MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director

DATE: October 5, 2012

SUBJECT: Zoning Commission Case No. 12-14 & 12-14A: **Setdown Report** for Consolidated Planned Unit Developments and Zoning Map Amendments for 3rd and M Street SW

I. SUMMARY RECOMMENDATION

3RD & M, LLC and Park Inn Associates, LP (collectively the "Applicant") have submitted two separate applications for consolidated Planned Unit Developments (PUDs) and related map amendments to collectively rezone Lots 816 and a portion of Lot 79 in Square 542 from R-5-D to CR to accommodate three new residential buildings with approximately 401 new residential units. Since the project site is non-contiguous, two applications (ZC Case No. 12-14 and 12-14A) bifurcate the site for procedural purposes.[1] Due to the close proximity of the project components, the common ownership, and the cohesive design and programming, the following OP report will consider most project features jointly and OP recommends that the Zoning Commission consider the applications in tandem. Overall, the proposal is not inconsistent with the Comprehensive Plan and, as such, the Office of Planning (OP) recommends that the PUDs and related map amendments be **setdown for public hearing**.

OP will continue to work with the Applicant to clarify several items prior to a public hearing, including:

- The adequacy of the proffered benefits and amenities package
- Areas of zoning flexibility

II. APPLICATION IN BRIEF

Location: The northwest corner of 3rd and M Streets SW; Square 542, Lot 816 and a portion of Lot 79;[2] Ward 6, ANC 6D.

Applicant(s): 3RD & M, LLC and Park Inn Associates, LP

Current Zoning: R-5-D

Property Size: Total: 108,895 square feet
North site (ZC #12-14): 76,106 square feet
South site (ZC #12-14A): 32,789 square feet

Proposal: On the North site, the Applicant proposes a PUD and related map amendment to accommodate three residential buildings, two of which would be new. In total, the North site would have buildings totaling 305,922 square feet (of which 195,672

[1] The Applicant originally filed a single submission for the project on August 13, 2012 and requested flexibility from § 2401.3, which states that "All of the property included in a PUD shall be contiguous, except that the property may be separated only by a public street, alley, or right-of-way." Following input from the Office of Attorney General and OP, the Applicant on October 1, 2012 submitted a modification to the original submission and filed a second submission dividing the project into two pieces.

[2] The submissions dated October 1, 2012 also identify the North site as Lots 816, 820, 821, and 869 and the South site also is identified as Lot 817. OP will work with the Applicant to clarify the appropriate lot designations for the site.

square feet would be new) with approximately 337 residential units (of which 209 would be new) and a limited amount of non-residential uses. The new buildings would measure 110' and 45' in height.

On the South site, the Applicant proposes a PUD and related map amendment to construct one new residential building totaling 171,809 square feet and containing approximately 192 units and a limited amount of non-residential use. The building would measure 110' in height.

In total, the Applicant proposes a project consisting of two PUDs with related map amendments to construct three new residential buildings and renovate an existing building which would total 477,731 square feet or 4.4 FAR, with 529 residential units and 2,940 square feet of non-residential use.

Relief and Zoning: Pursuant to 11 DCMR Chapter 24, the Applicant requested the following relief:

North Site (ZC #12-14):
1. PUD-related map amendment to CR
2. Rear yard requirements (§ 636)
3. Loading requirements (§ 2201.1)
4. Roof structure requirements (§ 411)

South Site (ZC #12-14A):
1. PUD-related map amendment to CR
2. Rear yard requirements (§ 636)
3. Loading requirements (§ 2201.1)
4. Roof structure requirements (§ 411)

Although not requested, OP recommends the applicant confirm whether additional flexibility is needed from the required standards for public open space at the ground level (§ 633) and for exceptions to building lot control for the North site (§ 2517).[3]

III. SITE DESCRIPTION

In total, the North and South sites include Lot 816 and a portion of Lot 79 in Square 542 (hereinafter, collectively the "Property"). The Property is zoned R-5-D. It is located on the northwest side of 3rd and M Streets, and faces K Street SW to the north. Presently, there are two existing 9-story, 90' tall buildings – the Pei Towers – on Lot 79. The northern Pei Tower (hereinafter, "North Pei Tower") is included in the North site application and would be renovated in coordination with the project. In contrast, the southern Pei Tower (hereinafter, "South Pei Tower") is a condominium not owned by the Applicant and is excluded from the PUD applications.[4] A more specific Property boundary, which carves out the South Pei Tower and a small accessory surface parking lot (located near the center of the site) can be found in the Applicant's October 1, 2012 Submissions Exhibit A, pages 0.5 N & 0.5S.[5] The Property also currently has surface parking lots at the northern and southern end of the Property and some green space between the Pei Towers.

