

EVALUATION OF CONSISTENCY WITH THE DC COMPREHENSIVE PLAN AND APPLICABLE SMALL AREA PLANS AND STUDIES

Pursuant to 11-X DCMR § 500.3, the Zoning Commission shall find that the proposed zoning map amendment is not inconsistent with the Comprehensive Plan (“Comp Plan”) and with other adopted public policies and active programs related to the subject site. Through a racial equity lens, this Evaluation of Consistency with the DC Comprehensive Plan and Applicable Small Area Plans and Studies (“Evaluation”) provides a thorough analysis of the map amendment’s consistency with the Property’s applicable designations under the Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”), relevant policies of the Near Northwest Area Element, and other Citywide elements of the Comp Plan. In addition, this Evaluation includes a summary of community outreach, and an analysis of outcomes that advance racial equity. An assessment of potential inconsistencies with the Comp Plan is also included, which offers justifications as to how such inconsistencies are outweighed.

General Highlights:

- When analyzed through a racial equity lens, the map amendment creates favorable outcomes for all District residents, namely by allowing for the underutilized Property to be adaptively reused with commercial uses, thus enabling the provision of neighborhood-serving amenities within a mixed-use area that is in close proximity to extensive public transportation options.
- The proposed ARTS-3 zone is not inconsistent with the Property’s FLUM and the GPM designations.
- The proposed map amendment advances numerous policies within the Near Northwest Area Element and Citywide Elements, including particularly relevant policies under the Land Use, Transportation, Environmental Protection, Economic Development, Historic Preservation, and Housing Elements.
- Any potential inconsistencies with the Comp Plan are significantly outweighed by other Comp Plan policies or competing considerations that value adaptive reuse of historic structures, job creation and economic vitality, and the promotion of mixed-use, inclusive neighborhoods.
- The outcomes of the map amendment will advance racial equity by allowing for the creation of new neighborhood-serving amenities that will add vitality to the neighborhood, provide goods and services to residents, create jobs, and produce physical improvements that will enhance accessibility and the environment.

- The Applicant has actively engaged with the community regarding the proposed map amendment through a series of outreach efforts designed to foster dialogue, gather feedback, and address concerns. The Applicant has also facilitated discussions with key community stakeholders, including the affected Advisory Neighborhood Commission (“ANC”), to better understand the community’s priorities and expectations. This ongoing engagement reflects the Applicant’s commitment to ensuring that future renovation of the Property benefits current and future residents and visitors to the District while minimizing any potential negative impacts.

Table of Contents

I.	INTRODUCTION	4
II.	RACIAL EQUITY AND THE COMPREHENSIVE PLAN	5
A.	RACIAL EQUITY AS A PROCESS	6
B.	RACIAL EQUITY AS AN OUTCOME.....	6
III.	PART ONE: RACIAL EQUITY ANALYSIS SUBMISSIONS (GUIDANCE REGARDING THE COMPREHENSIVE PLAN).....	6
A.	COMPREHENSIVE PLAN OVERVIEW AND APPLICATION.....	7
B.	FUTURE LAND USE MAP.....	7
C.	GENERALIZED POLICY MAP.....	9
D.	NEAR NORTHWEST AREA ELEMENT	10
E.	LAND USE ELEMENT.....	12
F.	TRANSPORTATION ELEMENT.....	15
G.	ENVIRONMENTAL PROTECTION ELEMENT	17
H.	ECONOMIC DEVELOPMENT ELEMENT	18
I.	HISTORIC PRESERVATION ELEMENT	19
J.	HOUSING ELEMENT.....	21
IV.	ANALYSIS OF POTENTIAL INCONSISTENCIES WITH THE COMPREHENSIVE PLAN.....	23
A.	H-1.1.8: PRODUCTION OF HOUSING IN HIGH-COST AREAS.....	24
B.	E-3.2.2: NET-ZERO BUILDINGS	24
C.	E-3.2.3: RENEWABLE ENERGY.....	25
D.	E-4.1.1: MAXIMIZING PERMEABLE SURFACES.....	25
E.	E-4.1.2: USING LANDSCAPING AND GREEN ROOFS TO REDUCE RUNOFF.....	26
V.	LOGAN CIRCLE INVESTMENT PLAN	26
VI.	PART TWO: APPLICANT’S COMMUNITY OUTREACH AND ENGAGEMENT	28
A.	COMMUNITY(IES).....	28
B.	PAST AND PRESENT RACIAL DISCRIMINATION / HARM TO COMMUNITY	31
C.	COMMUNITY PARTICIPATION / OUTREACH EFFORTS	34
D.	COMMUNITY PRIORITIES AND IMPACT ON ZONING ACTION.....	38
VII.	PART THREE: DISAGGREGATED DATA ON RACE & ETHNICITY.....	40
VIII.	PART FOUR: ZONING COMMISSION EVALUATION.....	40
IX.	CONCLUSION.....	43

I. Introduction

MR 1401 15th Street Retail LLC (the “Applicant”), the contract purchaser of property located at 1401-1405 15th Street, NW (Square 210, Lot 827) (the “Property”) submits this Evaluation in support of a proposed Zoning Map amendment to rezone the RA-5 zoned portion of the split-zoned Property to the ARTS-3 zone, such that the entire Property will be zoned ARTS-3 (the “Application”). The Property is improved with the Grace Reformed Church and Sunday School (together, the “Church”) and the Parish House (the “Parish House”), which collectively are (i) designated as an historic landmark in the D.C. Inventory of Historic Sites; (ii) listed in the National Register of Historic Places; and (iii) contributing structures to the Greater 14th Street Historic District. **The purpose of this Zoning Map amendment application is to allow for the adaptive reuse of the Church with commercial uses that are not inconsistent with the Comprehensive Plan and with other applicable District programs and policies.** Only the Church is proposed to be rezoned with this Application. The Parish House will continue to be zoned ARTS-3 and used for residential purposes.

As set forth below, the proposed map amendment is not inconsistent with the Comprehensive Plan as adopted by the D.C. Council pursuant to D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the GPM and FLUM (D.C. Resolution R24-0292), collectively referred to herein as the “Comp Plan”.¹

The Comp Plan guides the District’s development, both broadly and in detail, through maps and policies that address the physical development of the District. See 10-A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the city and the well-being of its citizens. The Comp Plan provides the “big picture” of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. See 10-A DCMR § 103.5.

Pursuant to the Home Rule Charter, zoning shall not be inconsistent with the Comp Plan. D.C. Code §6-641.02. As stated in the Framework Element, “[i]n its decision-making, the [Commission] must make a finding of not inconsistent with the [Comp Plan]. To do so, the [Commission] must consider the many competing, and sometimes conflicting, policies of the [Comp Plan], along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the [Commission] to consider and balance those policies relevant and material to the individual case... and clearly explain its decision-making rationale.” See 10-A DCMR § 224.8. To approve the map amendment, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination as to whether the request is “not inconsistent” with the Comp Plan when read as a whole.

¹ D.C. Law L23-0217 took effect on August 27, 2020, and included amendments to the Comprehensive Plan Framework Element. D.C. Law L24-0020 took effect on August 21, 2021, and included amendments to the Comprehensive Plan general, citywide, and area elements, and the Generalized Policy Map and Future Land Use Map. The Generalized Policy Map and Future Land Use Map were formally approved on November 16, 2021, pursuant to Resolution No. R24-0292

As detailed herein, the proposed Zoning Map amendment is not inconsistent with the policies and goals of the Comp Plan when read as a whole. The following sections reflect the Applicant's thorough evaluation of the map amendment's overall consistency with the Comp Plan. Given the broad range of overlapping policy topics addressed in the Comp Plan, certain Citywide Elements may have little to no applicability to a zoning proposal. Such is the case for the proposed map amendment. Nevertheless, in conducting its Comp Plan evaluation, the Applicant has thoroughly reviewed the goals and policies of each and every Comp Plan Element. For those Citywide Elements that are more directly applicable to the Applicant's request, a narrative is provided below explaining the basis for the Applicant's determination that the map amendment is not inconsistent with that particular element. Finally, in accordance with the guidance provided by the D.C. Court of Appeals (the "Court"), the Applicant's evaluation also includes a specific assessment of potential Comp Plan inconsistencies.

As described in Section IV, to the extent that the map amendment is inconsistent with the individual Comp Plan policies, such inconsistencies are far outweighed by other Citywide and Near Northwest Area Element policies relating to, among others, land use, transportation, environmental protection, economic development, historic preservation, and housing.

To the extent that the map amendment is inconsistent with certain recommendations, the inconsistencies are outweighed by the FLUM and other Comp Plan policies.

II. Racial Equity and the Comprehensive Plan

A primary focus of the Comp Plan, as reflected throughout its various policies, is achieving racial equity. The Framework Element of the Comp Plan defines racial equity as the moment when "race can no longer be used to predict life outcomes and outcomes for all groups are improved." See 10-A DCMR § 213.7. Indeed, the importance of equity to District residents was made abundantly clear when the D.C. Office of Planning ("OP") conducted its D.C. Values survey in Spring 2019. In addition to equity, city residents also expressed concerns about rising costs and inequitable access to opportunities for housing, businesses, employment, and other necessities. Overall, livability, equity, and safety were considered the most critical values. See 10-A DCMR §§ 107.17–107.22.

As stated in the Framework Element and as further discussed below, equity is both an outcome and a process. See 10-A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. An important factor to advancing racial equity is to acknowledge that equity is not the same as equality. *Id.* "As an outcome, the District achieves racial equity when race no longer determines one's socioeconomic outcomes, when everyone has what they need to thrive, no matter where they live or their socioeconomic status; and when racial divides no longer exist between people of color and their white counterparts. As a process, we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives, particularly people of color." See 10-A DCMR § 213.9.

Equity is conveyed through the Comp Plan, particularly in the context of zoning, where certain priorities stand out, including affordable housing, displacement, and access to opportunity. To help guide the Commission in applying a racial equity lens to its decision making, the Implementation Element reads, in relevant part, “[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas in the District.” *See* 10-A DCMR § 2501.6.

As related to zoning actions, racial equity is not a separate consideration from the normal legal standard of review. Rather, the Commission properly considers equity as an integral part of its analysis as to whether a proposed zoning action is “not inconsistent” with the Comp Plan. The scope of the racial equity review and the extent to which Comp Plan policies apply depend upon the nature of the proposed zoning action. In this case, the Commission shall evaluate the requested Zoning Map amendment through a racial equity lens to make its determination as to whether the requested rezoning is not inconsistent with the Comp Plan as a whole.

A. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. *See* 10-A DCMR § 213.7. The Applicant believes in inclusive, community engagement, and will work closely with the community and the affected ANCs throughout the map amendment process.

B. Racial Equity as an Outcome

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality.” *See* 10-A DCMR § 213.6. As stated above, under the Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens. The table in Section VIII correlates the proposed map amendment with a number of equitable development indicators in general terms. As the table shows, the map amendment has the potential to address a number of equity issues experienced by residents in the Logan Circle neighborhood.

