

TO:

District of Columbia Zoning Commission

FROM:

Jennifer Steingasser 16, Deputy Director- Development Review & Historic Preservation

DATE:

February 23, 2012

**SUBJECT:** 

Supplement Report Concerning Relationship Among Comprehensive Plan Components

and How They Apply to ZC 10-28 - Consolidated PUD at 901 Monroe Street, N.E.

# I. THE NATURE AND ROLE OF THE COMPREHENSIVE PLAN IN RELATION TO THE ZONING COMMISSION'S CONSIDERATION OF A PUD

The Zoning Commission requested the Office of Planning provide additional information on:

- How the various components of the Comprehensive Plan are used together in guiding recommendations and decisions on Planned Unit Developments;
- The relationship between the Comprehensive Plan and an adopted Small Area Plan;
- The guidance provided by the Comprehensive Plan and the Brookland/CUA Small Area Plan with respect to evaluating PUD application 10-28.

The 2006 Comprehensive Plan, as amended in 2010 ("Comp Plan"), states that the "Comprehensive Plan can be thought of as the centerpiece of a "Family of Plans" that guide public policy in the District" (Sec 103.1). The Comprehensive Plan is adopted by City Council legislation and consists of the Generalized Future Land Use Map (FLUM), the Generalized Policy Map, the written Citywide Elements, and geographically-relevant Area Elements.

A Small Area Plan (SAP) is adopted by City Council resolution and supplements "the Comprehensive Plan by providing detailed direction for areas ranging in size from a few city blocks to entire neighborhoods or corridors." (Sec 104). A SAP must also be consulted for additional guidance in evaluating any zoning action.

A PUD, is a zoning action and must be determined to be "not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site". (11 DCMR §2403.4).

The Comp Plan includes guidance on how its components are to be used.

#### A. GENERALIZED MAPS

Section 223.2 and Section 226 of The Framework Element of the Comprehensive Plan provide guidelines for using the generalized policy map and the future land use map.

The Purposes of the Policy Map [ are to]... guide land use decision-making in conjunction with the Comprehensive Plan text, the Future Land Use Map, and other Comprehensive Plan maps.

Boundaries on the map are to be interpreted in concert with these other sources, as well as the actual physical characteristics of each location shown. 223.2

District of Columbia.



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The Framework Element makes it clear that the maps are not zoning maps and are to be interpreted broadly. The Maps do not, in and of themselves, determine whether an application or a particular zoning designation is not inconsistent with the Comprehensive Plan. They are to be interpreted in conjunction with other written elements and an adopted Small Area Plan. Although several zone districts may be appropriate for a particular land use category, it should not be assumed that the densest district or the maximum permitted density of a zone is appropriate for a particular land use designation.

Guidelines for Using the Generalized Policy Map and the Future Land Use Map (§ 226, pp. 2-37 – 2-39)

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guides for development and conservation decisions. Several important parameters, defined below, apply to their use and interpretation.

- a. The Future Land Use Map is not a zoning map. Whereas zoning maps are parcelspecific, and establish detailed requirements for setbacks, height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. By definition, the Map is to be interpreted broadly...
- c. The densities within any given area on the Future Land Use Map reflect all contiguous properties on a block—there may be individual buildings that are higher or lower than these ranges within each area. Similarly, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate....
- d. The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.
- e. The designation of an area with a particular land use category does not necessarily mean that the most intense zoning district described in the land use definitions is automatically permitted.
- f. Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the existing C-2-A zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area and the adjacent uses.

## **B.** WRITTEN ELEMENTS

The written elements contain several land use and policy-specific Citywide elements, a Northeast Area Element that applies to Brookland, other geographic elements covering the rest of the District, and an Implementation element. While there is overlap among the elements and shifting emphasis among policies from one element to another, PUD proposals should be guided by the Citywide elements and its

accompanying maps, the relevant Areawide Element, and an adopted Small Area Plan. Among the written elements, the Land Use element is to be given greater weight than other elements, because it is intended to integrate the policies of the other elements.

