

**SUBMISSION FOR LARGE TRACT REVIEW
BY THE
DISTRICT OF COLUMBIA
OFFICE OF PLANNING**

**Application of CP VII Wardman 1-A, LLC and CP VII Wardman 1-B, LLC
Square 2132, Part of Lot 32 (A&T Lots 855, 856)**

December 21, 2022

Submitted by, on behalf of the Applicant:

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II. DEVELOPMENT TEAM

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III. LIST OF EXHIBITS

Exhibit A	Zoning Map
Exhibit B	Existing Conditions Photographs
Exhibit C	Plat Showing A&T Lots 855 and 856
Exhibit D	Comprehensive Plan Future Land Use Map
Exhibit E	Comprehensive Plan Generalized Policy Map
Exhibit F	Architectural Plans and Elevations, General Circulation Plan, Civil Plans
Exhibit G	Comprehensive Transportation Review Report
Exhibit H	Historic Preservation Review Board (HPRB) Concept Submission
Exhibit I	Existing Conditions Summary
Exhibit J	Tree Preservation Plan
Exhibit K	Site Utilities and Drainage
Exhibit L	Treatment of Natural Features
Exhibit M	Solid Waste Collection
Exhibit N	Estimated Water Consumption
Exhibit O	Completed Certification Form
Exhibit P	Letters of Authorization
Exhibit Q	List of Property Owners within 220 feet of the Subject Property

IV. INTRODUCTION

This statement and supporting documentation is submitted on behalf of both CP VII Wardman 1-A, LLC and CP VII Wardman 1-B, LLC (the “Applicant”) to the District of Columbia Office of Planning (“OP”) for Large Tract Review (“LTR”) of the proposed development at Square 2132, Part of Lot 32, A&T Lots 855 and 856 in Northwest Washington, DC (together, the “Subject Property”). The overall Subject Property consists of approximately 702,294 square feet of land area bounded by Woodley Road, NW to the north, 24th Street, NW and the Wardman Tower to the east, Calvert Street, NW to the south, and The Woodley Apartments, The Barton at Woodley, and Cleveland House Apartments to the west. The Proposed Project will be constructed on A&T lots 855 and 856, which have a combined land area of 414,382 square feet. These lots are not located in a historic district. As shown on the attached architectural drawings, the Applicant proposes to redevelop the Subject Property, previously the Washington Marriott Hotel, with two new serpentine structures, proposed "Building Segment A" to the east and "Building Segment B" to the west comprised of residential use. Redevelopment of the Subject Property will also include connections to existing buildings within the Wardman development and several open space areas and pedestrian walkways.

This application is submitted in accordance with Section 2300.1(a) of Title 10B of the District of Columbia Municipal Regulations (“DCMR”) which states that the OP shall ensure that there is established a coordinated interagency review process in the District of Columbia to do the following:

- a. Review, prior to the filing of applications for building or construction permits, all large tract development projects comprising three (3) acres or more and any commercial or mixed-use commercial development of fifty thousand square feet (50,000 sf) or more gross floor area (above grade) and cellar area (below grade);

As set forth below, this application meets the standards for submission of an LTR application pursuant to 10-B DCMR § 2301.3. In accordance with the provisions of 10-B DCMR, Chapter 23, the Applicant respectfully requests OP to proceed with its review, refer the application to District agencies as necessary, and issue a report on the application.

The LTR submission and process is not one of an approval or denial of building applications for the proposed development. The OP report provides a record that the process has been completed.

V. EXISTING CONDITIONS AND ZONING/PLANNING DESIGNATIONS

A. Existing Conditions - Subject Property

According to the records of the Office of Tax and Revenue, the overall Subject Property has a total land area of approximately 702,294 square feet (16.12 acres). The A&T lots, where the Proposed Project will be located, consists of a total land area of 414,382 square feet. The Subject Property is irregular in shape and is bounded by Woodley Road to the north, 24th Street and the Wardman Tower to the east, Calvert Street to the south, 2727 29th Street and 2701 Calvert Street to the west, all within the northwest quadrant of the District. As shown on the Zoning Map attached hereto as Exhibit A, the Subject Property is split-zoned RA-2 and RA-4; as shown in the photographs of the existing conditions (Exhibit B), the Subject Property is presently developed with an 11-story hotel consisting of approximately 1,152 rooms, 195,000 square feet of event space, and 95,000 square feet of exhibit space. The hotel was constructed in 1979 and was previously branded as the Washington Marriot Wardman Park; it closed in 2020. The Wardman Tower wing, which is not part of this Project, was added to the National Register of Historic Places on January 31, 1984.

By plat recorded in the Office of the Surveyor on September 13, 2022 (Exhibit C), the Subject Property, previously Lot 854, was divided into two Assessment & Taxation Lots ("A&T

Lots"). Lot 855 consists of 229,672 square feet of land area and will accommodate proposed Building Segment A, and Lot 856 consists of 184,710 square feet of land area and will accommodate proposed Building Segment B.

B. Existing Conditions - Surrounding Area

The Subject Property is located within the Woodley Park neighborhood of the District, near the Smithsonian National Zoological Park ("Zoo"), which is a very stable area in northwest that has seen little new development in recent years. To the north of the Property, across Woodley Road, are low-rise residential buildings and institutional uses; to the south is The Shoreham North Condominium; to the east is Calvert House and the Woodley Park-Zoo/Adams Morgan Metrorail; and to the west are Cleveland House Apartments, the Barton at Woodley, and Oyster-Adams Bilingual School. Further south, across Calvert Street, is the Omni Shoreham Hotel and co-op apartments. Properties in the surrounding area are generally zoned low-density residential designations, including R-1-B, R-3, and R-6, as well as moderate-high density residential designations, including RA-2 and RA-4.

Connecticut Avenue is a hub of activity, providing residential, retail, and restaurant uses adjacent to the Zoo, which is a destination for residents and tourists alike. In addition, the neighborhood is within close proximity to Rock Creek Park, a large urban park providing a wooded natural area with picnic sites and multi-use trails, accessible directly south across Calvert Street.

The Project is transit accessible, as it is approximately 0.1 miles to the Woodley Park-Zoo/Adams Morgan Metrorail Station across 24th Street, N.W. It is also walkable to the Cleveland Park Metrorail Station, which is less than one-mile from the Project. The L2 and 96 buses stop right at the corner of Connecticut Avenue and Woodley Road, just north of the Site.

C. Existing Zoning

As shown on the Zoning Map (Exhibit A), the Subject Property is split-zoned RA-2 and RA-4, with the southern portion of both lots being RA-4. The RA-2 zone is intended to provide for areas developed with predominantly moderate-density residential. 11-F DCMR § 300.3 The RA-4 zone is intended to provide for areas developed with predominantly medium- to high-density residential. 11-F DCMR § 300.5 The purposes of these zones are to: (a) permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and (b) permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones. 11-F DCMR § 300.1 The development standards in 11-F DCMR §§ 201 through 204 and §§ 302 through 307 control the bulk of buildings in RA-2 and RA-4 zones.

Pursuant to 11-F DCMR § 302.1, the maximum density permitted for the Subject Property in the RA-2 and RA-4 zones are as follows:

- RA-2 zone
 1. 1.8 Maximum FAR; or
 2. 2.16 FAR as an Inclusionary Zoning (“IZ”) development.
- RA-4 zone
 1. 3.5 Maximum FAR; or
 2. 4.2 FAR as an IZ development.

