

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Philip Bradford, AICP, Development Review Specialist  
*JL for* Jennifer Steingasser, AICP, Deputy Director, Development, Design & Preservation

**DATE:** May 12, 2025

**SUBJECT:** ZC Case 24-16 – OP Hearing Report for a Map Amendment Petition to Rezone Grace Reformed Church (1405 15<sup>th</sup> Street NW) from RA-5 to ARTS-3.

### **I. PROPOSAL AND RECOMMENDATION**

The applicant, MR 1401 15<sup>th</sup> Street Retail LLC requests a map amendment to rezone the subject property located at 1405 15<sup>th</sup> Street NW (Square 0210, Lot 0827) from the RA-5 zone to the ARTS-3 zone. The site is designated mixed-use medium-density residential and moderate-density commercial, a designation consistent with the ARTS-3 zone. The uses and development types permitted by the ARTS-3 zone would be compatible with the surrounding community.

The Office of Planning (OP) recommends that the Zoning Commission **approve** the proposed map amendment. Additionally, OP does not recommend the map amendment be subject to IZ Plus as further discussed in Section VI of this report.

### **II. COMMISSION COMMENTS FROM SET-DOWN MEETING**

The proposed map amendment was set down at the Zoning Commission's March 13, 2025 public meeting. At the meeting the Zoning Commission expressed their general support for the map amendment but requested additional information about the general feasibility of potential additions to the building to create additional housing. OP contacted Historic Preservation (HP) staff regarding potential for additions, HP Staff noted that due to the buildings occupying nearly 100% of the lot and the distinctive rooflines and dormer windows it is unlikely to construct an addition to the building without altering the architectural character. It is expected that the applicant will also address this question at the public hearing.

### **III. PETITION-IN-BRIEF**

<b>Applicant:</b>	Holland & Knight LLP on behalf of MR 1401 15 <sup>th</sup> Street Retail LLC
<b>Owner:</b>	MR 1401 15 <sup>th</sup> Street Retail LLC
<b>Proposed Map Amendment:</b>	From RA-5, high-density residential, to ARTS-3, medium-density, mixed-use; located directly adjacent to the site
<b>Address:</b>	1401-1405 15 <sup>th</sup> Street NW
<b>Ward and ANC:</b>	Ward 2, ANC 2F

<b>Legal Description:</b>	Square 0210, Lots 839, 840
<b>Property size:</b>	7,200 square feet
<b>Future Land Use Map Designation:</b>	Mixed Uses: Residential - Medium Density (RMED) Commercial – Moderate Density (CMOD)
<b>Generalized Policy Map Designation:</b>	Predominantly Neighborhood Conservation Area
<b>Historic District:</b>	Greater Fourteenth Street Historic District
<b>Historic Landmark:</b>	Grace Reformed Church