Policy IM-1.1.5: Development Approvals and the Comprehensive Plan To the extent they are relevant, consider the goals and policies of the District Elements in the approval of planned unit developments... 2502.9

Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions. Require the Board of Zoning Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. Decisions on requests for rezoning shall be guided by the Future Land Use Map read in conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. 2504.5

Policy IM-1.3.4: Interpretation of the District Elements: Recognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements. As noted at Section 300.2, since the Land Use Element integrates the policies of all other District elements, it should be given greater weight than the other elements. 2504.6

## C. SMALL AREA PLANS

As noted in several of the previously quoted policies, an adopted Small Area Plan provides important guidance in making zoning or PUD decisions. *Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions*, states that an adopted SAP should be consulted when considering a map amendment.

The Comprehensive Plan is intended to set out broad objectives and specific implementation items for the District and geographic sub-areas. A Small Area Plan (SAP) is intended to take the maps and policies of the Comprehensive Plan and through active collaboration between the community and the Office of Planning, provide land use and other often more specific guidance for a finer-grained part of the District. Although the Comprehensive Plan states, "Small Area Plans are not part of the Comprehensive Plan" (§104.5), the Comp Plan establishes a protocol for using its guidance:

Small Area Plans are not part of the Comprehensive Plan. As specified in the DC Code, Small Area Plans supplement the Comprehensive Plan by providing detailed direction for areas ranging in size from a few city blocks to entire neighborhoods or corridors. In the past, Small Area Plans are adopted by the DC Council by resolution. The Comprehensive Plan is adopted in a different manner—by legislation—and becomes part of the DC Municipal Regulations. 104.8

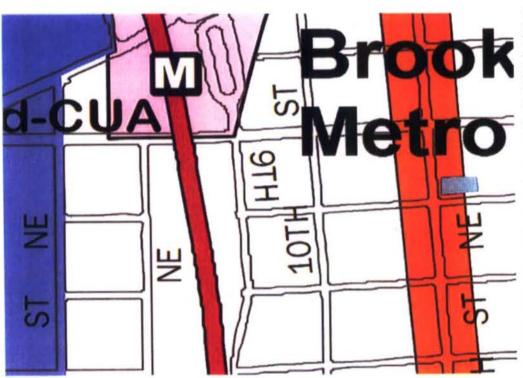
Policy IM-1.2.2: Protocol for Small Area Plans. Ensure that Small Area Plans take a form appropriate to the needs of the community and reflect citywide needs... Small area plans should be adopted by the Council and used to supplement the Comprehensive Plan. If necessary, Comprehensive Plan amendments should be introduced to ensure internal consistency for the areas involved. 2503.3

# II. RELATIONSHIP OF PUD 10-28 APPLICATION TO THE COMPREHENSIVE PLAN AND SMALL AREA PLAN

OP's analysis indicates that the proposed project would strike an appropriate balance among several policies, including those addressing transit oriented development, commercial revitalization and neighborhood conservation. Given the location and the proposed design, height and FAR restrictions and uses of the PUD, the project and the associated zoning request would not be inconsistent with the Comprehensive Plan.

## 1. MAPS

The pink areas on the <u>Generalized Policy Map</u> indicates that intensifying development at the Metro station near the Brookland Metro station, particularly on the north side of Monroe Street, is a public priority. The designation anticipates that development such as the applicant's is appropriate immediately adjacent to the station. It does not, however, make it clear that such development is preferred on the south side of Monroe Street. Determining the type of development appropriate for the applicant's site must involve a balancing of this map with the Generalized Future Land Use Map, the written elements—particularly the Land Use element—as well as additional guidance from the SAP.



suggested for production, distribution and repair uses.