Pursuant to 11-F DCMR § 303.1, the maximum building height permitted in the RA-2 zone is 50 feet, and pursuant to 11-F DCMR § 203.4 may have a height not exceeding 90 feet with certain setbacks. The maximum building height permitted in the RA-4 zone is 90 feet. The maximum permitted penthouse height in the RA-2 zone is 12 feet, except the penthouse

mechanical space may have a height of 15 feet. The maximum permitted penthouse height in the RA-4 zone is 20 feet. 11-F DCMR § 303.2.

The maximum permitted lot occupancy in the RA-2 zone is 60% and 75% in the RA-4 zone. 11-F DCMR § 304.1 The minimum rear yard in the RA-2 and RA-4 zones is a distance equal to four inches per one foot of the principal building's height, but not less than 15 feet. For example, a building with 90 feet of height would be required to provide a minimum rear yard of 29.7 feet. 11-F DCMR § 305.1 A side yard is not required to be provided in the RA-2 and RA-4 zones, but if one is provided, it shall be a minimum of four feet. 11-F DCMR § 306.2 The minimum Green Area Ratio ("GAR") required in the RA-2 zone is 0.1, and the minimum GAR required in the RA-4 zone is 0.3. 11-F DCMR § 307.1

The residential Project proposes to provide approximately 868 new dwelling units, including market rate and IZ units. A total of eight percent of the residential gross floor area will be set aside for households earning 60 percent median family income ("MFI"), resulting in a significant number of affordable units in a highly desirable neighborhood. The habitable penthouses will generate an additional 2,086 square feet of affordable housing, set aside for households earning 50 percent MFI.

A total of 873 parking spaces will be provided in below- and above-grade parking structures that will be incorporated into the building design. The hotel that occupies the Wardman Tower would use 21 of those spaces, leaving Building Segments A and B with a total of 852 parking spaces. Additionally, an existing easement allows the Wardman Tower Condominiums the use of 40 parking spaces. The Project will comply with any mitigation that may be required for the provision of parking in excess of minimum requirements. 11-C DCMR § 707.

As provided in the grading plans at Exhibit F, the Property has a significant grade increase between Calvert Street and the southern building façade of the Project of approximately 70 feet. As such, the Project includes several retaining walls that provide terraced landscaping and open space along the southern portion of the property. The retaining walls will comply with all applicable requirements.

In accordance with 11-C DCMR §302.2, for zoning purposes this development is part of a single building on Record Lot 32. As such, existing buildings within the development are connected by way of meaningful connections, which was redefined in the 2016 Zoning Regulations as "...an enclosed connection that is fully above grade, is heated and artificially lit; and either a common space shared by users of all portions of the building, such as a lobby or recreation room, or space that is designed and used to provide free and unrestricted passage between separate portions of the building, such as an unrestricted doorway or walkway." 11-B DCMR § 100.2, Building, Separate. The Project will include a meaningful connection that complies with this definition connecting Building Segment A to the Wardman Tower and Building Segment B to the Woodley Apartments, thereby resulting in one building as defined by the Zoning Regulations. Although Building Segment A is not a historic landmark or in a historic district, Historic Preservation Review Board ("HPRB") review was required because the Wardman Tower is a historic landmark. The meaningful connection has received concept approval from the HPRB and will be designed in accordance with Exhibit H; however, the Wardman Tower is not part of the Proposed Project. Additionally, Building Segments A and B will be connected through a meaningful connection.

New utility services for the Subject Property are to be provided by new service entrances for each Building Segment appropriately sized for this new development, including electrical vehicle charging infrastructure.

The Urban Forestry Division ("UFD") has identified a heritage tree on the Property. As such, the Applicant has initiated conversations with UFD and has been working with it to develop a tree preservation plan that is appropriate for the Project. These discussions are ongoing and the Applicant intends to comply with the finalized tree preservation plan.

VI. DESIGN OF THE PROPOSED DEVELOPMENT

As shown on the architectural drawings attached hereto as Exhibit F (the "Architectural Drawings"), the Subject Property will be developed with two new serpentine building segments (the "Buildings") that will together provide a total of approximately 947,196 square feet of GFA on the Subject Property (approximately 1.35 FAR). Given that the maximum density permitted is 1.8, there is only 951,846 square feet of area remaining for development on the A&T lots. In proceeding with the Project, the Subject Property was divided into two new irregularly-shaped tax lots known as "Lot 855" and "Lot 856" each running north-south on the Subject Property and having access from 24th Street to the east and Calvert Street to the south and Woodley Road from the north.

Development on "Lot 855" (to the east) is known as "Building Segment A," and development on "Lot 856" (to the west) is known as "Building Segment B." Building Segments A and B will be connected through a meaningful connection. Additionally, Building Segment A will be connected via a meaningful connection to the Wardman Tower and Building Segment B will be connected to The Woodley Apartments, establishing them as a single building for zoning purposes.

The overall Project will meet the requirements for an IZ development set forth in Subtitle C, Chapter 10, including the minimum set-aside requirements of 11-C DCMR § 1003.2 for Type I construction. The Project will set aside eight percent of the residential GFA for households earning 60 percent MFI, resulting in approximately 62,750 square feet of affordable housing. Approximately 43% of the of the dwelling units will have two bedrooms, and 6.3% of the dwelling units will have three-bedrooms, resulting in a substantial number of family-sized units.

The overall residential density for the project is approximately 1.35 FAR. The project will contain approximately 873 total parking spaces and adequate interior loading facilities to meet the zoning requirements and serve the proposed residential use. Maximum building heights will be 90 feet from the point of building height measurement point ("BHMP").

Between the Building Segments is a heavily landscaped courtyard area amounting to approximately 85,000 square feet of open space. The landscaped courtyard includes lush plantings as well as a pool, other gathering spaces, and several pedestrian walkways. Within the large interior courtyard, there are several retaining walls providing layered landscaping along the south property to accommodate grade changes in the southern portion of the Subject Property.

The streetscape will include wide sidewalks, landscaping, and vehicular circulation. Curb cuts, in general, are being reduced in width and one curb cut on Woodley Road will be eliminated. Long-term bicycle parking will be located in storage areas in the garage, providing approximately 376 spaces distributed proportionally between Building Segments A and B. Fifty-seven short-term bicycle parking spaces will be distributed within the Subject Property near entrances and amenity areas accessed by the public.

The Applicant will provide improved public streetscapes and sidewalks along the perimeter of the Subject Property on Calvert Street and at curb cut locations on Woodley Road and 24th

Street. The Calvert Street curb cut will be reduced from 60 feet wide to approximately 24 feet in width and will be used for access to the loading and parking areas for Building Segment B. This curb cut will also be used for access to parking and loading for The Woodley Apartments as required per an existing easement agreement. The 24th Street curb cut will be reduced from 29 feet to 24 feet and will be used for access to parking and loading for Building Segment A. The curb cut on Woodley Road will be used for access to the existing garage at the north of the Subject Property, the lobby entrances for Building Segments A and B, and for parking access to the garage under Building Segment B. One existing curb cut on Woodley Road will be eliminated.

The Project will also incorporate a number of sustainable elements, including bioretention and stormwater management facilities. Each Parcel will be designed to meet LEED Silver requirements under LEED for Homes - Multi-Family Midrise v4, providing efficient energy systems throughout the Project. Multiple bioretention facilities are proposed throughout the Subject Property to provide retention and detention in accordance with current DOEE regulations and slow the flow of rainwater entering the DC municipal system. Stormwater management controls will include green roofs with varying depths and planting arrangements in accordance with DOEE regulations for GAR and stormwater retention volume. The green roof areas will aid in meeting both the current quality and quantity requirements per DOEE and will be integrated into the architectural roof designs of each Parcel. A variety of plantings on the terraces and courtyards will also create a striking and lush native habitat and will serve as a barrier between vehicular and pedestrian traffic. The lot occupancy and impermeable surfaces will be significantly reduced from their current condition, providing opportunities for stormwater infiltration and bioretention. Solar-ready areas will be provided over most of the penthouse roofs.