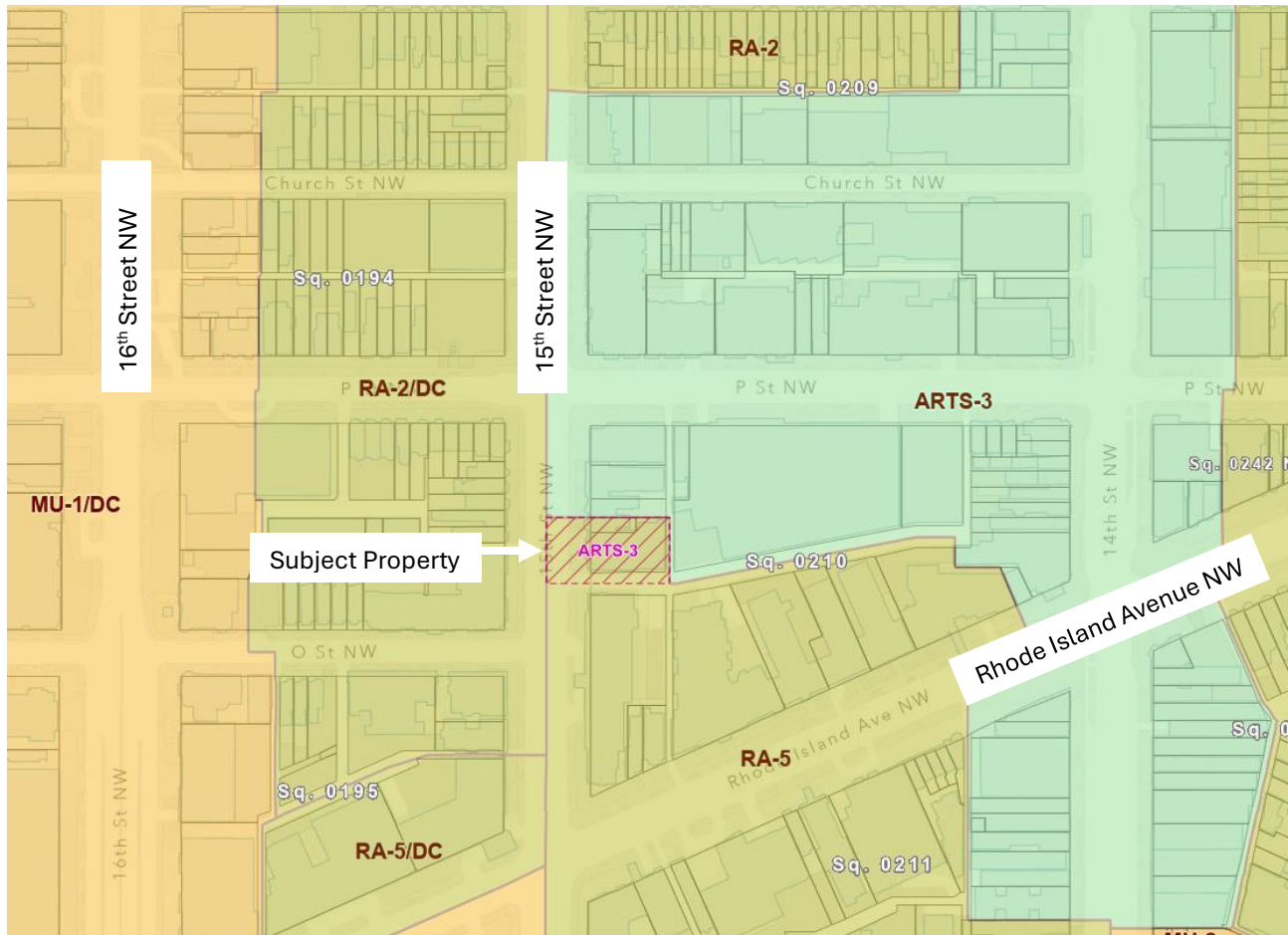
#### IV. SITE AND AREA DESCRIPTION

The property is located on the east side of 15<sup>th</sup> Street NW and is improved with the Grace Reformed Church. The site has functioned as a church since it was first constructed but has been vacant since 2022. Since set down the property has been divided into two lots, Lots 839 and 840, and the ownership has changed from Central Atlantic Conference of the United Church of Christ to MR 1401 15<sup>th</sup> Street LLC. The property is located within the Greater Fourteenth Street Historic District and is within the Logan Circle neighborhood. The church is surrounded by high- to medium- density residential development to the west and south, with mixed use development to the north along P Street NW, and east along 14<sup>th</sup> Street NW.

The surrounding neighborhood contains a variety of moderate density residential row houses and apartment buildings, many of which predate the 1958 zoning regulations. Some buildings in the vicinity contain ground floor commercial space or are occupied by hotels. The site is also well served by transit with various bus lines on P Street NW, 14<sup>th</sup> Street NW, and 16<sup>th</sup> Street NW, with lines on 14<sup>th</sup> and 16<sup>th</sup> street being priority bus corridors. The property is located approximately 3 blocks east of the Dupont Circle Metro Red Line Station. In addition to being located in a highly walkable area of the District the site is also located near several separated bike lanes and Capital Bikeshare stations.

The existing building is significant as it is the national memorial of the Reformed Church in the United States. The Washington congregation was established in 1868 and was located on the site since 1880. The property was listed on the National Register of Historic Places on April 18, 1991.