On the Generalized Future Land Use Map (FLUM) on the next page, the Pink and Tan hatched striping indicate areas suitable for moderate density mixed use development. The Light Brown and Yellow hatched striping indicate areas suitable for mixed use low density development The Yellow areas are suggested for low density residential and Mustard areas are suggested for moderate density residential. Blue areas are institutional and Purple areas are



Figure 2. Generalized Future Land Use Map (site outlined in Blue)

The map shows moderate density mixed residential and commercial use as being appropriate for the area around the Metro station and continues this designation onto about one-third of the Square in which the applicant's site is located. The remaining portions of the square are coded for low density residential and low density mixed use. The FLUM is generalized and shows general patterns of development appropriate for an area, not for individual property boundaries. A majority of the applicant's site is shown as appropriate for moderate density mixed uses.

The applicant requests a PUD-related C-2-B zoning for the project. The Comprehensive Plan considers the C-2-B zone to be congruent with both the Moderate Density Commercial Land Use category and the Medium Density Commercial Land Use category (Future Land Use Map and Categories, § 225.8 and § 225.9).

As § 226 (e) of the Comprehensive Plan states, "The designation of an area with a particular land use category does not necessarily mean that the most intense zoning district described in the land use definitions is automatically permitted." In this case, there is no matter-of-right rezoning requested, rather the development is proposed through a PUD which would limit the development to a density and height consistent with the FLUM.

The Comprehensive Plan describes moderate density commercial areas as having buildings that "generally do not exceed five stories in height." This suggests that buildings should typically not exceed five stories in areas designated for this category as a matter-of-right. The PUD regulations however, allow for Commission to approve "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." (11 DCMR 2400.2)

#### 1. WRITTEN ELEMENTS

The site's location is affected by differing Comprehensive Plan policies which must be balanced. These include transit-oriented development, commercial revitalization, and neighborhood conservation. OP's analysis indicates that the project strikes an appropriate balance between the Comprehensive Plan elements that support the construction of new housing and mixed-uses in areas adjacent to rapid transit stops and those that stress the importance of conserving healthy lower-density residential neighborhoods. Although the project would increase density, it would do so across from a Metro station and on one of the two principal mixed-use streets in Brookland's town center. It would provide new housing, enhance the area's retail offerings and remove a surface parking lot. It would also strengthen street-level continuity between new development the Commission approved for the Catholic University of America's south campus and the retail along 12<sup>th</sup> Street N.E. Several of the proffered public benefits are aimed at enhancing the retention of existing small businesses in Brookland and the retention of new ones.

A discussion of specific policies in relation to the proposal follows.

## Citywide Elements - Land Use

Given the location and the proposed design, height and FAR restrictions and uses of the PUD, the project and the associated zoning request would not be inconsistent with the Comprehensive Plan's land use element.

- Policy LU-1.3.5: Edge Conditions Around Transit Stations: Ensure that development adjacent to Metrorail stations is planned and designed to respect the character, scale, and integrity of adjacent neighborhoods. For stations that are located within or close to low density areas, building heights should "step down" as needed to avoid dramatic contrasts in height and scale between the station area and nearby residential streets and yards. 306.14
- 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.

The project's scale would mediate between the 70-foot high developments being constructed at the CUA south campus, the densities the Small Area Plan supports adjacent to the Brookland Metro station and south campus, and the single-family neighborhoods to the east and south of the project. Monroe Street east of the rail tracks now contains a mix of uses, including single-family

and multi-family residential, retail, and institutional uses. The 900 block of Monroe Street is predominately commercial with some residential use. Adjacent to the proposed project, 9<sup>th</sup> Street contains row structures that are primarily residential and a parking lot accessory to a commercial structure. 10<sup>th</sup> Street is institutional on the east side and residential on the west side, with a combination of single family detached and row houses. The project design integrates this form by continuing the traditional materials and bay-rhythms common to the neighborhood's commercial corridors. It mitigates the impact of its uses, height, and scale by setting the structure back from its property line, by providing smaller scale architectural details that relate to adjacent structures, by buffering and screening itself from adjacent residential yards, and by limiting its apparent height from surrounding streets to five stories through the provision of an additional set-back for its top story.

- Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods: Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to "create successful neighborhoods" in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others.
- Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods: Protect and conserve the District's stable, low density neighborhoods and ensure that their zoning reflects their established low density character. Carefully manage the development of vacant land and the alteration of existing structures in and adjacent to single family neighborhoods in order to protect low density character, preserve open space, and maintain neighborhood scale. (309.10)
- Policy LU-2.1.8: Zoning of Low and Moderate Density Neighborhoods: Discourage the zoning of areas currently developed with single family homes, duplexes, and rowhouses (e.g., R-1 through R-4) for multifamily apartments (e.g., R-5) where such action would likely result in the demolition of housing in good condition and its replacement with structures that are potentially out of character with the existing neighborhood. (309.13)

Although it would result in the demolition of five freestanding houses and would introduce moderate density zoning on sites now zoned for lower density commercial and residential uses, it would also remove a surface parking lot while reinforcing citywide Comprehensive Plan elements such as: economic development, land use, and leveraging of locations adjacent to transit stops. At this site, across from a Metro station and midway between the new retail development going up across from Catholic University and the older retail buildings on 12<sup>th</sup> Street, the injection of additional retail and commercial uses on the ground floor of a prominent commercial building will help to tie together the "new Brookland" and the "old Brookland" into a better functioning whole.

• Policy LU-2.3.3: Buffering Requirements: Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts.

The main block of the building would be set back between 14 and 16 feet from the property line. Bays would project into this setback space, but would never be closer than approximately 4.5

feet from the property line. There would be a 0.5:1 setback at the 50 foot level for the top story on Monroe, 9th and 10th Streets; a stepping down of height to the south, facing the single family detached properties on Lawrence Street and to the west facing the rowhouses on 10<sup>th</sup> Street; and extensive planting of trees and shrubbery between the courtyard and the rear yards of the remaining 10th Street houses. The applicant has demonstrated that with the combination of landscaping, bays reducing sight lines to the principal building block, and setbacks of the principal part of the structure above 50 feet, the project would have less of a street-level visual impact than would a project constructed to 50 feet with no setbacks from the property line.

# Citywide Elements - Housing

- H-1.1 Expanding Housing Supply: Expanding the housing supply is a key part of the District's vision to create successful neighborhoods. Along with improved transportation and shopping, better neighborhood schools and parks, preservation of historic resources, and improved design and identity, the production of housing is essential to the future of our neighborhoods. It is also a key to improving the city's fiscal health. The District will work to facilitate housing construction and rehabilitation through its planning, building, and housing programs, recognizing and responding to the needs of all segments of the community. The first step toward meeting this goal is to ensure that an adequate supply of appropriately zoned land is available to meet expected housing needs. (503.1)
- 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)
- Policy H-1.1.4: Mixed Use Development: Promote mixed use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. 503.5

The project would result in approximately 220 new housing units, at least 8% of which would be affordable to households earning less than 80% of the area median income (AMI). The site is across the street from a Metro station, is already mixed-use, and the Small Area Plan envisions Monroe Street as a mixed-use corridor between Michigan Avenue and 12<sup>th</sup> Street. The proposal would not be inappropriate for this location.

## Citywide Element - Economic Development

• Policy ED-2.2.3: Neighborhood Shopping: Create additional shopping opportunities in Washington's neighborhood commercial districts to better meet the demand for basic goods and services. Reuse of vacant buildings in these districts should be encouraged, along with appropriately-scaled retail infill development on vacant and underutilized sites. Promote the creation of locally-owned, non-chain establishments because of their role in creating unique shopping experiences.

This project would provide for smaller scale retail and a restaurant, and several of its proffers focus on improving local businesses and creating and training for new local jobs.

## Citywide Elements – Environmental Protection

• Policy E-1.1.1-- Street Tree Planting and Maintenance --encourages the planting and maintenance of street trees in all parts of the city. Policy E-1.1.3 -Landscaping-- promotes landscaping to beautify the city, enhance streets and public spaces, reduce stormwater runoff, and create a stronger sense of character and identity. Policy E-2.2.1 -- Energy Efficiency -- promotes the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses through mixed-use and shared parking strategies to reduce unnecessary construction of parking facilities. Policy E-3.1.2 -- Using Landscaping and Green Roofs to Reduce Runoff encourages the promotion of tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction. Policy E-3.1.3 -- Green Engineering-- has a stated goal of promoting green engineering practices for water and wastewater systems.

