

## MEMORANDUM

**TO:** District of Columbia Zoning Commission

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

**DATE:** January 15, 2016

**SUBJECT:** **Set down Report** for ZC Case No. 15-29, Consolidated PUD and PUD Related Map Amendment from C-2-A and R-1-B to C-2-B for 7828 Georgia Avenue, N.W.

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### I. SUMMARY RECOMMENDATION

The Office of Planning (OP) recommends that the application Jemal's Gateway DC, L.L.C. be **set down** for public hearing for a:

- Consolidated PUD; and
- PUD-related map Amendment from C-2-A and R-1-B to C-2-B with related relief from specific regulations as noted in the application.

Prior to the public hearing the applicant needs to provide:

1. Consider designing the building to read horizontally, providing for a separation between the retail and residential sections of the building, as opposed to the verticality of the design, where the ground floor retail "reads up", resulting in a commercial or office appearance to the façade.
2. Provide details to activate the area between the public space and the building, including the area contained within the building restriction line along the Alaska Avenue frontage. Such details could include outdoor seating and plantings, and how that space would be integrated into the building and the sidewalk.
3. Consider designing the residential windows on the west side of the building facing the Georgian-style residences to be more contextual with those residences.
4. A more detailed and comprehensive benefits and amenities proffer, commensurate with the flexibility gained through the PUD.

### II. APPLICATION-IN-BRIEF

**Location:** Square 2960, Lot 17

**Ward and ANC:** Ward 4, ANC 4A02

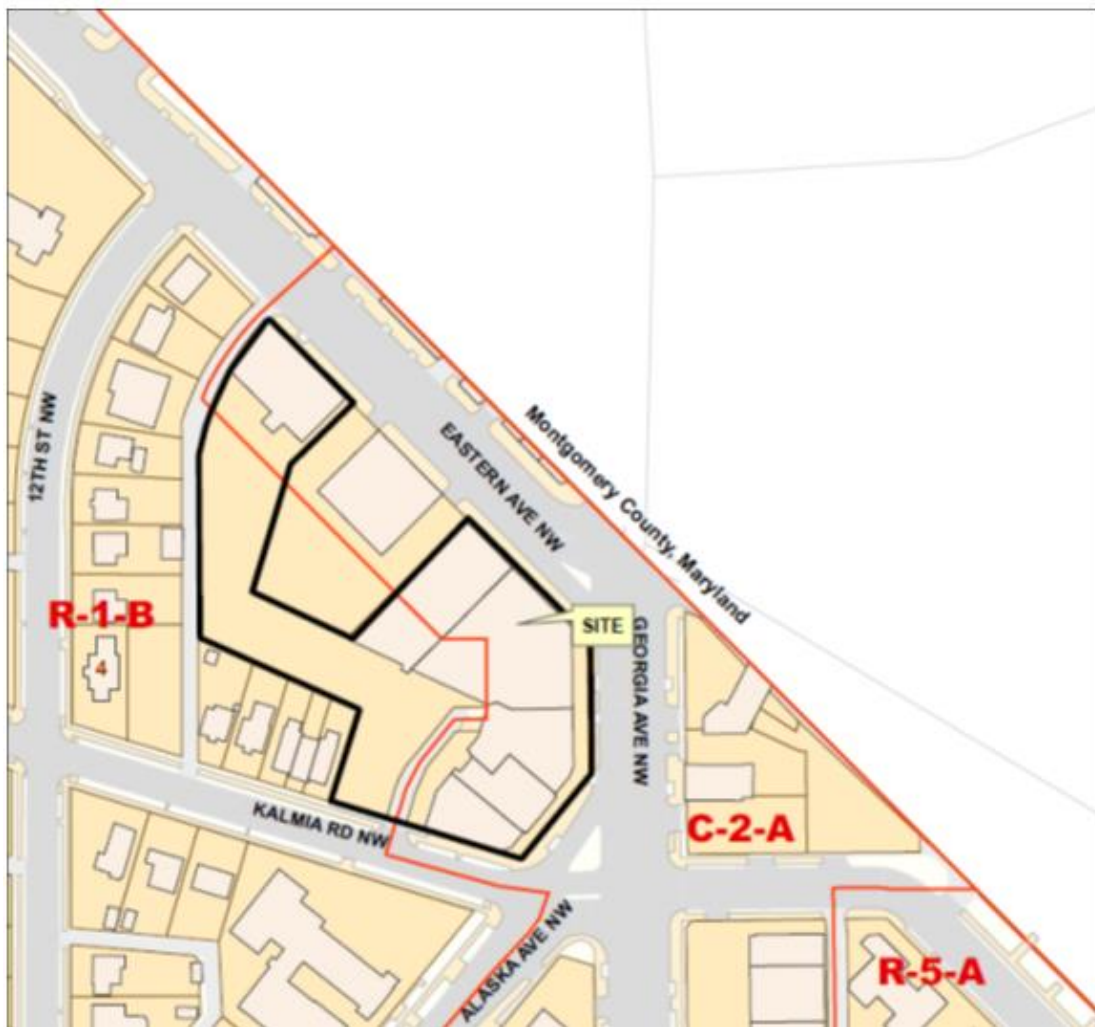
**Applicant:** Jemal's Gateway DC, L.L.C.