## V. COMPARISON OF EXISTING AND PROPOSED ZONES

The applicant's petition is to rezone the property from RA-5 to the ARTS-3 zone. The intent of the existing RA-5 zone is as follows (Subtitle F § 101.8):

- *The RA-5 zone provides for areas developed with predominantly high-density residential.*

The intent of the proposed ARTS-3 zone is as follows (Subtitle K § 800.4):

- *The ARTS-3 zone is intended to permit medium-density, mixed-use development, with a focus on employment.*

The property is improved with a now vacant historic Church building. A religious-based use is permitted as a matter-of-right in both the RA-5 zone and the proposed ARTS-3 zone. The ARTS-3 zone currently exists adjacent to this site, and is requested by the applicant as it allows a broader range of uses, including Arts, Design, and Creation, Eating and Drinking Establishments, and Retail, which increase the viability of adaptively reusing the historic but vacant structure and ensuring its preservation.

Rezoning applications consider only consistency with the Comprehensive Plan and do not include a specific development proposal. However, the applicant has stated that they propose to renovate the church for commercial uses, with the Parish House used for residential, which would not be inconsistent with the Comprehensive Plan and can be accommodated on site under the proposed ARTS-3 zoning.

The following table summarizes the existing RA-5 zone and the proposed ARTS-3 zone:

	Existing Zone: RA-5	Proposed Zone: ARTS-3
<b>Permitted Uses:</b>	Chapter 4 – Residential multi-family by-right; retail, eating and drinking not permitted by right	Chapter 7 – Residential multi-family, arts, design & creation. retail, and eating and drinking as a matter of right.
<b>Height:</b>	90 feet max.	65 feet max. (75 feet max. with IZ)
<b>FAR:</b>	6.0 max. 7.2 IZ	4.0 max. 4.8 IZ 2.5 FAR max. non-residential.
<b>Penthouse Height:</b>	20 feet max. and 1 story 2 <sup>nd</sup> story permitted for mechanical max.	12 feet max. and 1 story 18 feet 6 in. mechanical max.
<b>Lot Occupancy:</b>	75 % max. 80% IZ	75 % max. 80 % IZ
<b>Rear Yard:</b>	12 feet min. 3 in. per 1 ft of height	12 feet min. 2.5 in. per 1 ft. of height
<b>Side Yard:</b>	4 feet min. if provided	5 feet min. if provided
<b>GAR:</b>	.30 min.	.25 min.

## VI. IZ PLUS EVALUATION

502.1 Except as provided in Subtitle X § 502.2, the requirements of this section shall apply to:

(a) A map amendment that rezones a property:

- (1) From a PDR zone to an ARTS, CG, D, MU, NMU, R, RA or RF zone;
- (2) From any zone other than a PDR zone to a D zone without a prescribed residential FAR; or
- (3) From unzoned to an ARTS, CG, D, MU, NMU, R, RA or RF zone; or

(b) A map amendment not described in paragraph (a) of this subsection 502.1, which rezones a property from any zone to a zone that allows a higher maximum FAR, both exclusive of the twenty percent (20%) IZ bonus density, if applicable.

IZ Plus requires a higher affordable housing set-aside than regular inclusionary zoning. An IZ Plus set-aside requirement **would not be appropriate** pursuant to Subtitle X § 502.1 because:

1. The proposed map amendment is for a rezoning from the RA-5 zone to the ARTS-3 zone and would result in rezoning the property from a higher maximum FAR to a lower FAR, which does not meet the applicability requirements of the section above.
2. As the site is fully developed with a structure on the National Register of Historic Places, the development capacity of the site is limited to the confines of the existing building envelope.

Therefore, OP is recommending this map amendment not be subject to IZ Plus. IZ Plus is intended to produce more affordable housing, particularly in areas with relatively few affordable units. Although the Near Northwest planning has not met targets for the production of affordable units, this



## VII. PLANNING CONTEXT

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map, the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps and do not establish detailed requirements or permissions for a development's physical characteristics including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

**Generalized Future Land Use Map (FLUM)**

*The Future Land Use Map indicates areas where the mixing of two or more land uses is especially encouraged. The particular combination of uses desired in a given area is depicted*

*in striped patterns, with stripe colors corresponding to the categories defined on the previous pages. A Mixed Use Future Land Use Map designation should not be confused with the Mixed Use (MU) zoning districts, although they frequently apply to the same area or parcel of land.*