The following evaluation follows the Zoning Commission’s Racial Equity Tool,² organized in four parts.

III. Part One: Racial Equity Analysis Submissions (Guidance Regarding the Comprehensive Plan)

As required by Part One of the Racial Equity Tool, the Applicant has conducted a thorough evaluation of the proposed map amendment’s consistency with the Comp Plan, including the FLUM, the GPM, the policies of all applicable Citywide and Area Elements, and all other applicable adopted public policies and active programs.

² Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

A. Comprehensive Plan Overview and Application

The Comp Plan guides the District's development, both broadly and in detail, through maps and policies that address the physical development of the District. *See* 10-A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the District and the well-being of its citizens. The Comp Plan provides the general overview of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. *See* 10-A DCMR § 103.5.

Because the Comp Plan is the one plan that guides the District's development, it carries special importance in that it provides an overall direction and shapes all other physical plans the District may adopt. *See* 10-A DCMR § 103.2. The Comp Plan includes detailed maps and policies for the physical development of the District, and addresses social and economic issues that affect the District and its citizens. The Comp Plan allows the District to ensure its resources are used wisely and efficiently and that public investment is focused in areas where it is most needed. *See* 10-A DCMR § 100.13. Subsection 228.1(d) of the Comp Plan reads, in relevant part, the “zoning of any given area should be guided by the [FLUM] interpreted in conjunction with the text of the Comp Plan, including Citywide Elements and the Area Elements, as well as approved Small Area Plans.”

B. Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. *See* 10-A DCMR §§ 200.5 and 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical FARs as appropriate. However, the granting of density bonuses may result in densities that exceed those typical ranges stated in the land use category descriptions. *See* 10-A DCMR § 228.1(c). By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *See* 10-A DCMR § 228.1(a). Decisions on requests for rezoning shall be guided by the FLUM read in conjunction with the text of the Comp Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. *See* 10-A DCMR § 2504.5.

As shown below, the FLUM designates the Property as **Mixed Use Medium Density Residential and Moderate Density Commercial**.



Figure 1: Future Land Use Map

The Framework Element describes these designations as follows:

- **Medium Density Residential:** This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from **1.8 to 4.0 FAR**, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The **RA-3 Zone District** is consistent with the Medium Density Residential category, and other zones may also apply. See 10-A DCMR § 227.7 (emphasis added).
- **Moderate Density Commercial:** This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Low-Density Commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts uses that draw from a broader market area. Buildings are larger and/or taller than those in Low Density Commercial areas. Density typically ranges between a **FAR of 2.5 and 4.0**, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The **MU-5 and MU-7 Zone Districts** are representative of zone districts consistent with the Moderate Density Commercial category, and other zones may also apply. See 10-A DCMR § 227.11 (emphasis added).

The proposed ARTS-3 zone allows for a density of 4.0 FAR, or 4.8 FAR with Inclusionary Zoning (“IZ”), aligning with both the Medium Density Residential and Moderate Density Commercial designations. Under the ARTS-3 zone, non-residential uses may occupy up to 2.5 FAR, which is also consistent with these designations, and encourages retail, office, and service businesses.

C. Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. See 10-A DCMR § 225.1. The GPM is intended to “guide land use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” See 10-A DCMR § 225.2.

As shown below, the Property is designated as a **Neighborhood Conservation Area**.

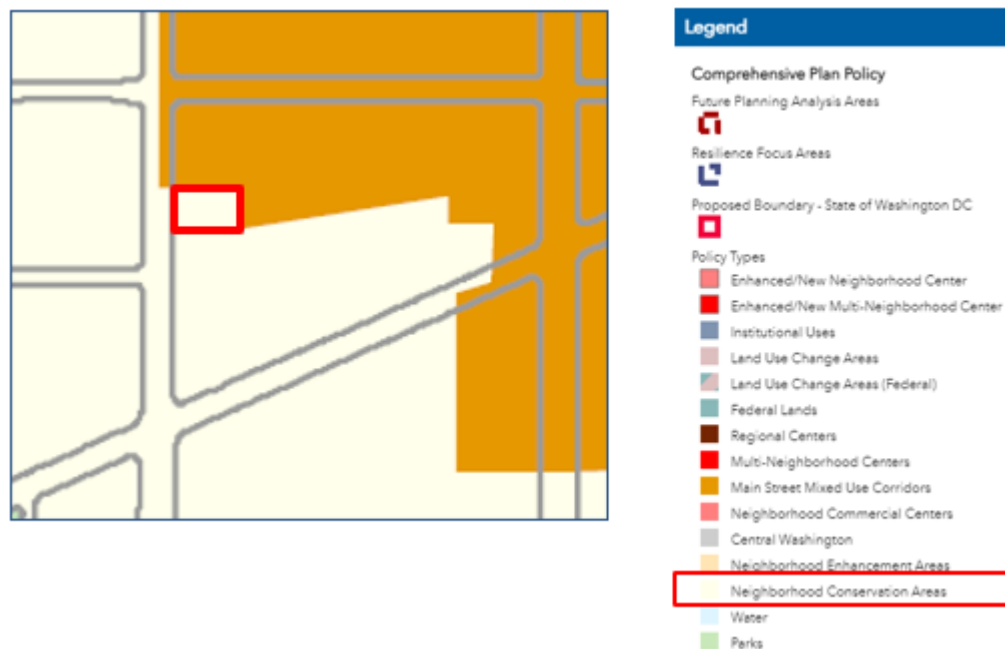


Figure 2: Generalized Policy Map

- Neighborhood Conservation Area:** 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 Comp 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. See 10-A DCMR § 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 Comp 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 and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. *See* 10-A DCMR § 225.5.

The proposed map amendment aligns with the Property's designation as a Neighborhood Conservation Area. This designation does not prohibit development. In this case, the ARTS-3 zone will enable the adaptive reuse of the existing historic structures to include retail and eating and drinking establishments. Doing so will allow for neighborhood-serving uses that align with the goal of increasing services and amenities at properties that have access to opportunities, including access to public transportation. The ARTS-3 zone also allows for greater non-residential density, which is consistent with the FLUM designations that support neighborhood-oriented uses that will enhance the area.

D. Near Northwest Area Element

The Property is located within the Near Northwest Area Element of the Comp Plan. *See* 10-A DCMR § 2100.1. The Near Northwest Planning Area encompasses the 3.6 square miles located directly north and west of Central Washington. Near Northwest is known for its historic architecture, well-established neighborhoods, lively shopping areas, and nationally recognized institutions. These features provide enduring reminders of the District's growth, from the 18th century to today's international destination. *See* 10-A DCMR § 2100.2. Today, more than half of Near Northwest's land area is included in historic districts, with concentrations of landmarks in Georgetown, on Washington Circle, within the campus of The George Washington University (GW), in Dupont and Logan Circles, and along Massachusetts Avenue NW. These designations include some of the oldest residential and commercial buildings in Washington, DC. *Id.*

The development pattern in the area is one of the densest in the Washington metropolitan region. Near Northwest neighborhoods contain some of the most diverse housing stock in the District, varying from single-family homes to high-rise apartments. *See* 10-A DCMR § 2100.3. Townhouses and mid-rise apartment buildings dating from the mid-19th to early 20th centuries define the area's residential neighborhoods; they are most prominent in Georgetown, Burleith, Dupont Circle, Foggy Bottom, Logan Circle, Shaw, and Mount Vernon Square. *Id.*

Shopping areas in Near Northwest range from regional destinations, such as M Street in Georgetown, to neighborhood commercial districts, such as 17th Street, NW in Dupont Circle. The more prominent retail areas are on the major streets and avenues, including Connecticut Avenue, U Street, and 7th, 9th, and 14th Streets NW. See 10-A DCMR § 2100.5. After years of disinvestment following the unrest in 1968, 14th Street has experienced intense development activity and restaurant openings, which have contributed to establishing the corridor as one of Washington, DC's premier food and entertainment districts. See 10-A DCMR § 2100.6.

The most significant challenge facing the Near Northwest Planning Area is retaining the physical and social fabric of the community in the face of intense economic pressure. See 10-A DCMR § 2100.9. Policies are needed to address a host of local issues, including the preservation and production of affordable housing; strengthening the opportunities for small and local businesses; maintaining existing and expanding new infrastructure and services, such as schools and recreational spaces, to serve a growing population of families in the area; and addressing the tensions that inevitably result from the area's highly diverse mix of land uses and densities. *Id.*

Area Element Evaluation

The proposed rezoning of the historically designated Church to the ARTS-3 zone advances key policies for the Near Northwest area. By allowing non-residential uses such as retail and eating and drinking establishments, the map amendment supports Policy NNW-1.1.2 by sustaining and enhancing established commercial areas, particularly along pedestrian-oriented streets. Future commercial uses at the Property enabled by the map amendment will contribute to the area's unique character, provide services that meet the needs of residents, workers, and visitors, and fill a long-vacant space along a thriving mixed-use corridor. Additionally, the map amendment aligns with Policy NNW-1.1.4 by ensuring that the new commercial uses will complement neighboring properties, enrich the community, and contribute to the overall vibrancy of the surrounding area.

The map amendment also promotes Policy NNW-1.1.10 by enhancing pedestrian and bicycle safety. The Church's proximity to the cycle track on 15th Street, along with improved streetscape maintenance associated with future redevelopment, will encourage safer and more accessible connections for both pedestrians and cyclists. In addition, by revitalizing the Church with new retail uses, the map amendment will advance Policy NNW-1.1.11 by fostering stronger pedestrian connections and contributing to a more comfortable and inviting environment for the community, consistent with the goal of improving pedestrian links throughout the Near Northwest.

The proposed rezoning also aligns with Policy NNW-1.2.9 by using the historic preservation design review process to promote high-quality architecture and urban design in Near Northwest's designated historic districts, including the Greater Fourteenth Street Historic District, in which the Property is located. The Property is located on the edge of the 14th Street NW / Logan Circle Policy Focus Area, which encourages the addition of restaurants, theaters, lofts, and apartments and the creation of a dynamic street environment that epitomizes the best qualities of urban living. See 10-A DCMR § 2113.3. The Policy Focus Area also states that development should be designed to minimize impacts on adjacent residential areas, and that historic structures such as churches should be adaptively reused to preserve long-time neighborhood institutions and character. *Id.* (emphasis added).

The proposed map amendment to adaptively reuse the existing historic Church with commercial uses that serve the neighborhood and help to create a dynamic street environment is fully consistent with the goals for this particular area of the District.

Accordingly, the map amendment is not inconsistent with the Near Northwest Area Element and advances the specific policies listed below.

