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January 3, 2025

*Via IZIS*

Anthony Hood, Chairperson  
District of Columbia Zoning Commission  
441 4th Street NW  
Suite No. 200S  
Washington, D.C. 20001

**Re: Racial Equity Analysis Supplement to the Text Amendment Application No. 07-08D (Extension of Surface Parking for Nationals Ballpark)**

Dear Chairperson Hood:

In supplement to the referenced text amendment application, the following the Racial Equity Analysis is provided as follows.

**Background**

The proposed text amendment seeks to extend zoning authority for parking use of Sq. 767, Lots 44-47, Sq. 768, Lots 19-22 & Sq. 882S, Lot 77 until April 1, 2028 (“Properties”) owned by the D.C. Housing Authority (“Housing Authority”): The proposed parking use is temporary and for the purpose of supporting the Nationals Ballpark nearby. The Properties are part of the mixed-use Arthur Capper/Carrollsborg HOPE VI site that is subject to a Planned Unit Development ZC 03-12/03-13, and modifications thereto to permit temporary parking on the Properties pursuant to ZC 03-12E/03-13E, 03-12O/03-12O), and 03-12W/12-13W (the “PUD”).

The Properties are part of a long standing, large PUD to include a mix of public housing replacement units as well as market rate units which will help to subsidize the affordable units. The PUD recently received Zoning Commission approval of a five (5) year extension (ZCO 03-12Z/03-13Z) until December 18, 2028, to provide additional time for the Housing Authority to

revisit the economics of the approved PUD, recalibrate as necessary for feasibility and identify a new development partner. Previously, the Housing Authority has been unable to obtain the financing needed to complete the project.

The Ballpark relies on the parking provided on the Properties. The parking provides convenient access to the Ballpark for people who are unable or unwilling to use other means of transportation and alternative parking facilities in the immediate area are inadequate to meet demand. In addition, the revenues generated by the parking support the Housing Authority's affordable housing objectives.

### **Disaggregated Data Regarding Race and Ethnicity**

Consideration of disaggregated race and ethnicity data is largely irrelevant to the Commission's evaluation of the proposed parking text amendment through a racial equity lens. As a result, this type of data and analysis is not provided herein.

### **Comprehensive Plan /Racial Equity Implications**

The proposed text amendment was evaluated for its consistency with the Comp Plan, including the Future Land Use Map (FLUM), Generalized Policy Map (GPM), and relevant policies of the Lower Anacostia Waterfront/ Near Southwest Area Element as well other Citywide elements. The text amendment is found to be not inconsistent with the Comprehensive Plan. It advances numerous policies within Lower Anacostia Waterfront/ Near Southwest Area Element and Citywide Elements, particularly those under the Economic Development Element.

### **Future Land Use ("FLUM") and Generalized Policy Map Designations**

The Council most recently approved the 2021 Comprehensive Plan. For the Properties, the updated Future Land Use Map did not change for Squares 767 and 768 from Mixed Medium Density Residential / Commercial, but did change for Square 739 from High Density Commercial Use to High Density Mixed Commercial / Residential Use. However, the FLUM change does not impact the consistency of the approved PUD and its intended development program.

With regard to the Generalized Policy Map, Square 737 did not change from Land Use Change Area, while Squares 767 and 768 changed from Land Use Change Area to Neighborhood Conservation Area, in anticipation of the completion of the PUD. The Properties are also now included on the edge of a Resilience Focus Area where “future planning efforts are intended to guide resilience to flooding for new and existing development and infrastructure projects, including public capital projects. Resilience focus areas will explore watershed resilience to encourage the implementation on a neighborhood scale, as well as site-specific solutions, design guidelines and policies for a climate adaptive and resilient District.”

These policies will be addressed as part of future Stage 2 PUD applications for development of the Properties and have little relevancy for the proposed temporary parking use. However, it bears noting that there have been no changes to the Comprehensive Plan to indicate that the current PUD approval and extensions are no longer consistent with the approved long term land use objectives for the Properties.

#### Comprehensive Plan City Wide and Area Elements

The following City Wide and Area Elements have relevancy to both the long term and short term planning objectives for the Properties.

