

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Michael Jurkovic, AICP, Development Review Specialist
MBR for Maxine Brown-Roberts, Associate Director, Development Review
 Radhika Mohan, Deputy Director, Development, Design and Preservation

DATE: July 20, 2026

SUBJECT: ZC 15-18E – Modification without Hearing to ZC 15-18, PUD and Consolidated Map Amendment for 2715 Pennsylvania Ave, NW

I. RECOMMENDATION

After a review of the request, including a comparison of the proposed change against the approved, the Office of Planning (OP) **does not object** to the applicant's request for a Modification Without a Hearing under Subtitle Z § 703, and recommends **approval of the requested modification with the condition discussed below.**

OP's support in the case is based both on the record and our discussions with the applicant which clarified the extent of the request. From our discussions, we understand that the applicant requested use change would be secondary to the underlying intent to lease all seven units on a long-term basis and we offer our support with the following condition:

- **All seven dwelling units may be designated as residential and/or lodging use, with no more than three of the seven units being designated as a lodging use at any given time, provided that the lodging units remain advertised for long-term residential lease, or sale, while assigned to lodging purposes or otherwise vacant.**

The requested modification would provide flexibility for the Applicant to expand the permissible uses for the previously approved seven dwelling units, so long as at any given time no more than three units are utilized for stays of less than 30 days. The retail use identified and public benefits proffered in the PUD approval remain unchanged.

II. APPLICATION IN-BRIEF

Applicant	Holland & Knight for Initio LP
Address	2715 Pennsylvania Avenue, NW
Legal Description	Square 1194, Lot 15
Ward, ANC	Ward 2 / ANC 2E
Underlying Zoning	C-2-A (now MU-4), low to moderate density mixed use, and unzoned.
PUD-Related Zoning	W-2 (now MU-13), medium density mixed use

Comprehensive Plan Maps	<u>Future Land Use Map</u> – Low Density Commercial / Parks, Recreation and Open Space <u>Policy Map</u> – Regional Center and Resilience Focus Area
Project Summary	The property as approved to be developed under a PUD and related map amendment for a mixed-use building with a restaurant on the ground floor and a four-story apartment house with seven residential units above. The building was approved for a height of 60 feet, and a density of 3.5 FAR. As part of the PUD, relief was granted from off-street parking, lot occupancy, and rear yard zoning requirements.
Project Benefits	The approved PUD included the following public benefits: • A requirement for a \$359,604 contribution to the Housing Production Trust Fund. Half which was to be paid prior to Building Permit issuance and the second half due at prior to the issuance of the Certificate of Occupancy. • The building shall meet or exceed LEED-Gold Certification. • Prior to the issuance of a Certificate of Occupancy, an agreement with the National Parks Service for the improvement of and long-term maintenance of Reservations 360 and 691 shall be finalized. The value of which shall be a minimum of \$200,000.
Previous Approvals:	<u>15-18A</u> : Minor Modification, clarification of exemption from the minimum PUD size requirement. <u>15-18B</u> : Modification of Consequence, additional zoning flexibility to permitted lot occupancy, 75% permitted 76.9% approved. <i>Covid-19 related extensions to March 9, 2022 and March 9, 2023 (15-18(1) and 15-18(2)).</i> <u>15-18C</u> : Two-year extension to March 9, 2025 <u>15-18D</u> : One-year extension to March 9, 2026
Status:	The applicant has started construction before the previously approved expiration date and is currently moving towards project delivery in Q1 of 2027.

III. ANALYSIS OF PROPOSED MODIFICATION WITHOUT HEARING REQUEST

Subtitle Z § 703 provides for Zoning Commission consideration of a modification without hearing to an approved Planned Unit Development (PUD) as follows:

703 CONSENT CALENDAR – TECHNICAL CORRECTIONS TO ADOPTED RULES AND MODIFICATIONS WITHOUT HEARINGS TO CONTESTED CASE ORDERS AND PLANS

703.1 . . .

703.6 For the purposes of this section, a “modification without hearing” is a modification in which impact may be understood without witness testimony, including, but not limited to a proposed change to a condition in the final order, a change in position on an issue discussed by the Commission that affected its decision, or a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission. Determination that a modification can be approved without witness testimony is within the Commission’s discretion. A request to add or change a zoning map designation to an approved planned unit development shall not be considered without a hearing.

As detailed in the applicant’s filings at Exhibit #2, the requested modification is to the approved uses in the development detailed throughout the original Order 15-18. Specifically, the request is to modify the approval to allow up to three of the seven units, originally proposed to be in entirely in residential use, to be used as lodging at any given time. This use flexibility would allow the applicant to lease up to three units for stays less than 30 days.

Approval of the requested modification would not alter the building design, land use transportation, or environmental impacts on which the Commission’s original and subsequent decisions were based, nor is it likely to have any significant negative impact on the surrounding neighborhood. The proposal would continue to be not inconsistent with the Comprehensive Plan’s Land Use and Housing policies and would introduce a wider mix of uses in the building as envisioned for the area. Accordingly, OP concurs with the applicant that this could be considered as a modification without hearing, and recommends the Commission approve the request and that the requested change, and its limitations, be incorporated into a revised order.

IV. OTHER DISTRICT AGENCY COMMENTS

DDOT has provided a report at Exhibit 5, which states that they have no objection to the proposed modification.

V. ANC COMMENTS

As of the writing of this report ANC 2E has not submitted comments to the record.

VI. COMMUNITY COMMENT

No community comments were submitted to the record as of the date of the filing of this report.

VII. LOCATION MAP

