

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: July 20, 2012

SUBJECT: Case No. ZC 10-23: **Setdown Report** for a Consolidated Planned Unit Development and PUD-Related Map Amendment for 4600-4614 Wisconsin Avenue, N.W., filed by Holland & Knight LLP for Jemal’s Babes, L.L.C.

PROPOSAL

Jemal’s Babe’s, LLC, the applicant, filed a petition for a Consolidated Planned Unit Development (PUD) and a related Map Amendment to rezone the site from C-2-A to C-3A to accommodate a 55-65 unit apartment building with 13,985 square feet of basement and ground floor retail space.

OFFICE OF PLANNING RECOMMENDATION

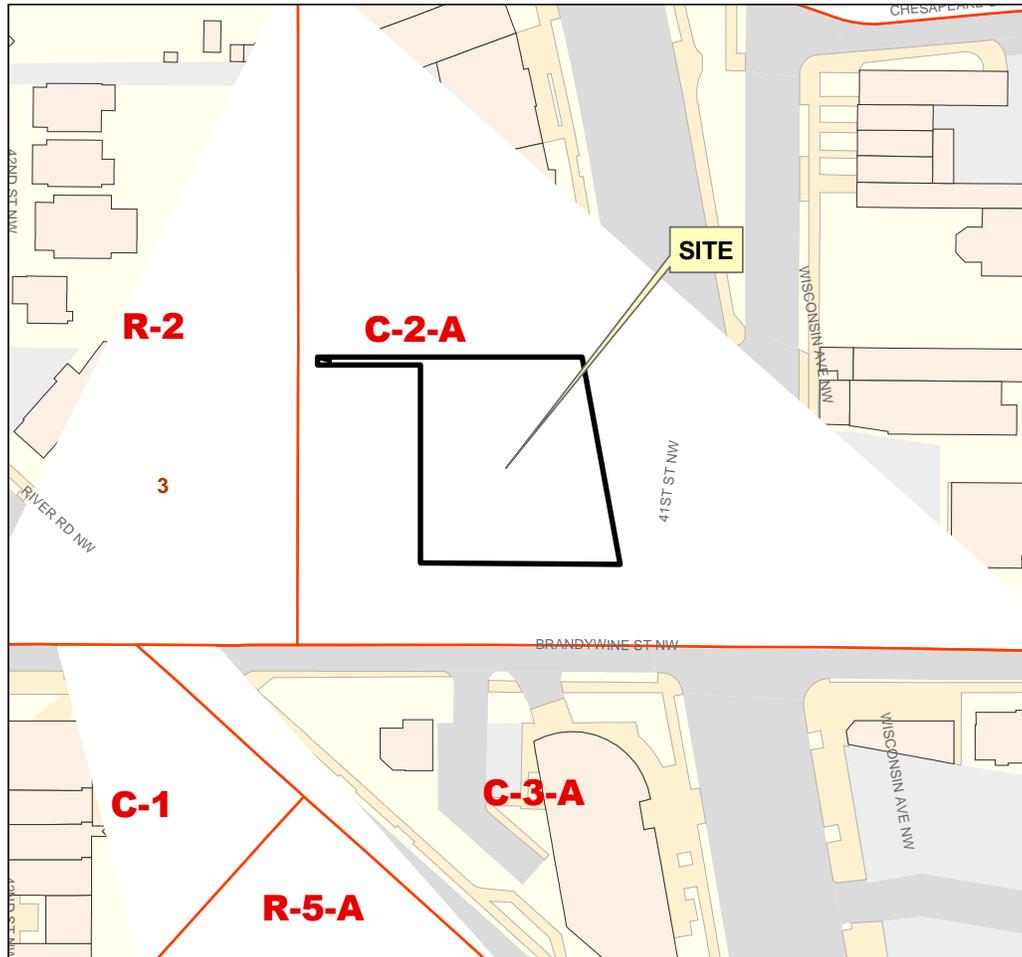
The Office of Planning (OP) recommends the case be set down for public hearing. This project will provide new housing and retail space within close proximity to the Tenleytown Metrorail station. The proposed development is not inconsistent with the Future Land Use Map or the Comprehensive Plan.

