

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director

DATE: February 1, 2013

SUBJECT: **Setdown Report** for ZC #02-38D, Waterfront Station Northwest Parcel
Second Stage Planned Unit Development

I. SUMMARY RECOMMENDATION

Forest City Washington and Vornado/Charles E. Smith have submitted an application for a Second Stage Planned Unit Development (PUD) to construct a mixed use building on the northwest parcel within the Waterfront Station development. The building would include retail and residential uses on the ground floor and residential uses on upper floors. The proposal is not inconsistent with the first stage PUD approval, the Comprehensive Plan, or the Zoning Regulations. The Office of Planning (OP), therefore, recommends that the application be set down for public hearing.

II. APPLICATION-IN-BRIEF

Location: 1001 4th Street, SW (West side of 4th Street, between Eye and M Streets)

Ward and ANC: Ward 6, ANC 6D

Applicant: Forest City Washington and Vornado/Charles E. Smith, dba Waterfront
1001 4th Street, LLC

PUD-Related Zoning: C-3-C

Property Size: 56,619 sf (Northwest parcel only)

Proposal: Construct a retail and residential building on the northwest parcel at the Waterfront Station development; Requesting Second Stage PUD approval and flexibility from rooftop structure requirements.

Background: In case 02-38A the Zoning Commission approved a First Stage PUD for the entire Waterfront Station project – eight buildings in total – and a Consolidated PUD for the four “middle” buildings on the site – the east and west office buildings and east and west residential towers.

The First Stage approval established, for the remaining four buildings, the site plan, the general use mix, the general massing of buildings, and the maximum heights and FARs. The northwest building was permitted a

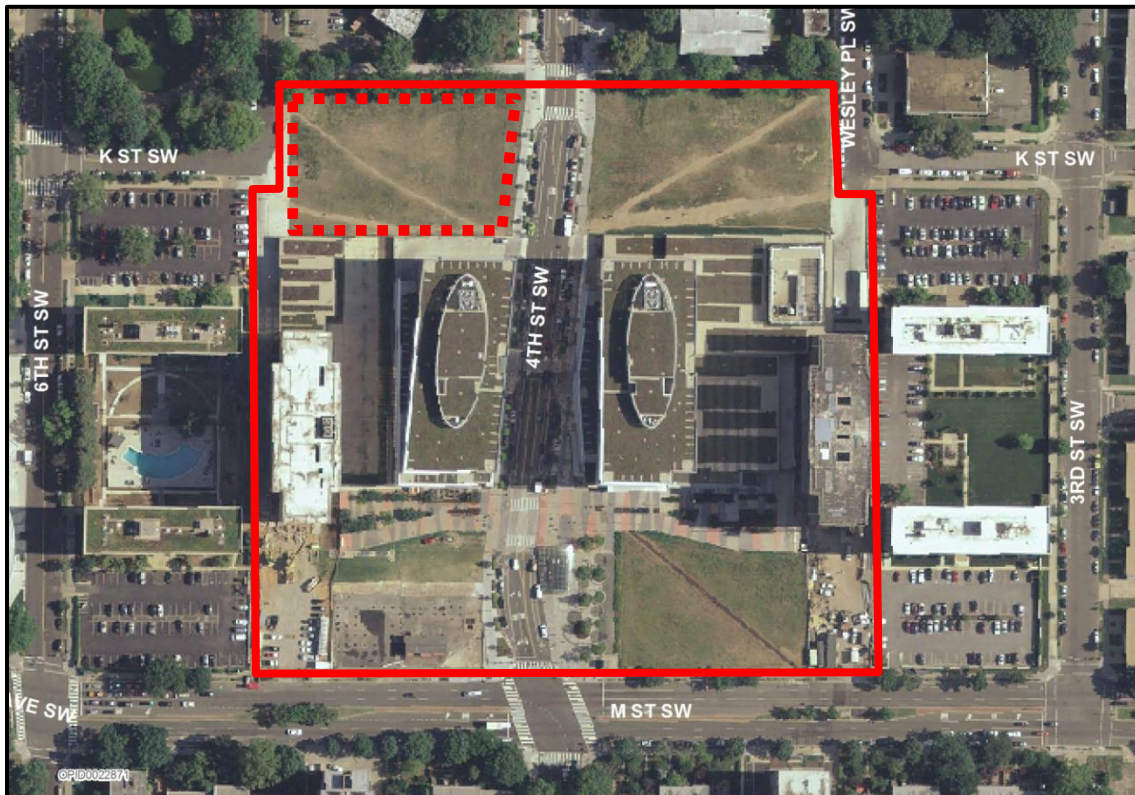
height of 114 feet and up to 388,000 square feet of either residential or office development, as well as ground floor retail.

