

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: *JL for* Jennifer Steingasser, Deputy Director

DATE: June 3, 2016

SUBJECT: **Setdown Report** for ZC #16-09, Central Armature, 1200 3rd Street, NE Consolidated Planned Unit Development and Related Map Amendment

I. SUMMARY RECOMMENDATION

Trammell Crow has submitted an application for a consolidated PUD and related map amendment to construct a mixed-use development on 3rd Street, NE, east of the NoMa metro station. The application also seeks flexibility to a number of provisions of the Zoning Regulations. The proposal is generally not inconsistent with the Comprehensive Plan. And although OP has discussed with the applicant ways that the project could more fully comply with the Production, Distribution and Repair (PDR) goals of the Comprehensive Plan, those matters could be addressed with additional information submitted prior to a public hearing. The Office of Planning (OP), therefore, recommends that the application be set down for public hearing.

II. APPLICATION-IN-BRIEF

Location	1200 3 rd Street, NE, between M Street on the south, Florida Avenue on the north, 3 rd Street on the east, and the railroad tracks to the west; Ward 6, ANC 6C
Property Size	106,139 square feet (2.44 acres)
Applicant	1200 3 rd Street, LLC (Trammell Crow)
Current Zoning	C-M-3, Industrial / Commercial
Existing Use of Property	Office, warehouse and manufacturing headquarters for an electrical apparatus repair, supply and construction company, serving commercial and industrial clients.
Proposed Zoning	C-3-C, High Density Mixed Use
Comprehensive Plan Future Land Use	Medium Density Residential; Production, Distribution and Repair

Proposed Use of Property	<p>A single mixed use building occupying almost 100% of the site and consisting of two residential towers and a hotel tower, all above a retail podium level;</p> <ul style="list-style-type: none"> - 120' in height, plus occupiable penthouse space - Total- 6.98 FAR, 740,511 sf - Residential – 5.24 FAR, 555,910 sf, 650 units - Hotel – 1.14 FAR, 121,101 sf, 200 rooms - Retail – 0.26 FAR, 27,084 sf (plus ~23,000 sf below grade) - Parking and Service – 0.29 FAR, 30,268 sf (plus other below grade parking)
Requested Flexibility	<ol style="list-style-type: none"> 1. PUD-related map amendment from C-M-3 to C-3-C; 2. § 411.4(c) – allow penthouse restaurant; 3. § 411.9 – varied heights for habitable portion of penthouse; 4. § 775 – side yard; 5. § 2115.9 – allow hotel valet parking to count toward required parking; 6. § 2201 – no 55' loading berth; 7. § 2605 – flexibility to concentrate IZ units; 8. Flexibility to vary the: <ol style="list-style-type: none"> a. exact number of units, hotel rooms, and parking spaces; b. size of the underground garage footprint; c. retail façade design; d. streetscape, in order to coordinate with DDOT and adjacent property owners; e. phasing.