NNW-1.1 Guiding Growth and Neighborhood Conservation

- NNW-1.1.2: Enhancing Established Commercial Areas
- NNW-1.1.4: Nonprofits and Private Service Organizations
- NNW-1.1.10: Pedestrian and Bicycle Safety
- NNW-1.1.11: Pedestrian Connections

NNW-1.2 Conserving and Enhancing Community Resources

- NNW-1.2.9: Design Review

E. Land Use Element

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of the District, and provides direction on a range of development, preservation, and land use computability issues. The element describes the range of considerations involved in accommodating an array of land uses within Washington, D.C. *See* 10-A DCMR § 300.1. Through its policies and actions, the Land Use Element addresses the numerous, challenging land use issues that are present in the District, including, among others:

- Providing adequate housing, particularly affordable housing;
- Enhancing neighborhood commercial districts and centers;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open spaces;
- Promoting transit-accessible, sustainable development; and
- Siting challenging land uses.

10-A DCMR § 300.2.

More than any other part of the Comp Plan, the Land Use Element lays out the policies through which growth and change occur. The Land Use Element integrates and balances competing policies of all the other District Elements. *See* 10-A DCMR § 300.3. The Implementation Element further recognizes the “overlapping nature” of the Comp Plan elements, stating that “an element may be tempered by one or more of the other elements,” and further states, “because the Land Use Element integrates the policies of all other District Elements, it should be given greater weight than the other elements.” *See* 10-A DCMR § 2504.6.

The policies and actions of the Land Use Element all aim to utilize land resources efficiently to achieve the following goals:

- Protect the health, safety, and welfare of District residents, institutions, and businesses;
- Address past and current inequalities disproportionately impacting communities of color;
- Provide for additional... employment opportunities; and
- Effectively balance the competing demands for land.

10-A DCMR § 302.1

Land Use Element Evaluation

The proposal to rezone a historic Church to the ARTS-3 zone advances several key land use policies. By allowing non-residential uses such as retail and eating and drinking establishments to occupy the building, the map amendment aligns with Policy LU-1.4.1, which encourages the development of Metro station areas as neighborhood centers that support mixed-use, walkable spaces. The proposed rezoning will enhance the area around the Dupont Circle Metrorail station, which is located approximately 0.6 miles to the west of the Property, and the McPherson Square Metrorail station, located approximately 0.5 miles to the south of the Property. The location of commercial uses enabled by the map amendment will enhance the community by reducing reliance on automobiles and increasing access to local services, jobs, and amenities due to its proximity to public transportation. It also supports Policy LU-1.4.2, as future uses at the Property will be complimented and served by nearby transit infrastructure, such as the bike lanes on 15th Street and nearby bus routes, and will promote pedestrian and bicycle access while minimizing the need for automobile use.

The proposed map amendment reflects the principles of Policies LU-2.1.1, LU-2.1.3, LU-2.1.4, and LU-3.3.2 by balancing adaptive reuse with historic preservation to contribute positively to the community. Consistent with Policy LU-2.1.1, the proposed map amendment will help to maintain the neighborhood's historic character while supporting adaptive reuse that will sustain population growth, affordability, and racial equity. Aligned with Policy LU-2.1.3, the proposed map amendment recognizes the importance of revitalizing neighborhoods through added housing and neighborhood commerce while conserving historic resources and advancing sustainability goals. Additionally, in accordance with Policy LU-2.1.4, the proposed map amendment prioritizes rehabilitation and adaptive reuse of this historically significant building over demolition, preserving its architectural heritage for community use.

Further, as outlined in Policy LU-3.3.2, the proposed map amendment promotes corporate citizenship by encouraging high-quality architecture and sustainable practices. The adaptive reuse of the landmark Church will not only respect the Property's historical importance but also serves as a model for green building and low-impact development, reinforcing the community's character and environmental goals.

By repurposing an existing structure, future redevelopment of the Property also upholds Policy LU-2.1.10, contributing to the pedestrian-friendly and transit-accessible character of the area while introducing compatible commercial uses that enhance the neighborhood. The continued maintenance of the streetscape and the addition of "eyes on the street" that would be increased with reuse of the Church would further support Policy LU-2.2.4, contributing to neighborhood beautification and improving public safety. Overall, future development of the Property enabled by the map amendment directly aligns with key District-wide goals of enhancing livability, promoting transit-oriented growth, and respecting neighborhood character.

The proposed rezoning of the historic Church to the ARTS-3 zone also advances racial equity by promoting inclusive economic opportunities and ensuring that the benefits of revitalization are accessible to all residents, particularly historically marginalized communities. By fostering a walkable, transit-oriented environment, the map amendment will reduce transportation costs and increase access to jobs, services, and amenities for lower-income and minority residents. The adaptive reuse of the Church will preserve the area's cultural heritage while creating new spaces that support local businesses, helping to prevent displacement and maintain the neighborhood's diverse character. Through these efforts, the rezoning supports equitable growth, ensuring that future redevelopment serves both current and future residents in an inclusive and sustainable manner.

Accordingly, the map amendment is not inconsistent with the Land Use Element and advances the specific policies listed below:

LU-1.4: Transit-Oriented and Corridor Development

- LU-1.4.1: Station Areas as Neighborhood Centers
- LU-1.4.2: Development Around Metrorail Stations
- LU-1.4.5: Design to Encourage Transit Use
- LU-1.4.6: Development Along Corridors

LU-2.1: A District of Neighborhoods

- LU-2.1.1: Variety of Neighborhood Types
- LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- LU-2.1.4: Rehabilitation Before Demolition
- LU-2.1.10: Multi-Family Neighborhoods

LU-2.2: Maintaining Community Standards

- LU-2.2.2: Appearance of Vacant Lots and Structures
- LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings
- LU-2.2.4: Neighborhood Beautification

LU-2.3: Residential Land Use Compatibility

- LU-2.3.7: Nonconforming Institutional Uses

LU-2.4: Neighborhood Commercial Districts and Centers

- LU-2.4.5: Encouraging Nodal Development
- LU-2.4.6: Scale and Design of New Commercial Uses

LU-3.3: Institutional Uses

- LU-3.3.2: Corporate Citizenship

F. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District’s transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comp Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving safety, mobility, and accessibility in the District. *See* 10-A DCMR § 400.1.

The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhance the quality of life for District residents.” *See* 10-A DCMR § 401.1.

Transportation Element Evaluation

The proposed rezoning of the landmarked Church to the ARTS-3 zone advances significant transportation and community policies, supporting transit-oriented development and pedestrian-friendly infrastructure. By permitting non-residential uses at the Property, such as retail and dining, the map amendment aligns with Policy T-1.1.4, which promotes transit-oriented, neighborhood-serving uses near major bus corridors, such as those along 14th Street (routes 52, 54, 59, and WP-AM), 16th Street (routes S2, S9, 315, and 325), and P Street (route G2). The proposed map amendment will strengthen last-mile pedestrian and bicycle connections by enabling the adaptive reuse of an underutilized property directly adjacent to protected bike lanes on 15th Street and within a diverse, walkable, mixed-use neighborhood. Any future redevelopment will also involve new streetscape improvements consistent with DDOT standards, which will also help to create a more accessible, walkable neighborhood and improve pedestrian safety.

The map amendment also supports Policy T-1.2.1 by contributing to beautification and stability along a major thoroughfare. Adaptively reusing an existing, underutilized building with commercial uses permitted in the ARTS-3 zone will improve connectivity and the creation of direct multimodal links to rebuild connections between neighborhoods. *See* Policies T-2.2.1 and T-2.2.2. Reuse of the existing building along the 15th Street cycle track, and the associated upgrades to the pedestrian environment abutting the Property, will together support Policies T-2.3.1, T-2.3.2, and T-2.3.3, which call for pedestrian safety, the provision of protected bike lanes, traffic-calming measures, and bicycle infrastructure.

Additionally, by fostering equitable transportation access, the proposed map amendment aligns with Policy T-1.1.7, ensuring that transit-accessible job opportunities and services are available to all residents, regardless of income or physical ability. This is further supported by Policy T-1.3.1, which encourages transit-accessible employment opportunities, leveraging the area's robust transit infrastructure—including metro, bus, and bike connections—to serve low-income and marginalized residents. The emphasis on pedestrian safety and connectivity, as guided by Policies T-2.4.1 and T-2.4.2, enhances the neighborhood's pedestrian network and promotes a safer, more connected environment.

Through transit-oriented development, inclusive transportation, and enhanced pedestrian infrastructure, the rezoning supports racial equity by reducing car reliance, lowering transportation costs, and expanding access to jobs and services. The resulting streetscape improvements will ensure equitable mobility and economic opportunities for all, advancing a connected, walkable, bikeable, and inclusive community that promotes racial equity through sustainable and accessible development.

Accordingly, the map amendment is not inconsistent with the Transportation Element and advances the specific policies listed below:

T-1.1 Land Use Transportation Coordination

- T-1.1.4: Transit-Oriented Development
- T-1.1.7: Equitable Transportation Access

T-1.2 Transforming Corridors

- T-1.2.1: Major Thoroughfare Improvements
- T-1.2.3: Discouraging Auto-Oriented Uses

T-1.3 Regional Smart Growth Solutions

- T-1.3.1: Transit-Accessible Employment

T-2.2 Making Multimodal Connections

- T-2.2.1: Multimodal Connections
- T-2.2.2: Connecting District Neighborhoods

T-2.3 Bicycle Access, Facilities, and Safety

- T-2.3.1: Better Integration of Bicycle and Pedestrian Planning
- T-2.3.2: Bicycle Network
- T-2.3.3: Bicycle Safety

T-2.4 Pedestrian Access, Facilities, and Safety

- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

T-2.5 Roadway System and Auto Movement

- T-2.5.1: Creating Multimodal Corridors

G. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of Washington, D.C.'s land, air, water, energy, and biological resources. This Element provides policies and actions for addressing important issues such as climate change, drinking water safety, the restoration of the tree canopy, energy conservation, air quality, watershed protection, pollution prevention, waste management, the remediation of contaminated sites, and environmental justice. The biological, chemical, and hydrologic integrity of the environment are key indicators of the quality of life in the District. Furthermore, environmental sustainability is linked to resilience, population health, and community prosperity. Good environmental management and pollution prevention are essential to sustain all living things and to safeguard the welfare of future generations. *See* 10-A DCMR § 600.1.

The overarching goal for the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, DC, taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the value and functions of the District's natural resources and ecosystem, and educate the public on ways to secure a sustainable future. *See* 10-A DCMR § 601.1.

Environmental Protection Evaluation

The proposed rezoning to the ARTS-3 zone supports Policy E-1.1.2: Urban Heat Island Mitigation by enabling development that will involve streetscape improvements that could involve tree planting and expanded green space, which help mitigate the urban heat island effect. The adaptive reuse of the historic structure permitted by the map amendment will reduce the need for new construction, and potential landscaping efforts could further reduce heat retention in the area. Given the Property's proximity to numerous public transportation options, including metro, bus, bike lanes, and extensive pedestrian infrastructure, the map amendment promotes sustainable transportation options, reducing the reliance on cars and contributing to the District's overall sustainability goals.