The Zoning Regulations describe a Second Stage PUD as a detailed review that examines the architecture of the proposed buildings, uses within the buildings, design of open spaces, site circulation, site infrastructure and compliance with the intent and purposes of the PUD process, the Regulations and the First Stage PUD. (§§ 2402.2(b), 2406.12 and 2408)

III. SITE AND AREA DESCRIPTION

The entire Waterfront Station PUD site is shown in the aerial photo below, and the site of the current Second Stage PUD is shown in the dashed outline. The surrounding properties are occupied as follows:

North	Westminster Presbyterian Church
South	Existing office and residential buildings
East	Vacant lot approved for residential and retail
West	Parking lot (approved for residential in ZC #05-38) and park



Waterfront Station 2012 aerial photo – Entire PUD in solid outline; Current application in dashed outline

The entire Waterfront Station PUD was approved for eight buildings. Two office buildings along 4th Street have already been constructed, and the two 130 foot tall residential towers are currently being renovated with occupancy planned for 2013. The northeast parcel was approved for a 114 foot tall residential building, and the two M Street parcels would have office buildings, both approved for 127 feet in height. To the west, in case #05-38, the Commission approved two new 112 foot tall buildings to be constructed on the parking lots of the Marina View property fronting on 6th Street.

The subject site itself is flat and vacant. It is bordered on the north by a pedestrian allée, a park-like walkway with mature trees and benches, connecting 4th Street and Makemie Place. Broad sidewalks line the property on its east and west frontages. To the west of the site an alley extends south from the intersection of Makemie Place and K Street to provide access to loading and parking for the existing residential building; It will eventually connect through to M Street. To the south a driveway from 4th Street provides access to parking under the office building.

IV. PROJECT DESCRIPTION AND ANALYSIS

The development of the northwest parcel would consist of an 11 story, 114 foot tall building with retail and residential on the ground floor and residential on the upper floors. Total residential floor area would be 383,845 square feet and retail would total 4,414 square feet. The number of residential units would be about 365.

Site Design and Ground Floor

A private street would connect 4th Street and Makemie Place, parallel to the pedestrian allée. The building would have a “C” shape with the open end facing to the south and containing a residential courtyard at the ground level. The residential lobby would be at the corner of 4th Street and the private street. Retail space would be located on 4th Street south of the lobby. Both the retail and the residential lobby would use significant amounts of glass in the façade to allow views into and out of the interior spaces. This should help activate the street. The background material at the ground level and for much of the building would be a dark brick.

Residential units on the ground floor would have a townhouse configuration with external entrances facing the private street and Makemie Place, as well as entrances to an internal hallway. These units would have a second story on the “Mezzanine Level”. Please refer to Sheets 32 and 33. Most of the townhouse units would have a private outdoor courtyard. OP supports this unit configuration, which would add activity at the street level. OP received from the applicant additional renderings of the courtyards, walls and landscaping that clarify the drawings submitted with the original plan set. The renderings should be included in any future submissions.

Building Appearance

Upper floors would also feature significant amounts of glass for residential units. The glass

elements would be repeated in a series of bays facing the private street, with the most prominent feature being a nearly all-glass tower element at the corner of 4th Street. The 4th Street façade is angled to parallel the line of the street. Many of the units have balconies, which OP supports as a way to provide private outdoor space for residents, and to provide additional eyes on the street. The applicant should examine ways to add balconies to the south side of the building as a way to provide amenity for residents and to reduce energy usage in the summer through shading. Perhaps the most prominent material on the upper stories is described in the plans as terracotta or a red brick. Prior to a public hearing, the applicant should choose between those materials as they have extremely different characters. More information should also be provided about external lighting of the building.

