

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

**STATEMENT IN SUPPORT OF
AN APPLICATION FOR A ZONING MAP AMENDMENT
FROM THE RA-5 AND ARTS-3 ZONE
TO THE ARTS-3 ZONE**

**GRACE REFORMED CHURCH
1401-1405 15TH STREET, NW (SQUARE 210, LOT 827)**

MR 1401 15TH STREET RETAIL LLC

November 18, 2024

Respectfully submitted by:

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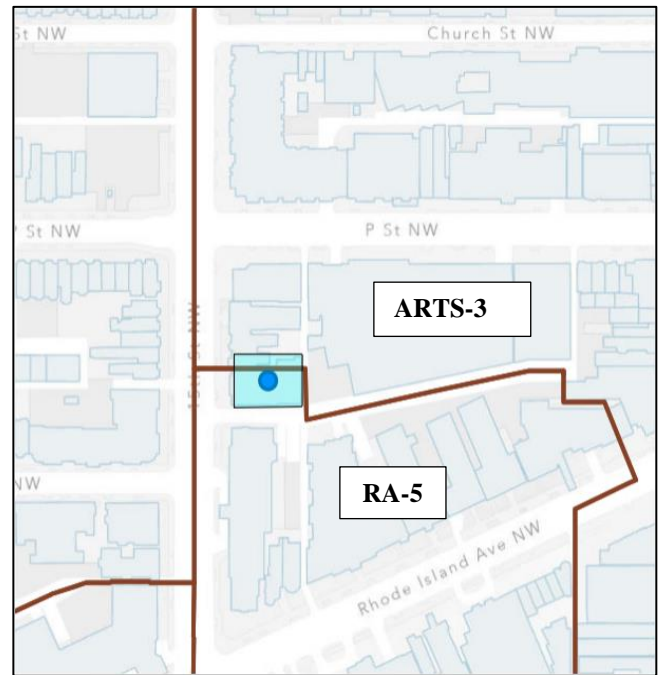
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List of Exhibits

Exhibit	Description
A	Surveyor's Plat
B	National Register of Historic Places Registration Form
C	Existing Condition Photographs of Historic Structures
D	HPRB Staff Report and Recommendation (HPA No. 23-043)
E	Portion of the Zoning Map showing the Property's existing zoning
F	Portion of the Comprehensive Plan Future Land Use Map (FLUM)
G	Portion of the Comprehensive Plan Generalized Policy Map (GPM)
H	Evaluation of Consistency with the D.C. Comprehensive Plan and Applicable Small Area Plans and Studies
I	Notice of Intent, Certificate of Notice, and list of owners/addresses for properties located within 200 feet of the Property
J	Form 100 – Zoning Commission Application Signature Form
K	Owner and Applicant Authorization Letters
L	Certificate of Proficiency

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 Statement in Support for an amendment to the Zoning Map of the District of Columbia (the “Zoning Map”) pursuant to Subtitle X, Chapter 5 and Subtitle Z §§ 201.2(e) and 304 of the Zoning Regulations of the District of Columbia (Title 11 of the District of Columbia Municipal Regulations (“DCMR”)) to which all subsequent citations refer unless otherwise specified. The Property is split-zoned RA-5 and ARTS-3. **The Applicant seeks to rezone the RA-5-zoned portion of the Property to the ARTS-3 zone so that the entire Property is zoned ARTS-3.** A copy of the Surveyor’s plat showing the Property to be rezoned is attached as Exhibit A.



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 existing historic structures in a manner that is not inconsistent with the Comprehensive Plan and with other applicable District programs and policies.** Specifically, the existing RA-5 zone designation for the southern portion of the Property does not allow for retail or eating and drinking establishment uses. While the landmark status of the existing structures on the Property will preclude any material expansion or increases in height and density, the proposed ARTS-3 zone would allow for limited commercial uses within the existing structures, thus fulfilling the District’s goals of creating areas with access to opportunities, services, and amenities for District residents, and reusing existing structures in a sustainable and productive manner.

