

Holland & Knight

800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564
Holland & Knight LLP | www.hklaw.com

CHRISTOPHER H. COLLINS
202-457-7841
chris.collins@hklaw.com

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VIA IZIS AND HAND DELIVERY

Zoning Commission of the
District of Columbia
441 4th Street, N.W., Suite 210S
Washington, D.C. 20001

Re: Z.C. Case No. 16-23
Valor Development, LLC – Voluntary Design Review
Applicant’s Response to Office of Planning Report

Dear Members of the Zoning Commission:

On behalf of Valor Development, LLC (the “Applicant”), we hereby submit the following information in response to the requests for clarification / additional information contained within the Office of Planning’s (“OP”) report dated January 2, 2018 (“OP Report”), which is included in the case record as Exhibit 130. Specifically, OP requests the following (*See* Page 1 of OP Report):

- Information regarding the nature of the grocery tenant based on the proposed square footage;
- Street level rendered perspective of the retail at the southwest corner of Building 1;
- Elevation of green wall on the south façade of Building 1;
- Additional details on how/whether building amenities would be shared between Building 1 and Building 2;
- Revise garage and loading façade to ensure pedestrian comfort and safety;
- Residential dwelling unit mix breakdown;
- Complete Inclusionary Zoning (IZ) summary table; and
- Full analysis of requested rear yard relief against the criteria in 11-G DCMR § 1201.1.

In addition to the above, within the body of its report OP includes a number of comments and requests for clarification on the following items:

- Interior programming of retail space relative to street-facing windows;
- Specification of sidewalk widths around the perimeter of the project;
- Clarification of LEED Silver certification, and commitment to strive to achieve LEED Gold;
- The areas of minor design flexibility requested by the Applicant relating to sustainable elements, number of dwelling units and required parking, distribution of affordable housing, and the design of retail frontages;

Finally, OP notes in its Comprehensive Plan analysis (OP Report, Attachment 3), that “[t]he Applicant has not addressed the Transportation Element...” In preparing its Comprehensive Plan analysis, which is included in the case record as Exhibit 114B, the Applicant found that the subject matter of the Transportation Element policies that directly apply to the project is largely covered by policies that are included within other elements of the Comprehensive Plan, including the Land Use, Urban Design, and Environmental Protection Elements. Thus, as a result of the interplay between the Comprehensive Plan elements, the Transportation Element policies, goals, and objectives that are applicable to the project have already largely been addressed within Exhibit 114B. Notwithstanding, for the sake of clarity and thoroughness of the case record, the Applicant hereby supplements its Comprehensive Plan analysis with the attached analysis of relevant Transportation Element policies (Exhibit A).

Information regarding the nature of the grocery tenant based on the proposed square footage

Consistent with the Applicant’s commitment to the community and the ANC, the proposal is to provide an approximate 13,000 – 15,800 square foot full-service grocery store. While originally much larger, the Applicant reduced the size of the proposed grocery store in response to community concerns regarding traffic and loading, and greater interest in a neighborhood-serving grocer rather than a destination grocer. As required under the terms of the Memorandum of Understanding with ANC 3E, for a period of at least 10 years from the date a certificate of occupancy is issued for the project, the Applicant shall devote a minimum of 13,000 square feet of commercial space to a “full-service grocer,” as that term is defined by the District of Columbia Alcoholic Beverage Regulation Administration (“ABRA”). Currently, the Applicant has a signed Letter of Intent with Balducci’s, which offers a full array of fresh produce, meats, seafood, prepared foods, and other consumer food items, and meets the ABRA definition of a full-service grocer.

Street level rendered perspective of the retail at the southwest corner of Building 1

The Applicant is in the process of preparing the requested rendering and will strive to have it ready at the public hearing. If the Applicant is unable to finish the rendering in time for the public hearing, it will be submitted as part of the Applicant’s posthearing submission.

Elevation of green wall on the south façade of Building 1

The green wall on the south façade of Building 1 has been removed from the project since the Applicant's initial submission of the voluntary design review application. The plans submitted as part of the Applicant's prehearing statement, which are consistent with the plans that were presented to the community and upon which the Advisory Neighborhood Commission 3E and 3D resolutions in support are based, no longer contain this landscape element.

