

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed modification advances the purposes of the Comprehensive Plan, is consistent with the Future Land Use Map and Generalized Policy Map, complies with the guiding principles in the Comprehensive Plan, and furthers a number of the major elements of the Comprehensive Plan.

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) (¶ 1-301.62).

The modification significantly advances these purposes by promoting the social, physical and economic development of the District through the provision of a high-quality, state-of-the-art, eco-friendly residential development that will add 126 residential units (plus or minus 10%) to the District, without generating any adverse impacts.

B. Future Land Use Map

The Subject Property is designated in the Mixed-Use, Medium Density Residential and Moderate Density Commercial land use category on the District of Columbia Comprehensive Plan Future Land Use Map. The Medium Density Residential designation is used to define neighborhoods or areas where mid-rise (4-7 stories) apartment buildings are the predominant use. Pockets of low and moderate density housing may exist within these areas. The Medium

Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. The R-5-B and R-5-C Zone districts are generally consistent with the Medium Density designation, although other zones may apply in some locations. (§2.4.2, ¶224.8)

The Moderate Density Commercial designation is used to define shopping and service areas that are somewhat more intense in scale and character than the low-density commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in low density commercial areas but generally do not exceed five stories in height. The corresponding Zone districts are generally C-2-A, C-2-B, and C-3-A, although other districts may apply. (¶224.12)

The Applicant's proposal to construct a mixed-use development on the Subject Property is consistent with the Comprehensive Plan designation of the Subject Property. The Applicant proposes to construct 4.33 FAR of residential use on the Subject Property, which is consistent with the amount of residential density permitted in medium density zones. Moreover, the C-2-B zoning classification is specifically identified as a moderate density commercial zone district. In addition, one of the primary purposes of the C-2-B District is to provide commercial and residential functions within a single building, which is also consistent with the stated principle of the mixed-use designation of the Subject Property. The Subject Property is also located along a transportation corridor and is in close proximity to two Metrorail stations. Given the District's stated policy of channeling new residential and retail growth into areas near transit stations and

along bus routes, the modified PUD is consistent with the Comprehensive Plan's designation of the Subject Property.

C. Generalized Policy Map

The Subject Property is designated in a Main Street Mixed Use Corridor area on the District of Columbia Comprehensive Plan Generalized Policy Map. Main Street Mixed Use Corridors are traditional commercial business corridors with a concentration of older storefronts along the street. The service area for Main Streets can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper story residential or office uses. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment.

The proposed PUD modification is consistent with this designation since the project includes both residential and retail uses, which will help to further economic and housing opportunities and serve neighborhood needs.

D. Compliance with Guiding Principles of the Comprehensive Plan

The Project is consistent with many guiding principles in the Comprehensive Plan for managing growth and change, creating successful neighborhoods, and building green and healthy communities, as set-forth in the Comprehensive Plan.

1. Managing Growth and Change.

In order to manage growth and change in the District, the Comprehensive Plan encourages, among other factors, the growth of both residential and non-residential uses, particularly since non-residential growth benefits residents by creating jobs and opportunities for

less affluent households to increase their income. (§ 2.3, ¶ 217.4). The Comprehensive Plan also states that redevelopment and infill opportunities along corridors is an important part of reinvigorating and enhancing neighborhoods. (§ 2.3, ¶ 217.6). The modified PUD is fully-consistent with each of these goals. Redeveloping the Subject Property into a vibrant mixed-use development will further the revitalization of the neighborhood.

2. Creating Successful Neighborhoods.

One of the guiding principles for creating successful neighborhoods is getting public input in decisions about land use and development, from development of the Comprehensive Plan to implementation of the plan's elements. (§ 2.3, ¶218.8). The modified PUD furthers this goal since, as part of the PUD process, the Applicant has been working with the Advisory Neighborhood Commission to ensure that the development provides a positive impact to the immediate neighborhood.

3. Increasing Access to Education and Employment

The Increasing Access to Education and Employment element includes a number of policy goals focused on increasing economic activity in the District, including increasing access to jobs by District residents (§219.1); encouraging a broad spectrum of private and public growth (§219.2); supporting land development policies that create job opportunities for District residents with varied job skills (§219.6); and increasing the amount of shopping and services for many District neighborhoods (§219.9). The project is fully consistent with these goals since the proposed retail area will help to attract new jobs to the District, as well as to this specific neighborhood.