AREA DESCRIPTION

Address	4600-4614 Wisconsin Avenue, N.W.
Legal Description	Square 1732 , Lots 817 and 820
Ward	3
Lot Characteristics	Corner lot sloping down from south to north and from east to west.
Existing Development	A vacant one-story commercial building at the corner of Wisconsin and Brandywine and a vacant two-story commercial building to the north.
Existing Zoning	C-2-A: Medium density community business center commercial district
Adjacent Properties	North: Four-story office building with ground floor retail South: Across Brandywine Street, five-story office building with ground floor retail East: Across Wisconsin Avenue, retail and office buildings, radio and television transmission towers, including a five-story office building West: A one-story veterinary hospital building, beyond which are one-family and semi-detached dwellings



Surrounding Neighborhood Character	Commercial and residential uses on Wisconsin Avenue, with lower density residential to the west and commercial uses to the east.
------------------------------------	--



Zoning and Vicinity Map

The subject property is 12,671 square feet in area and is located in the northwest corner of Wisconsin Avenue and Brandywine Street, N.W. The site is in the shape of a “pipe stem,” with a five-foot wide section of the lot extending westward to a twenty-foot wide public alley that runs north and south. With the exception of the tip of the pipe stem where it abuts the public alley, the site is surrounded on all sides by commercial zone districts.

The subject property is located one block north of the Tenleytown Metrorail station on the Red Line. Wisconsin Avenue is served by several Metrobus routes providing service throughout the District and into Montgomery County.

HISTORY

The site was the subject of a Planned Unit Development (PUD), ZC Case No. 03-27, and included a PUD-related map amendment to the C-2-B. It was approved by the Commission and became effective on November 18, 2005 and permitted a mixed-use building with:

- 42 residential units;
- 1,650 square feet of ground floor retail;
- A building height of 65 feet;
- A lot occupancy of 60 percent; and
- A Floor Area Ratio (FAR) of 3.0.

The PUD approval was extended by Zoning Commission Order No. 03-27A and expired on March 14, 2010. It was never constructed.

ZC Case No. 10-23 was filed by the applicant in 2010 to rezone the subject property from C-2-A to C-3-A. That application was never heard and never came before the Commission for set down. The subject application amends that application to instead request a PUD with a PUD-related map amendment to rezone the property from the C-2-A to C-3-A.

PROPOSAL

The Applicant proposes to construct a six-story mixed use building with retail on the ground and lower levels and apartments on the upper floors. The existing structure at 4600 Wisconsin Avenue, the former Babe's Billiards site, would be retained, with a new building constructed above the majority of the existing structure. The building at 4614 Wisconsin Avenue, adjacent and to the north of the Babe's site, would be removed and replaced with a structure that would provide core services for the building.

Residential access to the building would be on the north side of the site, which would include a lobby, elevators, a trash room and a staircase that would provide access to the mechanical penthouse on the roof. Ten to twelve units would be located on each of floors two through six. The majority of the units would be one-bedroom, but some junior one-bedroom and two-bedroom units would also be included. The application indicates that the building would be in compliance with Inclusionary Zoning for the provision of affordable units, or eight percent of the residential gross floor area.

Floors two through six would be set back from the west lot line facing the one-family dwellings across the public alley, a distance between twelve and twenty-six feet. This setback would allow for the provision of a terrace above the first floor of the building and outdoor recreational space for the units that abut it. Balconies would be provided for some of the other units.

The majority of the remainder of the first floor would be devoted to retail space, with access directly from the public sidewalk along Wisconsin Avenue. The portion of the first floor below the terrace would be devoted to storage, service-related uses, include loading, with the remainder of the basement level to be used as retail and accessed from a newly constructed areaway along Brandywine Street. Twenty-five bicycle parking spaces would be included in the basement. All vehicular access to the building would be from Brandywine Street.