Additional details on how/whether building amenities would be shared between Building 1 and Building 2

The residents of Building 2 will have full access to the pool, rooftop, and other building amenities in Building 1. It is expected that access to, and use of, these amenities will be coordinated, whenever necessary, through common building management.

Revise garage and loading façade to ensure pedestrian comfort and safety

The Applicant shares OP's interest in ensuring that the south and west facades of Building 1 are designed in the manner that ensures pedestrian comfort and safety, including at the area of the garage entrance and loading facilities. As currently proposed, the Applicant has already approached these two particular elevations with a higher sense of design than is typically employed along alley-facing facades. As shown in the proposed plans and discussed in the Applicant's prehearing statement, all proposed building facades have been thoughtfully designed to relate to the surrounding context in massing and articulation, architectural character, and through the use of high-quality materials. Indeed, no blank facades are proposed along any elevation, includes those facing the public alleys. In addition, the same high-quality materials that are proposed for the street-facing facades will also be used along the alley-facing facades. Further, as requested by OP the Applicant confirms that no street-facing windows belonging to the grocery store will be covered to accommodate back-of-house or storage functions.

Notwithstanding the above, the Applicant will thoroughly evaluate the design of the south and west facades of Building 1, including the false windows along the west facade and the area of the garage entrance and loading facilities, and will be prepared to discuss at the public hearing any feasible design options it identifies. Based upon its own evaluation, and any input provided by the Commission, the Applicant will submit any changes to these facades as part of its posthearing submission.

Residential dwelling unit mix breakdown

The following residential dwelling unit mix charts correspond to the plans submitted as part of the Applicant's prehearing statement:

Total Project (incl. residential units in penthouse)			
	#	Average NSF (sf)	% Total Project (Units)
Studio	2	806	1
1 Bedroom (Jr.)	49	736	22
1 Bedroom + Den	45	953	21
Total Studio, 1 BR, 1 BR + Den	96		44
2 Bedroom	86	1,070	39
2 Bedroom + Den	9	1,282	4
3 Bedroom	28	1,703	13
Total 2 BR, 2BR + Den, 3 BR	123		56
Total Project	219		100

Building #1 (incl. residential units in penthouse)			
	#	Average NSF (sf)	% Total Building #1 (Units)
Studio	2	806	1
1 Bedroom (Jr.)	46	738	23
1 Bedroom + Den	45	953	22
Total Studio, 1 BR, 1 BR + Den	93		46
2 Bedroom	77	1,068	39
2 Bedroom + Den	9	1,282	5
3 Bedroom	21	1,713	11
Total 2 BR, 2BR + Den, 3 BR	107		54
Total Building #1	200		100

Building #2 (incl. residential units in penthouse)			
	#	Average NSF (sf)	% Total Building #2 (Units)
Studio	0	0	0
1 Bedroom (Jr.)	3	709	16
1 Bedroom + Den	0	0	0
Total Studio, 1 BR, 1 BR + Den	3		16
2 Bedroom	9	1,090	47
2 Bedroom + Den	0	0	0
3 Bedroom	7	1,673	37
Total 2 BR, 2BR + Den, 3 BR	16		84
Total Building #2	19		100

Inclusionary Zoning (IZ) summary table

Residential Unit Type	GFA / Percentage of Total	Units	Income Type	Affordable Control Period	Affordable Unit Type	Notes
Total (incl. non-communal penthouse habitable space)	283,196	219				
Market Rate (incl. non-communal penthouse habitable space)	254,876	197	Market			
IZ (incl. non-communal penthouse habitable space)	28,320	22	60% MFI	Life of the project	Rental	
Affordable/Non IZ	N/A	N/A	N/A	N/A	N/A	

Full analysis of requested rear yard relief against the criteria in 11-G DCMR § 1201.1

The Applicant included a full analysis of its request for rear yard relief against the criteria of 11-G DCMR §1201.1 as part of its initial application (*See Exhibit 3, Pages 30 – 33*).¹ However, after further review of the design review provisions of 11-X DCMR § 603 (Design Review Flexibility) the Applicant omitted this analysis from its prehearing statement since these provisions appear to permit relief from rear yard, among other areas, in the form of flexibility similar to a Planned Unit Development. Notwithstanding, as clearly demonstrated in the analysis provided below, should the Commission find that the Applicant’s request for relief from the rear yard requirement for Building #1 must satisfy the special exception criteria of 11-G DCMR § 1201.1 rather than be reviewed as flexibility, the Applicant submits that it fully satisfies all such criteria.