VII. CONSISTENCY WITH ZONING REGULATIONS OF THE DISTRICT OF COLUMBIA

The project is designed to meet all applicable requirements of the RA-2 and RA-4 zones, including building height, density, lot occupancy, yards, and GAR. The project also conforms to the applicable parking, loading, and other physical requirements of the Zoning Regulations. See below table identifying conformance with the development standards in the Zoning Regulations:

Zoning Requirements for Buildings A and B		
Development Standard	Required	Proposed Lots 855 & 856
Density 11-F DCMR §302		
RA-2	1.8 max 2.16 (IZ) max	1.79 (entirety of Lot 36) 1,111,200 sq. ft. GFA
RA-4	3.5 max 4.2 (IZ) max	3.49 (entirety of Lot 36) 288,650 sq. ft. GFA
Approximate Number of Dwelling Units		
Building Segment A	N/A	290 dwelling units
Building Segment B	N/A	578 dwelling units
Height 11-F DCMR §§ 203 and 303		
RA-2	50 ft max OR 90 ft. max with setback equal to building height above natural or finished grade	90 ft.; 90 ft. setback from RA-2 property lines
RA-4	90 ft. max	90 ft.
Penthouse or Rooftop Structure Height 11-F DCMR § 303		
RA-2	12 ft. max, except 15 ft. for penthouse mech. space	12 ft. max, except 15 ft. for penthouse mech. space
RA-4	20 ft. max	20 ft.
Lot Occupancy 11-F DCMR § 304		
RA-2	60% max	22.3%
RA-4	75% max	29.7%
Rear Yard 11-F DCMR § 304		
RA-2	4 in. per 1 ft. of principal building height, 15 ft. min	Not required for through lot (11-C DCMR §317.3)
RA-4	4 in. per 1 ft. of principal building height, 15 ft. min.	
Side Yard 11-F DCMR §306		
RA-2	No side yard required, min 4 ft. if provided	4 ft. min.

Zoning Requirements for Buildings A and B		
Development Standard	Required	Proposed Lots 855 & 856
RA-4	No side yard required, min 4 ft. if provided	4 ft. min.
Green Area Ratio 11-F DCMR §307		
RA-2	0.4	0.38 weighted average across RA-2 and RA-4 (entirety of Lot 36)
RA-4	0.3	
Vehicle Parking 11-C DCMR §701		
Building Segments A & B - residential use	Residential, multiple dwelling unit - 1 per 3 dwelling units in excess of 4 units (310 spaces required)	852 spaces
Wardman Tower Base - hotel use	0.5 spaces per 1,000 sq. ft. (21 spaces required)	21 spaces
Wardman Tower Condominiums Existing Easement - residential use	N/A	40 spaces
Bicycle Parking 11-C DCMR § 802		
Building Segments A & B	Long Term: 1 space for each 3 dwelling units (310 spaces required) Short Term: 1 space for each 20 dwelling units (44 spaces required)	Long Term: 369 spaces Short Term: 64 spaces
Building Segment B	Long Term: 1 space for each 3 dwelling units (192 spaces required) Short Term: 1 space for each 20 dwelling units (29 spaces required)	Long Term: 246 spaces Short Term: 29 spaces
Loading Requirements 11-C DCMR § 901		
Building Segment A	1 loading berth; 1 platform; 1 delivery space	2 12'x30' loading berths; 2 platforms
Building Segment B	1 loading berth; 1 platform; 1 delivery space	2 12'x30' loading berths; 2 platforms;
Inclusionary Zoning 11-C DCMR § 1003		
Building Segment A	Greater of 8% of res. GFA or 50% of bonus density utilized @ 60% MFI	8% of residential GFA @ 60% MFI

Zoning Requirements for Buildings A and B		
Development Standard	Required	Proposed Lots 855 & 856
Building Segment B	Greater of 8% of res. GFA or 50% of bonus density utilized @ 60% MFI	8% of residential GFA @ 60% MFI
Penthouse Habitable Space IZ 11-C DCMR § 1003		
Building Segment A	8% of penthouse habitable space @ 50% MFI	8% of penthouse habitable space @ 50% MFI
Building Segment B	8% of penthouse habitable space @ 50% MFI	8% of penthouse habitable space @ 50% MFI

VIII. RACIAL EQUITY ANALYSIS

A. Racial Equity and the Comprehensive Plan

This analysis is provided for completeness of the record and not as an LTR requirement, since an approval by the District is not a part of this process.

A primary focus of the recently adopted Comprehensive Plan ("Comp Plan") is racial equity. The importance of equity to District residents was made abundantly clear when OP conducted its D.C. Values survey in Spring 2019. In addition to equity, District residents also expressed the importance of other high-level values such as accessibility, diversity, livability, opportunity, prosperity, resilience, and safety. When choosing equity, residents expressed concerns about rising costs and inequitable access to opportunities for housing, businesses, employment, and other necessities. Overall, livability, equity, and safety were considered the most important values. 10A DCMR §§ 107.17 – 107.22.

As stated in the Framework Element, equity is both an outcome and a process. 10A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. It is achieved by targeted actions and investments to meet residents where they are to create equitable opportunities. “As an outcome, the District achieves racial equity when race no longer determines one’s socioeconomic

outcomes; when everyone has what they need to thrive, no matter where they live or their socioeconomic status; and when racial divides no longer exist between people of color and their white counterparts. As a process, we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives, particularly people of color.” 10A DCMR § 213.9

Equity is conveyed throughout the Comp Plan, particularly in the context of zoning, where certain priorities stand out, including housing and affordable housing, displacement, and access to opportunity.

B. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low income communities to fully and substantively participate in decision-making processes. 10A DCMR § 213.7 The Applicant believes in inclusive community engagement, and thus far has worked closely with the community that will be most affected by the Project. These meetings started early in the Applicant’s formulation of the Project and have resulted in positive changes to the design of the Project. The Applicant presented the Project to the ANC through individual meetings with the Single Member District representative, at the ANC’s regularly-scheduled Administrative Meetings, and at the ANC’s regularly scheduled and duly-noticed public meetings. The Applicant also met multiple times with the most directly affected neighbors. In all of the aforementioned meetings the Applicant presented the Project, received feedback, and provided subsequent updates in response to stated comments and concerns. The Applicant will continue to work with the ANC and community as the Project advances through the LTR process. The Project will be fully compliant with the District’s affordable housing requirements.

C. Racial Equity as an Outcome

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality.” 10A DCMR 213.6. The following table correlates the Project and its outcomes with a number of equitable development indicators. As the table shows, the Project will directly address a number of equity issues that many Rock Creek West Planning Area residents are experiencing. Furthermore, through direct engagement with Planning Area residents, there is increased potential that the positive outcomes of the Project will directly benefit the neighborhood.