As required to be demonstrated pursuant to Subtitle X § 500.3, the requested Zoning Map amendment is not inconsistent with the Comprehensive Plan or with other adopted public policies and active programs related to the Property, particularly when analyzed through a racial equity lens. The Property’s designation on the Comprehensive Plan Future Land Use Map (“FLUM”) is Mixed-Use Medium Density Residential / Moderate Density Commercial. The Property’s designation on the Comprehensive Plan General Policy Map (“GPM”) is a Neighborhood Conservation Area. As explained herein, the proposal to rezone the southern portion of the Property from the RA-5 zone to the ARTS-3 zone is not inconsistent with the Property’s designations on the FLUM and GPM and helps to advance numerous policies within the text of the Comprehensive Plan.

As demonstrated herein, the proposed ARTS-3 zone will result in positive outcomes for the Property, the Near Northwest Planning Area, and the District overall. Approval of the requested Zoning Map amendment will specifically achieve the following:

1. Establish zoning on the Property that is not inconsistent with the Comprehensive Plan, as required under the Home Rule Charter.
2. Establish zoning on the Property that will allow for the adaptive reuse of the existing historic structures in a manner that is not inconsistent with the Mixed-Use Medium Density Residential / Moderate Density Commercial FLUM designations or with the Neighborhood Conservation Area GPM designation.
3. Advance the goals and objectives of the Logan Circle Investment Plan, issued by the Deputy Mayor for Planning and Economic Development and the Office of Planning, which was prepared to identify community priorities and set an agenda for investment resources.
4. Facilitate progress towards achieving racial equity by advancing numerous Comprehensive Plan policies geared towards fostering an inclusive city, reusing and preserving historic structures, and establishing neighborhood serving retail and service uses in a mixed-use, walkable, and transit-accessible area.
5. Support the protection, preservation, and revitalization of historic structures while putting them back into productive use, thus advancing sustainability goals, encouraging economic development, and allowing for thoughtful design within the context of the historic community.

II. Description of the Property and the Surrounding Area

The Property is located on the east side of 15th Street, NW, and is improved with the Church and Parish House. The Church is located on the southern portion of the Property and is zoned RA-5; the Parish House is located on the northern portion of the Property and is zoned ARTS-3.

The Church is comprised of the sanctuary building and the Sunday school. The Gothic Revival styled sanctuary building was designed by Paul J. Pelz and A.A. Ritcher and constructed in 1902-1903. The Sunday school addition at the rear of the sanctuary was designed by Paul J. Pelz and constructed in 1911-1912. The bay-fronted Victorian Parish House, preceding construction of the Church, was erected as a rowhouse in 1892 by W.H.H. Knight. The three structures are situated so that the sanctuary and Parish House front 15th Street, NW, and the Sunday school addition, abutting the Church to the east, faces onto a public alley that runs north-south through the square. *See* National Register of Historic Places Registration Form, a copy of which is attached hereto as Exhibit B. Photographs of the exterior and interior of the existing structures on the Property are attached hereto as Exhibit C.

The historic structures on the Property operated as a church for many years but are currently vacant. The current owner of the Property, the Central Atlantic Conference of the United Church of Christ (the “Seller”), ended its services due to declining congregation numbers, high operating

costs, and increasing capital improvement costs. The Seller leased the Property to the Christ Reformed Church until 2019, and to the Community Church of Washington DC until 2022. The Seller is now at a point where the capital required to renovate and maintain the Property is insurmountable, and declining congregation numbers and insufficient on-site parking for a typical congregation no longer make the Property a desirable location for religious use whether that be leasing or purchasing of the Property.