¹ The Applicant’s request for rear yard relief/flexibility for Building 1 was included in the initial Notice of Public Hearing published for the subject application (*Exhibit 7*), as well as all subsequent Notices of Rescheduled Public Hearing (*Exhibits 13, 24, and 72*). Further, the request for rear yard relief/flexibility for Building 1 has been clearly shown and described in all plans and statements submitted to the case record by the Applicant.

Pursuant to 11-G DCMR § 409.1, relief from the rear yard requirement in the MU-4 zone can be granted by special exception pursuant to the general special exception standard contained in Subtitle X, Chapter 9, and the provisions and limitations of Subtitle G, Chapter 12, which states that the requested relief may be granted provided the special exception:

- *Will be in harmony with the general purpose and intent of the MU Zone, Zoning Regulations, and Zoning Maps;*
- *Will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps; and*
- *Is subject in each case to any conditions that are specific to the areas of relief required.*

The requested special exception from the rear yard requirement for Building 1 will be in harmony with the general purpose and intent of the Zoning Regulations, Zone Map, and specifically the MU-4 zone. The overall general purpose of the Zoning Regulations is to establish minimum standards for the promotion of public health, safety, morals, convenience, order, prosperity, and general welfare by: (i) providing adequate light and air, (ii) preventing undue concentration of population and overcrowding of land, and (iii) distributing population, business and industry, and use of land in a manner that creates favorable conditions.

As shown on the plans submitted as part of the Applicant's prehearing statement, the extent of the requested rear yard relief is limited to only small portions of the Building 1 west façade. Specifically, for the first 25-feet of building height the 15-foot required rear yard will be provided since the rear yard can be measured from the centerline of the north-south public alley. Above 25 feet, where the rear yard is required to be measured from the rear property line, the requested rear yard relief is still only limited to relatively small areas along the rear façade of Building 1, and the extent of the relief in these areas is only approximately five feet since the entire west façade of Building 1 will be set back from the rear property line approximately 10 feet. Given the much lower height of the SVSC, the 20-foot public alley, and the 10-foot setback that will be provided, the requested special exception will be in harmony with the purposes of the Zoning Regulations stated above. Notwithstanding the requested relief, adequate light and air will be available to the dwelling units located along the west side of Building 1, the SVSC, and into the public alley. Finally, considering the location of the requested rear yard relief toward the interior of the Project Site, the special exception will not adversely affect the use of neighboring properties, which only includes the SVSC. The portion of the SVSC facing the area where the rear yard relief is required contains "back of house" functions and does not contain any windows. In addition, the special exception will not adversely impact the setting of the historic SVSC when viewed from Massachusetts Avenue, nor will the relief adversely impact circulation in the public alley since the required rear yard will be provided for the first 25 feet of building height along the alley.

In addition to the general special exception standard, requests for rear yard relief in the MU-4 zone must also meet the following criteria contained in 11-G DCMR § 1201:

- No apartment window shall be located within forty feet (40 ft.) directly in front of another building;

There are no residential dwelling unit windows along the rear of Building 1 that are located within 40 feet directly in front of another building. All residential apartment windows within Building 1 facing the SVSC, the only building directly opposite the rear of Building 1, will be above the height of the SVSC and will therefore not be in front of another building. Moreover, the SVSC does not have any windows along the façade that faces Building 1.

- No office window shall be located within thirty feet (30 ft.) directly in front of another office window, nor eighteen feet (18 ft.) in front of a blank wall;

Not applicable

- In buildings that are not parallel to the adjacent buildings, the angle of sight lines and the distance of penetration of sight lines into habitable rooms shall be considered in determining distances between windows and appropriate yards;

Not applicable

- Provision shall be included for service functions, including parking and loading access and adequate loading areas; and

Building 1 will contain the parking and loading required under Subtitle C, Chapters 7 and 9, respectively. In addition, adequate access will be provided to the parking and loading facilities from the existing east-west public alley located along the south side of Building 1.