One mechanical penthouse would be located on the roof, on the north side of the building, set back a distance less than its height from the east and west. South of the penthouse would be 2,500 square-foot area devoted to mechanical units at a height of less than four feet. The remainder of the roof, including much of the roof above the mechanical penthouse, would be improved as green roof.

The existing façade on the 4600 Wisconsin Avenue building would be removed and replaced with materials matching that of the new construction. Facing Wisconsin Avenue the building would be covered with tan and ochre terra cotta panels with large rectangular windows, similar to the large rectangular windows of other buildings facing Wisconsin Avenue. The Brandywine Street and the western facing façade would include metal panels, punched windows and balconies in acknowledgement of the residential development west of the site.

New sidewalks would be installed in Wisconsin Avenue and Brandywine Street. Street furniture, including tables, benches, four bicycle racks and trash receptacles would be added to Wisconsin Avenue. Nine trees would be planted within public space; four within Brandywine Street and five within Wisconsin Avenue.

ZONING

The applicant is requesting a PUD-related map amendment from C-2-A, a low to moderate density commercial district, to C-3-A, a moderate to medium density commercial district. C-3-A is located to the south of the subject property, on both sides of Wisconsin Avenue south of Brandywine Street. C-2-A abuts the subject property to the north, east and west. To the west of the public alley is the R-2 District.

Both C-2-A and C-3-A are mixed use districts allowing for a variety of uses, including residential and commercial. C-2-A, as described under § 720.5, is designed to “accommodate a major portion of existing commercial strip developments.” C-3-A, as described under § 740.5, “shall be compact in area and located on arterial streets, in uptown centers and at rapid transit stops.” (emphasis added)

The following table is a comparison of the C-2-A, C-3-A/PUD and the proposed development.

Table 1

Permitted/Allowed	C-2-A	C-3-A/PUD	Proposal
Building Height (max.)	50 feet	90 feet	70 feet, 10.5 inches
FAR (max.)			
-Residential	2.5	4.8*	3.7
-Non-Residential	1.5	3.0	1.1
-TOTAL	2.5	4.8*	4.8
Lot Occupancy (max.)			
-Residential	60 percent	80 percent*	76 percent
-Non-Residential	100 percent	100 percent	96 percent
Parking (min.)			
-Retail	>3,000SF, 1/300 SF	53	None**
-Residential	1 per 2 dwellings	33	None**
-TOTAL		86	None**
Loading (min.)			
-Retail	1 berth @ 30’ deep 1 platform @ 100 SF	1 berth @ 30’ deep 1 platform @ 100 SF	1 berth @ 30’ deep 1 platform @ 100 SF
-Residential	1 berth @ 55’ deep 1 platform @ 200 SF 1 service/delivery @ 20’ deep	1 berth @ 55’ deep 1 platform @ 200 SF 1 service/delivery @ 20’ deep	None** None** None**
Rear Yard (min.)	15 feet	2.5 feet per foot of bldg. height or 12 feet	83 feet, 10 inches
Roof Structure (max.)	1 roof structure Setback distance equal to height Enclosing walls of equal height	1 roof structure Setback distance equal to height Enclosing walls of equal height	1 roof structure Setback distance <u>not</u> equal to height Enclosing walls of equal height

* Inclusionary Zoning (IZ) bonus

** Relief requested

As can be observed from the table above, the C-3-A district allows for greater building height, lot occupancy and FAR than the C-2-A district.

WAIVER REQUEST

The applicant requests a waiver pursuant to § 2401.2 of the Zoning Regulations, in order to permit a C-3-A PUD on a site consisting of less than 15,000 square feet. The Commission is empowered to waive up to 50 percent of the minimum area required for a PUD located outside the Central Employment Area, subject to the following requirements:

- a. The Commission shall find after public hearing that the development is of exceptional merit and in the best interest of the city or country; and
- b. The Commission shall find that least 80 percent (80%) of the gross floor area of the development shall be used exclusively for dwelling units and uses accessory thereto.

