

**BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA**

**1600 North Capitol Street, NW
Square 3100, Lot 48**

**Application for a Zoning Map Amendment from the
MU-4 Zone to the MU-7B Zone**

**Statement of the Applicant
FLORIDA AND Q STREET LLC**

July 28, 2025

Respectfully submitted by:

HOLLAND & KNIGHT LLP

800 17th Street, NW, Ste. 1100
Washington, D.C. 20006
(202) 955-3500
Kyrus L. Freeman
Jessica R. Bloomfield
Counsel for the Applicant

Table of Contents

LIST OF EXHIBITS	II
I. INTRODUCTION	3
II. DESCRIPTION OF THE PROPERTY AND SURROUNDING AREA.....	4
A. THE PROPERTY	4
B. SURROUNDING AREA.....	5
III. EXISTING AND PROPOSED ZONING.....	5
A. EXISTING ZONE: MU-4.....	5
B. PROPOSED ZONE: MU-7B.....	6
C. COMPARISON OF MATTER-OF-RIGHT DEVELOPMENT STANDARDS.....	7
IV. COMPREHENSIVE PLAN FLUM AND GPM DESIGNATIONS.....	7
A. FLUM DESIGNATIONS.....	7
B. GPM DESIGNATION	8
C. COMPLIANCE WITH THE COMPREHENSIVE PLAN	9
V. STANDARDS APPLICABLE TO A ZONING MAP AMENDMENT APPLICATION	9
VI. EVALUATION OF PROPOSED ZONING MAP AMENDMENT AND COMPLIANCE WITH STATUTORY STANDARDS	9
A. COMPREHENSIVE PLAN.....	9
B. HEALTH, SAFETY, AND GENERAL WELFARE.....	10
C. NO ADVERSE CONSEQUENCES	10
D. PROPOSED MU-7B ZONE WOULD CREATE FAVORABLE CONDITIONS	10
VII. COMMUNITY OUTREACH AND ANC COORDINATION	11
VIII. CONCLUSION.....	11

List of Exhibits

Exhibit A	Plat of Property from D.C. Surveyor's Office
Exhibit B	Excerpt of the Zoning Map Showing the Property's Existing MU-4 Zoning
Exhibit C	Relevant portion of the Comprehensive Plan Future Land Use Map
Exhibit D	Relevant portion of the Comprehensive Plan Generalized Policy Map
Exhibit E	Comprehensive Plan Evaluation
Exhibit F	Form 100 – Zoning Commission Application Signature Form
Exhibit G	Letter of Authorization
Exhibit H	Notice of Intent, Certificate of Notice, and List of Addresses of Owners of Property within 200 feet of the Property

I. Introduction

FLORIDA AND Q STREET LLC (the “Applicant”), the owner of property located at 1600 North Capitol Street, NW (Square 3100, Lot 48) (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 District of Columbia Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations (“DCMR”)) to which all subsequent citations refer unless otherwise specified. The Applicant seeks to rezone the Property from the MU-4 zone to the MU-7B zone. A copy of the Surveyor’s plat showing the Property to be rezoned is attached as Exhibit A, and a portion of the Zoning Map showing the Property’s existing MU-4 zone is attached as Exhibit B.

As required to be demonstrated pursuant to Subtitle X § 500.3, the requested Zoning Map amendment is not inconsistent with the Comprehensive Plan and 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 Main Street Mixed Use Corridor. As explained herein, the proposal to rezone the Property from the MU-4 zone to the MU-7B 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.

The proposed MU-7B zone will result in positive outcomes for the Property, the Mid City Planning Area in which it is located, and the District overall. Approval of the requested Zoning Map amendment will specifically achieve the following:

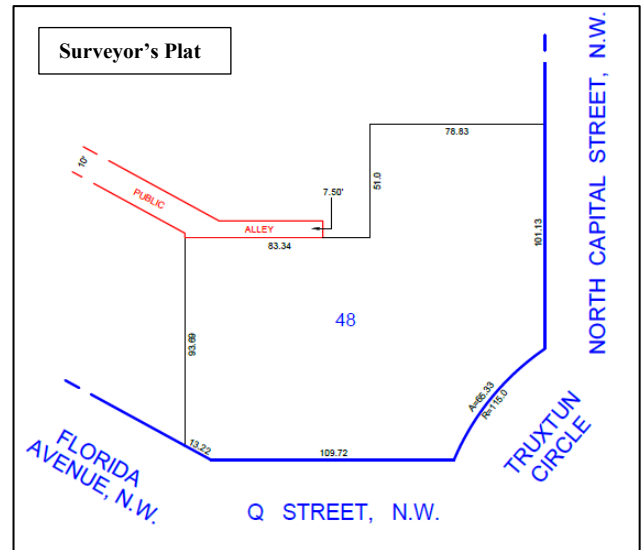
1. Establish zoning on the Property that is not inconsistent with the **Comprehensive Plan**, as required under the Home Rule Charter.
2. Establish zoning on the Property that will allow moderate- to medium-density mixed use development as supported by the **Mixed-Use Medium Density Residential / Moderate Density Commercial FLUM designations** and with the Main Street Mixed Use Corridor GPM designation.
3. Permit an increase in allowable residential density at the Property that is currently not permitted, and facilitate the future redevelopment of a vacant and underutilized site consistent with the Property’s **Main Street Mixed Use Corridor designation on the GPM**.
4. Provide opportunities to redevelop the Property with new multifamily housing and affordable housing, where such housing is lacking and desired in the **Mid City Planning Area**.
5. Advance the goals and objectives of the **Mid City East Small Area Plan**, the applicable Small Area Plan in which the Property is located, by enabling new mixed-use development that will be compatible with surrounding uses and help to stimulate the level of commercial activity that is envisioned for the neighborhood.

6. Facilitate progress towards achieving **racial equity** by advancing numerous Comprehensive Plan policies geared towards fostering an inclusive city, providing new housing opportunities, increasing access to neighborhood amenities, and establishing neighborhood serving retail and service uses in a mixed-use, walkable, and transit-accessible area.

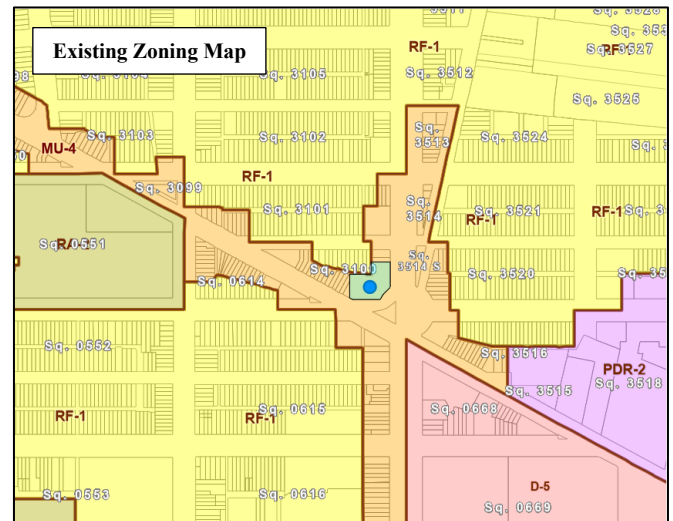
II. Description of the Property and Surrounding Area

A. The Property

The Property is located at the intersection of the Truxton Circle and Eckington neighborhoods in the northwest quadrant of the District of Columbia. The Property is bounded by North Capitol Street to the east, Florida Avenue, NW to the southwest, Q Street to the south, and Truxton Circle/Q Streetslip lane to the southeast. The Property is also bounded by private property to the north and west, and has frontage along a portion of a dead-end public alley that runs east-west through the Square. The Property is irregularly shaped and has approximately 18,984 square feet of land area. The Property is vacant.



The Property is zoned MU-4 and is located within the Bloomingdale Historic District. As shown on the Zoning Map, the Property and the majority of nearby properties located along the North Capitol Street and Florida Avenue corridors are zoned MU-4. Properties in the area without frontage on the larger corridors are primarily zoned RF-1. Properties to the southeast, directly across North Capitol Street on the south side of Florida Avenue, are zoned D-5; properties to the southeast on the north side of Florida Avenue are zoned PDR-2.