**PUD-Related Zoning:** C-2-A and R-1-B to C-2-B

**Property Size:** 87,522 square feet (2.01 acres)

**Proposal:** Construction of a mixed-used building consisting of approximately 199 residential units (189,099 square feet), 56,079 square feet of ground-floor retail and 28,130 square feet of community space for a total gross floor area of 273,308 square feet.

### III. SITE AND AREA DESCRIPTION



**Zoning Map**

The area of the PUD is shown within a solid black line. Properties surrounding the site include:

North: A five-story retail/office building with surface parking. Across Eastern Avenue are two-story commercial buildings.

South: One-family detached and triple-attached dwellings. Across Kalmia Road is a church.

East: Across Georgia Avenue, auto repair and one and two-story commercial buildings.

West: One-family detached dwellings.

#### **IV. PROJECT DESCRIPTION AND ANALYSIS**

The subject property is unusually shaped, with the bulk of the site on the east side of the property. An “arm” extends westward from the bulk of the site before curving northward to Eastern Avenue, resulting in a “hook-shaped” property. The “arm” extends around three sides of a five-story office building fronting on Eastern Avenue, developed with a surface parking lot around three sides of the building. A fifteen-foot wide building restriction line runs along the Kalmia Road and Alaska Avenue frontages.

Proposed for the site is a mixed-use building that would consist of ground floor retail, including a 56,079 square-foot grocery store on the east side of the building that would occupy most of the ground floor. An additional 2,735 square feet of ground floor retail would be located on the west side of the building, facing Eastern Avenue, with two floors above, one for 8,370 square feet of office space and the other for 7,342 square feet of community space. A lobby adjacent to this retail space would provide access to the community space. The table included in Section VI of this report provides additional development details.

The 199 residential units would be located on the east side of the building and include studio, one-bedroom, one-bedroom den and two bedroom units. The residential lobby would face Kalmia Road, a residential street. The two sections of building, the residential and the community/office space components, would be connected via a one-story segment that would enclose all of the loading operations and a portion of the larger retail space proposed to be devoted to the supermarket.

Residential and retail parking would be accessible from Kalmia Road on two below-grade levels providing 171 off-street parking spaces and 88 long term bicycle spaces, six of which would be available for the retail uses. Residential and retail loading would be on the west side of the building, directly accessible from Eastern Avenue.

A residential center court would be provided on the east side of the building, designed as a closed court on the second and third floors, and as an open court above, allowing for exterior windows to those units located on the inside of the double-loaded corridor. Above the third floor this court would become an open court, with the opening facing westward toward Kalmia Road. No court would be provided on the ground floor as this would be part of the area devoted to a supermarket. Many of the residential units would include balconies and private patios would be provided for some residential units on the top floor.

The exterior of the building is designed to appear to be divided into sections, each consisting of different materials, colors and window treatments. Window spacing on the ground floor, the

retail level, would generally align with the residential windows above, repeating the same window pattern and facade materials, but not providing for a visual separation from the two main uses of eastern side of the building, retail and residential. All residential windows should be designed to be, and appear as, operable. Provision of a horizontal separation between the two main uses of the building, commercial and retail, would create a more residential appearance to the façade on the upper floors, while exhibiting street-level commercial uses at the base of the building. On the west side of the building, the component proposed to contain retail and community space, the façade is more successful in providing a visual separation, with different window spacing and brick patterns between the ground floor and those above.