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome
Displacement		
Physical	<ul style="list-style-type: none"> Displacement due to redevelopment 	<ul style="list-style-type: none"> No physical displacement of residents; Property is currently an unoccupied hotel building
Economic	<ul style="list-style-type: none"> Displacement due to housing cost increases 	<ul style="list-style-type: none"> No loss of existing affordable housing units within the vicinity. Project will provide 8% IZ @ 60% MFI
Cultural	<ul style="list-style-type: none"> Loss of sense of belonging or shared identity in neighborhood 	<ul style="list-style-type: none"> Significant landscape improvements will beautify the site and provide gathering spaces for residents and neighbors
Housing	<ul style="list-style-type: none"> Number of new market rate housing units (per 2019 Housing Equity Report) 	<ul style="list-style-type: none"> Approx. 868 new dwelling units (68% of Planning Area overall housing goal)
Housing Burden	<ul style="list-style-type: none"> Affordable housing 	<ul style="list-style-type: none"> 8% IZ @ 60% MFI = approximately 62,750 sf 8% penthouse IZ @ 50% MFI = approximately 2,086 sf Increase in housing supply reduces cost of housing overall
Family-sized Units	<ul style="list-style-type: none"> Dwelling units with 3 or more bedrooms 	<ul style="list-style-type: none"> 43% 2-bedroom units and 6.3% 3-bedroom units
Transportation		

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome
Access to Transit	<ul style="list-style-type: none"> 0.1 miles to transit and other modes of public transportation 	<ul style="list-style-type: none"> Less than 0.1 miles to Woodley Park-Zoo/Adams Morgan Metrorail station Less than one mile to Cleveland Park Metrorail station Served by major WMATA bus routes Access to Capital Bikeshare
Transportation Improvements/ Pedestrian Safety/ Bicycle Safety	<ul style="list-style-type: none"> Gaps in pedestrian network Lack of pedestrian facilities (crosswalks, lighting, seating, etc.) Lack of bicycle facilities (bicycle lanes, Capital Bikeshare access, etc.) 	<ul style="list-style-type: none"> Upgrade streetscape to consist of fewer and narrower curb cuts on Calvert Street and 24th Street Removal of curb cut on Woodley Road Access to bicycle facilities Long term bicycle parking within parking garage Short term bicycle parking at building entrances Installation of Capital Bikeshare stations within Project vicinity TDM
Employment		
New Jobs	<ul style="list-style-type: none"> Create new jobs 	<ul style="list-style-type: none"> Construction jobs Building maintenance/management jobs
Access to Jobs	<ul style="list-style-type: none"> Multiple travel options Nearby employment opportunities 	<ul style="list-style-type: none"> Proximity to multiple modes of public transit Proximity to numerous other employment opportunities at nearby retail, service, and neighborhood-serving uses Access to employment centers
Education/Health/Wellness	<ul style="list-style-type: none"> Proximity to schools, libraries, and recreation 	<ul style="list-style-type: none"> Access to boundary schools Access to Recreation Centers Near Cleveland Park Library Close to Zoo Close to Rock Creek Park
Environmental	<ul style="list-style-type: none"> LEED Rating Use of renewable energy sources Stormwater management 	<ul style="list-style-type: none"> Designed to meet standards of LEED for Homes - Multifamily Midrise Silver under v.4 LEED standard EV charging stations for 18 vehicles Long-term bicycle storage room includes electrical outlets for electric bicycles and/or scooters Decreased lot occupancy and more permeable surfaces

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome
		<ul style="list-style-type: none"> Stormwater improvements including streetscape and green roof and at-grade landscape bioretention
Access to Amenities	<ul style="list-style-type: none"> Availability of building amenities for residents, not open to the public. Proximity/availability of "basic need" uses (grocery, retail, service, eating and drinking). 	<ul style="list-style-type: none"> High-quality resident amenities, including roof amenities Near retail and eating and drinking establishments

D. Designations on the Generalized Policy Map (GPM) and Future Land Use Map (FLUM)

Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. 10A DCMR § 225.1 The GPM is intended to “guide land use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” 10A DCMR § 225.2 As shown on the GPM, the Property is located within a Neighborhood Conservation Area, where maintenance of existing land uses and community character is anticipated over the next 20 years (Exhibit E). 10A DCMR §225 According to 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.” 10A DCMR § 225.5 The Framework Element further provides that “[t]he 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. 10A DCMR § 225.5

The Project is also located within a Future Planning Analysis Area, which are "[a]reas of large tracts or corridors where future analysis is anticipated to ensure adequate planning for equitable development... Such analyses shall precede any zoning changes in this area. The planning process should evaluate current infrastructure and utility capacity against full build out and projected population and employment growth. Planning should also focus on issues most relevant to the community that can be effectively addressed through a planning process." 10A DCMR § 2503.2 The Applicant is not requesting a land use change that would require the completion of this analysis.

Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. 10A DCMR §§ 200.5 and 224.4 The land use category descriptions on the FLUM describe the general character of development in each area, citing typical Floor Area Ratios ("FAR") as appropriate. However, the granting of density bonuses (for example, through Planned Unit Developments ("PUD") or IZ) may result in density that exceeds the typical ranges cited. 10A DCMR § 228.1

The Project is not inconsistent with the FLUM. The FLUM designates the Project as Mixed-Use High Density Residential ("HDR") and Low Density Commercial ("CLD") (Exhibit D).

High Density Residential

The HDR designation is "used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with IZ or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the HDR category, and other zones may also apply." 10A DCMR § 227.8 The Property is zoned RA-2 and RA-4, which permits a residential density achievable within the height and bulk permitted by the zone, and is not inconsistent with this designation.

Low Density Commercial

The CLD designation is "used to define shopping and service areas that are generally lower in scale and intensity. 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 that draw from a broader market area. Their common feature is that they are comprised primarily of commercial and mixed-use buildings that range in density generally up to a FAR of 2.5, with greater density possible when complying with IZ or when approved through a PUD. The MU-3 and MU-4 Zone Districts are consistent with the CLD category, and other zones may also apply." 10A DCMR § 227.10 The Property is currently zoned RA-2 and RA-4, which do not allow commercial uses. The Applicant proposes to construct a residential density achievable within the height and bulk permitted in the existing zones.

E. Applicable Planning Documents

Connecticut Avenue Development Guidelines - In Process

The Subject Property is located within the boundaries of the Connecticut Avenue Development Guidelines ("Guidelines"), which is currently underway by OP. The Guidelines is a neighborhood planning effort focused on the Cleveland Park and Woodley Park neighborhoods

and is part of a broader Rock Creek West Corridors Planning initiative outlined in the [2021 Rock Creek West Road Map](#). The planning process is led by OP and is intended to implement the [Comprehensive Plan Act of 2021](#), particularly where land use designations have been updated along Connecticut Ave. It is anticipated that this effort will be completed by Spring 2023.

The Guidelines will explore how to support the need for additional housing, particularly affordable housing, in these high-capacity transit nodes while allowing for development that is compatible in character with the established historic districts. The effort will be undertaken in collaboration with OP's Historic Preservation Office and the Historic Preservation Review Board to determine how design can both support the historic districts and meet the new land use designations provided in the updated Comp Plan. The Applicant will work with OP to determine how the Property will be treated as part of the development guidelines process.

Rock Creek West Roadmap

The Subject Property is located within the boundaries of the Rock Creek West Roadmap ("Roadmap"), a report released by OP in December 2021 intended to advance strategies for increasing affordable housing in the Rock Creek West Planning Area. The Roadmap is an important tool for government, business, and communities to align around how and where we build housing and affordable housing. The Roadmap recognizes the unique housing context of Rock Creek West and identifies several near-term opportunities to significantly increase the supply of affordable housing and tools that can be used to realize those opportunities. The Project will generate approximately 868 residential units with eight percent of the residential gross floor area ("GFA") set aside for IZ in an area identified by the Roadmap as a priority for the creation of more housing and affordable housing. The Roadmap does not identify any specific recommendations for the Subject Property.

IX. CONSISTENCY WITH THE COMPREHENSIVE PLAN

As discussed in detail below, the proposed development at the Subject Property is not inconsistent with the Comp Plan and has been envisioned and designed to directly implement the Comp Plan's objectives of developing new housing and affordable housing, enhancing the local economy, incorporating sustainable practices into new development, and creating vibrant, safe, and productive spaces for District residents, visitors, and workers to enjoy.