Additionally, the map amendment advances Policy E-2.1.2: Tree Requirements in New Development and Policy E-2.1.3: Sustainable Landscaping Practices because future redevelopment of the Property enabled by the map amendment would likely include new street tree planting, maintenance, and other streetscape enhancements. Adaptive reuse of the Church would also potentially integrate sustainable landscaping practices, such as native tree planting and green infrastructure, to beautify the area, manage stormwater, and create a more welcoming pedestrian environment. These elements will help enhance the character of the neighborhood while promoting environmentally responsible development practices.

Accordingly, the proposed Zoning Map amendment is not inconsistent with the Environmental Protection Element and advances the specific policies listed below:

E-1.1 Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation

E-2.1 Conserving and Expanding Washington, DC's Urban Forests

- E-2.1.2: Tree Requirements in New Development
- E-2.1.3: Sustainable Landscaping Practices

E-4.1 Green Infrastructure GI

- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

H. Economic Development Element

The Economic Development Element addresses the future of Washington, D.C.'s economy and the creation of economic opportunity for current and future District residents. It includes strategies to sustain the District's major industries, diversify the economy, accommodate job growth, maintain small businesses and neighborhood commercial districts, and increase access to employment for District residents. *See* 10-A DCMR § 700.1.

Since 2006, Washington, D.C.'s economy has expanded and diversified with growth in a range of sectors across the central employment area and along commercial corridors. *See* 10-A DCMR § 700.4. However, the District's economic growth has contributed to increases in property values that present challenging barriers for both established and emerging businesses, which can be particularly severe among small businesses. *Id.* Additionally, more work remains to ensure that all residents have access to retail, commercial facilities and job opportunities with career pathways. *Id.* The District is striving to ensure that all residents, particularly those from communities of color, are able to enjoy the benefits of economic growth in the District and the region. *Id.*

A racially equitable economy that ensures all residents, particularly those disadvantaged historically, can become economically secure is fundamental to the District's resilience and prosperity. *See* 10-A DCMR § 700.6. While the District has experienced population and economic growth in recent years, poverty, child poverty, and income inequality have all grown, and disproportionately affect people of color. *Id.* The District must commit to closing the racial wealth gap by reducing income inequality. *Id.*

The overarching goal for economic development in the District is to drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status. *See* 10-A DCMR § 701.1.

Economic Development Evaluation

The proposed rezoning of the historic Church to the ARTS-3 zone supports multiple economic development policies. First, it aligns with Policy ED-1.1.4: Promote Local Entrepreneurship by establishing an accessible commercial space that would allow for entrepreneurship. By reusing a historic building, the map amendment would help to create a vibrant commercial environment that attracts diverse business owners and promotes community wealth building.

Additionally, the proposal advances Policy ED-2.2.1: Expanding the Retail Sector and Policy ED-2.2.3: Neighborhood Shopping by transforming an underutilized site into a neighborhood hub for retail and services. Doing so supports the District's retail strategy by meeting

the demand for goods and services while capitalizing on the area's spending power. Furthermore, the location near bike lanes and high foot traffic areas also promotes Policy ED-2.2.9: Clustered Retail at Transit, fostering a strong retail node linked to multimodal transit options. Future commercial tenants would also create entry-level job opportunities, supporting Policy ED-4.2.6: Entry-Level Opportunities, which benefits local residents, particularly lower-income individuals seeking employment and training in retail or food services.

The proposed rezoning of the historic Church to the ARTS-3 zone advances racial equity by fostering economic opportunities for historically marginalized groups. By offering accessible commercial spaces, the map amendment promotes local entrepreneurship and community wealth building, ensuring that the economic benefits of development are shared equitably. The transformation of the Property into a commercial space will support the surrounding neighborhood retail hub by providing essential services and creating entry-level job opportunities, benefiting lower-income residents, many of whom are from communities of color. Additionally, the Property's proximity to metro, bus, and bike lanes enhances access to employment and services, making the area more inclusive and economically vibrant.

Accordingly, the proposed Zoning Map amendment is not inconsistent with the Economic Development Element and advances the specific policies listed below:

ED-1.1 Diversifying the Economic Base

- 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 Strengthening Retail Districts

- ED-3.1.1: Neighborhood Commercial Vitality

ED-4.2 Increasing Workforce Development Skills

- ED-4.2.6: Entry-Level Opportunities

I. Historic Preservation Element

The Historic Preservation Element guides the protection, revitalization and preservation of the Washington, D.C.'s valuable historic assets. *See* 10-A DCMR § 1000.1. It defines the District's role in exercising preservation leadership, promoting awareness of Washington, D.C. history, identifying and preserving historic resources, and ensuring compatible design in historic neighborhoods. *Id.* The element recognizes historic preservation as an important responsibility at all levels of government and as a valuable planning tool that provides an opportunity for community input, development collaboration, partnerships, and education. *Id.* Historic

preservation offers a sustainable urban development model that fosters a sense of community well-being and an appreciation of the multifaceted achievements of past Washingtonians. *Id.*

This is an era of revitalized historic neighborhoods, vibrant new design ideas, and a more sophisticated appreciation of the role that preservation can play in rejuvenating Washington, D.C. *See* 10-A DCMR § 1000.15. Reinvestment has built new homes and businesses, and adaptive reuse has put many older buildings back into productive use. *Id.* Continuing use of historic building stock can advance sustainability goals, while thoughtful design helps new technologies fit within the context of historic communities. *Id.* Washington's historic districts offer distinctive character that provides context for new development and elevates the quality of public spaces. *Id.* The policies in this element aim to lead preservation forward as an effective tool in achieving those goals. *Id.*

The overarching goal for historic preservation is to preserve and enhance the unique cultural heritage, beauty, and identity of Washington, D.C. by respecting the historic physical form of the District and the enduring value of its historic structures and places, sharing responsibility for their protection and stewardship, and perpetuating them for the benefit of the residents of the District and the nation. *See* 10-A DCMR § 1001.1.

Historic Preservation Evaluation

The proposed rezoning of the landmarked Church to the ARTS-3 zone aligns with several historic preservation policies, which will preserve the District's character while enabling adaptive reuse. The proposed map amendment supports Policy HP-1.6.1: Washington, DC's Historic Image by maintaining the historic Church, a contributing structure to the area's heritage, while adapting it for new uses that will include retail and dining, which bring vibrancy to the neighborhood. This approach aligns with Policy HP-2.5.2: Adaptation of Historic Properties for Current Use, ensuring the building's relevance in a modern context without compromising its historic integrity.

The proposal also advances Policy HP-2.4.1: Preservation Standards for Zoning Review by adapting the Church within zoning standards that respect its architectural features. Ensuring that any future development reflects the height, density, and historic character of the area will preserve the landmark's place in the community. Policy HP-2.5.3: Compatible Development and Policy HP-2.5.4: Suitability to the Historic Context are further supported by adaptive reuse that respects existing neighborhood features, including lot coverage, height limits, and architectural styles, while allowing complementary, modern enhancements.

By preserving the Church's integrity, the proposal aligns with Policy HP-2.5.5: Protecting Historic Building Integrity, prioritizing adaptive reuse over demolition, and discouraging facadism. Through this approach, the Church's original structure remains intact, thus retaining its historical value within the community. The map amendment also contributes to Policy HP-4.1.1: Preservation and Community Development and Policy HP-4.1.3: Neighborhood Revitalization, by using historic preservation to foster community-oriented economic growth.

Furthermore, adaptive reuse in this instance promotes racial equity by providing economic opportunities and accessible community spaces, benefiting all residents, including historically marginalized groups. Consistent with Policy HP-4.1.2: Preservation and Neighborhood Identity,

the Church's reuse enhances neighborhood identity and inclusivity, celebrating its history while contributing to a vibrant, equitable future.

Accordingly, the proposed Zoning Map amendment is not inconsistent with the Historic Preservation Element and advances the specific policies listed below:

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 Zoning Compatibility

- 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 Preservation and Economic Development

- HP-4.1.1: Preservation and Community Development
- HP-4.1.2: Preservation and Neighborhood Identity
- HP-4.1.3: Neighborhood Revitalization

J. Housing Element

The Housing Element describes the importance of housing to neighborhood quality in the District, and the importance of providing housing opportunities for all segments of the population throughout the District. *See* 10-A DCMR § 500.1. The District continues to face significant demand for more housing, and – in particular – affordable housing across a range of income levels. Other critical housing issues that the District is facing include furthering fair housing opportunities, especially in high-cost areas; fostering housing production to improve affordability; promoting more housing near transit; maintaining healthy homes for residents; and providing housing integrated with supportive services for older adults, vulnerable populations, and residents with disabilities. *See* 10-A DCMR § 500.2.

The overarching goal of the Housing Element is to develop and maintain new residential units to achieve a total of 36,000 new units by 2025, 12,000 of which are dedicated affordable, that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents of the District. *See* 10-A DCMR § 501.1. A multi-pronged strategy is needed to facilitate production, address regulatory and administrative constraints, and deliver a substantial number of

the new units that are affordable to District residents, particularly to moderate and lower income residents. See 10-A DCMR § 502.5.

Housing Element Evaluation

As noted above, the portion of the Property improved with the Parish House will be adaptively reused with residential use under its current ARTS-3 zone designation, while the Church will be adaptively reused with commercial uses under the proposed ARTS-3 zone designation. While it is practically difficult to renovate the historic Church for residential use, it can be easily adapted for commercial uses. In contrast, the Parish House, which is already zoned ARTS-3, will be able to accommodate residential use. Accordingly, upon approval of this Zoning Map amendment, the Property will be able to provide both residential and non-residential uses to serve the surrounding community, which is fully consistent with the purposes of the ARTS zones, which include expanding the area's housing supply, encouraging retail uses, and adaptively reusing older buildings, as well as with numerous policies set forth in the Housing Element of the Comp Plan.

The proposed rezoning of the Church portion of the Property to the ARTS-3 zone advances Policy H-1.4.6: Whole Neighborhood Approach by fostering balanced development that blends non-residential uses with improved neighborhood services and amenities. The inclusion of retail, dining, and job opportunities from future retail tenants will contribute to a more vibrant community, enhance local economic activity, and increase access to essential services for surrounding residents. Additionally, the map amendment's support for streetscape maintenance and proximity to bike lanes on 15th Street will promote safer, accessible transportation options, improving neighborhood connectivity. Collectively, the combination of residential and commercial uses on the Property will support the goal of creating a balanced, mixed-use development within the neighborhood.

By encouraging a mix of commercial and neighborhood-serving uses, the rezoning aligns with Policy H-1.1.4: Mixed-Use Development by creating a dynamic environment that supports both neighborhood vitality and sustainable, transit-oriented development. This mixed-use approach complements nearby commercial corridors and transit routes, thus supporting a balanced environment that benefits local residents, visitors, and businesses alike.