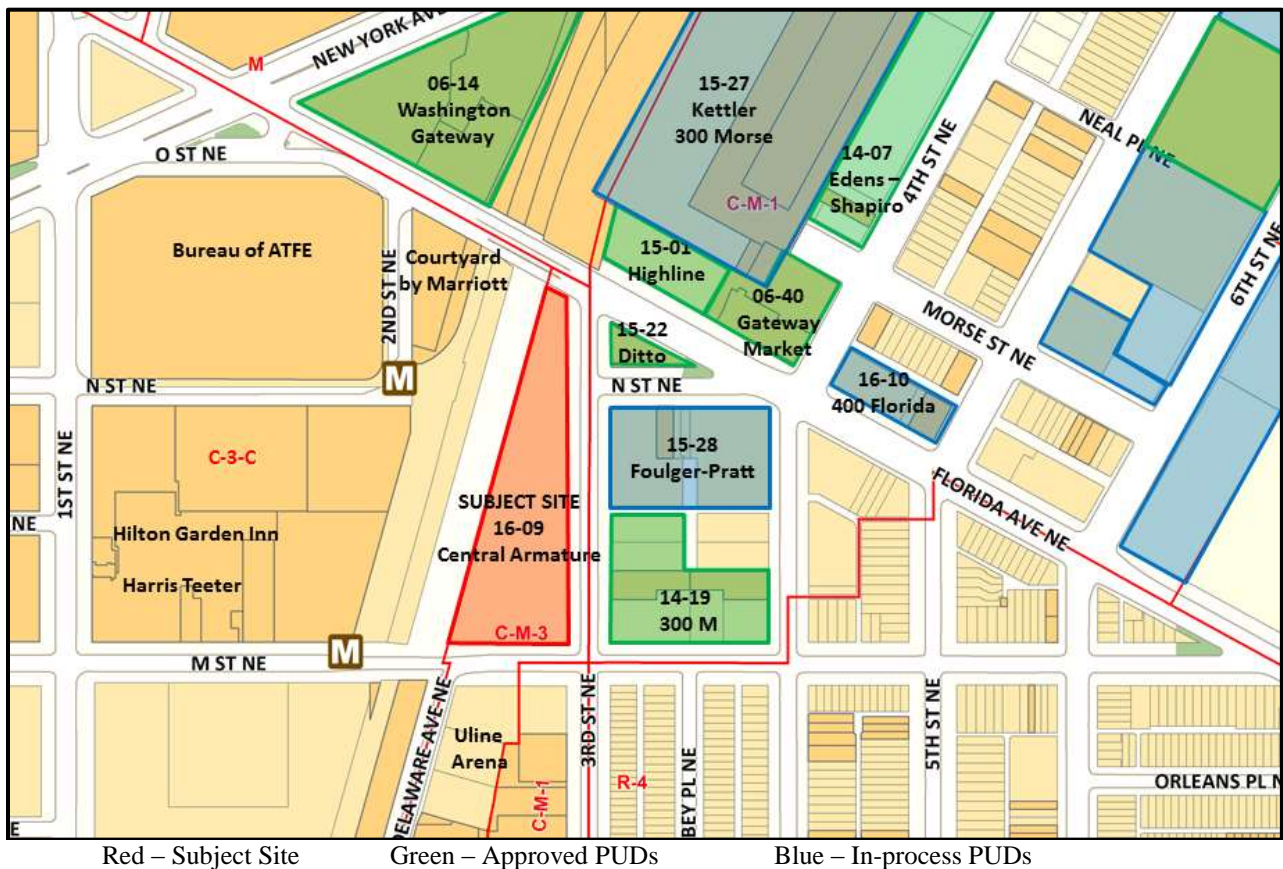
III. SUMMARY OF OP COMMENTS

OP supports the proposed development and feels the project is generally not inconsistent with the Comprehensive Plan. The following summarizes OP comments from this report.

OP Comment	Planning and / or Zoning Rationale
<p>Demonstrate, through a commitment to PDR or related uses on the ground floor, that the proposed development would further the PDR related objectives and land use direction of the Comprehensive Plan and the NoMa Plan.</p>	<p>It is a goal of the District to preserve PDR land, or, where the land is redeveloped, provide opportunities for PDR or similar uses to continue.</p>
<p>Refine the proposal for inclusionary zoning to warrant the request for a concentration of IZ units.</p>	<p>District policy supports an even distribution of IZ units throughout a project, as well as opportunities for both rental and homeownership.</p>
<p>The design should achieve a greater LEED-equivalent rating.</p>	<p>Environmental protection is an important goal of the Comprehensive Plan.</p>
<p>Include in future submissions exhibits that clearly show the location of habitable penthouses of multiple heights.</p>	<p>In order to evaluate the requested flexibility, exhibits sufficient to fully describe the project are required.</p>

OP would continue to work with the applicant to adequately address these issues, and other issues raised by the Commission at setdown, prior to a public hearing. OP understands that the applicant is also working with other area developers and the NoMa BID to effectuate a new entrance from their site to the NoMa metro station. OP is very supportive of this new entrance, as it would be of benefit to the entire area east of the tracks; the applicant is providing plaza space to accommodate this entrance, but should also update the Commission on the status of these discussions at the public hearing.