Specification of sidewalk widths around the perimeter of the project

As stated in the OP Report, the Applicant is proposing wide sidewalks around the perimeter of the project. Most notably, as part of the project the Applicant will permanently close approximately 80 linear feet of curb cuts that currently exist along 48th and Yuma Street, which will substantially improve pedestrian circulation and safety. As currently proposed, the clear sidewalk width along Yuma Street adjacent to the grocery store is 10 feet wide, with an 8 foot wide tree box area. East of the grocery store, the sidewalk width along Yuma Street will be 6 feet clear, and the tree box area will widen to 10 feet in order to provide more soil area to the existing trees that are being preserved. Of note, at the request of the District Department of Transportation (“DDOT”), the Applicant may narrow the sidewalk width adjacent to the grocery store from 10 feet to 8 feet in order to align the northern edge of the sidewalk and provide a continuous 10 foot wide tree box area adjacent to Lot 807 along Yuma Street. Along 48th Street adjacent to Lot 807, the Applicant is proposing to provide a clear sidewalk width of 6 foot, and a 6 foot wide tree box area. The sidewalk and tree box area widths described above either meet or exceed current DDOT standards.

As requested in the OP Report, as part of its posthearing submission the Applicant will submit a revised set of landscape drawings that specify the exact sidewalk widths along the 48th and Yuma Street frontages of Lot 807.

Clarification of LEED Silver certification, and commitment to strive to achieve LEED Gold

The Applicant is committing to certify the project as LEED (v4) Silver, which, as discussed in the Applicant's prehearing statement, exceeds what would be required for any matter-of-right development on Lot 807. As requested in the OP Report, the Applicant further commits to strive to achieve LEED Gold.

Areas of minor design flexibility relating to sustainable features, number of dwelling units and required parking, distribution of affordable housing, and the design of retail frontages

In its report, OP requested additional detail regarding the minor design flexibility requested by the Applicant relating to sustainable elements. As is typical of any project, there is often a need to make adjustments to sustainable design elements during design development due to structural and mechanical considerations. These considerations may require the reconfiguration of a green roof area, modification of green roof type, or replacement of one sustainable design element with another equally effective and "creditable" element. Based upon the Applicant's preliminary calculations, the extent of landscaping and green roof shown on the proposed plans is likely to be what is needed to comply with the District's stringent storm water retention requirements. However, as the project advances the Applicant may identify other ways to achieve the required stormwater retention with less green roof, potentially creating an opportunity to add additional sustainable elements, while at the same time achieving Green Area Ratio ("GAR") requirements and a minimum LEED (v4) Silver level. As such, the Applicant has requested flexibility to allow minor changes to the number, size, extent, and type of sustainable design elements provided the project meets or exceeds all applicable GAR and storm water requirements, and achieves a minimum LEED Silver (v4) certification. As stated above, the Applicant is committing to complete the LEED certification process at the LEED (v4) Silver level, and to strive to achieve LEED Gold.

Regarding the flexibility relating to the number of residential dwelling units and vehicle parking spaces, OP expressed concern that these areas of flexibility, when combined, could result in the project either requiring mitigation for excess parking or not meeting the minimum parking requirements. Upon further review, the Applicant fully understands OP's concern; and thus, proposes the following revised language for these areas of flexibility.

Regarding the number of residential dwelling units, the revised flexibility language below will allow for a limited increase, or a decrease, in the number of dwelling units within the approved gross floor area of the project while requiring that no less than 85 parking spaces be devoted to the residential uses on Lot 807. The 85 parking space required is consistent with the number of parking spaces shown on the proposed plans as being devoted to the residential uses on Lot 807, and will still exceed the minimum required despite the permitted limited increase in dwelling units.

Original language:

6. *To increase the final number of residential units by no more than 10% above the total number shown on the [approved plans] to respond to program demand, or to decrease the final number of residential units within the approved residential gross floor area of the project to accommodate demand for larger units; and*

Revised language:

6. *To increase the final number of residential units on Lot 807 by no more than 10% above the total number shown on the [approved plans] to respond to program demand, or to decrease the final number of residential units within the approved residential gross floor area of the project to accommodate demand for larger units, provided that the number of parking spaces that are solely devoted to the residential uses on Lot 807 is equal to the greater of the minimum required under the Zoning Regulations or 85 parking spaces;*

Regarding the flexibility relating to the garage layout, and the number, location, and arrangement of parking spaces, the Applicant's revised flexibility language below eliminates any potential that the residential and retail uses on Lot 807 would not meet the minimum parking requirement by requiring that a minimum of 85 parking spaces be devoted to the residential uses and 49 parking spaces be devoted to the retail uses at all times, both of which exceed the minimum required based upon the proposed building program. To address OP's concern regarding excess parking, the revised flexibility language makes clear that the Applicant will be required to comply with the excess parking requirements of Subtitle C, section 707 if the number of parking spaces solely devoted to residential or retail uses on Lot 807 exceeds two times the minimum number of spaces required for that particular use.