The development would plant street trees in 5-foot wide strips along the four streets bordering the site, and adjacent to the west side of the north-south alley. The courtyard would be extensively landscaped and would employ bio-retention to reduce runoff. The principal roof would be coated as a cool roof.

## Citywide Element - Urban Design

- <u>Policy UD-2.2.5: Creating Attractive Facades</u>: Create visual interest through well-designed building facades, storefront windows, and attractive signage and lighting. Avoid monolithic or box-like building forms, or long blank walls which detract from the human quality of the street.
- Policy UD-3.1.7: Improving the Street Environment: Create attractive and interesting commercial streetscapes by promoting ground level retail and desirable street activities, making walking more comfortable and convenient, ensuring that sidewalks are wide enough to accommodate pedestrian traffic, minimizing curb cuts and driveways, and avoiding windowless facades and gaps in the street wall.
- Policy UD-3.1.8: Neighborhood Public Space: Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the "activation" of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas.

The masonry-faced building would be fully designed with windows and architectural detail on every façade and every floor. It would not have a "back." The material and scale of the bays would give variety and rhythm to the facades. The 14 to 16 - foot setback from the property line, and the avoidance of utility vaults in public space, would enhance the pedestrian experience, as would the introduction of individual apartment entrances at the ground level on 9<sup>th</sup> and 10<sup>th</sup> Streets. The sixteen foot-high interior space, the intended sidewalk café and the prominent architectural treatment of the corner of 9<sup>th</sup> and Monroe Streets would emphasize that corner as a neighborhood-oriented center between the Metro Station and the area of Brookland south of Monroe Street. The proffered undergrounding of utility lines on Monroe Street would greatly enhance the attractiveness of that street-face.

## Citywide Elements - Transportation

• <u>Policy T-3.3.4: Truck Management:</u> Manage truck circulation in the city to avoid negative impacts on residential streets and reduce the volume of truck traffic on major commuter routes during peak travel hours.

Vehicle parking would be underground and entered and exited from the northern end of 10<sup>th</sup> Street, away from existing residences. Truck movements would be restrained to the northern part of the site and would be shielded by enclosing them in a covered, internal east-to-west private alley. Because it would not be possible for larger trucks to access the internal loading docks, the applicant has agreed to prohibit any commercial tenants from receiving deliveries from trucks larger than those that could be accommodated internally.

# Upper Northeast Area Element Policy Focus Area

• Policy UNE-1.1.: "New development around each of these three stations [Rhode Island Avenue, Brookland/CUA, and Fort Totten] is strongly supported." "Encourage moderate density mixed use development on vacant and underutilized property in the vicinity of the Brookland/CUA Metro station."

The Comprehensive Plan's future land use map designates a Brookland-CUA Metro Station Area policy focus area on the north side of Monroe Street. The scale and uses of the proposed PUD would provide a transition between the intensities at the policy focus area, and the residential area to the south of the project site.

• Policy UNE 1.1.6: "Continue to enhance 12<sup>th</sup> Street\_NE in Brookland as a walkable neighborhood shopping street...New pedestrian-oriented retail activity should also be encouraged around the area's Metro stations."

The ground floor interior height for the retail spaces along Monroe Street would be sixteen feet. The setbacks from the property line are intended to enhance the pedestrian orientation and enable the location of sidewalk cafes along Monroe Street and at the corner of Monroe and 9<sup>th</sup> Streets, where they would not interfere with existing residential uses.

The proposal would be not inconsistent with the Housing, Economic Development, Environmental Protection, Land Use, and Upper Northeast Area Elements of the Comprehensive Plan.