IV. SITE AND AREA DESCRIPTION



The subject site is located between Florida Avenue on the north, 3rd Street on the east, M Street on the south, and the railroad tracks on the west. As shown on the map above, the site is surrounded by properties that are either under construction, approved for new development, under consideration by the Commission, or proposed for development. The area west of the tracks is zoned C-3-C and is in a TDR receiving zone. All of the PUDs nearby have received or propose a PUD-related C-3-C zone.

The southern entrance to the NoMa metro station is just west of the property on M Street, and the northern entrance is opposite the property on the west side of the railroad tracks. The property's grade slopes down from east to west along M Street. At the northern end of the site the grade has been raised to allow access for service vehicles to the level of the railroad tracks. A large

industrial commercial building and parking areas occupy most of the remainder of the site.

V. PROJECT DESCRIPTION

The applicant proposes a single building consisting of three towers – a residential tower on the north, a residential tower at the southeast, and a hotel tower at the southwest. The towers would be built above a one-story base covering almost the entire site and used for retail and back-of-house uses. The roof of the ground floor would have significant landscaped and patio areas for use by residents and hotel patrons. The lot occupancy at the ground floor would be 96%, and 64% above the ground floor, although a significant open space at the ground floor would be provided for a future connection to the NoMa Metro Station. Total FAR would be 6.98, and the height would be 120', the maximum permitted under the 1910 Height Act for this site.



The first three floors of the project would be bifurcated at the alignment of N Street, where DC Water and Amtrak would own easements, and where a pedestrian way would be reserved for the possible future tunnel to the metro entrance on the other side of the tracks. The entire building would be served by a single curb cut, on M Street at the intersection with Delaware Avenue. All parking would enter at that location, and all loading would enter there and maneuver within the building to the loading docks.

Inclusionary Zoning

The proposed C-3-C zone would require that 8% of the total residential floor area be dedicated to households earning 80% of the AMI. The applicant proposes a deeper affordability commitment, with 2% of the floor area dedicated 50% AMI. A breakdown of the housing proposal is given in the table below.

Residential Unit Type	GFA	Percentage of Total	Units	Affordable Control Period	Affordable Unit Type
Total	555,910	100%	650		
Market Rate	511,437	92%	598*		
IZ – 80% AMI	33,355	6%	39*	Perpetuity	Rental
IZ – 50% AMI	11,118	2%	13*	Perpetuity	Rental
Affordable / Non IZ	n/a	-	-	-	-

* Estimated by OP

The applicant has requested flexibility that, should the southern residential building be developed as a condo, all the IZ units would be concentrated in the northern, rental building. District policy supports the provision of both rental and home ownership opportunities to households at lower income levels. OP has proposed a text amendment in the current inclusionary zoning case pending before the Commission, # 04-33G, that would clarify that IZ units must be distributed throughout a project, even if portions of that project differ in their form of tenure.

For these reasons, OP generally would not support the concentration of IZ, unless the applicant proffers significantly more affordable housing at deeper affordability in the rental building. If this were the case, OP could consider a more positive recommendation regarding some degree of concentration of units or income levels in the apartment building. OP has suggested to the applicant that they provide a more robust justification for this relief, and/or to re-examine their IZ provision.

LEED

The LEED scoresheets shown on Sheets 1.04 – 1.06 of Exhibit 2G indicate that the three major building components would each reach 50 points, barely achieving a LEED Silver level. OP informed the applicant that they should examine ways to achieve a higher score, and has suggested that they discuss this with the District Department of the Environment prior to a hearing.

Phasing

The application generally contemplates single construction of one building. But the applicant does request the flexibility to construct the northern section first, followed by the southern section. A building permit application would be required for the northern portion within two years of approval of the PUD, and four years for the southern portion. Given the scale of the development, and the amount of development in process in the vicinity, some flexibility in phasing is warranted.