Original language:

10. *To vary the garage layout and the number, location, and arrangement of vehicle and bicycle parking spaces provided the number of spaces, for both vehicles and bicycles, is not increased or reduced by more than ten percent of the number shown on the [approved plans]; and*

Revised language:

10. *To vary the garage layout and the number, location, and arrangement of vehicle and bicycle parking spaces provided the numbers of vehicle spaces that are solely devoted to residential and retail uses on Lot 807 are not reduced below 85 and 49 spaces, respectively. Any increase in the number of vehicle spaces solely devoted to residential or retail use on Lot 807 that exceeds two times the minimum required under the Zoning Regulations for that particular use shall require the Applicant to comply with the excess parking requirements of Subtitle C, Section 707. Further, the number of bicycle parking*

spaces solely devoted to residential and retail uses on Lot 807 shall meet or exceed the minimum bicycle parking requirements of Subtitle C, Section 802 at all times.

Regarding the flexibility requested relating to the number and location of affordable dwelling units, the IZ summary table included above provides the additional information requested by OP regarding how the Applicant is meeting the IZ requirements.

Finally, the flexibility requested to vary the final design of retail frontages in accordance with the needs of retail tenants is typical flexibility for almost all projects reviewed by the Commission, and is necessary to allow the Applicant to make minor adjustments to the retail facades to accommodate the specific need of retail tenants while also avoiding issues regarding compliance with the Commission final order during the permitting process. Understanding the context that surrounds the project, and the particular sensitivities related to building signage, the Applicant included in the language for this particular area of flexibility a collection of signage guidelines and limitations that are intended to substantially limit the location, extent, and design of building signage within the project.

We look forward to presenting the subject application to the Commission at the public hearing scheduled for January 11, 2018.

Respectfully Submitted,

HOLLAND & KNIGHT LLP



Christopher H. Collins

CHC:jma

Enclosures

cc: Jennifer Steingasser, Office of Planning (via email)
Joel Lawson, Office of Planning (via email)
Elisa Vitale, Office of Planning (via email)
Anna Chamberlin, District Department of Transportation (via email)
Aaron Zimmerman, District Department of Transportation (via email)
Advisory Neighborhood Commission 3E (via hand delivery and email)
Advisory Neighborhood Commission 3D (via USPS Priority Mail and email)
Edward L. Donohue, Donohue & Stearns, PLC, representing Citizens for
Responsible Development (via email)
Barbara & Sheldon Repp, Citizens for Responsible Development (via email)

Exhibit A

Supplement to Applicant's [Revised] Comprehensive Plan Analysis¹

4. Consistency with Citywide Elements

g. Transportation Element

The Transportation Element of the Comprehensive Plan provides policies and actions to maintain and improve the District's transportation system and enhance the travel choices of current and future residents. These policies are complemented by policies in the Land Use, Urban Design, and Environmental Protection elements on related topics such as air quality and the management of public space. The goal of the Transportation Element is to: “[c]reate a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents.” The Project is not inconsistent with the those policies of the Transportation Element that are applicable to the proposed development, including:

- **T-1.1.2: Land Use Impact Assessment** –This policy promotes the use of multi-modal standards rather than traditional vehicle standards when assessing the transportation impacts of development projects in order to more accurately measure and more effectively mitigate impacts on the transportation network.

¹ The Applicant's revised Comprehensive Plan analysis is included in the case record as Exhibit 114B. The specific project-related information/features referred to in this document is already included in the Applicant's prior submissions to the case record. No new information is contained herein. This document simply ties those project features to specific policies within the Comprehensive Plan Transportation Element, and supplements the Applicant's Comprehensive Plan analysis contained in Exhibit 114B of the case record.

The Project is not inconsistent with this policy. As thoroughly documented in the Comprehensive Transportation Review (“CTR”) submitted by the Applicant (Exhibit 107), a multi-modal standard was utilized for purposes of analyzing the potential transportation-related impacts of the Project.