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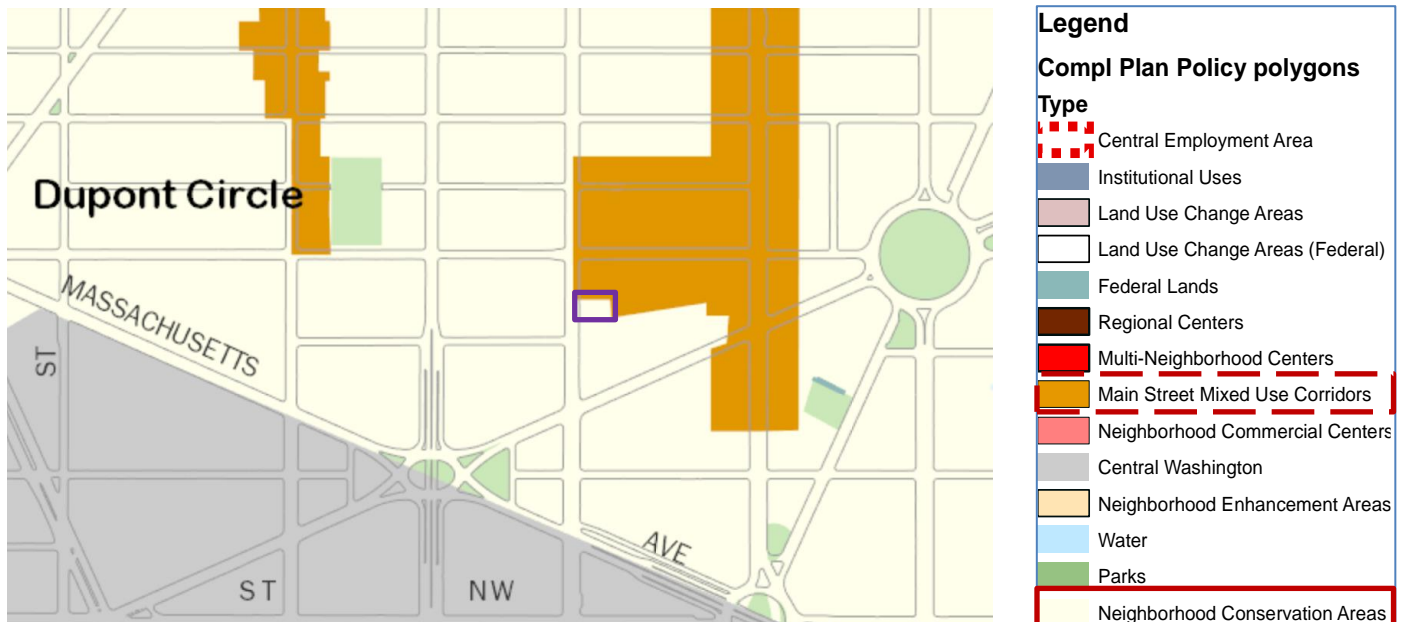
*The general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other (for example, ground-floor retail with three stories of housing above), the Future Land Use Map may note the dominant use by showing it at a slightly higher density than the other use in the mix (in this case, Moderate Density Residential/Low Density Commercial). The Comprehensive Plan Area Elements may also provide detail on the specific mix of uses envisioned. 227.21*

...

The proposed ARTS-3 zone would be more consistent with these designations than the existing RA-5 zone. The ARTS-3 zone allows a broader potential mix of uses, whereas the existing RA-5 zone is a high-density residential zone. On balance, the ARTS-3 zone is more appropriate for the site as it permits the types of uses envisioned by the mixed-use designation on the FLUM map.

### **Generalized Policy Map**

The Generalized Policy Map (GPM) indicates that the site is predominantly located within a Neighborhood Conservation Area. Although the GPM is intended to be read as generalized, a small portion at the north end of the site could be interpreted as being within the Main Street Mixed Use Corridor designation.