VI. COMPREHENSIVE PLAN POLICIES

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
- (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
- (10) The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. 218.3
- (25) Increased mobility can no longer be achieved simply by building more roads. The priority must be on investment in other forms of transportation, particularly transit. Mobility can be enhanced further by improving the connections between different transportation modes, improving traveler safety and security, and increasing system efficiency. 220.1

Prior to a public hearing, the application could be enhanced to more fully meet the following Guiding Principles:

- (4) The District needs both residential and non-residential growth to survive. Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. 217.4
- (21) Land development policies should be focused to create job opportunities for District residents. This means that sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. A mix of employment

opportunities to meet the needs of residents with varied job skills should be provided. 219.6

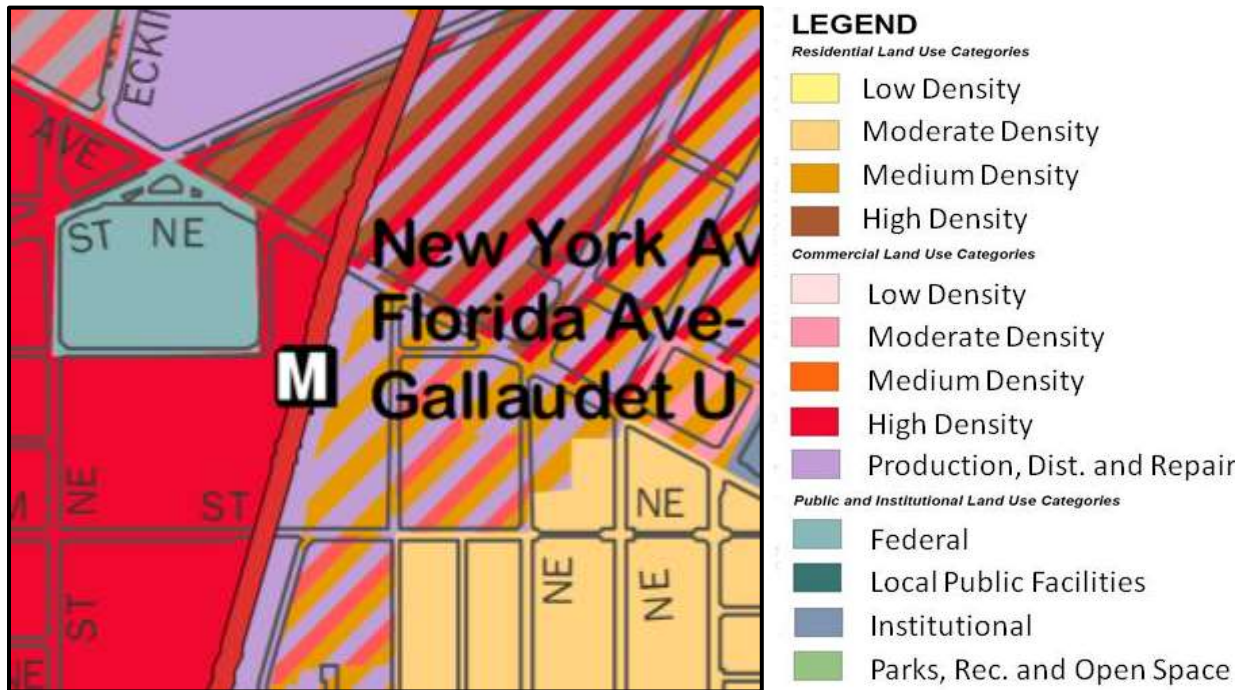
- (24) Despite the recent economic resurgence in the city, the District has yet to reach its full economic potential. Expanding the economy means increasing shopping and services for many District neighborhoods, bringing tourists beyond the National Mall and into the city's business districts, and creating more opportunities for local entrepreneurs and small businesses. The District's economic development expenditures should help support local businesses and provide economic benefits to the community. 219.9
- (34) As the nation's capital, the District should be a role model for environmental sustainability. Building construction and renovation should minimize the use of non-renewable resources, promote energy and water conservation, and reduce harmful effects on the natural environment. 221.3

The application is also consistent with major policies from the Transportation and Urban Design elements. The project would be largely consistent with policies from the Land Use, Housing, Economic Development and Central Washington elements, but could be refined to more completely achieve policy goals for a diverse mix of uses and diversity of tenure in affordable housing. Please refer to Attachment 1 for a complete analysis of those elements of the Plan.

VII. COMPREHENSIVE PLAN LAND USE MAPS

The Comprehensive Plan's Generalized Policy Map describes the subject site as a Land Use Change Area. Land Use Change Areas are anticipated to become "high quality environments that include exemplary site and architectural design and that are compatible with and do not negatively impact nearby neighborhoods (Comprehensive Plan, § 223.12). In Land use change areas the expected mix of uses is shown on the Future Land Use Map.