The purposes of the District Elements of the Comp Plan are to:

- a. Define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development;
- b. Guide executive and legislative decisions on matters affecting the District and its citizens;
- c. Promote economic growth and jobs for District residents;
- d. Guide private and public development in order to achieve District and community goals;
- e. Maintain and enhance the natural and architectural assets of the District; and
- f. Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District. 10A DCMR §102.5

The project has been designed with consideration given to these general purposes and the specific policies contained within the Comp Plan that are established to carry out these purposes.

A. Rock Creek West Area Element

The Project is not inconsistent with the policies set forth in the Rock Creek West Area Element, and in particular those listed below.

The Project will redevelop an underutilized property with two new portions of a single residential building, described as Building Segments A and B, consisting of approximately 868 market rate and affordable residential units near a Metrorail station (RCW-1.1.4, RCW-1.1.6, RCW-2.1.1, RCW-2.1.2). The Project will include significant open space throughout the Subject

Property, including in courtyards and on the roof, preserving much of the open space that currently exists and providing areas of respite for future residents (RCW-1.1.9).

The Project advances the following Rock Creek West Area Element policies:

RCW-1.1 Guiding Growth and Neighborhood Conservation

- RCW-1.1.4: Infill Development
- RCW-1.1.6: Metro Station Areas
- RCW-1.1.9: Conserving Common Open Space

RCW-2.1 Connecticut Avenue Corridor

- RCW-2.1.1: Connecticut Avenue NW Corridor
- RCW-2.1.2: Infill Development

B. Land Use Element

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of the District and provides direction on a range of development, preservation, and land use compatibility issues. The element describes the range of considerations involved in accommodating an array of land uses within Washington, D.C. 10A DCMR § 300.1 Through its policies and actions, the Land Use Element addresses the numerous, challenging land use issues that are present in the District, including, among others:

- Providing adequate housing, particularly affordable housing;
- Conserving, creating, and maintaining inclusive neighborhoods, while allowing new growth that fosters equity, including racial equity, and accessibility;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open spaces;

- Promoting transit-accessible, sustainable development; and
- Siting challenging land uses.

10A DCMR § 300.2

More than any other part of the Comp Plan, the Land Use Element lays out the policies through which growth and change occur. The Land Use Element integrates and balances competing policies of all the other District Elements and should be given greater weight than other elements. 10A DCMR § 300.3

The policies and actions of the Land Use Element all aim to utilize land resources efficiently to achieve the following goals:

- Meet long-term neighborhood, District-wide, and regional needs;
- To address past and current inequalities disproportionately impacting communities of color;
- Sustain, restore, and improve the affordability and equity of all neighborhoods;
- Provide for additional housing and employment opportunities; and
- Effectively balance the competing demands for land.

10A DCMR § 302.1.

Land Use Element Evaluation

For the reasons discussed below, the Project will help achieve the above-described goals through its consistency with several Land Use Element policies. Upon evaluation of the Land Use Element policies and actions, the Applicant finds the Project to be not inconsistent with the Land Use Element overall, and specifically with the policies listed below.

The Project represents a transit-oriented development, as it is located 0.1 miles from the Woodley Park-Zoo/Adams Morgan Metrorail Station, less than one mile from the Cleveland Park

Metrorail Station, and in very close proximity to Metrobus routes and stops along Connecticut Avenue. While much of the neighborhood is zoned for low density residential uses, the Connecticut Avenue corridor consists of moderate- to high-density residential development and nodes of neighborhood commercial uses, allowing for greater densities and a more vibrant public realm. The Project would accommodate population growth in a desired, established neighborhood that is walkable and has excellent access to public transit (LU-1.4.1, LU-1.4.2, LU-1.4.3). The Project will be located along the Connecticut Avenue corridor, providing housing and affordable housing with multimodal options that will respect the character, scale, and integrity of adjacent neighborhoods (LU-1.4.6). Due to its proximity to numerous transit choices, the neighborhood has increased access to jobs, a range of retail goods and services, and civic gathering spaces, all of which are within a short distance from the Project (LU-1.4.1, LU-1.4.2).

The approximately 868 new dwelling units contribute to the urban mixed-use neighborhood consisting of high-quality architecture and public spaces, where housing is encouraged (LU-1.4.3, LU-2.1.10). The Project would set aside eight percent of the residential GFA for IZ units available to households earning 60 percent MFI, resulting in a significant number of IZ units in a transit accessible, desirable location that is close to amenities (LU-1.4.3). The infill development will reactivate a dormant property at a desired location, providing an attractive view from Calvert Street (LU-1.5.1). The Project will support the surrounding low-density neighborhoods by concentrating density away from the low-density neighborhood and along the Connecticut Avenue corridor, and by having an aesthetic that is compatible with the general design character and scale of the existing neighborhood. The Project will provide generous open spaces (LU-2.1.5).

The Project will specifically help to advance the following Land Use Policies:

LU-1.4 Transit-Oriented and Corridor Development

- LU-1.4.1: Station Areas as Neighborhood Centers
- LU-1.4.2: Development Around Metrorail Stations
- LU-1.4.3: Housing Around Metrorail Stations
- LU-1.4.6: Development Around Corridors

LU-1.5 Neighborhood Infill Development

- LU-1.5.1: Infill Development

LU-2.1 A District of Neighborhoods

- LU-2.1.5: Support Low-Density Neighborhoods
- LU-2.1.10: Multi-Family Neighborhoods

C. 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 Comp Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improve safety, mobility, and accessibility in the District. 10A DCMR § 400.1

The overarching goal for transportation in the District is to create a safe, sustainable, equitable, efficient, and multi-modal transportation system that meets the access and mobility needs of District residents, workers, and visitors. 10A DCMR § 401.1 An important component to achieving this goal is to closely coordinate land use and transportation decisions. The balance between housing and jobs plays a clear role in travel patterns. Generally, when homes and jobs are located close to transit, quality of life is improved and the demands on transportation infrastructure

are reduced. The Comp Plan recommends that future efforts take these factors into account to ensure that households with varying incomes and communities of color have equitable access to housing and jobs via safe and efficient transportation options.

Transportation Element Evaluation

The project is not inconsistent with the following policies of the Transportation Element:

The Project will establish new transit-oriented development within close proximity to the Woodley Park-Zoo/Adams Morgan Metrorail station and other forms of public transportation and bicycle infrastructure (T-1.1.4, T-1-1-7). The Project includes various transit-oriented development-related improvements, including the construction of new housing and affordable housing units within walking distance of a Metrorail station, bicycle storage areas, and public space improvements that include new paving, lighting, landscaping, and bicycle racks, which will encourage pedestrian and bicyclist activity (T-2.3.1, T-2.4.1, T-2.4.2). Additional curb cuts will not be needed to facilitate circulation of the site, prioritizing pedestrian safety (T-1.2.3). The Project's proximity to transit infrastructure increases employment opportunities, particularly for individuals without vehicles (T-1.3.1). The Project also includes a robust TDM plan, as set forth in the Applicant's Comprehensive Transportation Review Report (Exhibit G), which includes installation of a new Capital Bikeshare station; 372 long-term bicycle parking spaces provided in bicycle rooms that will accommodate non-traditional sized bikes and provide electrical outlets; and a minimum of 18 electric vehicle (EV) spaces with access to charging stations (T-2.2.1, T-2.3.3, T-2.3.4).

The Project has been designed to integrate bicycle and pedestrian safety considerations. For example, the Project incorporates secure indoor bicycle parking and exterior short-term bicycle parking to encourage residents and visitors of the Project to travel by bike (T-2.3.2). The Capital

Bikeshare infrastructure will be expanded, as two new stations will be installed in the vicinity of the Project, increasing accessibility to and around the neighborhood (T-2.3.5). Furthermore, the Applicant will improve the public realm by making new landscape improvements to enhance the pedestrian experience and general safety of the surrounding area (T-2.3.1). Together, these physical improvements to the streetscape will improve bicycle and pedestrian safety in the area.