*Neighborhood Conservation Areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and*

*the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. 225.4*

*The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5*

***Main Street Mixed Use Corridors:** These are traditional commercial business corridors with a concentration of older storefronts along the street. The area served can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian oriented environment with traditional storefronts. Many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment. 225.14*

Although the landmark building enhances the neighborhood, the vacancy of any use does not. The proposed rezoning, while technically a downzoning in terms of permitted height and density, allows more flexibility regarding matter-of-right uses, which would enable the small site to be adaptively reused and add vitality to the neighborhood consistent with the intent of the Neighborhood Conservation Area and Main Street Mixed Use Corridors designations within the Generalized Policy Map. The proposed zone is also consistent with existing zoning to the north and east of the site.

## **B. Comprehensive Plan Analysis Through a Racial Equity Lens**

The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan. The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

*Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable,*

*marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7*

The Commission's four-part Racial Equity Tool outlines information to be provided to assist in the evaluation of zoning actions through a racial equity lens. The Applicant's Racial Equity Analysis is provided at [Exhibit 5H](#) and OP's analysis is provided on the setdown report at [Exhibit 13](#), and summarized below.

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning. The rezoning could allow the property to be adaptively reused with commercial and residential uses as supported by the Comprehensive Plan Future Land Use Map, Generalized Policy Map, and proposed zoning designation which would enhance the existing neighborhood.

### **RACIAL EQUITY TOOL PART 1 – COMPREHENSIVE PLAN GUIDANCE**

In the context of zoning, certain priorities of equity are explicit throughout the Comprehensive Plan, including affordable housing, displacement, and access to opportunity. Below is an outline of Comprehensive Plan policies relative to this proposal which, when viewed through a racial equity lens, provides the Commission a framework for evaluating the map amendment. Please refer to Attachment I in this report for the full text of each policy statement, or refer to the [Comprehensive Plan](#) available on the Office of Planning website – [www.planning.dc.gov](http://www.planning.dc.gov).

As noted above, the proposal would not be inconsistent with both Comprehensive Plan Generalized Policy and Future Land Use maps. Below is a list of Citywide and Area Element policies that are not inconsistent with the proposed map amendment. Please refer to the [OP Set Down Report](#) for the full text and complete analysis of these policies in relation to the proposed map amendment.

#### ***Near Northwest Area Element***

- *NNW-1.1.2: Enhancing Established Commercial Areas*
- *NNW-1.1.10: Pedestrian and Bicycle Safety*
- *NNW-1.1.11: Pedestrian Connections*
- *NNW-1.2.9: Design Review*

#### ***Land Use Citywide Element***

- *Policy LU-1.4.1: Station Areas as Neighborhood Centers*
- *Policy LU-1.4.2: Development Around Metrorail Stations*
- *Policy LU-1.4.6: Development Along Corridors*
- *Policy LU-2.1.1: Variety of Neighborhood Types*
- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods*
- *Policy LU-2.1.4: Rehabilitation Before Demolition*
- *Policy LU-2.1.10: Multi-Family Neighborhoods*
- *Policy LU-2.2.2: Appearance of Vacant Lots and Structures*
- *Policy LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings*
- *Policy LU-2.2.4: Neighborhood Beautification*
- *Policy LU-2.3.7: Nonconforming Institutional Uses*
- *Policy LU-2.4.5: Encouraging Nodal Development*
- *Policy LU-2.4.6: Scale and Design of New Commercial Uses*



***Transportation Citywide Element***

- *Policy T-1.1.4: Transit-Oriented Development*
- *Policy T-1.1.7: Equitable Transportation Access*
- *Policy T-1.2.1: Major Thoroughfare Improvements*
- *Policy T-1.2.3: Discouraging Auto-Oriented Uses*
- *Policy T-1.3.1: Transit-Accessible Employment*

***Environmental Protection Citywide Element***

- *E-1.1 Preparing for and Responding to Natural Hazards*
- *E-1.1.2: Urban Heat Island Mitigation*
- *E-2.1.2: Tree Requirements in New Development*
- *E-2.1.3: Sustainable Landscaping Practices*
- *E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff*