Private Street and Tree Protection and Landscaping

The private street as proposed would be 20 feet wide with two nine foot lanes separated by a two foot “water filtration strip” (Sheet 48). Sheet 53 of the plans shows that a number of the existing trees in that area are proposed to be removed. The applicant should narrow the private street so that more existing trees can be saved on its north side. Also, the street need not have a continuous width for its entire length – it could be more narrow in some places than in others.

OP has also asked the applicant to provide information about the protection of remaining trees during construction. OP recommends that the critical root zones of any remaining trees be completely undisturbed. Sheet 55 shows that the proposed “Limits of Disturbance” would encompass almost all of the existing trees in that area. Construction activity over a tree’s critical root zone – such as the movement of heavy equipment or trucks, piling of fill material, or the storage of construction materials – can severely harm or kill a tree. The applicant should also provide a plan for tree replacement should any remaining trees be destroyed during or as a result of construction activities. The trees in this area provide an amenity for the neighborhood and especially for pedestrians on the east-west walkway, and Comprehensive Plan policies support the retention of existing tree canopy.

The applicant should provide more information about the materials used for the street paving. Five large transformer grates would be located in the eastern end of the street and could reduce pedestrian mobility along the street. The applicant should consider adding a sidewalk as a solid-surface area for pedestrians to bypass the grates.

The landscape plan on Sheet 48 indicates that ginkgo trees could be used as shade trees. The applicant should either change species or commit to only plant male trees, which do not produce malodorous berries. The landscaped area between the building and private street is located over the underground garage; OP has asked the applicant to confirm the size of trees when planted, and that there would be enough soil volume for trees to reach maturity.

Parking and Loading

Vehicular parking and loading for the building would be accessed from the private alley on the

west of the property. Two thirty-foot loading berths would be provided for the proposed residential building. 223 parking spaces would be provided for the 365 residential units, for a ratio of 0.6 spaces per unit. OP appreciates the commitment to provide about 55 bicycle parking spaces for the building (Written Statement, Attachment D, #4), but the garage plans should be revised to show the location of the bike parking.

Overall, OP supports the design for the northwest parcel, which would positively add to the character and activity of 4th Street, the Waterfront Station project, and the immediate neighborhood.

V. COMPREHENSIVE PLAN

The Commission found during its review of the first stage PUD that the Waterfront Station project is not inconsistent with the Comprehensive Plan. OP finds that the current second stage PUD application is consistent with the first stage as approved and does not detract from project's correlation with the tenets of the Plan.

The application is also consistent with major policies from various elements of the Comprehensive Plan, including the Land Use; Transportation; Housing; Economic Development; Parks, Recreation and Open Space; and Lower Anacostia Waterfront / Near Southwest Area Elements. The design could more adequately meet the Environmental Protection element policies that encourage tree conservation and protection. For a complete analysis of the project against relevant planning policies, please refer to Attachment 1.

VI. ZONING

In the first stage PUD, the Commission approved PUD-related zoning of C-3-C for entire project site. Also in the first stage PUD, the Commission approved a height of 114 feet for the northwest building and established that the northwest building could be either residential or office use with ground floor retail. The current proposal is consistent with the previous approval in the first stage PUD.

The current second stage application requests flexibility from the specific zoning regulations listed below. A summary of each area of relief is given and OP will provide a complete analysis of the requested flexibility at the time of the public hearing.

1. Roof Structure Setback Requirements (§ 411)

The application requests flexibility for the setback of the mechanical penthouses from the interior courtyard of the building. The 18'6" tall penthouse is set back between approximately four and seven feet from the edge of the roof. The applicant should provide more information about the need for mechanical space on the roof. Please refer to Sheet 39. Conforming setbacks are provide on the other sides of the building.

2. Roof Structures of Unequal Heights (§ 411)

The application requests flexibility from the provision requiring equal height for all roof structure walls. In this case several different heights are requested, which, according to the application, would “create a roof structure that is as low and unobtrusive as possible (Written Statement, p. 8).