4. Connecting the City

The proposed PUD modification will help to implement a number of the guiding principles of this element. As shown on the Plans, the project includes streetscape improvements

to provide improved mobility and circulation through the project, as well as the overall neighborhood. (§220.2) In addition, the access points for the required parking and loading facilities have been designed to appropriately balance the needs of pedestrians, bicyclists, transit users, autos and delivery trucks as well as the needs of residents and others to move around and through the city. *Id.* Moreover, the redevelopment and streetscape improvements along Georgia Avenue will also help to reinforce and improve one of the “great streets” of the city. (§220.3).

5. Building Green and Healthy Communities.

One of the guiding principles for building green and healthy communities is that 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. (§2.3, ¶221.3) As discussed in more detail below, the building will include a significant number of sustainable design features.

E. Land Use Element

For the reasons discussed below, the Project supports the following policies of the Land Use Element:

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

The project exemplifies the principals of Transit-Oriented Development. The Subject Property is steps from multiple MetroBus stops and a 10 minute walk to both the Columbia Heights and Georgia Avenue-Petworth Metro Stations, which are serviced by the yellow and green lines. In addition, the project is located on Georgia Avenue, which the District has targeted as a revitalization area in need of increased density and neighborhood retail and services. Georgia Avenue is also designated as one of the District's “Great Streets,” which are intended to help spur economic development, transportation, and urban design benefits on the corridor. The proposed project includes retail and residential uses, as well as an attractive

design, all of which will help to increase the vitality of this portion of Georgia Avenue. In addition, the project is consistent with the following principles:

- A preference for mixed residential and commercial uses rather than single purpose uses, particularly a preference for housing above ground floor retail uses;
- A preference for diverse housing types, including affordable units; and
- A priority on attractive, pedestrian-friendly design and a de-emphasis on auto-oriented uses and surface parking.

2. Policy LU-1.4.1: Infill Development

The project is consistent with the goal of encouraging infill development on vacant land within the city, particularly in areas where there are vacant or underutilized lots that create gaps in the urban fabric and detract from the character of a commercial or residential street. The development complements the established character of the area and does not create sharp changes in the physical development pattern.

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

The project has been designed to encourage transit use and helps to enhance the safety, comfort and convenience of passengers walking to local buses along Georgia Avenue since the project incorporates new landscaping and includes ground floor retail uses that will activate and animate the street frontages.

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

In designing the proposed development, and consistent with this policy element, the project architect has sought to balance the housing supply in the area and expand neighborhood commerce with the parallel goals of protecting the neighborhood character, and restoring the environment.

5. Policy LU-2.1.11: Residential Parking Requirements

Policy LU-2.1.11 calls for ensuring 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. This policy also recognizes that parking reductions should be considered where a reduction in demand can be clearly demonstrated. In this case, the project includes a sufficient amount of parking to meet the building's anticipated retail and residential demand.

6. Policy LU-2.2.4: Neighborhood Beautification.

Policy LU-2.2.4 encourages projects to improve the visual quality of the District's neighborhoods. As shown on the Plans, the Applicant's architect has designed the building to improve the visual aesthetic of the neighborhood. Moreover, the development of the site will be an improvement to the current neighborhood condition and will help to revitalize the area.

F. Transportation Element

The Subject Property is located on Georgia Avenue, which, as shown on Map 4.2 of the Comprehensive Plan, has been identified as a major transit corridor able to support premium transit service. (§407.13). In addition, Georgia Avenue has been identified as one of the locations for new transit infrastructure, including bus rapid transit to provide travel options, better connect the city, and improve surface-level public transportation. (§407.23). Thus, in light of its location, the proposed project is uniquely situated to help further several policies and actions of the Transportation Element of the Comprehensive Plan, including:

1. Policy T-1.1.4: Transit-Oriented Development The proposed project is an example of transit-oriented development and includes various transportation improvements, including the construction of new mixed-uses along a major transportation corridor, the inclusion of bike racks and storage areas, and sidewalk improvements.

2. Policy T-2.3.1: Better Integration of Bicycle and Pedestrian Planning As shown on the Plans, the project architect has carefully considered and integrated bicycle and pedestrian planning and safety considerations in the development of the project.

3. Action T-2.3-A: Bicycle Facilities.

This element encourages new developments to include bicycle facilities. The Applicant proposes to include secure bicycle parking and bike racks as amenities within the development that accommodate and encourage bicycle use. Specifically, the Applicant will be providing 81 covered bicycle spaces and 8 short-term street spaces for the project.