## Small Area Plan

The Brookland Station Area Small Area Plan (SAP) was approved by the Council on March 3, 2009. It identifies most of the applicant's site as being in the Monroe Street Sub-Area (Figure 2.14 on page 28 of the SAP). The SAP includes statements that support the development of the site as an important link for "mixed use redevelopment along Monroe Street from Michigan Avenue to 12<sup>th</sup> Street" (SAP Executive Summary page 4). There are other statements that stress conserving the residential areas south of the Metro, which include a portion of the applicant's site.

• Executive Summary, Small Area Plan Concepts, Land Use & Neighborhood Character. Monroe Street is the primary gateway and connector between the East and West sides of Brookland. Monroe

Street is envisioned as a tree-lined mixed-use street, with neighborhood-serving retail, restaurants, arts and cultural use on the ground floor, and residential above. Economic Development and Neighborhood Amenities: Monroe Street will [include] infill and redevelopment east of the tracks to 12th Street. The commercial area south of the Metro Station would include additional residential and cultural development, compatible with the neighboring residential area. Open Space and Environment: Sidewalks should include open space...Open spaces and new trees, made possible by the under grounding of utilities, are envisioned to be part of every new development.

The applicant is proposing a small-scale mixed-use project with retail and restaurants on the ground floor and residential above. The project widens the sidewalk on Monroe Street, and includes outdoor café seating on the property itself. The landscape plan shows new trees around the project, including on Monroe Street. The applicant would bury utility lines on Monroe Street.

# • SAP Monroe Street Sub-Area Recommendations:

- 7. Allow infill and redevelopment along Monroe Street east of the WMATA/CSX tracks.
- 8. Development along Monroe Street east of the WMATA/CSX tracks may be allowed up [to] a maximum 50 feet through a Planned Unit Development...
- 10. Buildings in the [Monroe Street] sub-area should step back in height at a ratio of one half to one above 50 feet. For example, for every 10 feet in height above 50 feet, the building façade should step back 5 feet from the building edge.

The applicant is proposing both redevelopment and infill. While it would be 60' 8" high for most of its perimeter, it would be set-back between 5 feet and 15 feet from the property line. It would respect the intent of the sub-area recommendations by further stepping back at the recommended ½:1 ratio at the 50 foot level on three sides, and at approximately a 3:1 ratio at the top level facing Lawrence Street. It would also include setbacks adjacent to the northernmost rowhouse on 10<sup>th</sup> Street. As indicated in the diagrams that follow, the design would result in a building with site lines that would make it less intrusive than a building constructed to the property line at a height of fifty feet.

The Land Use and Neighborhood Character section states that The Small area Plan proposes new moderate density mixed use development in key subareas, including the Metro Station and Monroe Street (SAP, p. 38) and that Additional density may be proposed through the PUD for key sub-areas when it is necessary for the fulfillment of the objectives of the plan (SAP, p. 39). Note 6 in the SAP's Appendix A clarifies that the diagrams provided in each sub-area are for illustrative purposes and only demonstrate one-way of achieving the sub-area vision, framework plan and recommendations that are contained in the plan; the final site plans for development opportunity sites would be determined by the property owner in a public review process involving consultation with stakeholders including the affected ANC, residents, business, the Office of Planning, and other District agencies.

• With respect to the <u>SAP and the proposed project's public benefits and amenities</u>, the applicant:

- O Would underground utility lines on Monroe Street (consistent with SAP Executive Summary page 3 and elsewhere),
- o Has proffered grants to strengthen arts uses at Dance Place (consistent with SAP Land Use and Neighborhood Character Recommendation 1),
- o Would widen and enhance landscaping on adjacent streets (consistent with SAP Land Use and Neighborhood Character Recommendation 5), and
- o Would provide a grant to enhance equipment at Turkey Thicket Recreation Center (consistent with Open Space and Environment Recommendation 1).
- The applicant has also amended its proffers to include the installation of additional anti-crime cameras that would be monitored by the Metropolitan Police Department.

JLS/slc Stephen Cochran, AICP – project manager