***Economic Development Citywide Element***

- *ED-1.1.4: Promote Local Entrepreneurship ED-2.2 The Retail Economy*
- *ED-2.2.1: Expanding the Retail Sector*
- *ED-2.2.3: Neighborhood Shopping*
- *ED-2.2.4: Support Local Entrepreneurs*
- *ED-2.2.5: Business Mix ED-2.2.9: Clustered Retail at Transit*
- *ED-3.1.1: Neighborhood Commercial Vitality*
- *ED-4.2 Increasing Workforce Development Skills*
- *ED-4.2.6: Entry-Level Opportunities*

***Historic Preservation Citywide Element***

- *HP-1.6 The Image of Washington, DC*
- *HP-1.6.1: Washington, DC's Historic Image*
- *HP-1.6.2: Preserving the District's Historic Character*
- *HP-1.6.3: Enhancing the District's Historic Character*
- *HP-1.6.4: Downtown and Neighborhood Character*
- *HP-2.4.1: Preservations Standards for Zoning Review*
- *HP-2.5 Review of Rehabilitation and New Construction*
- *HP-2.5.1: Rehabilitation of Historic Structures*
- *HP-2.5.2: Adaptation of Historic Properties for Current Use*
- *HP-2.5.3: Compatible Development*
- *HP-2.5.4: Suitability to the Historic Context*
- *HP-2.5.5: Protecting Historic Building Integrity*
- *HP-2.5.6: Review Process for Local Projects*
- *HP-4.1.1: Preservation and Community Development*
- *HP-4.1.2: Preservation and Neighborhood Identity*
- *HP-4.1.3: Neighborhood Revitalization*

***Housing Citywide Element***

- *H-1.1.1: Private Sector Support*
- *H-1.1.4: Mixed-Use Development*
- *H-1.1.8: Production of Housing in High-Cost Areas*

- *H-1.1.9: Housing for Families*
- *H-1.4.6: Whole Neighborhood Approach*

The map amendment would allow for the preservation and adaptive reuse of the existing, vacant historic structures on the site to maintain neighborhood and the District identity, and to help to create an overall improved environment for the community. The Historic Preservation design review process would ensure retention of the high-quality architecture and urban design. The adaptive reuse of the existing vacant historic church for a commercial tenant could foster new business and local entrepreneurship, while also allowing for a small number of new housing units in a high-cost area of the District. The subject property is close to numerous bus lines and the Dupont Circle Red Line Metro station, and the re-use of the building would help to activate the streetscape.

**Which Comprehensive Plan policies related to racial equity that will potentially not be advanced by approval of the zoning action?**

In their filing the Applicant identifies several Comprehensive Plan policies that the application may be inconsistent with such as:

- H-1.1.8: Production of Housing in High-Cost Areas
- E-3.2.2: Net-Zero Buildings
- E-3.2.3: Renewable Energy
- E-4.1.1: Maximizing Permeable Surfaces
- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

All of the policies that the applicant has indicated that may be inconsistent with the Comprehensive Plan policies are directly related to the historic nature of the structures on the property, that make furthering these policies difficult. The historic landmark status of the structure limits the potential for exterior alterations, therefore upgrades that make the building net-zero may not be feasible. Including permeable surfaces or utilizing a green roof to reduce runoff is also not feasible given historic preservation guidelines that emphasize maintaining the original materials and design.

The proposed map amendment is also potentially inconsistent with policies that encourage housing production. While the map amendment would allow for commercial uses, the church structure cannot accommodate residential uses without significant alterations, due to building code limitations and the historic nature of the property. As such, any housing would be limited to the Parish House and Sunday School, which results in the potential for very few housing units produced in the mixed-use redevelopment of the property.

**RACIAL EQUITY TOOL PART 2 – APPLICANT / PETITIONER COMMUNITY  
OUTREACH AND ENGAGEMENT**

The applicant states they have engaged with ANC 2F beginning in June of 2024, with a site visit and meeting to tour the site and explain the proposed plans for the site to the ANC members. Later in June the applicant met with SMD 2F03 Commissioner for a site visit and to discuss plans for the property. The applicant presented to ANC 2F Community Development Committee on September 25, 2024 where the CDC voted in favor of the request. The applicant met with ANC 2F on October 2, 2024 at the regularly scheduled public meeting where ANC 2F voted unanimously in favor of the proposed map amendment. After the set down meeting, the applicant submitted to the record the letter in support from ANC 2F from October 15, 2025 in [Exhibit 16E](#). The applicant stated in their pre-hearing statement in [Exhibit 16](#) that they continue to work with the relevant ANCs and the community and will provide any updates prior to the public hearing.