In 2007 the Property was approved to be developed as a Planned Unit Development (“PUD”) with a related Zoning Map amendment from the C-2-A zone to the C-2-B zone under the then-applicable 1958 Zoning Regulations. *See* Z.C. Order No. 06-04, having an effective date of June 15, 2007. This original approval was extended and modified several times pursuant to Z.C. Order Nos. 06-04A through 06-04I. The most recent approval allowed for the development of a mixed-use building containing approximately 85,428 square feet of gross floor area (“GFA”) (4.5 floor area ratio (“FAR”)), a range of between 85 and 95 residential units, approximately 4,998 square feet of cellar floor area devoted to retail use, approximately 41 parking spaces, and a maximum building height of 72 feet, 4.5 inches. *See* Z.C. Order No. 06-04C, effective as of December 27, 2013, as modified by Z.C. Order No. 06-04E, effective as of October 7, 2016. The most recent extension of the

Zoning Commission orders expired on June 15, 2023. The Applicant now proposes to redevelop the Property under the matter-of-right development standards of the MU-7B zone.

B. Surrounding Area

The surrounding area boasts a diverse array of residential and commercial properties, featuring a blend of housing types, retail stores, service establishments, and institutional buildings. North Capitol Street and Florida Avenue serve as prominent gateways into the District, each offering a vibrant mix of neighborhood-serving amenities. The Property is centrally located in this eclectic, mixed-use, and walkable area, with convenient access to nearby retail and service establishments.

The Property is also well served by many diverse modes of transportation, including readily accessible public transit. The Property is located approximately 0.5 miles from the NoMa-Gallaudet University-New York Avenue Metrorail station, which services the red Metrorail line, approximately 0.8 miles from the Shaw-Howard University Metrorail station, which services the green line, and approximately one mile from the Mt. Vernon Square 7th Street-Convention Center Metrorail station, which services the green and yellow lines. A variety of Metrobus routes and stops are conveniently located in close proximity to the Property, as are numerous Capital Bikeshare stations. The website walkscore.com gives the Property a Walk Score and Bike Score of 95 given its location in an accessible, mixed-use neighborhood with a variety of walking, biking, and transit options.

III. Existing and Proposed Zoning

As previously noted, the Applicant proposes to rezone the Property from the MU-4 zone to the MU-7B zone. The MU zones provide for mixed-use developments that permit a broad range of commercial, institutional, and multiple dwelling residential development at varying densities. 11-G DCMR § 101.1. The MU zones are designed to provide facilities for housing, shopping, and business needs, including residential, office, service, and employment centers. 11-G DCMR § 101.2. The following sections describe the purposes and development standards for the existing and proposed zones.

A. Existing Zone: MU-4

As shown on the Zoning Map (Exhibit B), the Property is currently zoned MU-4. The MU-4 zone is intended to (a) permit moderate-density mixed-use development;¹ (b) provide facilities for shopping and business needs, housing, and mixed uses for large segments of the District of Columbia outside of the central core; and (c) be located in low- and moderate-density residential areas with access to main roadways or rapid transit stops, and include office employment centers, shopping centers, and moderate bulk mixed-use centers. 11-G DCMR § 101.9.

¹ On June 30, 2025, the Office of Planning filed an Omnibus Zoning Text Amendment application to modify and clarify the text of various provisions of the Zoning Regulations. See Z.C. Case No. 25-12. Included in the application is a proposal to modify the text of the Zoning Regulations to state that the MU-4 zone is intended to permit low to moderate density mixed-use development.

The maximum permitted density in the MU-4 zone is 2.5 floor area ratio (“FAR”) and up to 3.0 FAR for an Inclusionary Zoning (“IZ”) development. A maximum of 1.5 FAR is permitted for non-residential uses. 11-G DCMR § 201.1. The Zoning Commission may increase the maximum total density permitted for a planned unit development (“PUD”) by up to 20% of the maximum matter-of-right density permitted, and up to 34% of the maximum matter-of-right non-residential density permitted. 11-X DCMR § 303.3(b). The maximum permitted building height in the MU-4 zone, not including a penthouse, is 50 feet with no limit on the number of stories. 11-G DCMR § 203.2. The maximum lot occupancy permitted in the MU-4 zone is 60% or 75% as an IZ development. 11-G DCMR § 210.1.