G. Environmental Protection Element.

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. This element provides policies and actions on important issues such as energy conservation and air quality, and specific policies include the following:

1. Policy E-1.1.1: Street Tree Planting and Maintenance - encourages the planting and maintenance of street trees in all parts of the city;

2. Policy E-1.1.3: Landscaping - encourages 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;

3. Policy E-2.2.1: Energy Efficiency - promotes the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses;

4. Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff - calls for the promotion of tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction; and

5. Policy E-3.1.3: Green Engineering - has a stated goal of promoting green engineering practices for water and wastewater systems.

As discussed in both the Environmental Benefits and Building Green and Healthy Communities sections of this statement, the proposed project includes street tree planting, landscaping, energy efficiency, methods to reduce stormwater runoff, and green engineering practices, and is therefore fully consistent with the Environmental Protection Element.

H. 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." (§ 501.1). The modified PUD will help achieve this goal by advancing the policies discussed below.

1. Policy H-1.1.1: Private Sector Support

The project helps to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. Specifically, the project will contain approximately 90,650 square feet of gross floor area devoted to residential units, with eight percent of the residential floor area designated for affordable units. This represents a substantial contribution to the District's housing supply, and the provision of new affordable residential units at this location is fully consistent with the District's land use policies.

2. Policy H-1.1.4: Mixed Use Development

In accordance with Policy H-1-1.4, the project will help to promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers and along the Georgia Avenue corridor on a site that is well-served by public transportation.

3. Policy H-1.1.5: Housing Quality

As shown on the Plans, the project has been designed to include high-quality materials and design elements. Consistent with this policy goal, the affordable units will meet the same high-quality architectural standards provided for the market-rate housing and will be indistinguishable from market rate housing in their exterior appearance.

I. Urban Design Element

The modified PUD is also consistent with a number of the policies included in the Urban Design Element of the Comprehensive Plan. Consistent with Policy UD-2.2.1: Neighborhood Character and Identity, and Policy UD-2.2.7: Infill Development, the proposed development will help to strengthen the architectural quality of the immediate neighborhood by relating the project's scale to the existing neighborhood context, while also avoiding overpowering contrasts of scale, height and density. In addition, as shown on the Plans, the project includes an attractive, visually-interesting and well-designed building façade that eschews monolithic or box-like forms, or long blank walls which detract from the human quality of the street. See Policy UD-2.2.5.

The project is also consistent with the goals of Policy UD-3.2.5: Reducing Crime Through Design, since the development will bring additional "eyes and ears" to the area, as well as adequate lighting, clear lines of sight and visual access, all of which will help to minimize the potential for criminal activity in the immediate area.

J. Economic Development Element

The Economic Development Element of the Comprehensive Plan indicates that the addition of 125,000 jobs during the next 20 years will create the demand for office, retail, hospitality, institutional, and industrial space, and that several hundred acres of land will be required to sustain this development, in a variety of settings with a variety of building types.

(§706.1). Policy ED-2.2.3 therefore recommends creating additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. This policy also indicates that reuse of vacant buildings should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Moreover, Policy ED-3.1.1 calls for promoting the vitality and diversity of neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents. Finally, as set-forth in Policy ED-3.2.8, expanding opportunities for local, small, and disadvantaged business enterprises through city programs, incentives, contracting requirements, and other activities is an additional important goal. The Applicant's proposed development of new retail uses on the Subject Property, as well as its commitment to enter into a First Source Employment Agreement with the Department of Employment Services, are consistent with, and help to implement, each of these goals.

K. Mid-City Area Element

Policy MC-1.1.3 of the Mid-City Area Element of the Comprehensive Plan encourages the redevelopment of vacant lots and the rehabilitation of abandoned structures within the community, particularly along Georgia Avenue, and recommends that infill development be compatible in scale and character with adjacent uses. The Mid-City Area Element also calls for encouraging commercial uses in mixed-use Districts, provided that such new commercial uses do not impact the established residential uses. See Policy MC-1.1.6. Similarly, Policy MC-2.1.3 calls for upgrading the visual quality of the Georgia Avenue corridor through a number of improvements, including urban design and façade improvements that establish a stronger identity and improved image. The modified PUD is consistent with these policies since the development will help to strengthen the architectural quality of the immediate neighborhood by relating the project's scale to the existing neighborhood context. In addition, as shown on the Architectural

Plans and Elevations, the project includes an attractive, visually-interesting and well-designed building façade that will help to improve the neighborhood's visual identity and image.