Moreover, the rezoning aligns with Policy H-1.1.1: Private Sector Support by enabling private-sector participation in revitalizing the area and supporting neighborhood-serving development consistent with District objectives. In line with Policy H-1.1.8: Production of Housing in High-Cost Areas, while the amendment focuses on non-residential uses, it lays the groundwork for creating a more inclusive area. By making the neighborhood more vibrant and accessible, the map amendment encourages future development and investment within the neighborhood, potentially including affordable housing, in a way that supports diverse, equitable access to opportunity. This approach aligns with the Whole Neighborhood Approach, helping to ensure that longstanding residents benefit from the area's growth alongside new development.

Accordingly, the proposed map amendment will be consistent with the District's housing goals and will advance policies of the Housing Element, particularly those enumerated below:

H-1.1 Expanding Housing Supply

- 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 Housing and Neighborhood Revitalization

- H-1.4.6: Whole Neighborhood Approach

IV. Analysis of Potential Inconsistencies with the Comprehensive Plan

Notwithstanding the numerous policies across the Comp Plan’s various elements that the proposed map amendment would advance, an analysis of potential inconsistencies with the Comp Plan is also necessary to demonstrate that the ARTS-3 zone is “not inconsistent with the Comp Plan[.]” See 11-X DCMR § 500.3. As established by Court, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because of the overlap within and between the elements the evaluation must also recognize where there may be potential inconsistencies.³

In the event there are inconsistencies, an explanation must be provided as to why said inconsistencies are outweighed by the advancement of other policies and considerations. A “roadmap” of sorts for evaluating a proposal’s consistency with the Comp Plan can be found in the Court’s initial review of the McMillan PUD:

The Comprehensive Plan is a “broad framework intended to guide the future land use planning decisions for the District.” *Wisconsin-Newark Neighborhood Coal. v. District of Columbia Zoning Comm’n*, 33 A.3d 382, 394 (D.C. 2011) (internal quotation marks omitted). “[E]ven if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole.” *Durant v. District of Columbia Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013). The Comprehensive Plan reflects numerous “occasionally competing policies and goals,” and, “[e]xcept where specifically provided, the Plan is not binding.” *Id.* at 1167, 1168 (internal quotation marks omitted). Thus “the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole.” *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm’n*, 73 A.3d 107, 126 (D.C. 2013). “[I]f the Commission approves a PUD that is inconsistent

³ Since first being adopted by the D.C. Council, the Comprehensive Plan has always recognized that there is intentional overlap between its individual components (elements), and that it is intended to be a policy framework that is to be interpreted broadly and provide guidance to all executive and legislative decision making. Indeed, the first Comprehensive Plan adopted in 1984 stated “[t]he primary dynamic of the District elements of the Plan are the overlapping of its elements’ goals. This overlapping is intentional.” (Section 102, District of Columbia Comprehensive Plan Act of 1984). The current Implementation Element reflects the same language: “[r]ecognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements.” 10-A DCMR § 2504.6.

with one or more policies reflected in the Comprehensive Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016) (brackets and internal quotation marks omitted).

As discussed above, the FLUM designates the Property Mixed Use Medium Density Residential and Moderate Density Commercial, and the GPM designates the Property as a Neighborhood Conservation Area. The Applicant has specifically analyzed the proposed zoning for potential inconsistencies with the Comp Plan. After a full review of the elements, the Applicant has found only a few areas of potential inconsistency which are addressed below:

A. H-1.1.8: Production of Housing in High-Cost Areas

The proposed rezoning is potentially inconsistent with policies that encourage the development of market-rate and affordable housing in high-cost areas, since the future redevelopment enabled by the map amendment is for the purpose of allowing for commercial uses. As noted above and in the Statement in Support, the historic church structure cannot be adaptively repurposed for residential use due to Construction Code and other limitations associated with the historic designation of the building. Policy H-1.1.8 emphasizes the integration of diverse housing options to ensure that residents of varying income levels can benefit from proximity to amenities, transit, and job opportunities. By excluding residential development in the adaptive reuse of the Church specifically, the proposed map amendment does not itself contribute to the creation of more housing. This lack of housing, including affordable housing, limits access to the benefits associated with living in these areas and undermines efforts to create more equitable neighborhoods. However, as previously described, the portion of the Property improved with the Parish House will be converted to residential use, thus meeting the Comp Plan’s goals of creating more housing and affordable housing throughout the District.

Moreover, many policies described above support the provision of retail and neighborhood amenities in mixed use areas such as the neighborhood surrounding the Property, which aligns with the proposed rezoning. The future commercial uses at the Property will contribute to the vibrancy of the neighborhood, providing essential services and activating the streetscape in an area with significant housing. These commercial amenities will serve the needs of residents and visitors, fostering a more dynamic environment and supporting local businesses. While the absence of housing is a missed opportunity for inclusivity, the retail and service components are consistent with policies that promote neighborhood vitality and accessibility.

B. E-3.2.2: Net-Zero Buildings

Policy E-3.2.2 aims to encourage incentives that enable buildings to achieve net-zero energy design standards, a crucial aspect of D.C.’s broader objective to eliminate all carbon emissions by 2050.

The subject historic Church may face challenges in complying with Policy E-3.2.2: Net-Zero Buildings due to the inherent limitations of its historic structure. Meeting net-zero energy standards often requires significant alterations to a building's envelope, such as upgrading insulation, windows, or HVAC systems, and incorporating renewable energy sources like solar panels. These changes may conflict with historic preservation requirements, which prioritize maintaining the original architectural features and materials of historic properties. For example, installing solar panels on a historic roof or replacing original windows with energy-efficient models could be restricted by preservation guidelines that seek to protect the building's historical integrity.

Furthermore, older buildings are typically less energy-efficient by design, making it more difficult to retrofit them to meet modern energy standards without compromising their historical character. Achieving the high-performance energy efficiency required for net-zero buildings may also be cost-prohibitive for historic landmarks, given the specialized materials and techniques needed to maintain both energy efficiency and historical accuracy. As a result, while modern buildings can be designed from the ground up to meet net-zero standards, historic structures like the subject Church may not easily comply without significant trade-offs between energy performance and preservation goals.

C. E-3.2.3: Renewable Energy

Policy E-3.2.3 concerns the promotion of the efficient use of energy that reduces unnecessary energy expenses. Most often, this results in the installation of solar panels on the roof that reduce overall energy consumption for buildings.

The subject Church may struggle to comply with Policy E-3.2.3: Renewable Energy due to the constraints associated with preserving its historic features while promoting renewable energy use. The policy encourages efficient energy use and integrating renewable energy technologies, such as solar panels, wind turbines, or geothermal systems. However, installing these modern energy systems on a historic building can be difficult because preservation guidelines often restrict changes that could alter the building's original appearance or materials. For instance, mounting solar panels on a historic Church's roof might disrupt the architectural design or damage original materials, which preservation rules aim to protect.

Additionally, many historic buildings, including churches, were not constructed with energy efficiency in mind. Retrofitting such structures to accommodate renewable energy systems or improve efficiency may require intrusive changes that are not easily compatible with their historic nature. While the policy aims to reduce energy consumption and costs, balancing these goals with the preservation of a Church's historical and cultural significance can present substantial challenges, limiting the feasibility of complying fully with the policy.

D. E-4.1.1: Maximizing Permeable Surfaces

The subject Church may have difficulty complying with Policy E-4.1.1: Maximizing Permeable Surfaces due to the preservation requirements that protect its original materials and design. This policy promotes the use of permeable materials for paved surfaces, such as parking lots, driveways, and walkways, to reduce stormwater runoff. However, historic churches often

feature traditional materials like stone, brick, or concrete that were not designed with permeability in mind. Replacing or modifying these original surfaces with modern permeable alternatives could conflict with preservation guidelines aimed at maintaining the building's historic integrity.

Additionally, altering the surrounding landscape to install permeable surfaces could disturb the historical context or character of the Property, which preservation standards typically seek to protect. While the policy's goals of improving stormwater management are important for environmental sustainability, implementing such changes in a way that respects the Church's historic significance may be challenging or require careful, limited modifications. This tension between environmental objectives and historic preservation can result in non-compliance with the policy.

E. E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Upon redevelopment, the existing historic structures will likely not be able to comply with Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff as it relates specifically to green roofs due to architectural and preservation constraints. The roof of a historic church is often a defining architectural feature, designed with materials and structural systems that are not easily adaptable for the installation of a green roof. Green roofs require a strong support system to bear the additional weight of soil, plants, and water, which could exceed the load-bearing capacity of the Church's existing roof without extensive modifications. However, as noted above, future redevelopment of the Property will include upgrades to the streetscape and new landscaping, which will accommodate rainwater runoff and offset the inability to install green roof.

Furthermore, historic preservation guidelines typically emphasize maintaining the building's original materials and design, limiting changes that could alter the Church's historic character. Installing a green roof may conflict with the need to preserve the visual and structural integrity of the Church's roof, especially if it involves changing the roofing materials or modifying the roofline. This makes the installation of a green roof on a historic landmark difficult without compromising the preservation of its historic features.

V. Logan Circle Investment Plan

The Logan Circle Investment Plan ("Investment Plan") is a comprehensive document prepared by the D.C. Office of Planning in 2008. The Investment Plan was intended to provide a pool of resources to support investment and revitalization in emerging and distressed neighborhoods. See Investment Plan, p. 5. According to OP's website, the Investment Plan has been completed. Although there were no recommendations specific to the subject Property, the general investment goals cited in the Investment Plan would have been applicable to the Property, including those that supported the establishment of retail and the enhancement of the public realm.

The Investment Plan outlines a strategic approach to revitalizing the Logan Circle neighborhood through targeted investments and community engagement. Key points from the Investment Plan are as follows:

Investment Goals and Strategies:

- Revitalization through Arts and Culture: Promote arts and cultural activities to enhance existing businesses and institutions.
- Neighborhood-Oriented Retail: Improve and attract retail businesses through façade improvements and support for new retail establishments.
- Public Realm Enhancements: Create a safer, cleaner, and more active environment through public space maintenance and improvements.
- Affordable Housing Preservation: Preserve existing affordable rental housing units and promote government and non-government programs that aid in housing preservation.
- Implementation and Partnerships: Emphasize the importance of community-driven projects and partnerships with various stakeholders to achieve the investment goals.
- Historical and Demographic Context: Provide a detailed background of the Logan Circle area, including its historical significance, demographic trends, and current revitalization initiatives.
- Development Activity: Highlight recent and ongoing development projects in the area, such as Quincy Court, Whitman-Walker Clinic, Logan Station, and the Convention Center Headquarters Hotel.
- Public Outreach and Community Input: Formulate the plan through public meetings, workshops, and outreach efforts to gather community input and prioritize investment strategies.

The proposed map amendment to allow for retail and eating and drinking establishment uses at the Property aligns with and advances several key recommendations outlined in the Investment Plan.