Specifically, Page 24 of the CTR shows the specific mode splits that were used to estimate the potential number of the trips generated by the residential and retail components of the Project. These mode splits were identified in coordination with the District Department of Transportation (“DDOT”) and take into account Census data for the residents that live near the site and the location of the site relative to transit. Tailoring the mode-splits to the Project location not only helped the Applicant to more accurately measure potential impacts, but also to devise a robust set of transportation improvements and Transportation Demand Management (“TDM”) strategies that will effectively mitigate potential impacts on the transportation network.

· **T-1.1.B: Transportation Improvements** – This recommended

Comprehensive Plan action promotes requirements for TDM measures and transportation support facilities to be included in large development projects and major trip generators. The Project is not inconsistent with this recommended action. As part of the CTR, the Applicant is committing to a wide range of TDM strategies that are aimed at reducing the demand for single-occupancy, private vehicles during peak period travel times or shifting single-occupancy vehicular demand to off-peak periods. Subject to more revisions and clarifications, the Applicant’s list of TDM strategies was found

to be sufficient by DDOT if implemented in conjunction with the pedestrian network improvements also being provided as part of the Project. Some of the pedestrian network improvements being provided include the removal of approximately 80 linear feet of curb cuts, the creation of new pedestrian connections through and around the site, construction of pedestrian curb extensions at select intersections, and the construction of a High-Intensity Activated Crosswalk (“HAWK”) signal along Massachusetts Avenue,

- **T-1.2.3: Discouraging Auto-Oriented Uses** – This policy discourages certain auto-oriented uses such as “drive-through” businesses or stores with large surface parking lots, along key boulevards and pedestrian streets. It also promotes the minimization of curb cuts in new developments in order to increase pedestrian safety and maintain active and comfortable streetscapes. The Project is not inconsistent with the policy as it will permanently eliminate approximately 80 linear feet of curb cuts along Yuma and 48th Streets, and move all parking and loading access to Lot 807 to existing public and private alleys. The Project will also replace the large surface parking lot that currently occupies Lot 807 with a new mixed-use development that increases pedestrian connectivity through and around the site, and improves the safety and quality of the streetscape by activating the site and through several aesthetic improvements.
- **T-2.2.2: Connecting District Neighborhoods** – This policy call for improvements to connections between District neighborhoods through upgraded transit, auto, pedestrian, and bike connections, and by removing or

minimizing existing physical barriers. As part of the Project, the Applicant will carry out several upgrades to pedestrian, bike, and auto connections that will improve connections through and around the Project site, and between the commercial centers and neighborhoods located on the east and west sides of Massachusetts Avenue. These improvements include the reconstruction of the streetscape adjacent to Lot 807, including the permanent removal of substantial curb cuts, the construction of pedestrian curb extensions at select intersections, the construction of Windom Walk and other pedestrian improvements along existing alleys, and the construction of a HAWK signal on Massachusetts Avenue.

· **T-2.3.3: Bicycle Safety** – This policy promotes increasing bicycle safety through traffic calming measures, and improvements to bicycle access through the provision of public bike parking and elimination of barriers to bicycle travel. The Project is not inconsistent with this policy. Specifically, the Project will contain new short- and long-term bicycle parking, bicycle repair stations, as well as shower and locker facilities for retail employees. In addition, the substantial improvements to the streetscape, including the permanent removal of curb cuts, will result in further improvements to bicycle access and safety.

· **T-2.3.A: Bicycle Facilities** – This policy recommends that bicycle facilities such as secure bicycle parking and lockers, bike racks, and shower facilities be included in new commercial and residential buildings, where feasible. The Project will contain all of these bicycle facilities and amenities, and thus is not inconsistent with this policy.

- **T-2.4.1: Pedestrian Network** – This policy promotes the development, maintenance, and improvement of pedestrian facilities, including improvements to the District’s sidewalks to form a network that links residents across the city. The Project is not inconsistent with this policy. As described above, the Project contains several substantial improvements to the pedestrian network that will improve pedestrian safety through and around the Project site, and between nearby neighborhoods. These include the permanent removal of approximately 80 linear feet of curb cut; reconstruction of the streetscape adjacent to Lot 807, including new sidewalks and wide tree box areas; construction of pedestrian curb extension at select intersections; and the creation of new pedestrian connections through alley improvements and the construction of Windom Walk. The Applicant will also construct a new HAWK signal along Massachusetts Avenue which will improve pedestrian connectivity between the shopping centers and neighborhoods on either side of the corridor.