Regarding transit access, the Project is consistent with policies that require attention to the transportation needs of all District residents, including those that rely heavily on transit for work and other daily needs (T-1.1.7). The Project is located approximately 0.1 miles from the Woodley Park-Zoo/Adams Morgan Metrorail station and in close proximity to Metrobus routes, and will therefore be easily accessible to residents, employees, and visitors of the Project (T-2.6.1, T-2.6.2).

In addition to promoting the use of transit, walking, and bicycle use, the Project will also include a strong TDM program that reduces the number of vehicle trips and miles traveled and increases the efficiency of the transportation system (T-1.1.2, T-3.1.1). In addition, the Project will encourage sustainable transit practices by including bicycle and scooter charging infrastructure in bicycle storage rooms and up to 18 electric vehicle parking spaces with access to charging stations (T-5.2.2).

The Project will specifically help to advance the following Transportation Policies:

T-1.1 Land Use: Transportation Coordination

- T-1.1.2: Land Use Impact Assessment
- T-1.1.4: Transit-Oriented Development
- T-1.1.7: Equitable Transportation Access

T-1.2 Transforming Corridors

- T-1.2.3 Discouraging Auto-Oriented Uses

T-1.3 Regional Smart Growth Solutions

- T-1.3.1: Transit-Accessible Employment

T-2.2 Making Multimodal Connections

- T-2.2.1: Multimodal Connections

T-2.3 Bicycle Access, Facilities, and Safety

- T-2.3.1: Better Integration of Bicycle and Pedestrian Planning
- T-2.3.2: Bicycle Network
- T-2.3.3: Bicycle Safety
- T-2.3.4: Capital Bikeshare Expansion

T-3.1 Transportation Demand Management

- T-3.1.1 TDM Programs

T-4 Pedestrian Access, Facilities, and Safety

- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

T-5.2 Electric Vehicles

- T-5.2.2: Charging Infrastructure

D. Housing Element

The Housing Element describes the importance of housing to neighborhood quality in the District, and the importance of providing housing opportunities for all segments of the population throughout the city. 10A DCMR § 500.1 The District continues to face significant demand for more housing, and in particular affordable housing across a range of income levels. Other critical housing issues that the District is facing include furthering fair housing opportunities, especially in high-cost areas; fostering housing production to improve affordability; promoting more housing near transit; maintaining healthy homes for residents; and providing housing integrated with

supportive services for older adults, vulnerable populations, and residents with disabilities. 10A DCMR § 500.2

The overarching housing goal of the Housing Element is to develop and maintain new residential units to achieve a total of 36,000 new units by 2025, 12,000 of which are dedicated affordable, that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents of the District. 10A DCMR § 501.1. To achieve this target, the District must maintain a high rate of housing production at all income levels, with a range of housing types, in all parts of the District. The Comp Plan recognizes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that continues to create challenges for many residents, particularly low-income residents. However, the District's housing crisis cannot be successfully addressed by solely focusing on housing supply and demand. Rather, issues relating to the equitable distribution of housing and ensuring new housing has equitable access to transit and amenities are other important factors that need consideration.

Housing Element Evaluation

The Project helps meet the housing needs of present and future District residents at locations consistent with District land use and housing policies and objectives. The Project will include approximately 868 new market rate and affordable residential units in close proximity to a Metrorail station. This will provide a substantial contribution to the District's housing goals set forth in the Housing Equity Report (H-1.1.2, H-1.1.3, H-1.2.11, H-1.3.2). The new housing units in the Project represent a significant 43 percent of the overall housing goal for the Rock Creek West Planning Area. The Rock Creek West Planning Area has an affordable housing goal of 1,990 units and a total housing production goal of 1,260 units by 2025. The new affordable housing goals are greater than the total housing goals because the affordable housing goals include not only

net new production, but also conversion of existing housing into subsidized housing and voucher recipients living in non-restricted housing. In this case, the Project will provide a significant number of new market rate units and new affordable units, helping the District to meet its overall housing goals as provided in the Housing Equity Report. The Project proposes a significant number of IZ units that will be interspersed per DC policy within a market rate building (H-1.2.2, H-1.2.2, H-1.2.3).

The Proposed market rate housing will continue to drive down overall housing costs, further increasing affordability in a high-cost neighborhood. The Comp Plan provides that "[b]road affordability is a function of the overall market supply being able to meet rising demand. New supply can improve affordability by letting new residents move to Washington, DC without depleting the existing housing stock units, and by allowing existing residents to change residences, thereby vacating an existing unit for someone else to occupy." 10A DCMR §500.7b The Project will provide a substantial number of market rate units, allowing residents to move into the neighborhood or trade up to a new unit, potentially freeing up more affordable units in the neighborhood. The provision of market rate units is consistent with the goals and policies of the Housing Element.

The Project will be close to multiple modes of transit, employment centers, and neighborhood services. Additionally, it will be within close proximity to institutional uses, including schools and the Cleveland Park Library, and will have access to recreational facilities and open space, including Rock Creek Park and the Zoo. Due to the accessible nature of the Project, the cost of living within the Project will be more affordable because a personal vehicle would not be required in order to navigate the neighborhood, as some errands can be achieved within the area by foot or bicycle.

The Project will accommodate families so that they can take advantage of the area's resources. The Project's average unit size is 1,162 square feet in Building Segment A and 819 square feet in Building Segment B, and approximately 43 percent of the overall units will consist of two- and three-bedrooms.

The Project substantially advances the following Housing Element policies:

H-1.1: Expanding Housing Supply

- H-1.1.2: Production Incentives
- H-1.1.3: Balanced Growth
- H-1.1.4: Mixed-Use Development
- H-1.1.5: Housing Quality
- H-1.1.8: Production of Housing in High-Cost Areas
- H-1.1.9: Housing for Families

H-1.2: Ensuring Housing Affordability

- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- H-1.2.2: Production Targets
- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- H-1.2.11 Inclusive Mixed-Income Neighborhoods

E. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC's land, air, water, energy, and biological resources. This Element provides policies and actions for addressing important issues such as climate change, drinking water safety, the restoration of the tree canopy, energy conservation, air quality, watershed

protection, pollution prevention, waste management, the remediation of contaminated sites, and environmental justice. The biological, chemical, and hydrologic integrity of the environment are key indicators of the quality of life in the District. Furthermore, environmental sustainability is linked to resilience, population health, and community prosperity. Good environmental management and pollution prevention are essential to sustain all living things and to safeguard the welfare of future generations. 10A DCMR § 600.1.

As set forth in 10A DCMR § 600.2, some of the critical environmental issues facing Washington, DC that are addressed in the Environmental Protection Element include:

- Restoring the District’s tree canopy and expanding green infrastructure (“GI”);
- Conserving water and energy;
- Encouraging green building techniques and facilitating compliance with green building mandates;
- Growing access to, and use of, clean, local energy;
- Reducing air pollution;
- Eliminating the harmful effects of environmental hazards on all residents, particularly vulnerable populations and to address environmental justice issues; and
- Increasing resilience to urban heat island effect.