### RACIAL EQUITY TOOL PART 3 – NEAR NORTHEAST PLANNING AREA DATA

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. The OP setdown report at Exhibit 13 provides detailed disaggregated data using the 2012-2016 and 2018-2022 American Community Survey 5 Year Estimates by Planning Area available via the OP State Data Center ([ACS DATA](#)).

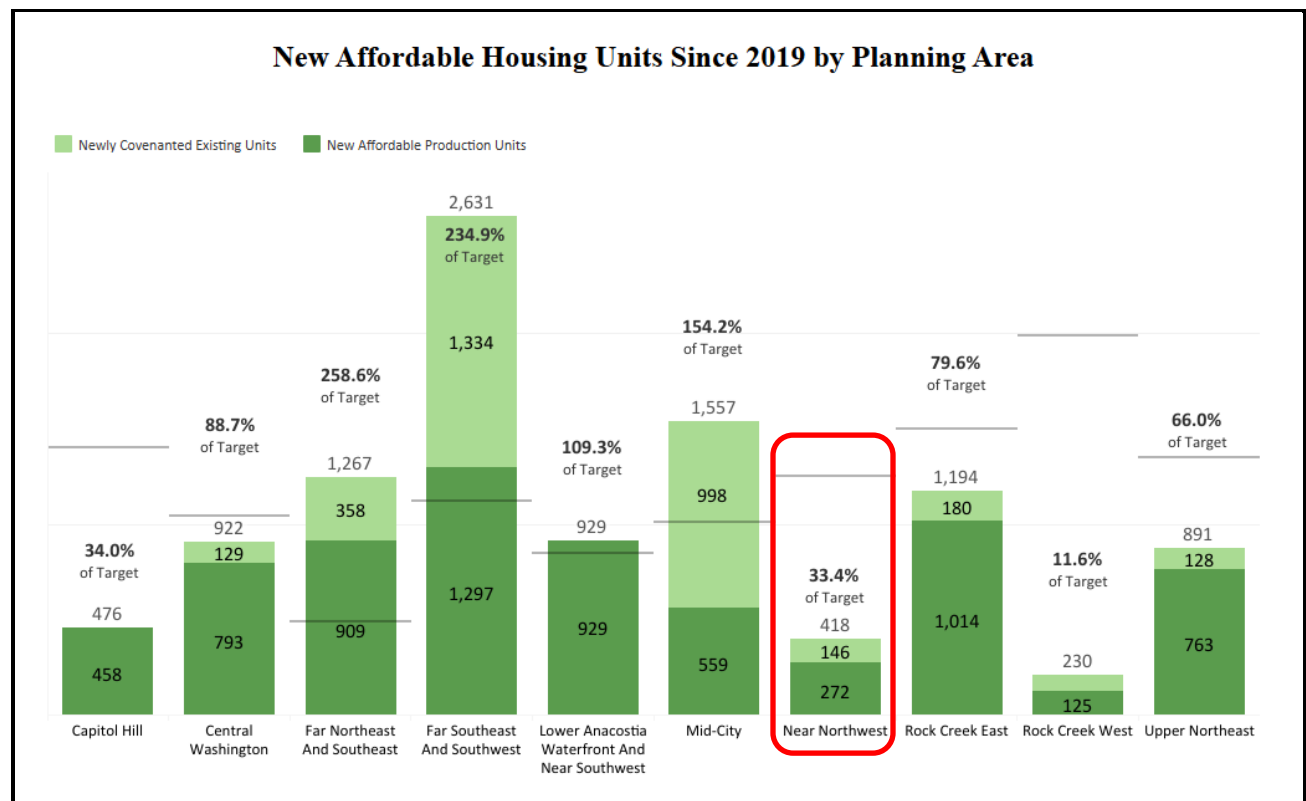
Part 3 also asks if the planning area is on track to meet affordable housing goals.