#### **506.8 Policy H-1.4.4: Public Housing Renovation**

Public housing is a critical part of meeting the demand for affordable housing and preventing displacement. Continue efforts to transform underfunded public housing projects to create equitable mixed-income neighborhoods. An equitable mixed-income neighborhood is one in which residents describe the neighborhood as safe for them and responsive to their concerns and ideas. Inform and engage the affected community throughout the redevelopment process. Target such efforts to locations where private sector development interest can be leveraged to assist in the revitalization, and support community programs and services that assist with creating and maintaining equity.

The proposed short term parking use will allow the Housing Authority to generate income to subsidize its public housing replacement efforts in the subject mixed income development and area. The applicable PUD process is a process which informs and engages the affected community in the redevelopment process.

### **ED-2.3 The Tourism and Hospitality Economy**

Section 709 The economic impact of tourism includes both direct employment in the hospitality industry and spending by tourists and business travelers during their stays in the District. As of 2017, hotels, bars, and restaurants directly provide more than 67,000 jobs in the District. 709.2 Future growth is expected in both the tourism and convention sectors. The Nationals Park opened in 2008, where it helped catalyze reuse of the Anacostia waterfront. Building on the momentum of Nationals Park, the new Audi Field and Entertainment Sports Arena at St. Elizabeth's East are expected to draw more visitors and spending to historically underserved communities near and along the Anacostia River. Meeting the increased demand for visitor services will require sustained efforts to expand the hospitality workforce, upgrade transportation capacity, increase awareness of the District's public safety, and maintain public access to key attractions and amenities. 709.4

The above tourism and hospitality policies are served with the temporary parking use of the Properties and have important racial equity implications. As indicated above, the Nationals Ballpark draws visitors and spending to the historically underserved communities which include the Properties. And the Ballpark is very dependent on the proposed parking at least until other nearby properties are developed with additional parking which can support the Ballpark. During times when the Ballpark is not in use, the proposed parking can provide parking to support other visitor attractions in the area and as well as neighborhood residents in support of both economic benefits and enhanced safety for area residents.

### **Chapter 19 Lower Anacostia Waterfront/ Near Southwest Area Element**

The Nationals Park continues to draw crowds from across the Washington, DC region to games, concerts, and other events. Overall, the ballpark hosts about 2.5 million visitors annually. Policy AW-2.2.2: Ballpark Entertainment District and Capitol Riverfront Leverage the success of Nationals Park and Audi Field (the new professional soccer stadium), drawing residents, workers, and visitors to the Capitol Riverfront/Navy Yard area to catalyze additional development of the South Capitol Street corridor with retail, high-density residential, entertainment, and commercial uses. 1911.8

The Comprehensive Plan Lower Anacostia Waterfront/Near Southwest Area Element recognizes and supports the importance of the Ballpark in catalyzing additional development of the South Capitol Street corridor with retail, high-density residential, entertainment and commercial uses that create activity, pedestrian traffic and eyes on the street thereby enhancing the safety of the subject underdeveloped area. Attracting new retail and residential offerings to the

area will promote racial equity for area residents which have previously had only limited nearby retail stores and services and older housing stock.

### **Community Outreach and Engagement**

The overarching Arthur Capper PUD process, including recent extensions has provided extensive opportunities for community and previous residents engagement. More specifically, the recent extension of the parking use of the Properties gained conditional support from ANC 8F. The Applicant will continue to engage with ANC8F and other affected community organizations as the referenced text amendment case continues to proceed.

### **Conclusion**

In conclusion, the proposed text amendment significantly advances racial equity by aligning with Comp Plan policies and allowing the Applicant to put the Properties to productive, income generating use while the Housing Authority continues to advance its public housing replacement objectives. Through extensive community outreach and engagement in the Arthur Capper PUD case and the proposed text amendment, the Applicant ensures that the voices and concerns of historically marginalized populations are heard and addressed.

On behalf of the Applicant, please consider the above racial equity and analysis as part of the referenced text amendment application. Thank you in advance for your consideration.

Sincerely,



Cynthia A. Giordano

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2025, electronic copies of the foregoing Supplement to the Text Amendment Application Following the Racial Equity Analysis; ZC No. 07-08D, (Extension of Surface Parking for Nationals Ballpark) was served on the following:

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