The Future Land Use Map (FLUM) indicates that the site is appropriate for medium density residential and production, distribution and repair uses. Given the property's location immediately adjacent to metro, its adjacency to high density mixed use and high density commercial areas, and its near encirclement by C-3-C zoning or PUD-related C-3-C zoning, the proposal for the same zone on this site, with a 6.98 FAR, is not-inconsistent with the medium density residential designation. However, as of this writing, it is not clear how the proposal is fully consistent with the PDR designation on the site. In order for the project to best meet the goals of the Comprehensive Plan, OP recommends that the applicant provide firm commitments to set aside a portion of the retail space to PDR or PDR-related uses, such as maker space, artist space, or other production or repair oriented businesses. OP will continue to work with the applicant prior to a public hearing on the appropriate level and specificity of commitment.



VIII. NOMA VISION PLAN AND DEVELOPMENT STRATEGY

The NoMa Vision Plan and Development Strategy (NoMa Plan) is a Council-adopted small area plan that applies to the subject site, and like all small area plans, supplements the Comprehensive Plan. The NoMa Plan designates the subject site as part of the “Creative Industries/Mixed-Use” transition area, which is described as “a mixed-use precinct with a diversity of uses including creative industries, residential and non-profit office uses, studio and live-work spaces...” (NoMa Plan, p. 5.12). The NoMa plan, on pages 5.12 and 5.13, lists a number of recommendations for this sub-area. Those relevant to this project include:

- Locating the greatest height and density near the NoMa metro station;
- Enhance connections to the Florida Avenue Market and strive for a synergy of uses in new project plans;
- Work with DC Commission on the Arts and Humanities to ensure a strong art presence in streets and public spaces, to include visual artists in preliminary phases of projects, and to fund artist / underpass projects;
- Encourage diversity of housing types, including live-work and flexible space for artists and artisans;
- Work with WMATA to study connections to New York Avenue Metro Station, including pedestrian links between the Florida Avenue Market and the metro station;

- Encourage public art in streetscape design as part of the proposed public realm plan and in individual projects.

Specifically regarding uses, the plan states that potential uses could include:

- Arts and design-oriented businesses and creative industries that can be broadly defined around the goal of creating job diversity. Potential tenants could include: technology companies, furniture manufacturers and designers, architects, engineers, electronics distributors, sign-makers, metal fabricators, jewelers, artists/sculptors, graphic designers, software engineers, video, radio, and television production, motion picture and sound recording, broadcasting, publishing industries, internet-related services, in addition to other uses;
- Non-profit office uses;
- Retail, in particular at ground floor, neighborhood-serving, smaller scale, such as coffee shops, dry cleaners, restaurant/café/bar/club; including design-related retail, showroom component of live-work uses, and uses that reinforce the connection between the Florida Avenue Market and the Metrorail Station entrance at M Street.

The proposed project would meet the plan guidance of concentrating height and density near metro, and would greatly enhance the streetscape at the edge of this site. The building would also allow for improved connections to metro by reserving a pass-through to a potential future pedestrian tunnel to the station. OP has encouraged the applicant to examine ways to more fully meet the goal of the NoMa Plan to provide a diversity of housing types, a stronger arts and creative economy presence, and a diverse mix of uses in this section of the neighborhood.

IX. INDUSTRIAL LANDS POLICIES OF THE WARD 5 WORKS STUDY

Although the subject site is located in Ward 6 across Florida Avenue from Ward 5, policies from the Ward 5 Industrial Land Transformation Study, known as Ward 5 Works, could be informative to the transition of this property from purely industrial to a mix of residential and PDR-related uses. The study is not a Council-adopted policy document, but provides guidance regarding the opportunities that can be found in industrial development. The vision of the study is to adapt industrial land to develop a cutting-edge and sustainable production, distribution, and repair industry that diversifies the District's economy, serves as a hub for low-barrier employment, complements and enhances the integrity of neighborhoods, and provides opportunities for arts, recreation and other community amenities. The study encourages the preservation of production uses, environmental stewardship, workforce development, long-term affordability of industrial space, development of new multi-tenant space providing space for arts uses and makers, and the development of additional community amenities. "Maker" spaces are defined as small scale, local businesses devoted to the creation and production of goods and services. Prior to a public hearing, the applicant should address these broad policy goals and describe how they would be met through redevelopment of the subject site.