The tallest portion of the building would face Georgia, Alaska and Eastern avenues, away from the two-story residences fronting on Kalmia Road and 12<sup>th</sup> Street. The building would taper down toward these residences, to a height of one and two-story sections of building. A façade of red brick would be used on the east side of the building, where the subject property abuts the rear yards of one-family dwellings or the public alley. Cascading plants would be provided on the portion of wall facing the residential rear yards, softening the effect.

The building is designed to LEED Gold standards at a score of 61. Much of the roof above the one-story segment of the building, including the area above the indoor loading facilities, would be dedicated to an intensive green roof. Additional green roof plantings would be provided along the western edge of the residential portion of the building, adjacent to private residential patios for some of the sixth floor units. Mechanical equipment would also be located on the roof.

New sidewalks would be installed around the site, with new street trees planted where necessary. Bike racks, trash receptacles, benches, planter boxes and street lights would also be installed. In coordination with DDOT a bus shelter on Georgia Avenue would be relocated. Additional plantings, including shrubs, ornamental trees and ground cover would be provided along the Kalmia Road frontage within the building restriction line.

## **V. COMPREHENSIVE PLAN**

The application is consistent with major policies from various elements of the Comprehensive Plan, including the Land Use, Transportation, Housing, Environmental Protection, Economic Development and Urban Design Citywide Elements, and the Rock Creek East Area Element.

### **GUIDING PRINCIPLES**

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

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

## **PLAN POLICIES**

### **Chapter 3 Land Use Element**

#### *Policy LU-2.4.5: Encouraging Nodal Development*

*Discourage auto-oriented commercial “strip” development and instead encourage pedestrian-oriented “nodes” of commercial development at key locations along major corridors. Zoning and design standards should ensure that the height, mass, and scale of development within nodes respects the integrity and character of surrounding residential areas and does not unreasonably impact them. 312.9*

The proposed development would provide a pedestrian-oriented development at a gateway entrance to the city along Georgia Avenue, a major corridor. The proposed building would taper down in height from east to west, with window treatments and a brick façade reminiscent of the adjacent one-family dwellings along the western facade.

### **Chapter 4 Transportation**

#### *Action T-2.3.A: Bicycle Facilities*

*Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. 409.11*

A secure long term bicycle storage facility would be provided within the below-grade parking garage. A second area for use by employees would be provided on the upper level of the below-grade garage. Additional bicycle racks would be provided outside of the building for use by the public.

### **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*

Currently developed with two one-story retail buildings and surface parking lots, the proposed PUD would create new housing on this currently underutilized property. Approximately four percent of the residential gross floor area would be devoted to low-income households earning up to fifty percent of the Area Median Income (AMI). An additional four percent of would be devoted to moderate-income households earning up to eighty percent AMI.

## **Chapter 6 Environmental Protection Element**

### *Policy E-1.1.2: Tree Requirements in New Development*

*Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. 603.5*

### *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*

### *Policy E-4.2.3: Control of Urban Runoff*

*Continue to implement water pollution control and “best management practice” measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. 619.8*

The application indicates that the building would be designed to LEED Gold standards, with a minimum score of sixty, and would conform to the minimum GAR requirement of 0.30. An intensive green roof with more than eight inches of growing media would be installed on much of the one-story sections of the building, while an extensive green roof with less than eight inches of growing media would be provided on much of the remainder of the building. Landscaping, including shade trees and small trees, would be planted within public space. On the south side of the building, between the building restriction line and the property line, shade trees, small trees, shrubs and groundcovers would be installed.

## **Chapter 8 Economic Development**

### *Policy ED-2.2.6: Grocery Stores and Supermarkets*

*Promote the development of new grocery stores and supermarkets, particularly in neighborhoods where residents currently travel long distances for food and other shopping services. Because such uses inherently require greater depth and lot area than is present in many commercial districts, adjustments to current zoning standards to accommodate these uses should be considered. 708.10*

The proposed building would include a new 56,079 square-foot supermarket where one does not currently exist.