The subject property is located outside of the Central Employment Area. The applicant has informed the Office of Planning that a minimum of 80 percent of the gross floor area of the development would be for dwelling units and uses accessory thereto, and that the proposed development would be of exceptional merit.

FLEXIBILITY

The following relief is required from the Zoning Regulations:

Roof Structure

§§ 411 and 770.6: These sections require that penthouse exterior walls be set back a distance at least equal to their height. The subject application proposes a penthouse 18.5 feet in height, with no setback from the building edge on the north, a setback of five feet, four inches from the east, facing Wisconsin Avenue, and a setback of three feet from the rear, or the west. This location of this penthouse is controlled by its location above the new portion of the building to be constructed from the ground up on the north side of the property, enabling it to better provide elevator service to all floors of the new building.

Off-Street Parking

§ 2101.1: This section requires one parking space for every two apartment units, or 33 residential parking spaces, and 53 retail parking spaces, for a total of 86. Although the application requests relief to provide no parking spaces, one car-share space would be provided within the building. The basement of the structure at 4600 Wisconsin Avenue, which the applicant proposes to retain and which contains more than 20 columns, impacts the ability of the applicant to provide off-street parking within the structure.

Loading

§ 2201.1: This section requires the provision of one 55-foot loading berth, one 200 square foot loading platform and one 20-foot service delivery space for the residential component of the building. All retail loading would be provided as required, but none of the residential. However, the structural design of the basement prohibits the provision of additional loading facilities.

Additional Areas of Flexibility

The application requests the ability to modify the plans as approved for this project. Specifically, the applicant requests the ability to:

1. Provide a range in the number of residential units between 55 and 65;
2. Vary the location and design of interior components, such as partitions, structural slabs, doors, hallways, columns, stairways and mechanical rooms, provided the exterior configuration of the building does not change; and

3. Vary the final selection of the exterior materials within the color ranges and material types as proposed, based on availability at the time of construction without reducing the quality of the materials; and to make minor refinements to exterior details and dimensions, including curtain wall mullions and spandrels, window frames, glass types, belt courses, sills, bases, cornices, railings and trim, or any other changes to comply with the Building Code or that are otherwise necessary to obtain a final building permit.

The Office of Planning will work with the applicant to further refine and define these requests and obtain DDOT comments prior to public hearing, should the Commission set down the application.

PUD EVALUATION STANDARDS

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Chapter 24. Section 2400.1 states that a PUD is “designed to encourage high quality developments that provide public benefits.” In order to maximize the use of the site consistent with the Zoning Regulations and be compatible with the surrounding community, the applicant is requesting that the proposal be reviewed as a consolidated PUD. This will allow the utilization of the flexibility stated in Section 2400.2.

The overall goal is to permit flexibility of development and other incentives, such as increased building height and density; provided, that the project offers a commendable number of quality public benefits and that it protects and advances the public health, safety, welfare, and convenience.”

The applicant has requested a related change in zoning of the property to gain 20 feet, 10.5 inches in building height and approximately 25,342 square feet in floor area over that permitted as a matter-of-right. Public benefits proposed by the applicant are discussed below.

Section 2403 further outlines the standards under which the application is evaluated.

2403.3 The impact of the project on the surrounding area and the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project.

The proposed mixed-use development would replace two vacant commercial spaces with two levels of modern retail space and five levels of apartments above, within close proximity to transit. It would complement other mixed-use developments that have taken place within Tenleytown over the last decade, including Cityline at Tenley and Tenley Hill Condominiums, and improve retail opportunities within the corridor.

PUBLIC BENEFITS AND AMENITIES

The Office of Planning will request additional information from the applicant regarding the proposed benefits and amenities to ensure that they are consistent with the relief requested.