- **T-2.4.2: Pedestrian Safety** – This policy promotes improvements to safety and security at key pedestrian nodes. As discussed above, the Project contains several substantial improvements to the pedestrian network that will improve pedestrian safety through and around the Project site, and between nearby neighborhoods.

- **T-3.1.1: Transportation Demand Management (TDM) Programs** – This policy encourages providing, supporting, and promoting programs and strategies aimed at reducing the number of car trips and miles driven to

increase the efficiency of the transportation system. The Project is not inconsistent with this policy as the Applicant will implement a robust set of TDM strategies that will reduce the number of trips generated by the Project and mitigate potential impacts to the surrounding transportation system.

- **T-3.1.3: Car-Sharing** – The Project is not inconsistent with this policy which encourages the expansion of car-sharing services as an alternative to private vehicle ownership. The Project will contain up to four dedicated car sharing parking spaces within the parking garage on Lot 807. In addition, as part of its TDM strategies the Applicant will offer either a one-year membership to Capital Bikeshare or a one-year membership to a car-sharing service to each residential unit for the initial lease of each unit.

- **T-3.1.A: TDM Strategies** – This recommended Comprehensive Plan action encourages the development of strategies and requirements that reduce rush hour traffic by, among other things, promoting carpooling and transit use; encouraging the formation of Transportation Management Associations; and undertaking other measures that reduce vehicular trips, particularly during peak travel periods. This action also recommends identifying TDM measures and plans as appropriate conditions for large development approval. The Project is not inconsistent with this recommended Comprehensive Plan action. As discussed above, the Project includes a robust set of TDM strategies that will be implemented by the Applicant for Buildings 1 and 2. These strategies will reduce the number of trips generated by the Project through the provision of adequate bicycle parking, unbundling the cost of residential parking from

residential lease or purchase costs, identification of TDM Leaders, provision of TDM materials to new residents, offering memberships to alternative travel modes such as Capital Bikeshare or a car-sharing service, installation of real-time transportation information displays within residential lobbies, and implementing Residential Parking Permit restrictions.

· **T-3.2.D – Unbundle Parking Costs** – This Comprehensive Plan action recommends finding ways to unbundle the cost of parking from residential units, thus allowing those purchasing or renting property to opt out of buying or renting parking spaces. The Project is not inconsistent with this recommended action since, as part of the TDM strategies that will be implemented by the Applicant, the cost of residential parking will be unbundled from the cost of leasing or purchasing a residential dwelling unit within Building 1 and 2.

· **T-3.3.1: Balancing Good Delivery Needs** – The Project is not inconsistent with this policy which promote balancing the needs for good delivery with concerns about roadway congestion, hazardous waste exposure, quality of life, and security. Most notably, in response to community concerns regarding the initial size of the grocery store, specifically regarding truck traffic, the Applicant reduced the size of the grocery store while maintaining the full-service, neighborhood-serving capability desired by the community. The reduction in size alone will substantially reduce the number of truck deliveries to the grocery store. In addition, the balance between delivery of goods and concerns about roadway congestion and quality of life will be further

addressed through the significant pedestrian, streetscape, and alley improvements that will be constructed, and the thorough loading management plan that will be implemented by the Applicant. Based on the above, the Project is not inconsistent with this policy.

· **T-3.3.4: Truck Management** – This policy calls for managing truck circulation to avoid negative impacts on residential streets and reduce volume of truck traffic on major commuter routes during peak travel hours. The Project is not inconsistent with this policy. The potential impact of truck traffic on the area surrounding the Project will be reduced through the permanent closure of approximately 80 feet of curb cut along Yuma and 48th Streets, which, consistent with DDOT policy, will result in all truck traffic utilizing the alley system for loading and unloading. Furthermore, truck traffic will be effectively managed through the Applicant’s loading management plan.

· **T-3.4.1: Traveler Information Systems** – This policy promotes the use of user-friendly, accurate, and timely traveler information systems, including real-time transit arrival information, in order to improve traffic flow and customer satisfaction. The Project is not inconsistent with this policy. Specifically, one of the TDM strategies that will be implemented by the Applicant is the installation of a Transportation Information Center Display (electronic screen) within the residential lobbies which will contain information related to local transportation alternatives.