- Neighborhood-Oriented Retail: The rezoning directly supports the Investment Plan's goal of improving and attracting retail businesses. By allowing retail and dining uses, the rezoning promotes new retail establishments that cater to the local community's needs. This not only strengthens the neighborhood's commercial base but also aligns with efforts to create more vibrant, walkable retail corridors. In addition, the Investment Plan's emphasis on façade improvements will be bolstered through the adaptive reuse of the existing structures, thus enhancing the overall aesthetic appeal of the area.
- Revitalization through Arts and Culture: The introduction of new retail and eating establishments complements the Investment Plan's goal to promote arts and cultural activities. Dining establishments often serve as social and cultural hubs, contributing to the area's vibrancy. These uses can also support local arts initiatives by offering venues for events or collaborating with nearby cultural institutions, fostering a stronger sense of community and artistic engagement.

- **Public Realm Enhancements:** The proposed retail and dining uses also advance the public realm improvements recommended by the Investment Plan. These establishments encourage more pedestrian activity, which can contribute to a safer and more dynamic street environment. Increased foot traffic will support local businesses, activate public spaces, and lead to further investment in public space maintenance and enhancements, such as outdoor seating and streetscape improvements.

In summary, the proposed rezoning advances key components of the Logan Circle Investment Plan by attracting neighborhood-serving retail, supporting cultural revitalization, and enhancing public spaces, all of which contribute to a vibrant, inclusive, and economically thriving community.

VI. Part Two: Applicant's Community Outreach and Engagement

As required by Part Two of the Racial Equity Tool, the Applicant has conducted outreach to the affected ANC 2F (in which the Property is located) and 2B (located across the street from the Property).

In addition to proactive engagement, Part Two of the Racial Equity Tool also requires the Applicant to consider the affected community and address various questions as they pertain to the proposed zoning action, to the extent possible. The Applicant's responses are provided below.

A. Community(ies)

The Congress for the New Urbanism ("CNU") defines a "community" as "a group of people living in the same place or having a particular characteristic in common." Many places have different communities inhabiting them, such as an elderly, or arts, or ethnic community living and/or working in close proximity to one another. Even the internet can be considered a place inhabited by many diverse communities. The scale, parameters, and character of a community-scaled planning effort can be difficult to define. See [CNU.org](https://www.cnu.org), Public Square.

What community is impacted by the zoning action?

The community impacted by the proposed map amendment would primarily include the residents, businesses, and stakeholders in the Logan Circle neighborhood and surrounding areas. This community encompasses a diverse mix of individuals, including long-time residents, newer homeowners, renters, and business owners. Logan Circle is a vibrant and historic neighborhood known for its residential character, local shops, restaurants, and proximity to key commercial corridors like 14th Street, 15 Street, P Street, and Rhode Island Avenue.

Additionally, the community may include those who use the neighborhood's infrastructure, such as bicyclists who rely on the two-way cycle track along 15th Street, NW, as well as workers, commuters, and visitors to the area who could be affected by changes in land use, traffic, and pedestrian patterns.

What specific factors define the impacted community?

- Historical Significance: Logan Circle is one of the oldest continuously inhabited areas in the District and has been an important part of Washington, D.C.'s development since the Civil War. Following the war, it became a sought-after residential area, known for its grand row houses that housed prominent political and social figures. The neighborhood's historical significance is rooted in its role in the city's expansion and the architectural legacy that continues to define it. Its inclusion in the Logan Circle Historic District solidifies its importance in the city's heritage. *See 10-A DCMR § 2101.4.*
- Architectural Style: The neighborhood's architectural character is defined by its mix of substantial, historic row houses and newer, modern developments. Many of the homes in Logan Circle and along 14th Street, NW reflect styles like Italianate, Romanesque, and Queen Anne, which are more elaborate and substantial than the simpler homes built before the Civil War. These houses contribute to the rich architectural tapestry of the area, showcasing the evolution of urban design and craftsmanship. The preservation of these structures is a key element of the neighborhood's historic identity. *See 10-A DCMR § 2101.4.*
- Cultural and Community Engagement: Logan Circle is known for its vibrant arts and cultural scene, with numerous galleries, theaters, and community-driven arts initiatives. The neighborhood promotes arts and cultural activities, which not only enhance the existing businesses and institutions but also foster a strong sense of community identity. Events like art festivals, local theater productions, and street performances help engage residents and visitors, solidifying Logan Circle's reputation as a cultural hub in the city. *See 10-A DCMR § 2113.2.*
- Economic Development: Over the past decade, Logan Circle has experienced significant revitalization and economic growth. This transformation is most evident along 14th Street, NW, where a lively arts, restaurant, and loft district has emerged. The development of independent businesses, local retail, and upscale dining options has created jobs and attracted both residents and visitors to the area. The continued improvement of public spaces and the influx of new businesses have enhanced the economic vitality of the neighborhood, making it one of the most desirable areas in the city. *See 10-A DCMR § 2113.2.*
- Public Realm Enhancements: Efforts to create a safer, cleaner, and more active environment in Logan Circle have focused on improving public spaces. Streetscape projects, such as widening sidewalks, installing bike lanes, and adding new street furniture, have made the area more pedestrian-friendly and aesthetically pleasing. Public parks and green spaces have also been revitalized to encourage outdoor activity and community interaction, further contributing to the area's livability and attractiveness. *See 10-A DCMR § 2107.3.*
- Affordable Housing Preservation: As property values have increased in Logan Circle, there has been a concerted effort to preserve affordable housing units to maintain the area's economic diversity. Programs aimed at housing preservation have been crucial in

protecting existing affordable rental units and ensuring that long-time residents can continue to live in the community. This focus on affordable housing is vital for balancing the neighborhood's growth with inclusivity and diversity, preventing displacement as development accelerates. *See* 10-A DCMR § 2111.3.

- **Demographic Trends:** Logan Circle has a diverse population, but like many areas in Washington, D.C., it has undergone significant demographic changes over time. The neighborhood's appeal as one of the most sought-after addresses in the District, particularly since the Civil War, has contributed to a shifting population. A mix of long-time residents, young professionals, and newcomers defines the community, reflecting the area's balance of historical significance and modern development. *See* 10-A DCMR § 2101.4.

In conclusion, the impacted community around Logan Circle is defined by a rich blend of historical, architectural, cultural, and economic factors. These factors combine to create a unique and dynamic neighborhood that continues to evolve while maintaining its distinctive character.

Who would potentially be burdened as a result of the zoning action?

Those who may be burdened in the short term as a result of the map amendment include residents living in residential buildings located adjacent to the Property, which could be impacted by construction and associated nuisances, such as truck traffic and noise. However, due to the historic nature of the Church, most if not all of the construction will occur inside the building, such that disruption will be minimal. Moreover, the Applicant will work with DDOT to establish a traffic control plan that will mitigate any potential impacts. Given that there is a historic landmark on the Property, additional density or residential use is unlikely to impact the neighborhood.

Redevelopment of the existing structures on the Property also has the potential to increase the assessed value of nearby properties, which may result in increased property taxes. However, the Office of Tax and Revenue offers tax relief and credit programs to assist eligible homeowners with increased property taxes, including the Assessment Cap Credit, Senior Assessment Cap Credit, First-Time Homebuyer Individual Income Tax Credit, Homestead Deduction, Individual Income Property Tax Credit, Lower Income Home Ownership Tax Abatement, Lower Income, Long-Term Homeowners Tax Credit, and Low-Income Senior Citizen Property Tax Deferral. *See* [DC Office of Tax and Revenue](#).

The Comp Plan verifies the success of these programs, providing that “[t]he District has taken enormous strides toward strengthening its affordable housing infrastructure. The city has some of the strongest tenant protection provisions in the country; the highest level, per capita, for affordable housing investment; the lowest residential real property tax rate in the region; and provides additional discounts for seniors and renters. It has innovative programs such as tax abatements to stimulate the development of workforce housing. From 2015 to 2018, the District of Columbia has successfully delivered, through subsidy or inclusionary zoning, 5,352 new or preserved affordable housing units.” *See* 10-A DCMR § 206.11.

Within the community, who would potentially benefit as a result of the zoning action?

Adaptive reuse of the Property enabled by the rezoning will provide numerous benefits to residents and visitors of the surrounding neighborhood. In its meetings with the ANC, concerns were raised regarding the presence of squatters breaking into the vacant buildings and the prevalence of rodents surrounding the Property. Adaptively reusing the Church with a neighborhood-serving commercial use would help to clean it up and prevent these types of issues from occurring. Renovations would also involve the provision of new streetscape improvements consistent with DDOT standards, would increase pedestrian safety and comfort, and would advance equity by making the area more accessible and inviting for all. Additionally, the community would benefit from the activation of this vacant building with neighborhood-serving uses that improve local access to essential services and amenities.

Through adaptive reuse, the transformation of this underutilized space would attract foot traffic, foster a more dynamic street environment, and stimulate economic growth, all while preserving the neighborhood's historic character. Importantly, the presence of public transit options, such as nearby bus routes, metro stations, and bike lanes, would ensure that the revitalized Property is accessible to a wide range of residents, including those who rely on alternative modes of transportation. This convenient transit access benefits both residents and visitors by providing easy connections to neighborhood services, dining, and retail options, as well as future employers working at the Property.

The revitalized Property would also create job opportunities for local residents, supporting workforce development and contributing to economic stability in the community. Small businesses and nearby business owners would benefit from the added foot traffic, complementary commercial uses, and increased customer base, thus helping to support a thriving local economy. Consequently, the community as a whole, including current and future residents, visitors, and local business owners, stands to gain from a more vibrant, connected, and economically resilient neighborhood.

B. Past and Present Racial Discrimination / Harm to Community

Are there negative conditions in the community that are the result of past or present discrimination?

The [Ward 2 Heritage Guide](#) ("Guide") is intended to identify historic or culturally important places in Ward 2 and to provide a framework for developing strategies necessary to capitalize on, and if necessary, protect these historic resources. The Guide's historical perspective presents several negative conditions in the Logan Circle community that are the result of past or present discrimination:

- **Residential Segregation**: Restrictive housing covenants and discriminatory lending practices (redlining) limited where African Americans could live, confining them to specific, often under-resourced neighborhoods. This led to segregated communities and inequitable access to housing and opportunities. See Guide, p. 38.