The overarching goal for the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, DC, taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the values and functions of Washington, DC’s natural resources and ecosystems, and educate the public on ways to secure a sustainable future. 10A DCMR § 601.1

Environmental Protection Element Evaluation

The Project is not inconsistent with the policies of the Environmental Protection Element. The Project will replace an existing 1970s hotel building that is no longer occupied with two new residential buildings providing many sustainable features. Sustainable demolition practices will be employed to reduce overall environmental impacts. The Project will be designed to achieve LEED Silver under LEED for Homes - Multi-Family Midrise v4 and will include technologies that improve water and energy efficiency (E-3.2.3, E-3.2.7, E-4.2.1), as well as improved stormwater management and compliance with Department of Energy and the Environment ("DOEE") Regulations and GAR. These elements increase the resiliency and efficiency of the Project and ultimately result in units that are more affordable. Additionally, this Project is located in an area with access to multimodal transit, where residents do not have to commute or drive to run errands, resulting in reduced greenhouse gas emissions (E-3.2.1).

As part of the Project, the Applicant will improve the public space along Calvert Street and 24th Street adjacent to the Project's curb cuts to include streetscape that will provide new trees that will add tree canopy, provide shade, mitigate urban heat island effect, improve air quality, provide urban habitat, and add aesthetic value (E-1.1.2, E-2.1.2). The Project will also incorporate significant landscaping, including trees and winding pedestrian paths, within the boundaries of the Project that will enhance and beautify the site, reduce stormwater runoff, and provide open space for residents of the community (E-2.1.3, E-2.1.6). Additionally, the Project includes green roof areas that will improve stormwater management and climate resilience (E-1.1.5, E-4.1.2, E-4.1.3).

The Project advances the following Environmental Protection Element policies:

E-1.1: Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation

- E-1.1.5: Resilient Infrastructure

E-2.1: Conserving and Expanding Washington, DC’s Urban Forests

- E-2.1.2: Tree Requirements in New Development
- E-2.1.3: Sustainable Landscaping Practices
- E-2.1.6: Urban Tree Canopy Goals

E-3.2: Conserving Energy and Reducing GHG Emissions

- E-3.2.1: Carbon Neutrality
- E-3.2.7: Energy-Efficient Building and Site Planning

E-4.1: Green Infrastructure

- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

E-4.1.3: GI and Engineering

- E-4.2: Promoting Green Building
- E-4.2.1: Support for Green Building

F. Economic Development Element

The Economic Development Element addresses the future of Washington, DC’s economy and the creation of economic opportunity for current and future District residents. It includes strategies to sustain the District’s major industries, diversify the economy, accommodate job growth, maintain small businesses and neighborhood commercial districts, and increase access to employment for District residents. 10A DCMR § 700.1 Some of the critical long-term economic development issues identified by the Comp Plan include: ensuring that prosperity is equitably shared across race and geography; growing and diversifying the District’s economy; increasing employment and training opportunities for those most in need; and expanding opportunities for small, local and minority businesses.

The economic development issues listed above were identified in the 2006 Comp Plan, and this predates the ongoing COVID-19 public health emergency. While the District's current economic position has been substantially affected by the COVID-19 pandemic, it is believed that economic trends will hold in the long-term, and that the policies contained within the current Economic Development Element will continue to effectively guide the District through periods of growth and recession. The District's economic strength has gotten significantly stronger in the past 15 years, and the city's economy has vastly diversified. However, the District's economic growth has not benefitted all residents equally. More work remains to ensure that all residents have access to retail, commercial facilities and job opportunities. The District is striving to ensure that all residents, particularly those from communities of color, are able to enjoy the benefits of economic growth in the District and the region. 10A DCMR § 700.4

Economic Development Element Evaluation

The Project will replace an unoccupied hotel building within close proximity to Metrorail and mixed-use developments with a new residential development consisting of approximately 868 market rate and affordable units. It will be located in the amenity-rich Woodley Park neighborhood and within proximity to neighborhood serving retail and eating and drinking establishments along Connecticut Avenue and in the adjacent Adams Morgan neighborhood (ED-2.2.3). The Project will increase the overall neighborhood population, bringing in new patrons that will contribute to the success of existing commercial uses (ED-2.2.5, ED-2.2.9).

The Project will provide employment opportunities that include construction of the building, and building management and facilities upon its completion. Additionally, the location of the Project increases economic opportunities, as it will be in a transit-oriented neighborhood

where residents can reduce expenses by running errands without a car, and is near employment centers that can be reached by walking, biking, or taking public transit.

The Project advances the following Economic Development Element policies:

ED-2.2: The Retail Economy

- ED-2.2.3: Neighborhood Shopping
- ED-2.2.5: Business Mix
- ED-2.2.9: Clustered Retail at Transit

G. Parks, Recreation, and Open Space Element

The Parks, Recreation, and Open Space Element addresses the future of parks, recreation, and open space in the District. It recognizes the important role parks play in recreation, aesthetics, health and wellness, neighborhood character, environmental quality, and resilience. The element also recognizes that parks have the potential to bring people together across social, economic, and racial divides. Finally, this element includes policies and actions that support the delivery of equitable access, great spaces, and exceptional experiences. 10A DCMR § 800.1

The critical parks, recreation, and open space issues facing the District include, among others, providing additional recreational land and facilities in underserved areas; maintaining and improving existing facilities and access; and increasing funding for capital improvements and operations through partnerships and creative strategies. 10A DCMR § 800.2

The District's overarching goal for parks, recreation, and open space is to preserve and enhance parks and open spaces to meet active and passive recreational needs through universal access, promote health and wellness, improve environmental quality, enhance the identity and character of District, neighborhoods, and provide visual beauty in all parts of the city. 10A DCMR

§ 801.1 Overall, the Applicant submits that the Project is not inconsistent with the policies and actions of the Parks, Recreation, and Open Space Element, and in particular those listed below.

Parks, Recreation, and Open Space Element Evaluation

The Project is not inconsistent with the policies and goals of the Parks, Recreation, and Open Space Element. The Project will be located in a mixed-use neighborhood that has access to premium parks and open space, including Rock Creek Park, which is essentially across the street to the south, and the Zoo (PROS-3.2.3). The Project will include streetscape improvements with landscaping and wide sidewalks that will increase accessibility of nearby open space and parks, and will provide stormwater management (PROS-1.2.2). Additionally, the Project will include approximately 175,000 square feet of lushly landscaped open space within the Project. The streetscape will include trees, providing shade for pedestrians. The Project will also have access to nearby Recreation Centers in Kalorama, Adams Morgan, and Cleveland Park. Overall, the Project's proximity to open space and recreation spaces increases the potential for health and wellness of its future residents (PROS-1.3.7).

The Project incorporates generous setbacks, affording the buildings privacy from the Connecticut Avenue corridor and from other neighboring buildings. Amenity and open space will be included on the roof, providing common spaces in which the residents of the Project can gather, as well as in large open courts, providing additional permeable green spaces (PROS-4.3.3, PROS-4.3.4).

The Project advances the following Parks, Recreation, and Open Space Element policies:

PROS-1.2: Closing the Gaps

- PROS-1.2.2: Improving Accessibility

PROS-1.3: Preserving the Value of Parkland

- PROS-1.3.7: Health and Wellness

PROS-4.3: Open Space and the Cityscape

- PROS-4.3.3: Common Open Space in New Development
- PROS-4.3.4: Preservation of Open Space in Multi-family Development

H. Urban Design Element

The Urban Design Element addresses the District's physical design and visual qualities. It describes ways in which different aspects of the District's landscape, especially its buildings, streets, and open spaces, work together to define impressions of the city and its neighborhoods. The defining urban design qualities of the District derive from the historic Plan of Washington, and the unique characteristics of the city's many neighborhoods. As the District continues to support growth to address housing and economic development needs, several important urban design challenges must be considered. These include strengthening neighborhood quality of life while accommodating growth and change, and providing compatible infill development and appropriate transitions between varying uses and densities. 10A DCMR §§ 900.1 and 900.2

The overarching goal of the Urban Design Element is to enhance the beauty, equity, and livability of Washington, DC by reinforcing its historic design legacy and the identity of its neighborhoods and centers, integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and functions of streets and public spaces. 10A DCMR § 901.1

Urban Design Element Evaluation

Overall, the Applicant submits the Project to be not inconsistent with the policies and actions of the Urban Design Element, and in particular those listed below.