[3] The requested relief changed slightly following the bifurcation of the project into two components. The original submission, dated August 14, 2012, requested relief from the side yard requirements (but not the rear yard standards).
[4] The Applicant has indicated that there has been some coordination with the South Pei Tower concerning the project. The exclusion of this building created the need for two separate PUD applications.
[5] It appears that the parking spaces in the accessory parking lot are separately deeded to individual condominium owners.

IV. AREA DESCRIPTION

To the immediate west of the Property is the Waterfront PUD (with related map amendment to C-3-C) consisting of the former 11-story Environmental Protection Agency towers which are currently being renovated for residential uses, the Waterfront Station development, consisting of the phased PUD development of high density commercial and residential uses flanking the newly installed 4th Street SW.[6] Among other features, residential towers of 114' in height are approved for the currently undeveloped northern portions of the Waterfront Station site, and 127' tall commercial buildings are approved for the undeveloped southern portions of the site. West of the Waterfront Station development, at the northeast corner of M and 6th Street SW, is the approved Marina View PUD and related map amendment from R-5-D to C-3-C zoning which incorporates two other similarly sited Pei towers.[7]

Additional Surrounding uses:

- To the east of the Property across 3rd Street are the Greenleaf Gardens housing complex, which include moderate density townhouses and garden-style apartment buildings zoned R-5-A.
- To the north of the Property, across K Street, is the Southwest Public Library.
- To the south of the Property, across M Street, are the Carrollsburg Square and Carrollsburg A Condominium complexes comprising a mix of high density residential buildings and moderate density residential row dwellings. The St. Matthews PUD and related map amendment from R-3 to CR to accommodate an 11-story residential building and rebuilt church was recently approved by the Commission for the southwest corner of M and Delaware Avenue SW.[8]
- More generally, relatively abrupt variation in residential building height is a notable characteristic of the area.