## **Chapter 9 Urban Design**

### *Policy UD-1.4.2: City Gateways*

*Create more distinctive and memorable gateways at points of entry to the city, and points of entry to individual neighborhoods and neighborhood centers. Gateways should provide a sense of transition and arrival, and should be designed to make a strong and positive visual impact. 906.8*

### *Policy UD-2.2.3: Neighborhood Centers*

*Undertake strategic and coordinated efforts to create neighborhood centers, civic buildings, and shopping places that reinforce community identity. 910.9*

### *Policy UD-1.4.5: Priority Avenues/Boulevards*

*Focus the city's avenue/boulevard design improvements on historically important or symbolic streets that suffer from poor aesthetic conditions. Examples include North and South Capitol Streets, Pennsylvania Avenue SE, and Georgia Avenue and the avenues designated by the "Great Streets" program. 906.11*

The site, located just inside the District line on Georgia Avenue, would add a grocery store and a small retail space to this neighborhood center. A space for community use, where the local ANC could hold its meetings, would provide a civic aspect to the development, contributing toward community identity.

## **Chapter 22 Rock Creek East Area Element**

### *Policy RCE-1.1.2: Design Compatibility*

*Ensure that renovation, additions, and new construction in the area's low density neighborhoods respects the scale and densities of adjacent properties, avoids sharp contrasts in height and mass, and preserves parklike qualities such as dense tree cover and open space. 2208.3*

### *Policy RCE-1.1.3: Directing Growth*

*Concentrate economic development activity and employment growth in Rock Creek East around the Georgia Avenue/Petworth Metrorail and Takoma station areas, along the Georgia Avenue corridor, along Kennedy Street, and on 14th Street NW between Allison and Decatur Streets. Provide improved pedestrian, transit, and bicycle access to these areas, and improve their visual and urban design qualities in order to create a unique destination for the local community to enjoy. 2208.4*

### *Policy RCE-1.1.6: Development of New Housing*

*Encourage the retention of existing subsidized housing units within the Rock Creek East Planning Area, along with other measures to increase housing choices and improve housing*

*affordability for area residents. This should include the production of new mixed income housing along Georgia Avenue, and the encouragement of mixed income housing in the industrially zoned area west of Georgia Avenue between Upshur and Shepherd, and on District-owned land along Spring Road near the Petworth Metro Station. A particular emphasis should be placed on providing low cost affordable housing for seniors. 2208.7*

*Policy RCE-1.2.3: Gateways*

*Enhance 16th Street, Georgia Avenue, and New Hampshire Avenue as gateways into the District of Columbia. 2209.3*

*Policy RCE-2.3.1: Upper Georgia Avenue*

*Develop Upper Georgia Avenue (from Decatur to Eastern) as a walkable shopping street with distinct and clearly identifiable activity centers along its course. Encourage development that reinforces a nodal pattern, with new retail or local-serving office development clustered at key locations and new housing or mixed use development on underutilized commercial properties in between. Conserve existing housing along the corridor and support its maintenance and renovation. 2213.7*

The subject property is located within the Upper Georgia Avenue /Walter Reed Rock Creek East Policy Focus Area. The addition of this building would provide significant redevelopment of underutilized commercial properties while adding retail diversity and housing to this gateway location. It would improve and maintain Georgia Avenue as a walkable shopping street with the addition of a large supermarket and a small amount of local-serving office space along the Eastern Avenue frontage of the building. The building would be at its greatest height on the east side, along Georgia Avenue, before tapering down to a height of one to three stories, respecting the adjacent one-family dwellings of Shepherd Park.

The majority of the building would introduce mixed income housing in conformance with the Inclusionary Zoning requirements while providing development activity along the Georgia Avenue corridor. Bicycle parking would be provided within the building for tenants and employees and outside for visitors.

The proposed building does not take full advantage of the opportunity to improve the visual and urban design qualities of the site. Revisions to the façade could take advantage of an opportunity to separate the residential and the commercial uses of the building, including the addition of windows that give the appearance of being operable residential windows.

In summary, the proposal is consistent with the policies of the Rock Creek East Area Element of the Comprehensive Plan, provided the applicant takes the opportunity to soften the design the residential façade of the, and visually separates the retail and residential uses as they appear from the street.



## Upper Georgia Avenue Great Streets Redevelopment Plan

This plan, approved by Council in 2008, is a part of the Great Streets Initiative. It is a revitalization strategy and framework for Georgia Avenue from Decatur Street to Eastern Avenue that promotes new retail and housing units. Lack of off-street parking and the existing small and narrow retail spaces are viewed as impediments to the economic vitality of the area and ability to compete with downtown Silver Spring.

