets included with the Plans include specifications for utilities, grading, erosion and sediment control, and stormwater management. Moreover, the Applicant will be required to coordinate with applicable public utilities and District agencies during the permitting process, including DC Water, to ensure that adequate services will continue to be available for existing and new uses.

2. Policy IN-2.1.1: Improving Wastewater Collection

The Project will provide for the safe and efficient collection of wastewater generated by the Project. In obtaining building permits the Applicant will work with applicable District agencies and utilities to ensure that the Project will not exacerbate wastewater systems and will instead support improved system efficiency and reliability.

3. Policy IN-2.2.1: Improving Stormwater Management

Similar to wastewater collection, the Applicant will ensure the efficient conveyance of stormwater on the Site by coordinating with applicable District agencies and utilities during the public permitting process. The civil sheets included in the Plans specifically include details on the Project's proposed stormwater management systems.

4. Policy IN-6.1.3: Developer Contributions

As a private developer the Applicant will be required to fund the necessary relocation or upgrading of existing utilities to address any limitations with existing infrastructure related to the Project. Indeed, as part of the permitting process the Applicant will coordinate with all applicable utilities and agencies to ensure that adequate services will continue to be available for the new residential use proposed for the Site and for existing uses in the surrounding neighborhood. The Applicant will pay all required costs and fees associated with acquiring utility permits for the Site.

K. Far Southeast/Southwest Area Element

The Site is located within the boundaries of the Far Southeast/Southwest Area Element. Section 1807 of the Comprehensive Plan sets forth the Far Southeast/Southwest Area Element's planning and development priorities, which include recognizing opportunities for increased housing density and establishing transit-oriented development to provide opportunities for seniors and households without cars. Priorities also include making streetscape improvements and upgrading public transit near retail centers, and prioritizing bus service.

The proposed Project and related Zoning Map amendment are consistent with these policies because the new building will help revitalize the existing neighborhood and provide additional housing for seniors. The Project will reinvest in the neighborhood by creating new residential units so that seniors can comfortably age in place. Furthermore, the Project will be responsive to the local community through engagement with the ANC and other stakeholders to ensure that their interests and concerns are taken into consideration through the PUD process. In addition, the Project is consistent with the following specific policies within the Far Southeast/Southwest Area Element:

1. Policy FSS-1.1.14: District Government Incentives for Economic Development

The Applicant will use a variety of incentives, including development of the Site through the PUD process, to promote and leverage economic development in the Far Southeast/Southwest area.

2. Policy FSS-1.2.1: Health Care Facilities

The Project will help to support this policy by developing new senior housing directly adjacent to the Transitional Care Center rehabilitation center. Doing so will support existing health care and social service facilities and ensure that health care can be easily and conveniently provided for Project residents if needed. Indeed, this policy encourages the consolidation of health care facilities and compatible uses.