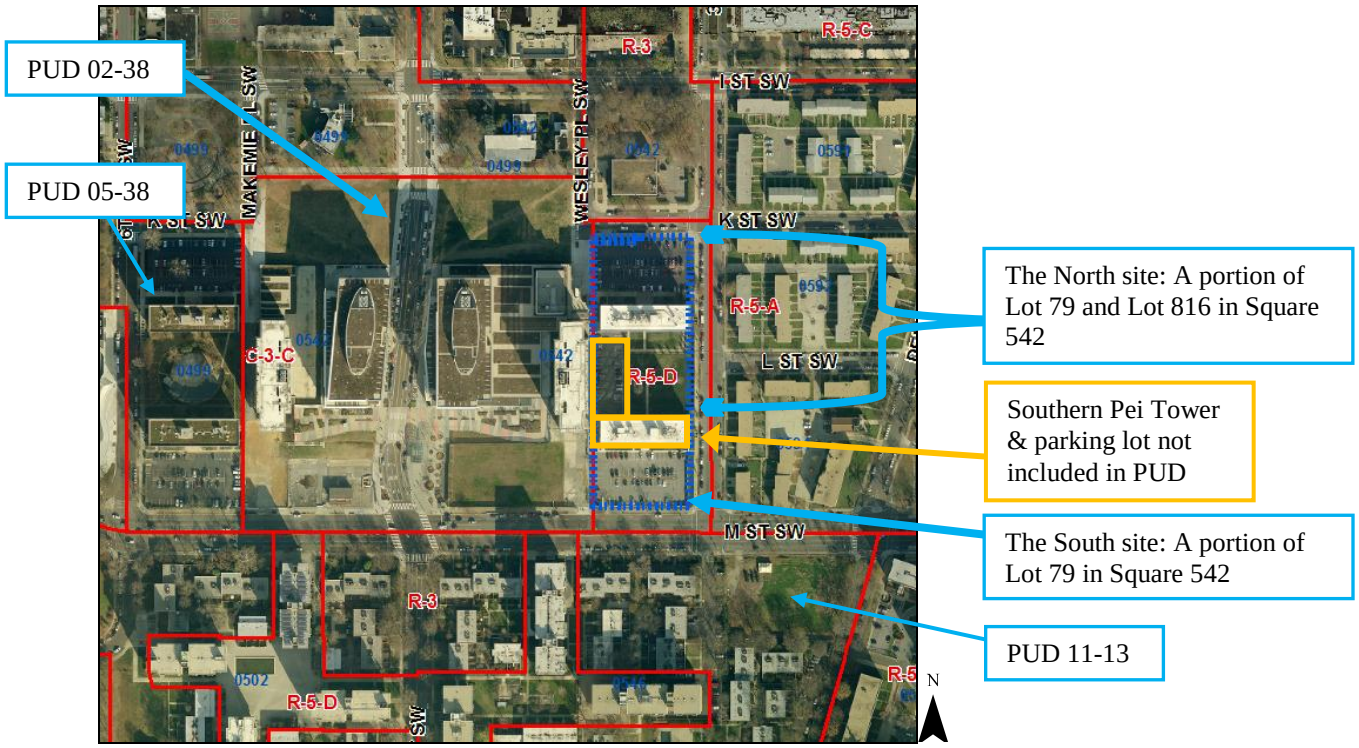

Exhibit 1: Zoning Vicinity Map

[6] See ZC Order #02-38 (2003) and #02-38A (2007).
[7] See ZC Order #05-38 (2007) and #05-38A (2008). The Marina View PUD also included two new parallel residential towers on the north and sound ends of the site.
[8] See ZC Order #11-13 (2012).

The M Street right-of-way is 120' wide, the 3rd Street right-of-way is 110' wide, and the K Street right-of-way is 80' wide. M Street accommodates six lanes of vehicular traffic. The subject site is approximately half-a-block from the Waterfront Metro Station and also is served by several bus lines and Capital Bikeshare. More generally, M Street is envisioned as a future streetcar route.

