

Updated Statement and Comprehensive Plan Analysis

4347 Hunt Place Holdings LLC

For a change from MU-3A Zone to the MU-8B Zone

Future Land Use Map

The Future Land Use Map designates the site as Medium Density Residential and Medium Density Commercial. On the commercial side, the FLUM anticipates development between 4.0 and 6.0 FAR, and the Comp Plan expressly identifies the MU-8 and MU-10 zones as representative of Medium Density Commercial. The MU-8B zone, with its permitted 5.0 FAR total FAR, with 4.0 FAR of commercial potential, therefore, aligns directly with that guidance. While MU-7A was adequate, MU-8B is in fact a more precise translation of the FLUM's commercial expectations for this property. As before, the residential component remains optional—consistent with a mixed-use designation—and the change in emphasis toward commercial density does not create inconsistency with the FLUM, which allows a range of land use mixes so long as the overall intensity falls within the medium-density category.

Generalized Policy Map

The Generalized Policy Map designates the site as a Neighborhood Commercial Center. The site's designation as a Neighborhood Commercial Center calls for the preservation and strengthening of commercial activity, with neighborhood-serving retail, services, and small businesses intended to anchor daily life for surrounding residents. Upper-story residential uses are supported but are not mandatory. The MU-8B zone, which permits significantly more commercial intensity than MU-7A, better supports this policy direction and responds directly to the ANC's assertions that although new housing has been delivered in the area, commercial amenities have lagged. Both the ANC and the Deanwood Citizens Association emphasized that the neighborhood needs retail, service, and job-generating uses, not another residential project. MU-8B is therefore uniquely responsive to that input while also remaining squarely within the expectations of the GPM.

Small Area Plan

The shift to MU-8B is similarly consistent with the Nannie Helen Burroughs Corridor Small Area Plan. That SAP encourages medium-density mixed-use development, reinvestment in underutilized sites, and strengthened commercial corridors, particularly at visible nodes and intersections. It envisions this corridor as a revitalized spine with improved economic opportunities and services for nearby residents. MU-8B allows the type of commercial viability, scale, and flexibility that is needed to attract meaningful retail and service tenants. As a result, the MU-8B zone does not deviate from the SAP's vision; it arguably better implements it.

Far Northeast and Southeast Area Element

The Far Northeast and Southeast Area Element—especially the Deanwood Focus Area policies—further reinforces the appropriateness of the MU-8B zone. The Area Element repeatedly calls for increased commercial activity, reinvestment in the Nannie Helen Burroughs corridor, and the transition of certain lower-density commercial or mixed-use zones into higher-density ones to catalyze economic growth. It specifically encourages medium-density development near key intersections and corridors, and it identifies the lack of retail and neighborhood-serving amenities as a long-standing challenge. MU-8B squarely addresses those issues. It enables meaningful commercial development, supports job creation, and contributes to the restoration of a more balanced land use pattern east of the Anacostia River, where large volumes of residential development have historically not been matched with corresponding commercial investment.

Other Citywide Elements

The remaining Citywide Elements analyzed in the original Comprehensive Plan submission continue to support the updated rezoning. The Land Use Element remains entirely consistent, as MU-8B promotes corridor-focused, transit-accessible development and reinvestment in commercial nodes—goals that are central to LU-1.4 and LU-2.4. The Transportation Element continues to support a more intensive mixed-use designation at this site because of its strong bus access and proximity to the Minnesota Avenue and Benning Road Metrorail Stations. The Economic Development Element is enhanced by the shift to MU-8B, which creates greater potential for small business opportunities, neighborhood-serving retail, and employment growth. The Environmental Protection Element remains fully satisfied because any future project must still comply with floodplain, green building, and stormwater standards regardless of the exact zone. And the Housing Element is not undermined by this shift, as the site currently contains no housing and no displacement is possible. While MU-8B may produce fewer residential units than MU-7A, there is no Comprehensive Plan requirement that this particular property maximize residential output; rather, the Plan requires a balancing of policies, and the community-identified need for commercial services is a legitimate and Comp-Plan-supported rationale for allowing a more commercial-oriented zone.

Racial Equity

From a racial equity standpoint, the MU-8B rezoning remains entirely consistent with the prior analysis and, if anything, enhances it. Deanwood has experienced decades of disinvestment in its commercial corridors, and residents have been historically underserved by local retail, grocery access, and employment opportunities. Increasing commercial capacity at this site directly addresses those inequities. The rezoning still creates no displacement, still supports the delivery of neighborhood amenities in an equity-focused planning area, and still aligns with the Comprehensive Plan's explicit call for targeted reinvestment east of the river. It also responds meaningfully to the ANC Chair's expressed concern that the area has absorbed large numbers of income-restricted units without appropriate commercial infrastructure to support those households.

Conclusion

Where MU-8B differs from MU-7A—principally in its higher commercial density and slightly greater allowable height—those differences do not render the rezoning inconsistent with the Comprehensive Plan. The increased commercial FAR is entirely within the Medium Density Commercial framework. The incremental height difference remains within the mid-rise scale that the Comp Plan anticipates in this corridor, and the site’s position at a major intersection and across from other mixed-use parcels mitigates any compatibility issues. The Plan requires balancing, not strict adherence to a single element, and the enhanced alignment with Area Element and GPM policies—combined with clear and documented community preference—satisfies that balancing test.

In summary, the MU-8B rezoning is fully consistent with the logic and conclusions of the existing Comprehensive Plan analysis. Every major policy foundation that supported the MU-7A rezoning continues to apply, and the MU-8B zone better effectuates the FLUM, better serves the Neighborhood Commercial Center designation, better aligns with the Deanwood community’s stated needs, and better supports the commercial revitalization goals articulated throughout the Comprehensive Plan. Where differences exist, they are not inconsistencies; rather, they are refinements that strengthen the proposal’s fidelity to the District’s adopted land use policy.

Respectfully Submitted,

Alexandra Wilson

Alexandra Wilson
Sullivan & Barros, LLP