3. Other Minor Flexibility

The application also requests other minor flexibility that is often included as part of PUD applications. This includes the ability to vary interior components; vary the exact selection of exterior materials; vary landscaping materials; and make minor refinements to exterior details (Written Statement, pp. 11-12).

VII. PURPOSE AND EVALUATION STANDARDS OF A PUD

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Chapter 24. The PUD process is “designed to encourage high quality developments that provide public benefits.” Through the flexibility of the PUD process, a development that provides amenity to the surrounding neighborhood can be achieved.

The applicant is requesting approval of a second stage PUD. The PUD standards state that the “impact of the project on the surrounding area and upon the operations of city services and facilities shall not 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” (§2403.3). Based on comments to be supplied by referral agencies, OP will provide at the time of the public hearing an analysis of the project’s impact on city services.

VIII. PUBLIC BENEFITS AND AMENITIES

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, §2403.8 states that “the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” Sections 2403.9 and 2403.10 state that a project must be acceptable in all the listed proffer categories, and must be superior in many. To assist in the evaluation, the applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to typical development of the type proposed...” (§2403.12).

The first stage PUD included a number of benefits for the entire project, some of which have already been implemented. The project benefits include:

1. Efficient Land Utilization – redevelopment of an underutilized site

2. Urban Design – reopening of 4th Street; creation of a town center and walkable streetscape; creation of public open space; provision of at least 110,000 square feet of retail, including a new grocery store
3. Affordable Housing – a total of about 160,000 square feet of affordable housing (note that the northwest building was exempted from providing affordable units)
4. Local Retail – Commitment to try to lease 12,500 square feet of space to local retailers
5. First Source and CBE agreements
6. Maintenance of Public Park
7. Community Meeting Space
8. Green Design – Please refer to Attachment D of the applicant’s written statement; In order to facilitate analysis of the green features of the project, the applicant should provide, prior to a public hearing on this case, a LEED scorecard evaluation of the design.

The Commission found that the proffered benefits were commensurate with the amount of flexibility sought through the PUD, including that requested for the northwest building. These benefits will continue to be implemented with the construction proposed by the current application. The Office of Planning feels that the information regarding benefits is sufficient for setdown, and that implementation of the benefits is consistent with the previous PUD approval.

IX. AGENCY REFERRALS

If this application is set down for a public hearing, the Office of Planning will consult with the following government agencies for review and comment:

- Department of the Environment (DDOE);
- Department of Transportation (DDOT);
- Department of Housing and Community Development (DHCD);
- Department of Employment Services (DOES);
- Department of Parks and Recreation (DPR);
- Department of Public Works (DPW);
- DC Public Schools (DCPS);
- Fire and Emergency Medical Services Department (FEMS);
- Metropolitan Police Department (MPD); and
- DC Water.

X. COMMUNITY COMMENTS

The site is located in ANC 6D. As of this writing OP has not received any comments from the community.

XI. SUMMARY OF OP COMMENTS

OP supports the overall design for the northwest parcel and feels that it will contribute positively to pedestrian activity and the overall vitality and mix of uses of the Waterfront Station project. The proposal is in conformance with the First Stage PUD and is not inconsistent with the Comprehensive Plan, so OP therefore recommends setdown of the application. The following summarizes OP comments from this report, all of which can be addressed prior to a public hearing.

