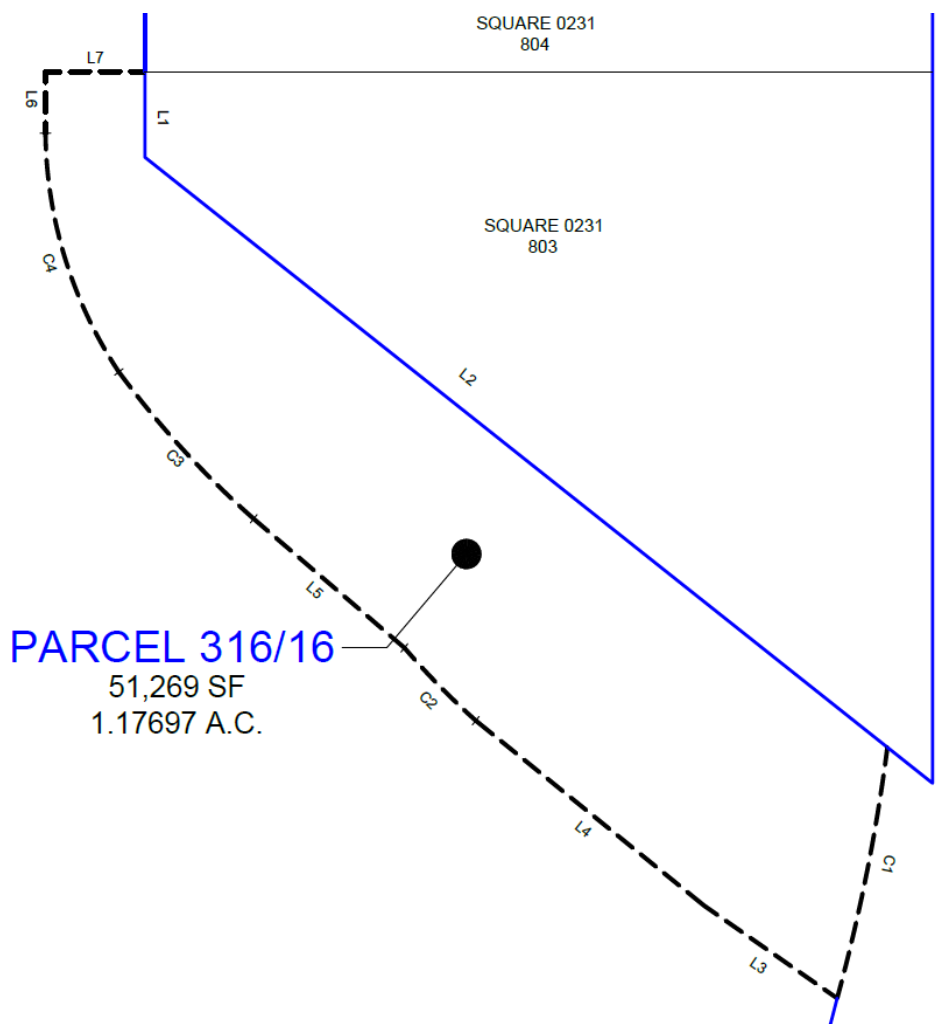


**DISTRICT OF COLUMBIA
ZONING COMMISSION**

**STATEMENT IN SUPPORT OF MAP AMENDMENT APPLICATION
of 401 14 St SW 2025 LLC**

Unzoned to D-8 Zone



Property located at 401 14th Street, SW (Square 0231, Lot 0803); along with (ii) a 1.18 acre adjacent tract of land between the lot 803 and Maine Avenue, SW

Respectfully Submitted By:
Sullivan & Barros, LLP

CERTIFICATION OF COMPLIANCE WITH SUBTITLE Z § 304 OF THE ZONING REGULATIONS

Pursuant to 11-Z DCMR § 304, the undersigned, on behalf of 401 14th St SW 2025 LLC (the “**Applicant**”), hereby certifies that this application, complies with the provisions of Subtitle Z § 304.7 – 304.8 of the 2016 Zoning Regulations of the District of Columbia (“**ZR16**”), as set forth below:

Subtitle Z	Description	Page/Exhibit
304.7(a)	A completed application or petition form;	NA
304.7(b)	A certified surveyor’s plat of the subject property prepared by the Office of the Surveyor;	Exhibit A
304.7(c)	A map showing the location of the properties including, the existing zoning, the zoning of adjacent properties, and all proposed changes of zoning;	Exhibit B
304.7(d)	A description of the map amendment’s consistency with the Comprehensive Plan and any other adopted public policies and active programs related to the subject site;	Included herein – Section III Pg. 7
304.7(e)	For a map amendment application, a statement certifying to whom and in what manner the required NOI was given. The applicant shall also indicate what meetings or discussions were held with the community and the OP and the affected ANC as well as any changes that resulted from community input; and	Exhibit C
304.7(f)	A racial equity analysis relative to the Comprehensive Plan in compliance with the Zoning Commission’s current Racial Equity Tool, which is available on the Office of Zoning’s website; and	Included herein – Section IV Pg. 25
304.7(g)	For a map amendment application, the name and addresses of the owners of all property located within two hundred feet (200 ft.) of the subject property and names and addresses of each lessee having a lease with the owner for all or part of any building located on the property involved in the application; however, in the case of a residential condominium or cooperative with twenty-five (25) or more dwelling units, notice may be provided to the board of directors of the association of the condominium or cooperative that represents all of the owners of the dwelling unit.	Exhibit D
304.8	No application or petition shall be accepted unless accompanied by a certificate of service demonstrating that a copy of the application and all accompanying documents have been served upon: (a) The Office of Planning; and (b) The affected ANC.	Exhibit E