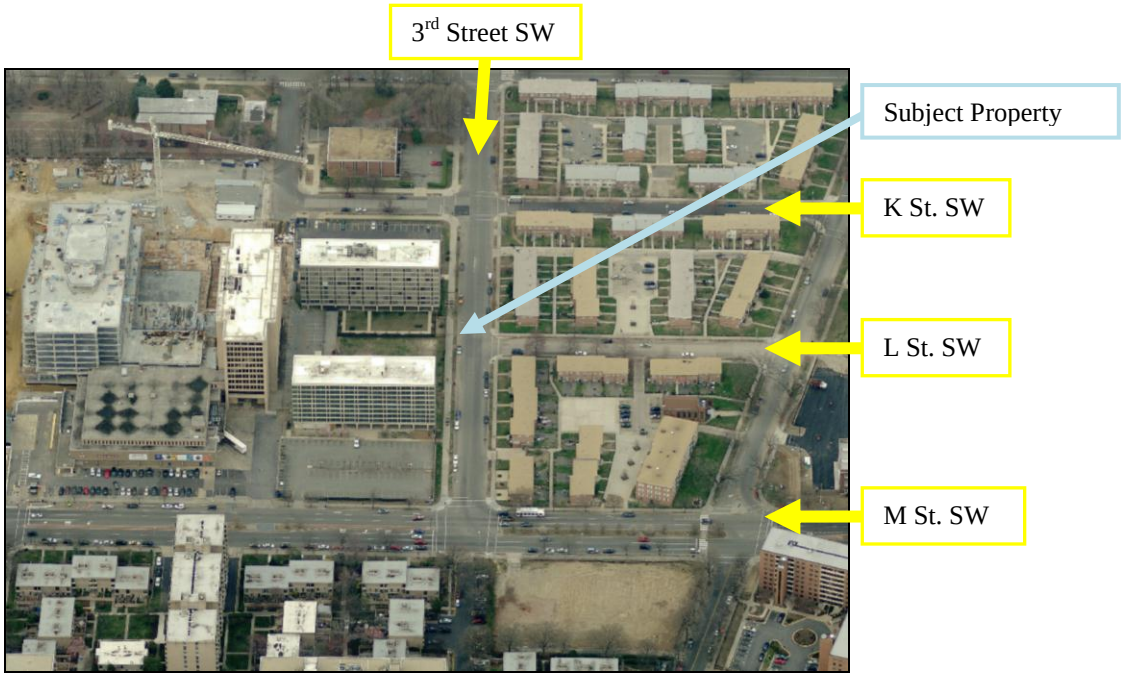

Exhibit 2: View of the Property Looking North Across M Street (2009 image)

V. PROJECT DESCRIPTION

The Applicant proposes two parallel 11-story buildings supplanting existing surface parking lots on the Property's north and south ends (hereinafter, the "North Tower" and "South Tower"). A 45' tall 4-story building (hereinafter, "Center Building"), sited perpendicular to the towers and fronting 3rd Street, would be built toward the middle of the Property.

Overall, the proposed project (including the North Pei Tower) would include a total of approximately 477,731 square feet or 4.4 FAR with the following components:

- The North Tower would contain approximately 190 residential units;
- The Center Building would contain approximately 19 residential units;
- The South Tower would contain approximately 192 residential units;
- Provision of affordable housing as outlined in a 2006 Land Disposition and Development Agreement (hereinafter, "LDA");
- Renovation of the North Pei Tower; and
- A small retail / office component of 2,940 square feet (or .03 FAR) is proposed for some space in the North and South Tower ground floors.

Concerning design, the application describes how the proposed North and South Towers would align and complement the existing Pei Towers. Among other features, the proposed North and South Towers would have "large glazing and exposed concrete frame," and the residential floors would be elevated "above the

ground on pilotis, with only minor lobby spaces occurring on the ground floor."[9] The top two floors would incorporate setbacks to accommodate terraces and pools and recreation space would be located on the roofs. A one-story glass pavilion would connect the North Tower and the North Pei Tower. The new Center Building would have stoops and entry doors along 3rd Street. Three new courtyard spaces would be formed between the towers. Renderings include in the application appear to show new fencing around portions of the Property.

The project would include a total of 289 below-grade parking spaces in two underground garages located beneath the North and South Towers. The Applicant has indicated that the existing North Pei Tower and proposed Center Building would share the parking spaces. Parking and loading for the proposed South Tower would be accessed by an existing private drive from M Street, and an existing curb cut on the Property's south side would be closed.[10] The North Tower's parking and loading would be accessed by a curb cut (substantially in the same location as an existing one) on the site's K Street side. Motor courts are proposed for pick-up and drop-off space in the interior of the sites. The project also would provide 40 interior and 20 exterior bicycle parking spaces.

The application indicates that the project is exempt from inclusionary zoning because it is subject to the affordability requirements of the LDA (which appears to exceed the housing affordability otherwise required under IZ). Additional detail regarding housing affordability is described on page 9 of the OP report.

VII. ZONING AND PUD RELATED MAP AMENDMENT

The site is currently zoned R-5-D. To the immediate west of the Property is a PUD with related C-3-C zone. To the north, across K Street, is an R-3 zone, to the east across 3rd Street is an R-5-A zone, and to the south across M Street is an R-3 zone. While the R-5-D zone is characterized by relatively high height and medium to high density residential use, the proposed CR (Mixed Use Commercial Residential District) encourages a diversity of compatible land uses that may include a mix of residential, office, retail, recreational, light industrial, and other miscellaneous uses.

The following table is a comparison of the R-5-D, CR, and CR/PUD standards for certain development features and the proposed development. Certain square footages have changed slightly from the original to the supplemental submissions as the Applicant has recalculated the project components. Nonetheless, the Applicant has indicated that no consequential project features have changed since the original submission.