X. ZONING RELIEF

To construct as proposed, the applicant requests the following flexibility. A summary of each area of relief is given and OP will provide a complete analysis of the requested relief at the time of the public hearing.

1. PUD-related map amendment from C-M-3 to C-3-C

The proposed zone would be not inconsistent with the Comprehensive Plan.

2. § 411.4(c) – allow penthouse restaurant

The design proposes a restaurant in the hotel penthouse, a use permitted only by special exception.

3. § 411.9 – varied heights for habitable portion of penthouse

Penthouse walls for mechanical and habitable space may be of different heights, but the walls for just the habitable space should all be of uniform height. The design proposes multiple heights for residential penthouses, as shown in the section drawing on Sheet 4.01 of Exhibit 2G. Page 21 of the written statement, Exhibit 2, states that the hotel would also have multiple heights, but that location is not clear from the drawings. The applicant should provide exhibits that clearly show all locations for habitable penthouses of multiple heights.

4. § 775 – side yard

As described on pages eight and 21 of Exhibit 2, the application requests a side yard of 15' along the railroad tracks, where 20' is required if a side yard is provided. OSHA rules require a setback of 15' for new construction next to high-voltage power lines.

5. § 2115.9 – allow hotel valet parking to count toward required parking

Sections 2115.9 through 2115.18 permit valet parking in commercial buildings. The applicant requests to provide 60 all-valet spaces for the hotel, fulfilling the requirement of 56 spaces, despite the overall building being a mix of residential and commercial uses. The retail and residential parking would be conventional, non-valet parking.

6. § 2201 – no 55' loading berth

The applicant requests flexibility to not provide a 55' loading berth.

7. § 2605 – flexibility to concentrate IZ units

As discussed earlier in the report, OP generally would not support this request and has advised the applicant to provide additional justification, and/or to augment its affordable housing proposal.

8. Flexibility to vary the:

- a. number of units, hotel rooms, and parking spaces;**
- b. size of the underground garage footprint;**
- c. retail façade design;**
- d. streetscape, in order to coordinate with DDOT and adjacent property owners;**
- e. phasing**

XI. 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 application exceeds the minimum site area requirements of Section 2401.1(c) to request a PUD. The applicant is requesting a consolidated PUD and related map amendment. 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.

XII. 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).

Amenity package evaluation is partially based on an assessment of the additional development gained through the application process. In this case, the application proposes a PUD-related map amendment from C-M-3 to C-3-C, which would allow the residential use, and would allow the proposed 0.98 gain in FAR (103,677 sf) and an increase in height of 30 feet over C-M-3 matter-of-right levels.

	Existing Zoning (C-M-3)	Proposed Zoning (C-3-C PUD)	Proposed Development
Height	90'	130'	120'
FAR	0.0 – residential	8.0 – residential	[Mix of residential and non-residential]
	6.0 – non-residential	8.0 – non-residential	
	6.0 – Total (636,834 sf)	8.0 – Total (849,112 sf)	

The application lists several benefits, some of which can be considered amenity items. Although it is typical for the details of the benefits and amenities package to be resolved closer to the public hearing date, the following is OP’s preliminary summary of some of the benefits listed in the application. The proffered list is sufficient for setdown, and OP will continue to work with the applicant to refine the package of benefits. Should the applicant commit to a range of uses to fulfill the PDR goals of the Comprehensive Plan, OP could also consider those uses amenities of the project.