- Urban Decay: Discriminatory federal policies denied loans and repair assistance to African American neighborhoods, contributing to the decline of urban areas. Without investment, these neighborhoods deteriorated, exacerbating poverty and limiting economic mobility for residents. *See Guide, p. 38.*
- Displacement from Urban Renewal: Many historically Black neighborhoods, such as those around Shaw and Georgetown, were targeted for urban renewal and highway construction projects, resulting in the forced displacement of long-term residents. These initiatives destroyed established communities and cultural ties and led to the loss of affordable housing and cultural dislocation, as communities were uprooted. *See Guide, p. 42.*
- Exclusion from New Suburbs: African Americans were systematically excluded from moving into newly developing suburbs through both formal covenants and informal discrimination, restricting access to better housing, schools, and job opportunities. This segregation entrenched disparities in access to wealth-building opportunities, creating long-lasting inequalities in wealth accumulation and homeownership rates. *See Guide, p. 38.*
- Gentrification and Housing Inequity: Today, the legacy of these discriminatory practices has contributed to the gentrification of historically Black neighborhoods in Ward 2, such as Shaw. Rising property values and rents have displaced many lower-income residents, eroding the cultural fabric of these communities while making them unaffordable for the original inhabitants. *See Guide, p. 42.*
- Educational Disparities: As a result of segregation and underinvestment, schools in historically Black neighborhoods received fewer resources and poorer quality facilities, contributing to long-term educational inequities that have persisted over generations. The legacy of unequal education persists in some areas of Ward 2. *See Guide, p. 42.*
- Economic Marginalization: African Americans and other minority groups were often excluded from economic opportunities in the area. Discriminatory employment practices and limited access to business loans or capital further entrenched poverty in Ward 2 communities, reducing economic mobility and limiting wealth accumulation. *See Guide, p. 38.*
- Health Disparities: Due to historic segregation and underinvestment in infrastructure, predominantly African American communities faced inadequate access to healthcare facilities and healthy living conditions, leading to worse health outcomes for residents in these areas. *See Guide, p. 38.*

In conclusion, the legacy of past and present discrimination in Ward 2 has left deep and lasting impacts on the community. African Americans have faced systemic barriers in housing, economic opportunity, education, and healthcare due to discriminatory practices such as redlining, restrictive housing covenants, and urban renewal policies. These policies created segregated neighborhoods, fostered urban decay, and displaced long-standing communities, particularly in

historically Black areas. As a result, residents were denied equitable access to housing, education, and wealth-building opportunities, leading to entrenched inequalities that persist today.

Are there current efforts or ongoing efforts in the community that are addressing past discrimination described above?

District government has established programs intended to address past discrimination perpetuated by redlining. The Black Homeownership Strike Force (“BHSF”) acknowledges that D.C.’s history of redlining and racist real estate practices blocked Black households from attaining the “American Dream.” [Black Homeownership Strike Force](#), p.5. The patterns established by redlining decades ago are visible today, as Black households are concentrated in the eastern wards of the city, particularly to the east of the Anacostia River. *Id.* at 7. The BHSF establishes a goal of gaining 20,000 net new Black homeowners by 2030 by implementing the following recommendations:

- Provide estate planning resources and legal services to assist with the transfer of ownership to homeowners and their heirs.
- Pass legislation to protect homeowners from unwanted solicitation regarding the sale or potential purchase of their homes.
- Establish a Homeowner Assistance Fund to aid Black homeowners at risk of foreclosure due to their inability to pay their mortgage and related housing fees.
- Provide homeownership units to Black owner occupant homebuyers with a mixed income requirement with an average income restriction of 80 percent MFI.
- Leverage the \$10 million Black Homeownership Fund to create a public-private fund where 1/3 of the units are affordable, 1/3 of the units are market rate and sold to Black owner-occupant homebuyers.
- Broaden awareness of programs to support homeownership.
- Increase the effectiveness of all homeownership programs to increase the ability of Black homebuyers using District programs to compete for homes in the current market.

D.C.’s [Upward Mobility Action Plan](#) (“UMAP”) also addresses disparities long entrenched through discriminatory policies, such as redlining and segregation and exacerbated by the COVID 19 pandemic. The UMAP introduces an approach to boosting mobility from poverty in the District by aligning systems and programs for housing, financial wellbeing, and workforce development / adult education. *See* UMAP, p. iv. In particular, community-based organizations that partnered with the District in this effort noted that homeownership remains the strongest pathway to prosperity. *See Id.* p. ii. The UMAP recommends a systemic approach to boost upward mobility by 1) improving residents experience of District programs; 2) aligning programs that help residents achieve stability and then mobility toward prosperity; 3) measuring progress for upward mobility; and 4) evaluating program effectiveness to improve resident outcomes. *See Id.* at 19–21.

The efforts described above work in combination with other existing programs within the District that provide resources for housing, including the IZ Affordable Housing Lottery, Home Purchase Assistance Program, Housing Choice Voucher Program, Foreclosure Prevention Resources, Employer Assisted Housing Program, Tenant Opportunity to Purchase Act, District Opportunity to Purchase Act, Public Housing, and Housing Assistance Payment Program, among

others available through [Housing DC](#).

More specific to the Logan Circle neighborhood, there are several efforts underway to address previous discrimination.

- Affordable Housing and IZ: One key effort is the promotion of affordable housing to counteract the displacement experienced by lower-income residents, particularly Black residents. By leveraging IZ policies, the District ensures that many new developments include IZ units to maintain economic diversity and provide housing opportunities for residents who may otherwise be priced out of the neighborhood.
- Preservation of Cultural Heritage: The neighborhood's rich African American history is being preserved and honored through historic designations and the recognition of landmarks, such as the homes of civil rights leaders like Mary McLeod Bethune and Belford Lawson. These efforts not only acknowledge the contributions of the Black community but also help preserve the cultural identity of Logan Circle.
- Public Space Enhancements and Community Engagement: Logan Circle has also seen investments in public space improvements, creating a more inclusive and accessible environment for all residents. These enhancements, along with community-driven events and cultural activities, aim to foster a sense of belonging and mitigate the impacts of exclusion caused by past discriminatory practices.

These efforts, while ongoing, demonstrate a commitment to addressing the historic inequalities in Logan Circle by promoting inclusivity, honoring cultural heritage, and preserving the neighborhood's diversity.

C. Community Participation / Outreach Efforts

The planning and development policies for the Near Northwest Area Element derive from large Comp Plan workshops that took place in the Planning Area during the 2006 Comp Plan revision. These meetings provided an opportunity for residents to discuss neighborhood planning issues, as well as District-wide issues. There were also other meetings in the community not directly connected to the Comp Plan that focused on specific planning issues for different parts of the area. These include meetings relating to the Shaw/Convention Center Small Area Plan, the Great Streets Initiative, campus plans for the local universities, and a variety of transportation, historic preservation, and economic development initiatives across the area. See 10A DCMR § 2107.2.

The community identified the following priorities during these meetings:

- There is a strong desire within the community to maintain the historic and architectural character of its neighborhoods. Infill development should prioritize diverse designs that avoid monotonous aesthetics while preserving a mix of building types to enhance the area's visual appeal. Additionally, there was a call for more historic designations in Shaw and Mount Vernon Square North, as well as the need for downzoning in Dupont and Logan

Circles to ensure that new developments align with the established character and scale of these historic districts.

- Mixed-use developments in the Near Northwest area have led to conflicts between residential and commercial spaces, raising concerns among residents about the impact of fast food restaurants and liquor-licensed establishments. These developments have created challenges related to parking, trash removal, and the management of sidewalk cafes, which can disrupt the quality of life for those living nearby. As a result, residents are increasingly vocal about the need for solutions that balance commercial activity with the preservation of their residential environments.
- The high demand for parking near commercial areas and universities has created significant challenges in the Near Northwest community, as many residences lack off-street parking. This scarcity has led to conflicts between residents and visitors or employees seeking parking, exacerbating congestion in the area. While programs such as residential permit parking and university shuttles have provided some relief, there is a consensus that further measures are necessary to effectively address the ongoing parking issues and ensure a more harmonious balance between residential needs and commercial activity.
- The Near Northwest area is experiencing uneven retail conditions, with shuttered storefronts evident on streets like 7th and 9th Streets NW, while more prosperous retail districts face the risk of becoming overly homogeneous as national chains increasingly replace local businesses. This shift toward chain establishments threatens the unique character of these neighborhoods, and rising rents are placing additional stress on small businesses, potentially resulting in the loss of neighborhood-defining shops that contribute to the community's identity and charm.

See 10A DCMR § 2107.3.

The proposed map amendment would address the above-mentioned community priorities by allowing a commercial use along a mixed-use corridor that will activate the public realm and provide neighborhood-serving uses. In meeting with the community associated with the Property prior to filing the Application, residents indicated concerns about potential trash, noise, and construction activities. The Applicant's response to these concerns are set forth below. Additionally, it will allow for the reuse of a historic landmark that enhances the established character and scale of the historic district.

What unique factors about the affected community and/or communities influenced your outreach plan / efforts?

Logan Circle's community engagement is influenced by several unique factors, including its designation as a historic district, which drives strong interest in preserving the neighborhood's architectural character. The area's diverse population, with a mix of long-term residents, urban professionals, artists, and members of the LGBTQ+ community, adds a variety of perspectives that shape priorities around inclusive development. The neighborhood's walkable, mixed-use environment heightens community focus on pedestrian safety and streetscape improvements. Additionally, rising housing costs raise concerns about affordability, often bringing affordable

housing into engagement conversations. Proximity to arts and cultural venues also impacts community priorities, as residents advocate for policies that support cultural spaces and the local arts scene, making Logan Circle a deeply invested and vibrant community.

By planning for new commercial uses at the Property with early input from the ANC, the Applicant is engaging with local civic organizations that are highly active in planning discussions. This aligns with the neighborhood's interest in ensuring that new development respects community standards, particularly associated with noise and trash management, which are critical to maintaining the walkable, mixed-use character of Logan Circle.

Moreover, by anticipating the need to address potential impacts associated with trash, noise, and construction activities, as further described below, the Applicant is responding to concerns around livability in a high-density, pedestrian-friendly environment. This preparation also acknowledges the neighborhood's diverse resident base, which includes long-term residents who may be sensitive to changes affecting quality of life. Overall, this approach demonstrates a commitment to addressing potential impacts, supporting the neighborhood's values of historic preservation, livability, and quality of life in the face of new development.

How were your outreach efforts proactive in terms of meeting community needs and circumstances?

The Applicant engaged with ANC 2F, the Historic Preservation Office, and the Office of Planning before filing the subject application or placing the Property under contract to inform them of its proposal and gather feedback on any potential concerns. The Applicant also reached out to ANC 2B, the ANC located across 15th Street from the Property, before submitting the application.

What was the overall timeframe and frequency of your outreach?

The Applicant has engaged with the community as provided in the following table:

Engagement/Event	Date	Brief Summary
Meeting & Site Visit ANC 2F CDC Chair Commissioner Helen Kramer	June 5, 2024	The Applicant met with Commissioner Helen Kramer, the CDC Chair, and provided her with a tour through the Property. During the visit, the Applicant explained the proposed plans for the Property to assess whether they should except to receive support from the ANC before filing the map amendment application or placing the Property under contract. Commissioner Kramer agreed that the plan was reasonable and would likely be supported.
Zoom Meeting	June 6, 2024	The Applicant discussed its plan for the Property with Mr. Calcott, who

Engagement/Event	Date	Brief Summary
Historic Preservation Steve Calcott		confirmed that the historic designation applies only to the exterior and structural assemblies, not to the interior finishes or space layouts. Mr. Calcott agreed that the proposed use was likely the only way to not negatively impact the exterior of the Property. During this meeting Mr. Calcott indicated that he previously discussed redevelopment of the existing historic structures with residential use and does not support that approach. He appreciates that the Applicant will be preserving most of the interior finishes.
Zoom Meeting Office of Planning Joel Lawson and Jennifer Steingasser	June 12, 2024	The Applicant discussed the proposed plan and zoning for the Property, and the Office of Planning agreed that the proposal aligns with the Comp Plan. OP's stated position was consistent with the message conveyed during a 2019 meeting with the current owner of the Property, during which it was stated that an alternative use for the Property should be considered as it would otherwise fall into disrepair.
Meeting & Site Visit Commissioner Joe Florio	June 26, 2024	The Applicant met with Single Member District Commissioner Joe Florio (SMD 2F03) and provided him with a tour through the Property. The Applicant explained the plans for the Property to assess whether the proposed map amendment would likely receive support from the ANC before filing the application or placing the Property under contract. Commissioner Florio agreed that the proposal was reasonable and would likely be supported.
Presentation to ANC 2F CDC	September 25, 2024	All Commissioners present at the CDC meeting voted in favor of the request and expressed excitement about the Applicant's plan for the Property.