OP Comment	Planning and / or Zoning Rationale
Submit to the record additional renderings of the ground level private courtyards.	Renderings will help the Commission fully evaluate the design of the ground level, including layout and materials.
Examine ways to add balconies to the south side of the building.	Balconies would provide private outdoor space for residents and would reduce energy usage in the summer through shading.
Choose between terracotta and red brick for the material used on the upper floors of the building.	The two materials have very different character and selecting one will help the Commission and staff understand the appearance of the building.
Provide more information about external lighting for the entire building.	External lighting for the building will determine how it is viewed at night from the surrounding neighborhood.
Narrow or examine alternative configurations for the private street.	Narrowing the private street would potentially save additional existing mature trees. The Comprehensive Plan supports the preservation of tree canopy. Please refer to the Environmental Protection Element policies found in Attachment 1 of this report.
Provide a tree protection plan for use during construction.	Construction activity over a tree's critical root zone – such as the movement of heavy equipment or trucks, piling of fill material, or the storage of construction materials – can severely harm or kill a tree.
Provide a tree replacement plan.	Activities that do not follow the tree protection plan could destroy a tree during construction or damage it so that it dies after construction. Any trees accidentally destroyed should be replaced.
Provide more information about materials used in the private street. Consider adding a sidewalk in the vicinity of utility grates.	Additional information will help the Commission and staff fully evaluate the proposal. The street will be used by pedestrians, and the concentration of utility grates may make passage more difficult for

	heeled shoes.
Provide more information about landscaping – tree species and soil volume	Appropriate shade trees will enhance the pedestrian experience, while female ginkgo trees would detract from the appeal of this area. Sufficient soil volume is necessary to ensure trees grow to full maturity and provide maximum benefit as described in the Plan.
Revise plans to show bike parking.	This building would be located in a very bikeable location, and adequate access to bike parking will encourage bicycle use by residents.

XII. ATTACHMENT

1. Comprehensive Plan Analysis
 - A. Guiding Principles
 - B. Plan Policies
 - C. Land Use Maps

JS/mrj

Attachment 1 Comprehensive Plan Analysis

A. GUIDING PRINCIPLES

The proposal would further the following Guiding Principles of the Comprehensive Plan, as outlined and detailed in Chapter 2, the Framework Element:

- (1) Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives such as poverty, crime, and homelessness. 217.1
- (5) Much of the growth that is forecast during the next 20 years is expected to occur on large sites that are currently isolated from the rest of the city. Rather than letting these sites develop as gated or self-contained communities, they should become part of the city's urban fabric through the continuation of street patterns, open space corridors and compatible development patterns where they meet existing neighborhoods... 217.5
- (6) Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. 217.6
- (7) Growth in the District benefits not only District residents, but the region as well. By accommodating a larger number of jobs and residents, we can create the critical mass needed to support new services, sustain public transit, and improve regional environmental quality. 217.7
- (26) Transportation facilities, including streets, bridges, transit, sidewalks, and paths, provide access to land and they provide mobility for residents and others. Investments in the transportation network must be balanced to serve local access needs for pedestrians, bicyclists, transit users, autos and delivery trucks as well as the needs of residents and others to move around and through the city. 220.2

B. PLAN POLICIES

The application is also consistent with major policies from various elements of the Comprehensive Plan, including the Land Use; Transportation; Housing; Economic Development; Parks, Recreation and Open Space; and Lower Anacostia Waterfront / Near Southwest Area Elements. The design could more adequately meet the Environmental Protection element policies that encourage tree conservation and protection.

Chapter 3 Land Use Element

Policy LU-1.2.1: Reuse of Large Publicly-Owned Sites

Recognize the potential for large, government-owned properties to supply needed community services, create local housing and employment opportunities, remove barriers between neighborhoods, provide large and significant new parks, enhance waterfront access, and improve and stabilize the city's neighborhoods. 305.6

Policy LU-1.2.2: Mix of Uses on Large Sites

Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses. 305.7

§ 306.4 The District's Metrorail stations include 15 stations within the Central Employment Area and 25 "neighborhood" stations (see Map 3.5). Looking forward, certain principles should be applied in the management of land around all of the District's neighborhood stations. These include:

- A preference for mixed residential and commercial uses rather than single purpose uses, particularly a preference for housing above ground floor retail uses
- A preference for diverse housing types, including both market-rate and affordable units and housing for seniors and others with mobility impairments
- A priority on attractive, pedestrian-friendly design and a de-emphasis on auto-oriented uses and surface parking
- Provision of well-designed, well-programmed, and well-maintained public open spaces
- A "stepping down" of densities with distance away from each station, protecting lower density uses in the vicinity
- Convenient and comfortable connections to the bus system, thereby expanding access to the stations and increasing Metro's ability to serve all parts of the city
- A high level of pedestrian and bicycle connectivity between the stations and the neighborhoods around them

§ 306.8 To avoid adverse effects on low and moderate density neighborhoods, most transit-oriented development should be accommodated on commercially zoned land. Possible rezoning of such land in a manner that is consistent with the Future Land Use Map and related corridor plans should be considered.