Applicant’s Amenities / Benefits		OP Comments, if applicable
1. Production of housing and affordable housing	Deeper affordability than required	OP supports the provision of housing at a deeper level of affordability than required, but has encouraged the applicant to augment this proffer, and to provide additional justification for the requested relief from IZ housing location.
2. Urban design	Single curb cut and internal loading	OP is strongly supportive of the innovative way in which the applicant has provided parking access and internalized all loading.
	Provision of open spaces at south side of building and at N Street	The provision of more open space in the NoMa area has been identified as a priority.
	Working with adjacent property owners to establish uniform streetscape	Prior to the public hearing the applicant should provide an update on these discussions and include in the plans the latest concept for the streetscape
	Art in southern plaza and N Street	More details on needed on what the art would be

Applicant's Amenities / Benefits		OP Comments, if applicable
3. Site planning	Providing access to potential metro access tunnel	OP is very supportive of this intent as serving as a great benefit to this project and to the neighborhoods east of the tracks, and has been raising the need for this entrance with this and other area developers. Applicant should quantify the cost associated with providing the pass-through, not including the portion for the DC Water and Amtrak easements
4. Infrastructure	Pay for a new traffic signal at the south side of the M and Delaware intersection	The applicant should quantify the cost of the new signal
5. Environment	Proposes LEED silver buildings	The applicant should explore ways to increase the LEED rating of the building
6. First Source and LSDBE		No commitment at this time – the applicant should address their commitments to this important item prior to the public hearing.

XIII. AGENCY REFERRALS

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

- Department of Energy and the Environment (DOEE);
- 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);
- DC Water.

XIV. ATTACHMENT

1. Comprehensive Plan Policies

JS/mrj

Attachment 1 Comprehensive Plan Policies

Land Use Element

The project would generally further Policy LU-1.1.5, which encourages the development of high density mixed use neighborhoods in central Washington, including in NoMa. The Land Use Element also encourages infill development and development near metro stations (Policies LU-1.3.1 and LU-1.3.2). The project would further Policy LU-1.3.4, which encourages site designs that enhance pedestrian connections to metro. The policies of this element also generally encourage the conservation of industrially-zoned lands, but this site has been identified in the Comprehensive Plan for a transition from industrial to mixed use, including residential and low-impact PDR uses (Policy LU-3.1.1 and Action LU-3.1.A).

Transportation Element

The Transportation Element supports transit-oriented development and discourages auto-oriented uses (Policies T-1.1.4 and T-1.2.3). The proposed development would concentrate housing immediately next to metro, and enhance accessibility to metro through the reservation of a pass-through to an eventual metro access tunnel. This element also seeks to improve major boulevards through “transportation, economic development, and urban design improvements” (Policy T-1.2.1) The proposed design would also improve the pedestrian network and pedestrian safety, as called for in Polices T-2.4.1 and T-2.4.2.

Housing Element

The project would meet the Housing Element goal of concentrating residential uses near a metro station (Policy H-1.1.4). The Housing Element encourages the production of new affordable housing, which this development would do, including at affordability levels not required by Inclusionary Zoning. But policy H-1.3.2 specifically recommends a diversity of tenure, with new affordable housing being provided for both rental and homeownership. The applicant’s request to concentrate all affordable units in the northern building, should the southern become a condo, would go against that policy.

Economic Development Element

The Economic Development Element notes that “PDR jobs are particularly desirable in the District, as they offer competitive wages to persons with limited education an academic credentials” (§ 711.1). It goes on to state that “the areas that currently accommodate many of the city’s PDR jobs have come under scrutiny as developers have run short of more favorably-located sites. This is particularly true around the New York Avenue Metro station... The production, distribution, and repair sector plays an important role in supporting other sectors of the economy.” (§§ 711.2 and 711.3). A commitment to retain some low intensity PDR or PDR-related uses on the subject site would more fully meet the spirit of these policy statements.

Urban Design Element

Policy UD-1.1.2 calls for reinforcement of the L'Enfant Plan, and Policy UD-1.4.1 promotes enhancements to major avenue and boulevards, especially those in emerging neighborhoods. The proposed design would help to visually define and improve the streetscape of Florida Avenue, 3rd Street and M Street. The building's proposed setback from Florida Avenue would help support Policy UD-1.4.4, which promotes multiple modes of travel on all streets.

Central Washington Area Element

The Central Washington Area Element envisions the NoMa neighborhood with a diverse mix of uses (Policy CW-2.8.1). This project would generally further that policy. Policy CW-2.8.2 states that industrial uses in this location can be redeveloped to other uses, including housing, but that redevelopment should include live/work space, artists' studios and similar uses. The project should seek ways to more completely fulfill this policy goal.