Requirement	**R-5-D (Matter of right)**	**CR (Matter of right)**	**CR/PUD**	**Proposal (North site, #12-14)**	**Proposal (South site, #12-14A)**	**Proposal (Total)**	**Deviation**
Height (max.)	90'	90'	110'	110'/45'	110'	110'/110'/45'	Conforms
FAR (max.)	3.5	6.0 (total) 3.0 (non-residential limit)	8.0 (total) 4.0 (non-residential limit)	4.0 (residential) .01 (non-residential)	5.18 (residential) .06 (non-residential)	4.36 (residential) .03 (non-residential)	Conforms
Lot occupancy (max)	75%	75%	Same as MOR	49%	50%	49%	Conforms
Rear yard (min)	4 in. / ft. of height; not less than 15'	3 in. / ft. of height; not less than 12'	Same as MOR	16' (North Tower); 102'2" (Center	16' (South Tower)	16' for North and South Towers; 102'2"	*Relief needed*: 11'6" deficient for North and

[9] "Pilotis" are "a column of iron, steel, or reinforced concrete supporting a building above an open ground level." See dictionary.com.
[10] The Applicant indicates that the use of the private drive is governed by an easement.

		North and South Towers required 27'6"; Center Building 21'9"		Building)		for the Center Building	South Towers
Parking (min.)	1 for each 3 dwelling units	Residential: 1 for each 3 dwelling units North Site: (113 required) South Site: (64 required) Retail / Office in excess of 3,000 square feet, 1 for each additional 750 square feet of gross floor area: None required because retail / office of less than 3,000 square feet is proposed.	Same as MOR	Residential: 176 spaces Retail / Office: None	Residential: 113 spaces Retail / Office: None	Residential: 289 spaces (.55 spaces per dwelling unit) Retail / Office: None	Conforms

VIII. FLEXIBILITY

The following relief is required from the Zoning Regulations[11]:

- Rear yard
  Pursuant to § 636, a rear yard is required for each residential building in a CR zone at a minimum depth of three inches per foot of building height (but not less than 12 feet).[12] In this case, rear yards of 27'6" would be required to the west of the proposed North and South Towers. The existing Pei Towers currently have 16' deep rear yards on their west side, and the Applicant indicates that the proposed North and South Towers would match the 16' rear yard depth.[13] To the immediate west of the proposed 16' wide side yards are private driveways on adjacent properties. The Applicant indicates that providing conforming rear yards would be difficult due to the multi-building scheme and that open space included within the site would allow adequate light and air.

- Loading
  Section 2201.1 requires the loading facilities for the new towers include two 55' berths, two 200 square foot platform, and two 20' deep spaces for service/delivery. Instead, the project proposes that two 30' berths, two 200 square foot platforms, and two 20' deep service/delivery spaces be provided. The Zoning Commission "may reduce or increase the amount of such facilities [loading berth facilities] depending on the uses and the location of the project" pursuant to § 2405.6. The Applicant indicates that 55' loading berths would be "disruptive to the adjacent streets." The application

[11] See § 2405.7.
[12] In the Applicant's August 13, 2012 submission, the space was originally identified as non-conforming side yards.
[13] OP encourages the Applicant to address whether the proposed paseo on the ground level along the North Tower's west side effects the measurement of the rear yard's non-conformity.

provides drawings which seem to indicate that 55' trucks could be accommodated on-site when necessary.[14]

- Roof Structures of Unequal Height and Substandard Setback
  The Applicant requests relief for roof structure enclosures of unequal height and deficient setbacks from bounding walls. The roof structures vary in height between 15' to 18'6". The application indicates that the stepped down height would make the structures less intrusive by reducing the massing. Additionally, the 10th and 11th floor designs produce substandard penthouse setbacks which OP estimates are approximately 15' where 18'6" would be required. OP suggests that the Applicant clarify the amount of setback non-conformity.

OP also recommends that the Applicant address further whether the proposal satisfies § 633 "required public space at ground level." The application indicates that the project provides 23,850 square feet of open space, which exceeds the required 10,890 square feet (10% of the total lot area). But § 633 requires that the open space be "located immediately adjacent to the main entrance to the principal building or structure on the lot, and shall service as a transitional space between the street or pedestrian right-of-way and the building or structure." Additionally, the "area shall be suitably lighted and landscaped for public use … [t]he space shall be open and available to the general public on a continuous basis." The Applicant needs to clarify whether additional flexibility from this requirement is needed. The Applicant should also address whether relief for multiple buildings on one single lot (§ 2517) for the North site is required.