Policy LU-1.3.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for economic and civic development in locations that currently lack adequate neighborhood shopping opportunities and employment. The establishment and growth of mixed use centers at Metrorail stations should be supported as a way to reduce automobile congestion, improve air quality, increase jobs, provide a range of retail

goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities which the stations provide. This policy should not be interpreted to outweigh other land use policies which call for neighborhood conservation. Each Metro station area is unique and must be treated as such in planning and development decisions. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. 306.10

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-1.4.2: 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. 307.5

Chapter 4 Transportation Element

§ 403.1 ...Coordinating transportation and land use decisions is critical to making the best use of infrastructure and finite land resources... The balance between housing and jobs plays a clear role in travel patterns. In general, the demands on our transportation system are reduced when homes are located close to places of employment and shopping. People spend less time traveling and overall quality of life may be improved. The transportation system as a whole benefits when more compact residential and employment areas are situated along major transit routes. Travel times are reduced and there is better use of public transportation investments.

Policy T-1.1.5: Joint Development

Attract new riders to the transit system by fostering transit-supportive commercial and residential joint development projects on Washington Metropolitan Area Transit Authority (WMATA) owned or controlled land and on private properties adjacent to Metrorail stations. 403.11

Policy T-1.2.3: Discouraging Auto-Oriented Uses

Discourage certain uses, like “drive-through” businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas. 404.8

Policy T-2.4.1: Pedestrian Network

Develop, maintain, and improve pedestrian facilities. Improve the city's sidewalk system to form a network that links residents across the city. 410.5

Policy T-2.4.2: Pedestrian Safety

Improve safety and security at key pedestrian nodes throughout the city. Use a variety of techniques to improve pedestrian safety, including textured or clearly marked and raised pedestrian crossings, pedestrian-actuated signal push buttons, and pedestrian count-down signals. 410.6

Chapter 5 Housing Element

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

Chapter 6 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-1.1.3: Landscaping

Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. 603.7

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

Chapter 7 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

Chapter 8 Parks, Recreation and Open Space Element

Policy PROS-4.3.1: Open Space in the Downtown Landscape

Sustain a high quality network of downtown pocket parks, courtyards, arcades, plazas, and rooftop gardens that provide space for recreation, scenic beauty, and outdoor activities for workers, visitors, and residents. 818.3

Chapter 19 Lower Anacostia Waterfront / Near Southwest Area Element

Policy AW-2.1.6: Waterside Mall

Support the redevelopment of Waterside Mall with residential, office, and local-serving retail uses. The site should be strengthened as a retail anchor for the surrounding Southwest community. Its redesign should restore 4th Street SW as part of the city street grid, and improve aesthetics, circulation, and connectivity to surrounding uses. 1511.12

C. LAND USE MAPS

The Generalized Policy Map designates the Waterfront Station site as a Land Use Change Area and an Enhanced / New Multi-Neighborhood Center. Land Use Change Areas are those areas anticipated to undergo redevelopment to a land use different from what exists today. Many of these areas should become mixed use communities. Multi-Neighborhood Centers are typically located at major intersections and along key transit routes. “These centers might include supermarkets, general merchandise stores, drug stores, restaurants, specialty shops, apparel stores, and a variety of service-oriented businesses” (Comprehensive Plan, § 223.17).

The Future Land Use Map recommends the subject site for High Density Commercial and High Density Residential development. High Density Commercial “is used to define the central employment district of the city and other major office employment centers on the downtown perimeter” (§ 224.14). Buildings are often greater than eight stories tall and C-3-C is listed as one of the compatible zone districts. High Density Residential is also characterized by buildings of eight stories or more. The planned development is consistent with these designations and the Office of Planning supports a mix of uses on the site at the scale proposed by the applicant.