#### **Racial Equity Tool – Disaggregated Data Regarding Race and Ethnicity**

Please see the [OP Set Down Report](#) for detailed disaggregated data. In summary, the data shows that the Near Northwest Planning Area is increasingly diverse while still majority white. Incomes increased by approximately \$25,000 between the time periods. The housing tenure shows the planning area has a lower owner occupancy than the district average. Disparities in income and owner occupancy exist with White and Asian residents showing higher income and higher owner occupancy than Black, Hispanic, Indigenous American, and mixed-race groups. The planning area also has a lower unemployment and poverty rate than the district average and this is also reflected in a slightly lower cost burden than the rest of the district.

#### **Progress Toward Housing Equity Goals**

The most recent update to the [DMPED 36,000 by 2025 Dashboard](#) indicates that the planning area has not met its targets for housing production or for the production of dedicated affordable units. The proposed map amendment would result in an overall downzoning in residential capacity when compared to the RA-5 zone, but the site is principally limited by its historic landmark status which limits significant alterations to the existing buildings to accommodate more housing.



## **RACIAL EQUITY TOOL PART 4 –ZONING COMMISSION EVALUATION FACTORS**

- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.*

<b>Factor</b>	<b>Question</b>	<b>OP Response</b>
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	Direct displacement as a result of this map amendment is not anticipated. The site is currently occupied by a vacant church and does not contain housing units or commercial space.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Indirect displacement as a result of this map amendment is not anticipated. The proposed map amendment would facilitate the preservation but adaptive reuse of existing buildings, potentially including commercial space and a small number of residential units within the Parish House. Any new units constructed that meet the threshold for IZ would add to the supply of affordable and market rate units in the area that could limit indirect displacement of existing residents.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> <li>▪ Market Rate Housing</li> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	The map amendment would result in the potential for market rate and affordable housing. OP is not recommending IZ plus be applied to the map amendment, as outlined earlier in this report.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Infrastructure Improvements</li> <li>▪ Arts and Culture</li> <li>▪ Environmental Changes</li> <li>▪ Streetscape Improvements</li> </ul>	The proposal is likely to result in an improved streetscape and pedestrian realm facing 15 <sup>th</sup> Street NW. It is not likely that the proposed rezoning would have negative impacts to the physical environment as the uses allowed by the requested ARTS-3 zone include residential and commercial uses that would compliment the existing mixed-use area in the vicinity such as P Street NW and 14 <sup>th</sup> Street NW.
Access to Opportunity	Is there a change in access to opportunity? <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> <li>▪ Healthcare</li> <li>▪ Addition of Retail/Access to New Services</li> </ul>	The site is highly transit accessible, walkable and bikeable. The map amendment would allow for by-right commercial uses and thus new employment and job training opportunities through the new jobs created on site. These jobs would likely have a low barrier of entry and combined with the transit rich location would support access to residents

Factor	Question	OP Response
		regardless of age, race, income, geography, or physical ability.
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant's filings indicate the extensive community discussions that took place, which significantly impacted the proposed conditions.

### C. SUMMARY OF PLANNING CONTEXT ANALYSIS

As discussed above, the proposed map amendment would rezone the site to a zone that is more consistent with the Comprehensive Plan's land use recommendations for the subject property. The proposed ARTS-3 zoning could potentially help the site move from a vacant disused property to become adaptively reused as a mixed use development as encouraged by the Comprehensive Plan's Future Land Use Map and various other adopted District policies.

## VIII. DISTRICT AGENCY COMMENTS

In [Exhibit 3D](#) is a Staff Report and Recommendation to the Historic Preservation Review Board recommending approval for the proposed subdivision of lot. The report notes that the existing RA-5 zoning allows 90 feet in height and 6.0 FAR which provides for a development potential that is unrealistic for this historic landmark and creates pressure that could result in substantial alterations or new construction to utilize the full development potential of the site under the RA-5 zone.

[Exhibit 27](#) contains a report from DDOT stating no objection to the proposed map amendment and requesting further coordination with the applicant depending on the final development program for the site.

## IX. ANC COMMENTS

At [Exhibit 16E](#) is a report from ANC 2F in support of the map amendment. At the writing of this report, a report from ANC 2B has not been submitted to the record.

## X. COMMUNITY COMMENTS

At [Exhibit 25](#) and [Exhibit 26](#) are letters in opposition of the proposed map amendment.