The Comprehensive Plan Framework Element describes the MU-4 zone as being consistent with the Low Density Commercial FLUM designation, and as noted above, the Zoning Regulations describe the MU-4 zone as being one which is intended to permit moderate-density mixed-use development (see footnote 1). 10-A DCMR § 227.10 and 11-G DCMR § 101.9.

B. Proposed Zone: MU-7B

The Applicant requests a Zoning Map amendment to rezone the Property to the MU-7B zone. The MU-7 zones are intended to (a) permit medium-density mixed-use development; and (b) be located on arterial streets, in uptown and regional centers, and at rapid transit stops. 11-G DCMR § 101.12.²

The maximum permitted density in the MU-7B zone is 4.0 FAR and up to 4.8 FAR for an IZ development. A maximum of 2.5 FAR is permitted for non-residential uses. 11-G DCMR § 201.1. As noted above, the Zoning Commission may increase the maximum total density permitted for a PUD by up to 20% of the maximum matter-of-right density permitted, and up to 34% of the maximum matter-of-right non-residential density permitted. 11-X DCMR § 303.3(b). The maximum permitted building height in the MU-7B zone, not including a penthouse, is 65 feet with no limit on the number of stories. 11-G DCMR § 203.2. The maximum lot occupancy permitted in the MU-7B zone is 75% or 80% as an IZ development. 11-G DCMR § 210.1.

The Comprehensive Plan Framework Element describes the MU-7B zone as being consistent with the Moderate Density Commercial FLUM designation, wherein 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.” 10-A DCMR § 227.11. As noted above, the Zoning Regulations describe the MU-7 zones as being those that are intended to permit medium-density mixed-use development (see footnote 2). Accordingly, the MU-7B zone is not inconsistent with the FLUM designation for the Property.

² Z.C. Case No. 25-12 includes a proposal to modify the text of the Zoning Regulations to state that the MU-7 zone is intended to permit moderate to medium density mixed-use development

C. Comparison of Matter-of-Right Development Standards

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

	Existing Zone – MU-4	Proposed Zone – MU-7B
Height	50 ft.	65 ft.
Penthouse Height	12 ft. and 1 story; except 15 ft. and a second story permitted for penthouse mechanical space.	12 ft. and 1 story; except 18.5 ft. and a second story permitted for penthouse mechanical space.
Density (FAR)	2.5 FAR 3.0 FAR (IZ) 1.5 FAR non-residential	4.0 FAR 4.8 FAR (IZ) 2.5 FAR non-residential
Lot Occupancy	60% 75% (IZ)	75% 80% (IZ)
Rear Yard	15 ft.	2.5 in. per 1 ft. of height (12 ft. min.)
Side Yard	None required, but if provided 2 in. per 1 ft. of height (5 ft. min.)	None required, but if provided 2 in. per 1 ft. of height (5 ft. min.)
Green Area Ratio	0.30.	0.25.
Open Court (residential)	<u>Width:</u> 4 in. per 1 ft. of height of court (10 ft. min.)	<u>Width:</u> 4 in. per 1 ft. of height of court (10 ft. min.).
Closed Court (residential)	<u>Width:</u> 4 in. per 1 ft. of height of court (15 ft. min.) <u>Area:</u> Twice the square of the req'd width of court (350 sq. ft. min.)	<u>Width:</u> 4 in. per 1 ft. of height of court (15 ft. min.) <u>Area:</u> Twice the square of the req'd width of court (350 sq. ft. min.)
Uses	MU-Use Group E.	MU-Use Group F

IV. Comprehensive Plan FLUM and GPM Designations

A. FLUM Designations

As shown on the FLUM excerpt attached hereto as Exhibit C, 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 the MU-7B zone is not inconsistent with the Property's FLUM designations because it would allow for densities that are fully consistent with those prescribed for the Moderate Density Commercial designation, which specifically identifies MU-7 as a "representative" zone district.

B. GPM Designation

As shown on the GPM excerpt attached hereto as Exhibit D, the Property is designated as a Main Street Mixed Use Corridor.

Main Street Mixed Use Corridors are "traditional commercial business corridors with a concentration of older storefronts along the street. The area served can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian-oriented environment with traditional storefronts. Many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment." 10-A DCMR § 225.14.

The proposed Zoning Map amendment to the MU-7B zone is not inconsistent with the Property's GPM designation because it will allow for future mixed-use development that will contribute to the pedestrian-oriented environment, foster economic growth, provide opportunities for housing, and serve neighborhood needs.