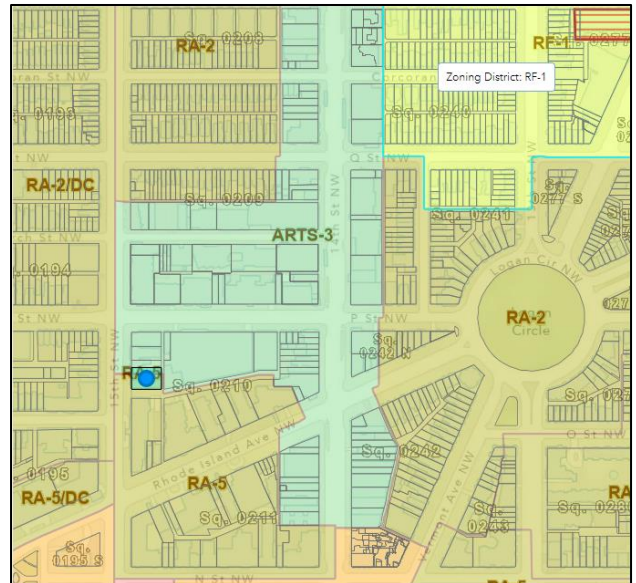
In addition, given the Property's landmark designation, unique architectural configuration, and split-zoning, there are few realistic options for adaptive reuse. While the Church's RA-5 zone would allow for up to 90 feet in height and 6.0 floor area ratio ("FAR") as a matter of right, this level of development potential is unrealistic given the landmark status. *See* Historic Preservation Review Board ("HPRB") Staff Report and Recommendation, dated November 17, 2022, for the then-proposed subdivision of the Property (HPA No. 23-043) attached hereto as Exhibit D.¹

The historic Church has been specifically evaluated for residential use, but such conversion has proved to be difficult and ultimately infeasible for a variety of reasons, including (i) it is challenging to renovate the existing structure to meet applicable Building Code requirements associated with residential use; (ii) it would be impossible to convert the Church to residential use (and meet the Building Code) without modifying the exterior of the historic building, and it would be difficult to obtain HPRB support for any exterior modifications; and (iii) residential conversion would be prohibitively costly, since the financial returns on the investment would be negligible, falling well short of a return that would justify the significant level of risk involved.

At the same time, the Church lends itself perfectly for adaptive reuse as an eating and drinking establishment, which results in the need for the proposed Zoning Map amendment to the ARTS-3 zone. In contrast, the Parish House, which is already zoned ARTS-3 and permits commercial uses, can easily accommodate residential use, which is currently being proposed. 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. *See* 11-K DCMR § 800.1.

¹ The subdivision application, which proposed to subdivide the single lot into two separate record lots, was approved by HPRB on November 17, 2022. However, the plat was never signed or recorded.

The Property is rectangular in shape and has approximately 7,200 square feet of land area. The Property is bounded by private property to the north, public alleys to the east and south, and 15th Street, NW to the west. As noted above, the southern portion of the Property, which is improved with the Church, is zoned RA-5, and the northern portion of the Property, which is improved with the Parish House, is zoned ARTS-3. Properties immediately surrounding the Property to the north and east along 15th Street and P Street, and to the east along the 14th Street corridor, are also zoned ARTS-3. The entirety of the Property is located within the Greater 14th Street Historic District.



The Property is located in the Logan Circle neighborhood of the District and specifically along the 15th Street mixed-use corridor. This neighborhood supports a wide variety of residential, retail, service, office, lodging, and other commercial uses. A mix of single- and multi-family residential buildings are located in the immediate vicinity, as are large number of eating and drinking establishments, hotels, fitness studios, salons, theaters, and banks. A Whole Foods grocery store is located a half block to the east on P Street, NW. Many public open spaces are also in close proximity, including Logan Circle to the east, Scott Circle to the southwest, and Stead Park to the west.

The Property is well served by public transportation. The Dupont Circle Metrorail station is located approximately 0.6 miles to the west of the Property, which services the red line, and the McPherson Square Metrorail station is located approximately 0.5 miles to the south of the Property, which services the blue, orange, and silver lines. A variety of Metrobus lines also run along corridors immediately adjacent to the Property, including the G2 line, which runs along P Street, NW, the 52, 54, 59, and WP-AM lines, which run along 14th Street, NW, and the S2, S9, 315, and 325 lines, which run along 16th Street, NW. Numerous Capital Bikeshare stations are also located within several blocks of the Property, including one at the corner of 15th and P Streets. Accordingly, access to public transportation from the Property is convenient and easily accessible.

III. Existing and Proposed Zoning

The Applicant proposes to rezone the Property from the split-zoned RA-5 and ARTS-3 zones to the ARTS-3 zone only. Accordingly, the existing RA-5 zoned portion of the Property would be rezoned, while the existing ARTS-3 portion of the Property would remain.