IX. PUD EVALUATION STANDARDS AND PUBLIC BENEFITS AND PROJECT AMENITIES

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

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

The application requests a change in zoning of the Property which would allow approximately 20' of additional building height above R-5-D limits. The proposal would capture little additional square footage in spite of the greater CR allowances. The project proposes an FAR of 4.4, an amount which is about half the density permitted under a CR PUD.[15] The CR zoning also accommodates the limited amount of retail and/or office use proposed.

The PUD standards further provide 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."[16] Based on the information provided, additional detail and attention is needed to determine the adequacy of the offered public amenities and benefits and how exactly the benefits exceed matter-of-right.

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

[14] See #12-12 Submission, dated October 1, 2012, Exhibit A, page 5.5N; see also #12-12A Submission, dated October 1, 2012, Exhibit A, page 5.2S.
[15] It actually appears that the project could also achieve an FAR of 4.4 through an R-5-D PUD.
[16] Section 2403.3.

development incentives requested, and any potential adverse effects according to the specific circumstances of the case." 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 the typical development of the type proposed…" (§ 2403.12). The application has offered the following amenities and benefits as an offset to the additional development gained through the application process:

1. *Urban design, architecture, landscaping or creation or preservation of open space* – The overall building form, specifically the distribution of height and massing, generally is appropriate of the site.

   The location of the new residential towers in place of existing surface parking lots are intended to complement the existing Pei Towers in orientation and design. The application provides that the proposed towers would contain large areas of fixed glazing picture windows and their central façade generally would align with the façade grid of the Pei Towers. The North and South Towers would have two-story high glass enclosed bases intended to reflect the open ground floors of the Pei Towers. The application indicates that the main massing of the new towers would rise to about 90' (equivalent to the height of the Pei Towers) before stepping back on the top two floors. Unlike the Pei Towers, the North and South Towers would include inward facing balconies. A one-story glass pavilion also would connect the North Tower and the North Pei Tower.

   Concerning the North and South Towers specifically, OP encourages the Applicant to examine whether the west and east facades of the new towers could benefit from additional glass, particularly at the street level. Additional renderings of the street level facades along M and K Streets could also provide a better sense of how the buildings may enhance street activity. OP also requests that the Applicant provide additional information about (1) the roof structures and intended programming; and (2) the utility of the one-story glass pavilion, its visual impact on the North Pei Tower, and its division of courtyard space.

   The proposed 4-story Central Building would replace underused space on the site (including an existing brick wall) and could generate additional activity along 3rd Street. OP suggests that the Applicant continue to study the relative proportions of the Central Building's height as it relates to the 90' Pei Towers to determine whether the 45' height is appropriate.

   The proposed location of the buildings creates distinct courtyard spaces. It appears that the South Tower and South Pei Tower would be separated by approximately 63', and the North Tower and North Pei Tower would be about 66' apart. The Pei Towers currently are divided by a distance of approximately 197'. OP encourages the Applicant to provide additional information concerning the landscaping, programming, and fencing around the various open spaces. The drawings indicate that the courtyards are intended primarily for building resident use. Further, OP suggests that the Applicant provide a fuller explanation of what space is intended to be publically versus privately accessible.[17]

   The Applicant should also confirm that any new transformers or PEPCO vault space is captured within the site and not in public space.[18]

2. *Site planning, and efficient and economical land utilization* – The proposal would enhance a currently underused site located within close proximity to a Metro station and several Metrobus lines. Buildings would replace two surface parking lots and create more active uses fronting three adjacent streets. The application also included shadow studies demonstrating the impact of the new development on neighboring properties.[19]

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[17] See #12-12 and #12-12A submissions dated October 1, 2012, Exhibit A, page 7.14.
[18] See #12-12 submission dated October 1, 2012, Exhibit A, page 2.2N; see also #12-12A submission dated October 1, 2012, Exhibit A, page 2.2S. The submissions appear to show that new vault space would be located in private property.
[19] See #12-12 and #12-12A submissions dated October 1, 2012, Exhibit A, pages 2.11N-2.16N & pages 2.11S-2.16S.