Section 2403.9 outlines “Public benefits and project amenities of the proposed PUD may be exhibited and documented in any of the following or additional categories:

- (a) Urban design, architecture, landscaping, or creation or preservation of open spaces;
- (b) Site planning, and efficient and economical land utilization;

- (c) *Effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts;*
- (f) *Housing and affordable housing;*
- (h) *Environmental benefits, such as stormwater runoff controls and preservation of open space or trees;*
- (i) *Uses of special value to the neighborhood or the District of Columbia as a whole;*

Urban Design, Architecture, Landscaping or Creation or Preservation of Open Space

The site plan proposes improvements to the public space adjacent to the building that would include the following:

- Special entrance pavement;
- Street edging and border of mixed ground covers and perennials;
- Planting of:
 - Five street trees on Wisconsin Avenue; and
 - Four street trees on Brandywine Street;
- Four bicycle racks on Wisconsin Avenue;
- Street furniture, including:
 - Benches;
 - Tables with seating;
 - Trash cans; and
 - Outdoor patio area along Brandywine Street for use by commercial tenants; and
- Fountain wall and planter at the corner of Brandywine Street and Wisconsin Avenue.

Transportation Features

The applicant proposes to implement a Transportation Demand Management (TDM) plan that would include the following:

- Resident Transportation Coordinator;
- Digital Multimodal Display, or “NextBus Display;”
- Bicycle Usage Program, secure storage in a convenient location for 25 resident bicycles, and provision of a one-time annual membership fee to each initial tenant to a bike share program
- Car Sharing/ Handicap Parking;
- Provision of a one-time \$50.00 transit fare card to each initial resident and employee within the building; and
- The applicant proposes not to apply for and would restrict in its leases any resident from apply for a Residential Parking Permit (RPP).

Environmental Benefits

The applicant to achieve the equivalent of 60 LEED points, or LEED Silver rating, and would include the following:

- High performance building envelope, including terracotta and brick-clad screen-wall with an R value of 20 or greater;
- Energy-efficient mechanical, electrical and plumbing systems; and
- Water conservation measures, including:
 - Low-flow plumbing fixtures; and
 - Energy Star rated appliances.

The Office of Planning will request more information from the applicant and comments from DDOT and DDOE prior to public hearing, should the application be set down by the Commission to further refine this request.

COMPREHENSIVE PLAN AND PUBLIC POLICIES

The proposed development is located within the Rock Creek West Area Element of the Comprehensive Plan and is not inconsistent with the following policies of the Rock Creek West Area Element of the Plan:

Policy RCW-1.1.3: Conserving Neighborhood Commercial Centers

Support and sustain local retail uses and small businesses in the area's neighborhood commercial centers. These centers should be protected from encroachment by large office buildings and other non-neighborhood serving uses. Compatible new uses such as multi-family housing or limited low-cost neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area's commercial centers to meet affordable housing needs, sustain new neighborhood-serving retail and small businesses, and bring families back to the District. (§ 2308.4)

Policy RCW-1.1.4: Infill Development

Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, work with ANCs, residents, and community organizations to encourage projects that combine housing and commercial uses rather than projects that contain single uses. Heights and densities for such development should be appropriate to the scale and character of adjoining communities. Buffers should be adequate to protect existing residential areas from noise, odors, shadows, and other impacts. (§ 2308.5)

Policy RCW-1.1.6: Metro Station Areas

Recognize the importance of the area's five Metrorail stations to the land use pattern and transportation network of Northwest Washington and the entire District of Columbia. Each station should be treated as a unique place and an integral part of the neighborhood around it. The development of large office buildings at the area's metro stations should be discouraged. The preference is to use available and underutilized sites for housing and retail uses in a manner consistent with the Future Land Use Map, the Generalized Policies Map, and the policies of the Comprehensive Plan. Careful transitions from development along the avenues to nearby low-scale neighborhoods must be provided. (§ 2308.7)