Located in Zone 1 of the plan, which extends from Fern Street on the south and Eastern Avenue on the north, the intersection of Georgia and Eastern is identified as a major development opportunity. As a gateway, the proposed building would have the opportunity to anchor this gateway into the District. Zone 1 is identified as having the ability to support one-hundred to two-hundred new dwelling units, and 50,000 to 60,000 square feet of neighborhood goods and services, such as a grocery store.

The proposed building could address the grocery store, new dwelling unit and off-street parking needs of Zone 1 of the Upper Georgia Avenue Great Streets Redevelopment Plan. As a gateway location, the applicant has the opportunity to take better advantage of this anchor site at the entrance to the District with a mixed-use residential and commercial building.



### -LAND USE MAPS

The Generalized Policy Map, shown to the left, designates the site as Main Street Mixed Use Corridor, with the exception of the portion of the site fronting on Kalmia Road, which is designated as Neighborhood Conservation Area. Main Street Mixed Use Corridors are those where a “*common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper story residential or office uses. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment.*”



The Future Land Use Map, shown above, designates the site for Mixed Use, a combination of Low Density Commercial, areas where “*retail, office and service businesses are the predominant uses,*” and Moderate Density Residential, “*characterized by a mix of single family homes, two to four unit buildings, row houses and low-rise apartment buildings*”. The planned development is consistent with these designations and the Office of Planning supports the mix of uses as proposed by the applicant.

## VI. ZONING

The applicant is requesting a PUD-related map-amendment from:

- C-2-A to C-2-B PUD for the Eastern, Georgia and Alaska Avenue frontages and the eastern portion of Kalmia Road; and
- R-1-B to C-2-B for the remainder of the site.

C-2-B PUD is requested for the site to accommodate the building height and FAR. R-1-B permits a building height of up to forty feet and C-2-A permits a building height of fifty feet and a total FAR of 2.5. The applicant proposes a building height of seventy-five feet and an FAR 3.2.

The following table is a comparison of the R-1-B, C-2-A, C-2-B and C-2-B PUD for the PUD.

	<b>R-1-B</b>	<b>C-2-A</b>	<b>C-2-B</b>	<b>C-2-B PUD</b>	<b>Proposal</b>
<b>PUD Area (min.)</b>	2 acres	15,000 SF	15,000 SF	15,000 SF	88,483 SF
<b>Height (max.)</b>	40 feet	50 feet	65 feet	90 feet	75 feet
<b>FAR (max.)</b>					
<b>-Residential</b>	--	2.5	3.5	6.0	2.2
<b>-Commercial</b>	--	1.5	1.5	2.0	1.0
<b>-TOTAL</b>	--	2.5	3.5	6.0	3.2
<b>Lot Occupancy (max.)</b>					
<b>-Residential</b>	60%	60%	80%	80%	53%
<b>-Commercial</b>	--	100%	100%	100%	94%
<b>Open Court (min.)</b>	6 feet	15 feet	15 feet	15 feet	6 feet, 11 inches*
<b>Rear Yard (min.)</b>	25 feet	15 feet	15 feet	15 feet	45 feet
<b>Parking (min.)</b>					
<b>-Residential</b>	--	1/2 du's=100	1/3 du's=66	1/3 du's=66	141
<b>-Retail</b>	--	177	71	71	130
<b>Loading (min.)</b>					
<b>-Residential</b>					
<b>-Berth</b>	--	1@55 feet	1@55 feet	1@55 feet	1@55 feet
<b>-Platform</b>	--	1@200 feet	1@200 feet	1@200 feet	1@200 feet
<b>-Delivery</b>	--	1@20 feet	1@20 feet	1@20 feet	None*
<b>-Retail</b>					
<b>-Berth</b>	--	1@30 feet & 1@55 feet	1@30 feet & 1@55 feet	1@30 feet & 1@55 feet	1@30 feet & 1@55 feet
<b>-Platform</b>	--	1@100 SF & 1@200 SF	1@100 SF & 1@200 SF	1@100 SF & 1@200 SF	1@100 SF & 1@200 SF
<b>-Delivery</b>	--	1@20 feet	1@20 feet	1@20 feet	1@20 feet
<b>GAR</b>		0.30	0.30	0.30	TBD**

\* Flexibility requested

\*\*The application indicates the final number has yet to be determined, but that the development would conform to the requirements of Section 3401, Applicability of Green Area Ratio Standards

A summary of each area of relief is provided and OP will provide a complete analysis of the requested flexibility at the time of the public hearing.