3. *Transportation features* – The application generally proposes to minimize curb cuts from adjacent streets, only incorporating a single existing curb cut along K Street in the proposed site design. A curb cut along M Street would be closed, and the project would instead utilize an existing private driveway to access parking on the site's south side. The project proposes two levels of underground parking beneath each new tower. Forty new interior and 20 exterior bicycle parking spaces are proposed. OP notes that the Applicant has participated in traffic study scoping meetings with DDOT, and OP recommends that the Applicant submit a transportation demand management plan for the project prior to any public hearing. Additional information is needed to explain how the proposed transportation features rise to the level of public benefits.

4. *Environmental benefits* – The application proposes at least LEED Silver Certification for the project. A LEED checklist for the new buildings and the renovated North Pei Tower are included in the October 1, 2012 submissions, Exhibit A, pages 6.1S & 6.0N-6.3N. The submissions include some landscape designs. The Applicant should flesh out the sustainable features of the development, such as the amount of green roof proposed.

5. *Employment and training opportunities* – OP encourages the Applicant to address the project's commitment to First Source Employment and CBE Agreements.

6. *Housing and affordable housing* – The project would create 401 new residential units on the site, in addition to the 128 existing units in the North Pei Tower. Additional information is needed regarding the unit mix. The application indicates that the project's affordable housing commitment is guided by an executed LDA. The application indicates that the project would provide 20% of its units as affordable: 5% to households making 50% or less than Area Median Income ("AMI"); 5% to households making 60% or less than AMI; 5% to households making 70% or less than AMI; and 5% to households making 80% or less than AMI.

   OP recommends additional information regarding the LDA commitment, unit count, square footage, unit mix, tenure of affordability and distribution of the units in the project be provided. Additionally, the Applicant should clarify whether the affordable unit commitment also includes the existing North Pei Tower. Although the affordable housing commitment exceeds IZ, OP needs additional information about the LDA to determine if the housing commitment is an amenity / benefit or if it is satisfying (but not exceeding) negotiated terms of the LDA.

7. *Historic Preservation* – The Applicant proposes to renovate the historically significant North Pei Tower.[20] Assuming the Historic Preservation Office considers the Applicant's commitment to be worthy of amenity / benefit consideration, OP encourages the Applicant to work closely with the Historic Preservation Office to develop a specific and quantifiable restoration plan.

8. *Uses of special value to the neighborhood or the District of Columbia as a whole* – The Applicant proposes the following additional public amenities / benefits:

   - Parking on 3rd Street – The Applicant proposes to coordinate with DDOT and to pay all costs associated with reconfiguring the on-street parking on 3rd Street along the east side of the Property and to plant street trees. OP understands that proposed angled parking, rather than the present curbside parking, could increase the number of parking spaces available and potentially provide a traffic calming effect to the wide 3rd Street right of way. Assuming that DDOT is receptive to the proposal, OP will work with the Applicant to better define the cost and timing of the conversion. In addition, clarity is needed to determine whether the additional parking spaces

[20] The Pei Towers are not historically landmarked.

created would largely function as spillover parking for tenants of the subject property or be available to the public at large.

- Improvements to the Southwest Public Library – The Applicant proposes to make a capital contribution to the Southwest Public Library. OP will work with the Applicant to clarify a more specific and quantifiable commitment.

Should the project be setdown, OP would continue to work with the Applicant to advance an appropriate level of amenities and benefits for the project. OP urges the Applicant to strengthen its proposed offering through additional discussions with the ANC.

X. COMPREHENSIVE PLAN LAND USE MAPS

The Future Land Use Map recommends the subject site for high density residential use. The proposed CR zoning, which is intended to accommodate a more intensive residential project, is consistent with the land use designation.