C. Compliance with the Comprehensive Plan

A detailed 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 Comprehensive Plan Evaluation, attached hereto as Exhibit E.

V. Standards Applicable to a 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 Zoning Map Amendment and Compliance with Statutory Standards

A. Comprehensive Plan

As described in detail in the attached Comprehensive Plan Evaluation (Exhibit E), 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).³

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 MU-7B will allow the Property to be put to a productive use, thus contributing to the ongoing vitality of the neighborhood and allowing for uses that are not inconsistent with the Comprehensive Plan, including the FLUM and GPM, and the applicable Mid City East Small Area Plan. The Zoning Map amendment will enable redevelopment of the Property at a density that is consistent with its applicable designations, and will provide opportunities for new housing, affordable housing, and 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 appropriate development of the vacant Property. The proposed MU-7B zone will ensure a compatible density and mix of uses with the surrounding area in a manner that is not inconsistent with the Comprehensive Plan, particularly when viewed through a racial equity lens. The Zoning Map amendment will not generate negative external effects and will instead promote the efficient use of land by allowing for greater density in a mixed-use, walkable, and transit-accessible neighborhood.

D. Proposed MU-7B Zone Would Create Favorable Conditions

The proposed Zoning Map amendment is not inconsistent with the mixed-use designation of the Property on the FLUM and with the written elements of the Comprehensive Plan overall. The Zoning Map amendment will bring the Property's zone designation into greater conformity with the FLUM and the Comprehensive Plan overall. The requested rezoning to the MU-7B zone can accommodate a greater residential density and an appropriate amount of non-residential density. These density increases will together create opportunities to better utilize the vacant Property and facilitate redevelopment that will attract an influx of residents to support neighborhood retail and reinforce the vitality of the neighborhood overall.

In addition, as set forth in the Comp Plan Evaluation (Exhibit E), the proposed rezoning will advance numerous policies embodied in the various elements of the Comprehensive Plan, as well as the relevant recommendations of the Mid City East Small Area Plan. It is also favorable when considering the District's racial equity objectives. The Zoning Map amendment will promote

³ D.C. Law No. 23-0217 took effect on August 27, 2020, and included amendments to the Comprehensive Plan Framework Element. D.C. Law No. 24-0020 took effect on August 21, 2021, and included amendments to the Comprehensive Plan general, citywide, area elements, and the GPM and FLUM. The GPM and FLUM were formally approved on November 16, 2021, pursuant to Resolution No. 24-0292.

the efficient use of land, foster sustainability, and facilitate additional connections to services, amenities, and employment opportunities. It will enable an expansion of the District's housing and affordable housing stock, attract additional neighborhood-serving uses, and facilitate new connections to services, amenities, employment, and recreational opportunities in a high-opportunity area. Accordingly, the 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 in Ward 5 within the boundaries of Advisory Neighborhood Commission ("ANC") 5E02, and across North Capitol Street from ANC 5F. The Applicant has engaged the affected ANCs for many years in relation to the prior PUD applications, modifications, and extensions, and the more recent proposals to activate the Property with a temporary use.

In addition, the Applicant engaged with the affected ANCs following issuance of the Notice of Intent to file the subject Zoning Map amendment application. The Applicant has made the following presentations regarding the subject Zoning Map amendment application:

- July 2, 2025 – Participated in a Single Member District meeting with ANC Commissioner Lewis (5E02) and neighborhood constituents.
 - Explained the expiration of the prior PUD approvals, the potential short term interim uses for the Property, and the long-term plan to redevelop the Property under the proposed MU-7B zone.
- July 15, 2025 – Participated in ANC 5E public meeting
 - Presented application and compliance with standards for approving a Zoning Map amendment. Responded to questions and comments from ANC commissioners and the public. Will continue to work with ANC 5E as the Application progresses.
- July 15, 2025 – Participated in ANC 5F public meeting
 - Presented application and compliance with standards for approving a Zoning Map amendment. Responded to questions and comments from ANC commissioners and the public. Will continue to work with ANC 5F as the Application progresses.

The Applicant will continue to work closely with the affected ANCs 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 MU-4 zone to the MU-7B 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.