

COMPREHENSIVE PLAN ANALYSIS

The proposed PUD 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)).

The PUD project significantly advances these purposes by promoting the social, physical and economic development of the District through the provision of a high-quality residential development on the PUD Site without generating any adverse impacts.

B. Future Land Use Map

According to the District of Columbia Comprehensive Plan Future Land Use Map, the PUD Site is designated as high density residential. At the time that the original Z.C. Order No. 05-38 was issued, the PUD Site was designated in the medium-density commercial land use category on the Future Land Use Map, and in Z.C. Order No. 05-38, the Zoning Commission found that the proposed project was consistent with that designation (see Exhibit A, Finding of

Fact No. 37). As described below, the revised project is consistent with the PUD Site's revised designation on the Future Land Use Map.

The high density residential category is used to define neighborhoods and corridors where high rise (eight stories or more) apartment buildings are the predominant use. Pockets of less dense housing may exist within these areas. The corresponding Zone districts are generally R-5-D and R-5-E, although other zones may apply. 10A DCMR § 225.6. The Applicant's PUD, as modified, continues to be consistent with the Comprehensive Plan designation of the PUD Site, even though the designation has changed on the Future Land Use Map. The PUD is consistent with the high density residential category because the project will be built to a maximum density of 3.40 FAR, with the new residential buildings on Lots 855 and 859 having a maximum height of 85 feet, which are well within the PUD standards set forth in sections 2405.1 and 2405.2 of the Zoning Regulations.

C. Generalized Policy Map

The Subject Property is located in the a Neighborhood Conservation Area on the District of Columbia Comprehensive Plan Generalized Policy Map. Neighborhood Conservation Areas have very little vacant or underutilized land and are primarily residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. When change occurs, it will be modest in scale and will consist primarily of scattered site infill housing, public facilities, and institutional uses. 10A DCMR § 223.4. The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas, but they are small in scale. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. 10A DCMR § 223.5.

The PUD is consistent with this designation. The Applicant proposes to construct infill housing that will enhance the established neighborhood and is compatible with the surrounding architectural character on the PUD Site and within the surrounding area. The proposed new residential buildings will help improve the neighborhood fabric and create appropriate mixed-use density that will fit in with existing uses.

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. The Comprehensive Plan also states that redevelopment and infill opportunities along corridors is an important part of reinvigorating and enhancing neighborhoods. The modified PUD is fully-consistent with each of these goals. Redeveloping the PUD Site into a residential development with ground floor retail space 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. The proposed PUD furthers this goal since it will incorporate two new residential buildings onto a site with existing residential development, thus bringing new residents and retail patrons to the area.

3. Building Green and Healthy Communities.

A major objective 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. The project will feature energy efficient HVAC, lighting, low-flow plumbing fixtures, and a transportation program including a bike room that will store 124 bikes. The outdoor areas will be integrated with the stormwater retention system, and all landscaped areas on the PUD Site will utilize native and adaptive plants requiring little irrigation.

E. Land Use Element

For the reasons discussed above, the project supports the following policies of the Land Use Element:

1. Policy LU-1.2.2: Mix of Uses on Large Sites

The project, which includes residential and retail uses on a large site, is consistent and compatible with adjacent uses and will provide a number of benefits to the immediate neighborhood and to the city as a whole. In addition, as discussed above, the proposed mix of uses on the PUD Site is consistent with the Comprehensive Plan Future Land Use Map's designation of the PUD Site as high density residential

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

The project exemplifies the principals of Transit-Oriented Development. The PUD Site is located less than 0.1 miles from the Waterfront Metrorail Station and is served by several major bus routes along M Street, I Street, and 4th Street, S.W.

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 the Waterfront Metrorail Station and to local

Metrobus stops, since the project incorporates ground floor uses that will activate and animate the street frontages and increase safety by providing more eyes and ears on the street.

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

In designing the PUD, and consistent with this policy element, the project architect 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-2.2.4: Neighborhood Beautification

This policy encourages projects to improve the visual quality of the District's neighborhoods. As shown on Proposed Revised Plans, the architect designed the new buildings to improve the visual aesthetic of the PUD Site and the neighborhood in general. Moreover, the development of the PUD Site will be an improvement to the current neighborhood condition and will help to revitalize the area. The project also includes a significant amount of landscaped and open spaces that will help to enhance the streetscape.

F. Transportation Element

The PUD Site has frontage on K Street, M Street, and 6th Street, which enables the project to help further several policies and actions of the Transportation Element of the Comprehensive Plan. For example, consistent with 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 incorporation of bike storage areas within the building, and adjacency to both Metrorail and Metrobus.

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."

10A DCMR § 501.1. The proposed project 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 516 new residential units, which represents a substantial contribution to the District's housing supply. Moreover, provision of new housing at this particular location is fully consistent with the District's land use policies.

2. Policy H-1.1.5: Housing Quality

The PUD will create high-quality affordable housing that will meet the same architectural standards of the market-rate housing, will be indistinguishable from the market rate housing in its exterior appearance, will address the need for open space and recreational amenities, and will respect the design integrity of adjacent properties and the surrounding neighborhood.

3. Policy H-1.2.3: Mixed Income Housing

The proposed development is mixed-income and includes both market-rate and affordable housing units. Thus, the project will further the District's policy of dispersing affordable housing throughout the city in mixed-income communities, rather than concentrating such units in economically depressed neighborhoods.

H. 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 specific environmental policies, including the following:

- Encouraging the planting and maintenance of street trees in all parts of the city (Policy E-1.1.1);

- Encouraging 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 (Policy E-1.1.3);
- Promoting the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses (Policy E-2.2.1); and
- Promoting tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction.

The proposed project includes street tree planting, landscaping, energy efficient techniques and materials, and methods to reduce stormwater runoff, and is therefore fully consistent with the Environmental Protection Element.

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. For example, the project is consistent with Policy UD-2.2.1 and Policy UD-2.2.7 because the project will help 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 Proposed Revised Plans, the project includes attractive, visually-interesting and well-designed building façades. See Policy UD-2.2.5.

J. Lower Anacostia Waterfront/Near Southwest Area Element

The PUD Site is located within the boundaries of the Lower Anacostia Waterfront/Near Southwest Area Element. Section 1907 of the Comprehensive Plan explains the Lower Anacostia Waterfront/Near Southwest Area Element's planning and development priorities. One stated priority is to revitalize and conserve existing neighborhoods and provide diverse housing choices so that a mix of household types and incomes are accommodated. 10A DCMR §

1907.2(b). Another priority is to reinforce existing neighborhood commercial centers and enhance the quality of life for existing residents, all while being responsive to local concerns about traffic, crowd-control, displacement, community service impacts, and changing neighborhood character. *Id.* at 1907.2(g). The PUD is consistent with these policies because the new residential buildings will help revitalize the existing neighborhood with additional housing choices that will accommodate a range of household types and income levels. The project will also be responsive to local concerns by providing appropriate public benefits and project amenities and by working closely with the ANC, the existing residents of the Pei Towers, and other community to groups to ensure that their concerns are adequately addressed.

The PUD is also consistent with Policy AW-1.1.1 and Policy AW-1.1.3 because it will help revitalize and preserve the established neighborhood by investing in the existing housing stock, while simultaneously establishing new commercial development in a manner that is consistent with the Future Land Use Map. The PUD will also support Policy AW-1.1.9 by providing pedestrian amenities, public transit improvements, landscaping, and ground floor uses along M Street/Maine Avenue that together create a vibrant street environment.