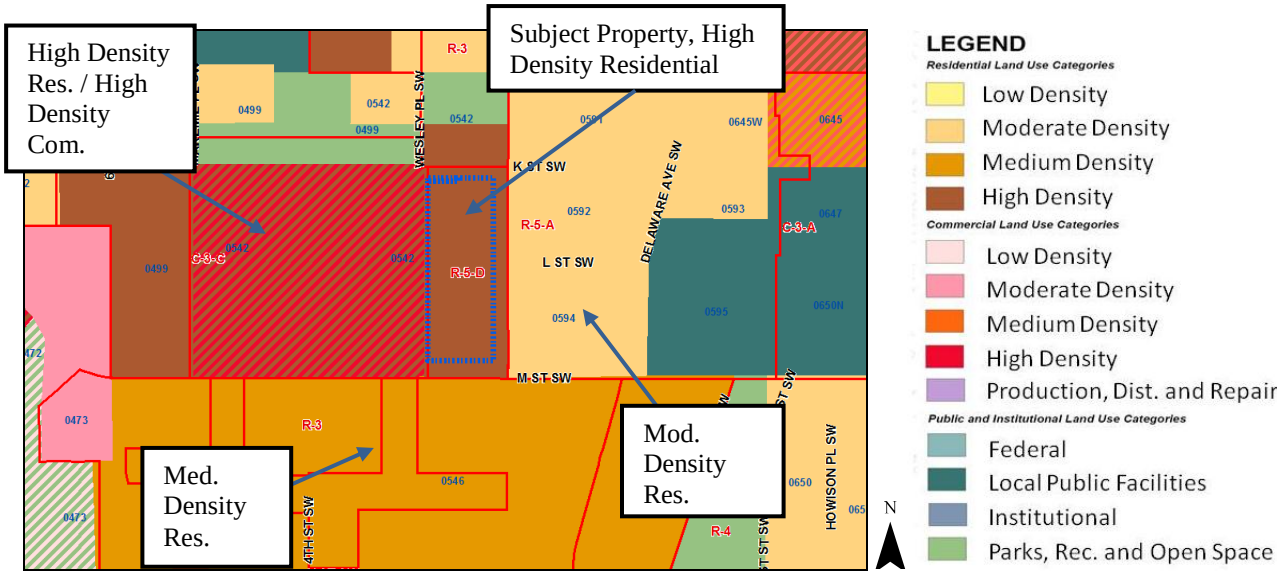

Exhibit 3: Comprehensive Plan Future Land Use Map

The Generalized Policy Map recommends the site as a neighborhood conservation area, where the guiding philosophy is to "conserve and enhance established neighborhoods." Further, the "diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area."

The Comprehensive Plan also provides the following land use policy guidance:

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.

Policy LU-1.4.1: Infill Development
Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create "gaps" in the urban fabric and detract from the character of a commercial or residential

street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern.

Policy LU-1.4.3: Zoning of Infill Sites
Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development.

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.

Policy H-1.1.5: Housing Quality
Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood.

Policy H-1.2.1: Affordable Housing Production as a Civic Priority
Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city.

Policy H-1.2.2: Production Targets
Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in the city over the next 20 years should be affordable to persons earning 80 percent or less of the area-wide median income (AMI). Newly produced affordable units should be targeted towards low-income households…

Policy H-1.2.5: Workforce Housing
In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, fire fighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city.

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.

Policy UD-2.2.1: Neighborhood Character and Identity
Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context.

Policy AW-1.1.1: Conservation of Established Waterfront Neighborhoods
Revitalize and preserve established neighborhoods in the Waterfront Planning Area. Continued investment in the existing housing stock and in established local commercial areas should be strongly encouraged.

Policy AW-2.1.1: Mixed Use Development

Support the redevelopment of the Southwest Waterfront with medium to high-density housing, commercial and cultural uses, and improved open space and parking. The development should be designed to make the most of the waterfront location, preserving views and enhancing access to and along the shoreline.

XI. AGENCY REFERRALS

Subsequent to setdown for a public hearing, the application would be referred to District government agencies for review and comment, including:

- Department of Transportation (DDOT);
- Department of the Environment (DDOE);
- Fire and Emergency Medical Services Department (FEMS);
- DC Water;
- DC Public Schools (DCPS);
- Department of Housing and Community Development (DHCD);
- Department of Public Works (DPW);
- Department of Employment Services (DOES); and
- Department of Health (DOH).

JS/pg
Case Manager, Paul Goldstein