Engagement/Event	Date	Brief Summary
Email – ANC 2B Commissioner Meg Roggensack	September 25, 2024 – September 26, 2024	The Applicant emailed ANC 2B to inform them of the plans for the Property and the proposal to file a map amendment application. The Applicant offered to schedule a call to discuss the plans and/or present at and ANC meeting. Commissioner Roggensack indicated that they would follow up with the Applicant if a presentation is desired.
ANC 2F Meeting	October 2, 2023	ANC voted unanimously at its regularly scheduled and duly noticed public meeting to support the proposed map amendment application.

D. Community Priorities and Impact on Zoning Action

Has the community identified negative outcomes that could result from the zoning action, i.e. specific things the community doesn't want to change/happen as a result of the zoning action?

The community has not identified any major negative outcomes and is aware that the Applicant plans to establish an eating and drinking establishment at the Property. Some community members raised questions about controlling noise, which the Applicant addressed by stating that an acoustical consultant would be hired to mitigate noise. Following the ANC meeting, the Applicant conducted a sound test at the Property with an acoustical consultant to assess noise levels outside the Property. Due to the Church's existing design and materials used in its construction, exterior noise levels were barely perceptible just outside the windows of the Church. However, the Applicant is committed to further reducing any potential noise impacts by incorporating strategic design elements and noise-mitigating materials during the renovation.

The community requested that the Applicant prepare a trash management plan and minimize the amount of trash placed in the alley to help prevent rodent issues. The Applicant will address these concerns by devising a trash management plan that is consistent with industry standards for an eating and drinking establishment. The trash management plan will be a major focus for the Applicant and its design team as design for the renovation is advanced. The trash management plan will include properly sealed containers that are concealed and located off the alley to prevent rodent intrusion. As it relates to construction activities, the Applicant will enter into a traffic control plan with DDOT to ensure that any potential impacts during construction are adequately mitigated.

The Applicant will continue to work with the community and address concerns as they arise, including mitigation measures to prevent any potential impacts.

Has the community identified positive outcomes that could result from the zoning action, i.e. specific things the community wants to change as a result of the zoning action?

The community is pleased that the Parish House will be converted to residential use. The currently vacant Church has caused issues for neighbors, including the presence of homeless individuals and squatters, and they are excited that the building will be reactivated. They also appreciate that the Church will be preserved with little to no changes to the exterior and that most of the interior finishes will be maintained.

Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?

There will be no permanent displacement of any residents or businesses as a result of the zoning action, as the building is currently vacant.

Did community outreach inform/change your zoning action? If so, how does it incorporate or respond directly to the community input received?

Community outreach has played a key role in shaping the proposal by giving residents the opportunity to raise important issues for the Applicant to address. Feedback from the community has highlighted concerns about squatters in the building, rat infestations, potential noise, and effective trash management. In response, the Applicant is committed to implementing solutions that directly address these issues, ensuring a safer, cleaner, and more welcoming environment for all neighborhood residents.

The criteria of 11-X DCMR § 500.3 does not require the Zoning Commission to assess the merits of a potential design, only the map amendment's consistency with the Comp Plan.

If the zoning action could potentially create negative outcomes, how will they be mitigated?

In the event that rezoning the Property to the ARTS-3 zone leads to potential negative outcomes, the Applicant will actively work to mitigate them through careful planning and community engagement. Some potential concerns, such as changes in land use, can be addressed through strategies like ensuring compatibility with the surrounding neighborhood character.

Traffic and parking concerns may be managed by incorporating transportation demand management ("TDM") measures, promoting alternative transportation options, and working closely with DDOT to enhance pedestrian and transit infrastructure.

Restaurants and retail businesses generate waste, which could lead to issues with trash accumulation and sanitation, particularly since the Church is adjacent to residential areas. A robust waste management plan, including scheduled trash pickups and appropriate disposal methods, would be essential to address this concern and has been requested by the community.

The community has also expressed concerns about squatters in the building, potential noise from the eating and drinking establishment use, and potential vermin as a result of the trash. By adaptively reusing the vacant Church and Property, the community's concerns with squatters in

the building will be fully addressed. As it relates to noise, the proposed use will be inside the building, such that it will not likely have any negative impacts on nearby residential properties. If the eating and drinking establishment proposes any outdoor space, issues associated with noise will be addressed during the public space and/or Alcoholic Beverage and Cannabis Administration approval process. As it relates to trash and vermin control, the Applicant will establish a comprehensive trash management plan and will take all commercially reasonable efforts to establish rat abatement protocols.

The Applicant is committed to collaborating with the community, city agencies, and stakeholders to ensure that future redevelopment contributes positively to the neighborhood while minimizing adverse impacts.

What input from the community was shared but not incorporated into the zoning action? Why?

The community has not provided input to incorporate into the zoning action, as the Application does not require architectural plans. However, the Applicant will continue to engage with the community to address concerns when necessary.

VII. Part Three: Disaggregated Data on Race & Ethnicity

The Zoning Commission expects disaggregated race and ethnicity data from the **Office of Planning** in every racial equity analysis submission that analyzes a zoning action through a racial equity lens. The Applicant will provide any additional information as requested by the Zoning Commission.

VIII. Part Four: Zoning Commission Evaluation

Part Four of the Zoning Commission's Racial Equity Tool provides the criteria with which the Zoning Commission shall evaluate a proposed action through a racial equity lens. This evaluation is guided by the following questions:

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

The table below indicates how the proposed map amendment will generally result in positive outcomes when considered through several racial equity themes, as it has the potential to address a number of equity issues that residents in the Near Northwest Planning Area are experiencing. Throughout the processing of this Application, the Applicant will continue engaging with the affected ANC's and community stakeholders.

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome / Applicable Public Benefit
Displacement		
Physical	Displacement due to redevelopment.	Displacement will not occur on the Property because the building is currently vacant.
Economic	Displacement due to housing cost increases.	Retail and eating/drinking establishment uses enabled by the map amendment may improve the economic prospects of a neighborhood and increase the land value, which may result in higher property taxes for housing.
Cultural	Loss of sense of belonging or shared identity in neighborhood.	The exterior and the majority of the interior of the landmark Church will be preserved, minimizing the impact the proposed map amendment will have on the neighborhood's identity.
Housing	Number of new market rate and dedicated affordable units (per 2019 Housing Equity Report).	The proposed map amendment will allow for the establishment of new neighborhood services that will benefit residents and enhance the area's vitality, making it a more desirable place to live.
Housing Burden	Households that pay more than 30% of income (burdened), or 50% of income (severely burdened) on housing.	- New retail and eating and drinking establishment uses may encourage future investment in housing in the surrounding neighborhood, which would help to increase supply to meet demand and drive down housing costs. - Retail services can reduce the cost of living for nearby residents by providing easier access to necessities, lowering transportation costs and encouraging local spending,

		which can make housing more affordable indirectly.
Family-sized Units	· Dwelling units with 3 or more bedrooms.	· The proposed map amendment would not result in housing.
Transportation		
Access to Transit	· 0.5 miles to Metrorail. · 0.25 miles to priority bus corridors and other modes of public transportation.	· Located 0.6 miles from the Dupont Circle Metrorail station, · Located 0.5 miles from the McPherson Square Metrorail station. · Bus routes on 14th Street (routes 52, 54, 59, and WP-AM), 16th Street (routes S2, S9, 315, and 325), and P Street (route G2).
Transportation Improvements / Pedestrian Safety	· Gaps in pedestrian network. · Lack of pedestrian facilities (crosswalks, lighting, seating, etc.).	· Potential improvement of pedestrian connectivity with streetscape enhancements. · Reduction of underutilized lots; ultimately improving connectivity, walkability, and safety.
Employment		
New Jobs	· Establishment of new businesses · Mixed use developments that include offices, restaurants, retail, or other uses. · Construction of new development.	· Increased non-residential density can result in jobs related to retail or eating and drinking establishments. · Creation of construction jobs.
Access to Jobs	· Proximity to public transit. · Reduced commute times. · Walkability and bikeability. · Affordable housing near Employment Centers. · Internet Access · Access to childcare	· Property is in close proximity to public transit, including Metro stations, multiple bus lines, and cycle track on 15th Street, providing access to and from neighborhoods to potential employment at the Property. · Increase in neighborhood services fills a gap in the street and facilitates walkability and strengthens connections between residential areas and local businesses.

Community		
Education / Health / Wellness	· Access to quality public services. · Access to safe, clean public gathering spaces, open spaces, and recreation. · Healthy natural environment.	· Proximity to public schools, including Ross Elementary School, John Francis Education Campus, and Cardozo Education Campus. · Proximity to West End Neighborhood Library (1.6 miles), Northwest One Neighborhood Library (1.5 miles), and Mt. Pleasant Neighborhood Library (1.7 miles). · MedStar Georgetown University Hospital (2.7 miles) · Near Stead Recreation Center. · Near Rock Creek Park
Environmental	· LEED rating. · Use of renewable energy sources. · Storm water management. · Placement of unwanted / high-impact land uses	· Adaptive reuse of the Church reduces environmental impact. · Potential for improved storm water infrastructure. · Incorporation of resiliency features into redevelopment, where possible. · Compliance with applicable Building Code requirements and energy-efficient building systems and technologies. ·
Access to Amenities	· Availability of building amenities. · Proximity/availability of uses that meet day-to-day needs (grocery, retail, service, eating and drinking).	· Map amendment will allow for commercial uses along the 15th Street corridor in a mixed-use and diverse neighborhood, therefore granting residents more access to day-to-day needs.

IX. Conclusion

In light of the foregoing analysis, the Applicant submits that the proposed map amendment will advance many Comp Plan policies related to racial equity. Overall, rezoning the southern portion of the Property to the ARTS-3 zone will allow for adaptive reuse of the historic structures on the Property, thus allowing for the establishment of new neighborhood-serving commercial uses in a mixed-use, walkable, transit- and pedestrian-oriented neighborhood, all fully consistent with the Comp Plan designations for the Property.