The Project is not inconsistent with the policies of the Urban Design Element. The building's massing is consistent with the intent of the RA-2 and RA-4 zones and with other neighboring residential and mixed-use buildings (UD-2.2.3). The Project will consist of two residential buildings providing a FAR of 1.36 and a height of 90 feet (measured from BHMP). It will align with neighboring projects, filling in a significant section of the Wardman development and reactivating the Subject Property (UD-2.2.5). The scale, height, volume, and massing of the building is compatible with neighboring properties, and would comply with the development standards for the RA-2 and RA-4 zones.

Open space will be a feature of the Project, including verdant courtyards offering opportunities for active and passive recreation. The Project includes outdoor amenity spaces on the upper levels and roof of the Project. Green roof areas and large courts will also be provided to add additional open space on the Property and to increase permeable surfaces while providing light and air to building residents (UD-2.1.1, UD-2.1.3, UD-2.4.1). The penthouse will provide spaces for gathering, allowing residents of the building opportunities for engagement, as will the improved streetscape for users of the public space (UD-3.3.1). The ground floor will have tall, transparent windows allowing porosity through the Property and for pedestrians to engage with activities beyond the public realm (UD-2.1.1, UD-2.1.7). The building design incorporates high-quality materials that significantly enhance the overall development and adjacent Wardman Tower historic landmark, and includes architectural elements that provide variety and visual interest (UD-4.2.1, UD-4.2.2, UD-4.2.4).

The Project advances the following Urban Design Element policies:

UD-2.1: Street For People

- UD-2.1.1: Streetscapes that Prioritize the Human Experience

- UD-2.1.3: Complete Streetscape Design
- UD-2.1.7: Streetscapes That Encourage Activation

UD-2.2: Designing for Vibrant Neighborhoods

- UD-2.2.3: Neighborhood Mixed-Use Centers
- UD-2.2.5: Infill Development

UD-2.4: Inclusive Community Spaces

- UD-2.4.1: Inclusive and Diverse Neighborhood Spaces

UD-3.1: Public Life for All

- UD-3.1.1: Freely Accessible Public Space

UD-3.3: Places for Linger

- UD-3.3.1: Neighborhood Meeting Places

UD-4.2: Designing Architecture for People

- UD-4.2.1: Scale and Massing of Large Buildings
- UD-4.2.2: Engaging Ground Floors
- UD-4.2.4: Creating Engaging Facades

I. Historic Preservation Element

The Historic Preservation Element guides the protection, revitalization and preservation of Washington, DC’s valuable historic assets. It defines the District’s role in exercising preservation leadership, promoting awareness of Washington, DC history, identifying and preserving historic resources, and ensuring compatible design in historic neighborhoods. The element recognizes historic preservation as an important responsibility at all levels of government and as a valuable planning tool that provides an opportunity for community input, development collaboration, partnerships, and education. Historic preservation offers a sustainable urban

development model that fosters a sense of community well-being and an appreciation of the multifaceted achievements of past Washingtonians. 10A DCMR § 1000.1

The overarching goal for historic preservation is to preserve and enhance the unique cultural heritage, beauty, and identity of Washington, DC by respecting the historic physical form of the District and the enduring value of its historic structures and places, sharing responsibility for their protection and stewardship, and perpetuating them for the benefit of the residents of the District and the nation. 10A DCMR §1001.1

Historic Preservation Element Evaluation

Overall, the Applicant submits the Project to be not inconsistent with the policies and actions of the Historic Preservation Element, and in particular those listed below.

The Project is not inconsistent with the policies of the Historic Preservation Element. Although the Project itself is not a historic landmark, it will be connected to the Wardman Tower to the north, which is a historic landmark. At its April 28, 2022 meeting, the HPRB gave concept approval to the meaningful connection between Building Segment A and the Wardman Tower (Exhibit F). The HPRB found that the connection complemented the existing historic landmark and enriched the design heritage and historic character overall (HP-1.6.3). Although the Project is not a historic landmark and is not located in a historic district, the connection will respect the historic context through siting and design, and through the use of appropriate materials and architectural detail (HP-2.5.3). The Wardman Tower is not part of the Proposed Project.

The Project advances the following Historic Preservation Element policies:

HP-1.6: The Image of Washington, DC

- HP-1.6.3: Enhancing the District's Historic Character
- HP-2.5.3: Compatible Development

**X. EVALUATION OF POTENTIAL COMPREHENSIVE PLAN
INCONSISTENCIES**

The foregoing Comp Plan analysis thoroughly demonstrates the numerous ways in which the Project aligns with the policies and goals of the Comp Plan, including the FLUM and GPM. However, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because there is intentional overlap within and between the Comp Plan elements, a Comp Plan evaluation must recognize potential inconsistencies and explain why the inconsistencies are outweighed by other Comp Plan policies and/or competing considerations.

The Implementation Element reflects similar guidance: “[r]ecognize the overlapping nature of the [Comp Plan] elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10A DCMR § 2504.6

A. Consistent with the guidance provided in the Implementation Element, the Applicant conducted a thorough Comp Plan evaluation using a racial equity lens and, as detailed throughout this statement, finds the proposal is not inconsistent with the Comp Plan when read as a whole. In conducting its evaluation, the Applicant was careful to identify any instances where the proposal may be viewed as being inconsistent with certain Comp Plan policies; the result being that the Applicant did not identify policies where the Project may be viewed as inconsistent. In addition, the Project is a matter of right under the Zoning Regulations with no relief being requested from either the Zoning Commission or the Board of Zoning Adjustment.

The Project will improve the Subject Property's current condition, thereby enhancing the appearance of the entire community and increasing revenue for the District. Additionally, the large

scope of the Project will help the District attain its housing and affordable housing goals for the Planning Area, facilitating progress towards achieving racial equity.

XI. COMMUNITY ENGAGEMENT

The Subject Property is located within the boundaries of Advisory Neighborhood Commissions (“ANC”) 3C02. Since the property was purchased, the Applicant has been engaging with and has met various neighborhood groups, community leaders, and ANC representatives on multiple occasions regarding this project. The Applicant gave five presentations to the ANC between February 2022 and April 2022 and looks forward to continuing to work with the ANC, community organizations, and stakeholders as the project moves forward.

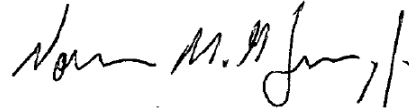
XII. CONCLUSION

For the reasons stated above, the Applicant submits that the proposed development project conforms to the applicable Zoning Regulations and the Zoning Map and is not inconsistent with the purposes and intent of the District Elements of the Comprehensive Plan for the National Capital. The Subject Property is zoned RA-2 and RA-4 and the LTR submission has been designed to conform to all area requirements, including building height, density, lot occupancy, setbacks and open spaces, GAR, and parking/loading.

The project will significantly enhance the surrounding area and minimize impacts to adjacent and nearby properties by constructing new housing and affordable housing in a high-demand, amenity-rich area, all while incorporating landscaping and open spaces, providing ample on-site vehicular parking, employing sustainable development techniques, and generally creating a desirable new residential development. Accordingly, the Applicant respectfully requests OP issue its report concerning this LTR application in accordance with the provisions of Chapter 23 of Title 10B of the District of Columbia Municipal Regulations.

Respectfully submitted,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "Norman M. Glasgow, Jr.", with a stylized flourish at the end.

Norman M. Glasgow, Jr.