A. Existing Zone: RA-5 Zone

As shown on the Zoning Map (Exhibit E), the southern portion of the Property is currently zoned RA-5. The purposes of the RA zones are to (a) permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and (b) permit the construction of those institutional

and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones. 11-F DCMR § 101.3. The RA-5 zone provides for areas developed with predominantly high-density residential. 11-F DCMR § 101.8.

The maximum permitted density in the RA-5 zone is 6.0 FAR for an apartment house or hotel, 1.8 FAR for a public recreation or community center, and 5.0 FAR for all other structures. 11-F DCMR § 201.1. Up to 7.2 FAR is permitted for an Inclusionary Zoning (“IZ”) development. 11-F DCMR § 201.4. The maximum permitted building height in the RA-5 zone, not including a penthouse, is 90 feet. 11-F DCMR § 203.2. The Comprehensive Plan Framework Element describes the RA-5 zone as being consistent with the High Density Residential FLUM designation, and as noted above, the Zoning Regulations describe the RA-5 zone as being one which should provide for areas developed with predominantly high-density residential. 10A DCMR § 227.8 and 11-F DCMR § 101.8. However, the RA-5 zone does not permit retail or eating and drinking establishment uses as a matter-of-right or as a special exception.

B. Proposed Zone: ARTS-3

The Applicant requests a Zoning Map amendment to rezone the southern portion of the Property to the ARTS-3 zone so that the entire Property is zoned ARTS-3. The ARTS-3 zone is intended to permit medium-density, mixed-use development, with a focus on employment. 11-K DCMR § 800.4. The maximum permitted density in the ARTS-3 zone is 4.0 FAR, and 4.8 FAR as an IZ development, of which up to 2.5 FAR may be devoted to non-residential uses. 11-K DCMR § 801.1. Projects are eligible for additional bonus density for space devoted to one or more of the preferred uses listed in Subtitle K § 802.2. 11-K DCMR § 802.1. The maximum permitted building height in the ARTS-3 zone, not including a penthouse, is 65 feet, or 75 feet as an IZ development. 11-K DCMR § 803.1. A maximum of 75 feet for a non-IZ development is permitted provided that (a) the penthouse does not exceed 85 feet; and (b) if the lot abuts an R, RF, or RA zone or an alley that serves as the zone district boundary line, no part of the building may project above a plane drawn at a 45 degree angle from a line located 50 feet directly above the property line that abuts the R, RF, or RA zone. 11-K DCMR § 803.3. The ARTS-3 zone permits retail and eating and drinking establishment uses as a matter-of-right.

The Comprehensive Plan Framework Element describes the Moderate Density Commercial designation as achieving densities that range between 2.5 FAR and 4.0 FAR. 10-A DCMR § 227.11. **Accordingly, the ARTS-3 zone is not inconsistent with the FLUM designation for the Property.**

C. Comparison of Development Standards (RA-5 to ARTS-3)

The table below compares the development standards for the existing and proposed zones:

	EXISTING ZONE: RA-5	PROPOSED ZONE: ARTS-3
	Permitted / Required Matter-of-Right	Permitted / Required Matter-of-Right
Height	90 ft.	65 ft. (75 ft. with IZ or with conditions).
Penthouse Height	20 ft. and 1 story plus a mezzanine; except a second story permitted for penthouse mechanical space.	12 ft. and 1 story; except 18 ft., 6 in. and second story permitted for penthouse mechanical space (as limited by K § 803.3).
Density (FAR)	6.0 FAR residential (7.2 FAR with IZ); 1.8 FAR for a public recreation and community center; 5.0 FAR for all other structures.	4.0 FAR (4.8 FAR with IZ); 2.5 FAR max. non-residential. Additional bonus density permitted for preferred uses.
Lot Occupancy	75% (80% with IZ); 20% for public recreation and community center.	75% for residential use; 80% for residential use w/ IZ.
Rear Yard	3 inches per 1 ft. of height; 12 ft. min.	2.5 inches per 1 ft. of height; 12 feet min.
Side Yard	None required, but if provided no less than 4 ft.	None required, but if provided: 2 in. per 1 ft. of building height, but no less than 5 ft.
Green Area Ratio	0.30.	0.25.
Open Court (width)	<u>Residential</u> 4 in./1 ft. of height of court; 10 ft. min. <u>Non-Residential and Lodging</u> 2.5 in./1 ft. of height of court; 6 ft. min.	<u>Residential</u> 4 in./ 1 ft. of height of court; 10 ft. min. <u>Non-Residential and Lodging</u> 2.5 in./1 ft. of height of court; 6 ft. min.
Closed Court	<u>Residential</u> Width - 4 in./1 ft. of height of court; 15 ft. min. Area - Twice the square of the req'd width of court; 350 sq. ft. min. <u>Non-Residential and Lodging</u> Width - 2.5 in./1 ft. of height of court; 12 ft. min. Area - Twice the square of the req'd width of court; 250 sq. ft. min.	<u>Residential</u> Width - 4 in./1 ft. of height of court; 15 ft. min. Area - Twice the square of the req'd width of court; 350 sq. ft. min. <u>Non-Residential and Lodging</u> Width - 2.5 in./1 ft. of height of court; 12 ft. min. Area - Twice the square of the req'd width of court; 250 sq. ft. min.

Uses	RA zones - Retail and eating and drinking establishment uses <u>not permitted</u> as a matter-of-right.	MU-Use Group F - Retail and eating and drinking establishment uses <u>permitted</u> as a matter-of-right or as a special exception. Arts uses in Subtitle U, Chapter 7 permitted as a matter of right, subject to limitations and conditions of Subtitle K § 811. Preferred uses of Subtitle K § 802. Ground floor linear frontage requirements are not applicable at the Property.
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IV. Comprehensive Plan FLUM and GPM Designations

A. FLUM Designations

As shown on the excerpt of the FLUM attached as Exhibit F, the Property is designated mixed-use Medium Density Residential and Moderate Density Commercial.

- The Medium Density Residential 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. 10-A DCMR § 227.7.
- The Moderate Density Commercial 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. 10-A DCMR § 227.11.

The proposed Zoning Map amendment to apply the ARTS-3 zone to the entire Property is not inconsistent with the Property's FLUM designations, as it would allow for the adaptive reuse of the existing historic landmark structures with uses that are consistent with the mixed-use FLUM designations.

B. GPM Designations

As shown on the excerpt of the GPM attached as Exhibit G, the Property is designated as a **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 Comprehensive Plan policies and the FLUM. 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 FLUM and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 10-A DCMR § 225.5.

C. Compliance with the Comprehensive Plan

An analysis of how the proposed Zoning Map amendment is not inconsistent with the Property's designations on the FLUM and GPM is included in the Evaluation of Consistency with the D.C. Comprehensive Plan and Applicable Small Area Plans and Studies (the "Comp Plan Evaluation"), attached hereto as Exhibit H.

V. Standards Applicable to Zoning Map Amendment Application

The requested Zoning Map amendment is submitted as a contested case pursuant to Subtitle Z § 201.2(e). Pursuant to the Zoning Act of 1938, approved June 20, 1938, as amended ((52 Stat. 797; D.C. Official Code § 6-641.01 *et seq.* (2012 Repl.)) (the "Zoning Act"), there are a number of criteria that must be applied by the Zoning Commission in adopting and amending the Zoning Regulations and the Zoning Map. The Zoning Act states that the Zoning Regulations are designed to "promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital..." D.C. Code § 6-641.01. The Zoning Act further provides as follows:

Zoning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and zoning regulations shall be designed to lessen congestion in the street, to secure safety from fire, panic, and other dangers, to promote health and the

general welfare, to provide adequate light and air, to prevent the undue concentration of population and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.” D.C. Code § 6-641.02.

In all cases, the Commission must find that a Zoning Map amendment is not inconsistent with the Comprehensive Plan and with other adopted policies and active programs related to the subject site. 11-X DCMR § 500.3.