The requested map amendment would not be inconsistent with the following policies of the Land use Element:

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. (§ 306.11)

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. (§ 306.13)

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. (§ 306.14)

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. (§ 307.5)

Policy LU-1.4.2: Long-Term Vacant Sites

Facilitate the reuse of vacant lots that have historically been difficult to develop due to infrastructure or access problems, inadequate lot dimensions, fragmented or absentee ownership, or other constraints. Explore lot consolidation, acquisition, and other measures which would address these constraints. (§ 307.6)

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. (§ 309.8)

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. (§ 309.9)

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. (§ 309.16)

The requested map amendment would not be inconsistent with the following policies of the Housing Element:

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. (§ 503.2)

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. (§ 503.4)

Policy H-1.1.4: Mixed Use Development

Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. (§ 503.5)

The requested map amendment would not be inconsistent with the following policies of the Environmental Protection Element:

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. (§ 603.4)

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. (§ 613.3)

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. (§ 614.2)

The requested map amendment would not be inconsistent with the following policies of the Economic Development Element:

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. (§ 708.7)

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. (§ 713.5)

The requested map amendment would not be inconsistent with the following policies of the Urban Design Element:

Policy UD-1.4.1: Avenues/Boulevards and Urban Form

Use Washington's major avenues/boulevards as a way to reinforce the form and identity of the city, connect its neighborhoods, and improve its aesthetic and visual character. Focus improvement

efforts on avenues/boulevards in emerging neighborhoods, particularly those that provide important gateways or view corridors within the city. (§ 906.6)

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. (§ 906.9)

The proposed development would provide new private-sector supplied multi-family housing in a mixed use building within close proximity to the Tenleytown Metrorail station. A long vacant site, this development would retain the existing structure, incorporating it into the new building and renovating it for use as retail space. The new building, six stories in height, would be similar in height to other buildings along Wisconsin Avenue and would contribute to the improvement of the Wisconsin Avenue street-wall as infill development, with the upper floors set back from the rear lot line facing the lower density residential uses west of the site.

With the exception of one car-share space, no off-street parking would be provided, minimizing automobile usage. A “Next-Bus” display would be provided within the residential lobby to encourage transit use, and twenty-five bicycle spaces would be provided within the building as part of a TDM program.

A green roof would be provided, including the roof of the mechanical penthouse. New street trees would be added to Wisconsin Avenue and Brandywine Street.

COMPREHENSIVE PLAN FUTURE LAND USE MAP: “Mixed Land Use” consisting of Moderate Density Commercial and Medium Density Residential.

Moderate Density Commercial: “Defines 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 range from small business districts that draw primarily from the surrounding neighborhoods to larger business district uses that draw from a broader market.”

Medium Density Residential: “Defines 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.”

COMPREHENSIVE PLAN GENERALIZED POLICY MAP

Main Street Mixed Use Corridors: “Traditional commercial business corridors with a concentration of older storefronts along the street. The service area for Main Streets can vary from one neighborhood to multiple neighborhoods. Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper story residential or office uses. Conservation and redevelopment that occurs should support transit use and enhance the pedestrian environment.”

AGENCY REFERRALS AND COMMENTS

If this application is set down for a public hearing, it will be referred to the following District government agencies for review and comment:

- DCWater;
- Department of the Environment (DDOE);
- District Department of Transportation (DDOT);
- Fire and Emergency Medical Services Department (FEMS); and
- Metropolitan Police Department (MPD).

RECOMMENDATION

The Office of Planning supports the proposal for a new mixed-use building providing space for residential and commercial uses. The proposed PUD and related map amendment are not inconsistent with the elements of the Comprehensive Plan. Therefore, the Office of Planning recommends that the application be set down for public hearing. The Office of Planning will continue to work with the applicant towards a more detailed review prior to the public hearing, should the application be set down by the Commission.

JLS/sjm^{AICP}
Case Manager: Stephen J. Mordfin, AICP