**Flexibility:**

- a. **Open Courts:** Regulations require a minimum width of 15 feet and the applicant proposes a width of 6 feet, 11 inches for an open court facing Kalmia Road adjacent to the parking garage entrance.
- b. **Compact Parking Spaces:** Regulations require compact parking spaces in groups of no less than five and the applicant proposes to provide some of these spaces in groups of one and two.

- c. **Loading:** Regulations require a one service/delivery space for the apartment building and the applicant proposes that the retail and residential uses share one service/delivery space.
- d. **Additional Areas of Flexibility:** The applicant requests flexibility to vary the number of residential units by up to 10 percent; vary the location and design of all interior components; number, vary the location and arrangement of vehicular and bicycle parking, but not below the minimum required; vary the sustainable design features without reducing the LEED points below 60; vary the final design features based on availability and to conform with all District laws and regulations; and vary the location and design of ground floor components to ensure conformance with all District laws and regulations.

## **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 consolidated PUD for a portion of the site. 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 PUD related map amendments would increase the building height from 50 feet to 75 feet, and the FAR from 2.5 to 3.2. The PUD includes a number of benefits for the project, as identified by the applicant, including:

1. Urban Design, Architecture and Landscaping: The proposed PUD would eliminate one-story commercial buildings with accessory surface parking with a multi-story, mixed-use building with below-grade parking and loading internal to the building.
2. Effective and Safe Vehicular and Pedestrian Access: The proposed design of the loading would locate all truck movements within the building. Secure bicycle parking would be provided within the building for tenants and additional bicycle parking would be provided in public space adjacent to the building.
3. Special Value for the Neighborhood: The proposed development would provide a community room that would be available to the ANC and other community organizations, contribute \$25,000 to Shepherd Elementary School, dedicate rental units for the elderly and restrict building residents from obtaining Residential Parking Permits.
4. Housing and Affordable Housing: Approximately four percent of the residential gross floor area would be set aside as affordable for households earning up to fifty percent of AMI, and an additional four percent would be set aside for households earning up to eighty percent of AMI, consistent with IZ. An additional eight percent of the residential gross floor area would also be set aside for households earning up to eighty percent AMI that would be improved with grab bars, lower sinks, walk-in showers and higher toilets.
5. Environmental Benefits: The applicant proposes to provide street tree planting and maintenance, landscaping, alternative energy sources and energy efficiency, green engineering and stormwater runoff reduction. The building would be designed to LEED Gold standards, and a checklist was submitted with the application.

OP will continue to work with the applicant to refine and expand this list should the application be set down by the Commission.

#### **IX. AGENCY REFERRALS**

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

- Department of Energy and Environment (DOEE);
- Department of Transportation (DDOT);
- Department of Housing and Community Development (DHCD);
- Department of Public Works (DPW);
- Fire and Emergency Medical Services Department (FEMS);
- Metropolitan Police Department (MPD); and
- District of Columbia Water and Sewer Authority (DC Water).

## **X. COMMUNITY COMMENTS**

On September 1, 2015 ANC 4A, at a regularly scheduled public meeting, adopted a resolution in support of the application.

## **XI. CONCLUSION**

The proposed PUD would redevelop the subject property, currently an underutilized one-story commercial property with surface parking, into a mixed-use multi-story mixed-income property at this prominent gateway entrance to the District along Georgia Avenue, designated as a great street. The addition of a supermarket on the ground floor would address a need not currently available within the neighborhood. Although the building would be six stories in height on its east side, facing Georgia Avenue, it would step down from east to west to one, two and three stories in height, where it abuts one-family dwellings, while a red brick facade similar to that of many of the existing one-family dwellings would be incorporated into the western facade. Should the Commission set down this application, OP would continue to work with the applicant to refine the architecture to more effectively announce its residential uses on the upper floors, while continuing to provide retail on the ground floor.

The application is not inconsistent with the Comprehensive Plan and would further many of its policies. Therefore, OP recommends the application be set down for public hearing and will continue to work with the applicant to respond to requests for additional information prior to the public hearing.

JS/sjm<sup>AICP</sup>