VI. Evaluation of Proposed Map Amendment and Compliance with Statutory Standards

A. Comprehensive Plan

As described in detail in the attached Comp Plan Evaluation (Exhibit H), the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan, as adopted by the D.C. Council pursuant to D.C. Law No. 23-217, effective August 27, 2020 (Comprehensive Plan Framework Amendment Act of 2019) and D.C. Law No. 24-20, effective August 21, 2021 (Comprehensive Plan Amendment Act of 2021), which includes the FLUM and the GPM, as specifically approved by the D.C. Council on November 16, 2021, by D.C. Resolution No. 24-292.

B. Health, Safety, and General Welfare

The proposed Zoning Map amendment will protect the health, safety, and general welfare of the District of Columbia. The requested rezoning to ARTS-3 will allow the Property to be put to a productive use, thus contributing to the ongoing vitality of the Logan Circle neighborhood and allowing for uses that are not inconsistent with the Comprehensive Plan, including the FLUM and GPM. The Zoning Map amendment will enable the adaptive reuse of the historic landmark structures, thus deterring the structures from remaining vacant and potentially falling into disrepair. The types of uses that would be permitted under the ARTS-3 zone, which are not permitted under the current RA-5 zone, will provide for opportunities for neighborhood-serving retail and service uses that will contribute to the general welfare of the city. Overall, the proposed Zoning Map amendment advances the District’s goals without causing adverse impacts on adjacent properties.

C. No Adverse Consequences

The proposed Zoning Map amendment will not result in adverse consequences to neighboring properties. Quite the opposite, the requested rezoning will result in positive outcomes

and important benefits by facilitating the adaptive reuse of the historic structures. The proposed ARTS-3 zone will ensure compatible uses with the surrounding mixed-use area in a manner that is not inconsistent with the Comprehensive Plan, particularly when viewed through a racial equity lens. Such adaptive reuse is desirable because it will improve the existing structures' current vacant and underutilized condition, support historic preservation and sustainability goals, and enhance the surrounding neighborhood. Moreover, the Zoning Map amendment will not generate any negative external effects and will instead promote the efficient use of land by allowing for the reuse of an existing historic structure.

D. Proposed ARTS-3 Zone Would Create Favorable Conditions

The proposed Zoning Map amendment is fully consistent with the mixed-use designation of the Property on the FLUM and with the written elements of the Comprehensive Plan overall. The proposed Zoning Map amendment will positively impact the surrounding area by supporting a mix of neighborhood-serving uses and preserving a landmarked historic structure. Moreover, as set forth in the Comp Plan Evaluation (Exhibit H), the proposed rezoning will advance numerous policies embodied in the various elements of the Comprehensive Plan. When taken together, the Zoning Map amendment will promote the efficient use of land by expanding historic adaptive reuse opportunities, fostering sustainability, and facilitating additional connections to services, amenities, and employment opportunities. Accordingly, the proposed Zoning Map amendment will help to foster an inclusive city and expand access for persons of all socioeconomic levels.

VII. Community Outreach and ANC Coordination

The Property is located within the boundaries of Advisory Neighborhood Commission ("ANC") 2F and across 15th Street, NW, from ANC 2B. Prior to mailing the Notice of Intent to file the subject application, a copy of which is included in Exhibit I, the Applicant met with ANC 2F on a variety of occasions, including touring the Property with the Single Member District representative (ANC 2F03) and the chair of the ANC's Community Development Committee ("CDC"), and presenting the application to the full CDC at its September 25, 2024, public meeting. After issuance of the NOI, the Applicant presented the application to ANC 2F at its regularly scheduled and duly noticed public meeting of October 2, 2024, at which a quorum of Commissioners was present. At that meeting, ANC 2F voted unanimously (4-0-0) to support the application. The Applicant will continue to work closely with the CDC, the SMD representative, and the full ANC as it moves forward with the application and will provide further updates on its community engagement prior to the public hearing.

VIII. Conclusion

For the reasons explained herein, the Applicant submits that the proposed rezoning from the RA-5 zone to the ARTS-3 zone meets all of the requirements for a Zoning Map amendment application and is not inconsistent with the Comprehensive Plan or with other adopted public policies and active programs related to the Property, particularly when analyzed through a racial equity lens. Accordingly, the Applicant respectfully requests that the Commission set down the application for a public hearing and ultimately grant the requested Zoning Map amendment.