Alexandra Wilson

Alexandra Wilson

I. INTRODUCTION.

A. Map Amendment Overview

401 14 St SW 2025 LLC (the “Applicant”), the owner of (i) the property located at 401 14th Street, SW (Square 0231, Lot 0803); along with (ii) a 1.18 acre adjacent tract of land between the lot 803 and Maine Avenue, SW, the jurisdiction for which has recently been transferred from the National Park Service to the General Services Administration, in furtherance of the disposition of the Liberty Loan building (collectively, the “**Property**”), submits this Statement in Support of an amendment to the Zoning Map of the District of Columbia (the “**Zoning Map**”) pursuant to 11-X DCMR § 501.1 and to 11-Z DCMR §§ 201.2(e), 304 of the 2016 Zoning Regulations of the District of Columbia (the “**Zoning Regulations**”). More specifically, the Applicant proposes that the Property, which is currently not zoned, be zoned D-8 through this Map Amendment (the “**Application**” or the “**Map Amendment**”). A plat from the DC Office of the Surveyor which depicts the Property to be rezoned is attached as **Exhibit A**.

B. Planning Framework

As required by 11-X DCMR § 500.3, the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan, including the Property’s designation on the Comprehensive Plan’s Future Land Use Map (“**FLUM**”) and Generalized Policy Map (“**GPM**”) and any Small Area Plans (“**SAP**”).¹ It is designated as “PROS” on the FLUM, and has multiple GPM designations (Federal and Resilience Focus Area). Additionally, the proposed Zoning Map amendment advances the objectives and recommendations of the Central Washington Area Element. The proposed map amendment is also consistent with the purposes of the Zoning Enabling Act of 1938 (the “**Zoning Act**”) in that it will create conditions that are favorable to public health, safety, welfare, and convenience. As demonstrated below, approval of the Application will result in positive outcomes for the Property, the Central Washington Planning Area, and the District.

C. Description of the Property and the Surrounding Area

The Property consists of two contiguous components: (i) Lot 0803 in Square 0231, commonly known as 401 14th Street, SW, and (ii) an approximately 1.18-acre adjacent tract of land located between Lot 0803 and Maine Avenue, SW. The Property is currently improved with a five-story structure commonly known as the former Liberty Loan Building. It was constructed in 1918 as a temporary war office during World War I. As the federal government rapidly expanded to manage the war, Congress authorized funding to construct temporary, utilitarian buildings to house the sudden influx of workers. The structure served as the headquarters for the Liberty Bonds

¹ The Property is not located within the boundaries of any Small Area Plan. It is just outside the boundaries of the Maryland Avenue Study Area, which is located Ward 6 (property in Ward 2) and bounded by 6th and 12th Streets, SW along the Maryland Avenue SW corridor, per the plan’s executive summary. It is also located near, but not in, the boundaries for the Southwest Neighborhood Plan.

campaign, which raised billions of dollars to finance World War I. It is located within the 100-year and 500-year floodplain, is within the jurisdiction of the Commission of Fine Arts, and is located in ANC 2A.

The Property occupies a prominent location within the Near Southwest neighborhood, immediately south of the National Mall and in close proximity to the Wharf, one of the District's most significant mixed-use redevelopment areas. The surrounding area is characterized by a mix of high-density residential, hotel, office, and retail uses, reflecting a broader transition from historically federal and institutional uses to vibrant, mixed-use development.

To the north, the Property is within a short distance of the National Mall and federal office buildings, while to the south and west, the Maine Avenue corridor and the Wharf support a dense concentration of residential, hospitality, entertainment, and commercial uses. To the east, the Property is connected to the L'Enfant Plaza area, a major employment center with office, retail, and transportation infrastructure. This immediate context reflects a fully urbanized environment with significant pedestrian activity and a strong mix of uses.

The Property is well-served by public transportation. It is located within one-half mile of L'Enfant Plaza, and is accessible to numerous Metrobus routes and major transportation corridors, including 14th Street SW and Maine Avenue SW. The area also benefits from extensive pedestrian and bicycle infrastructure, including connections to the Southwest Waterfront and the National Mall.

Notably, the Property remains unzoned due to its historic federal ownership and jurisdictional status. As the site transitions to private ownership, it represents an important opportunity to establish zoning that reflects the surrounding high-density, mixed-use context and the District's long-term planning objectives.

D. Current and Proposed Zoning

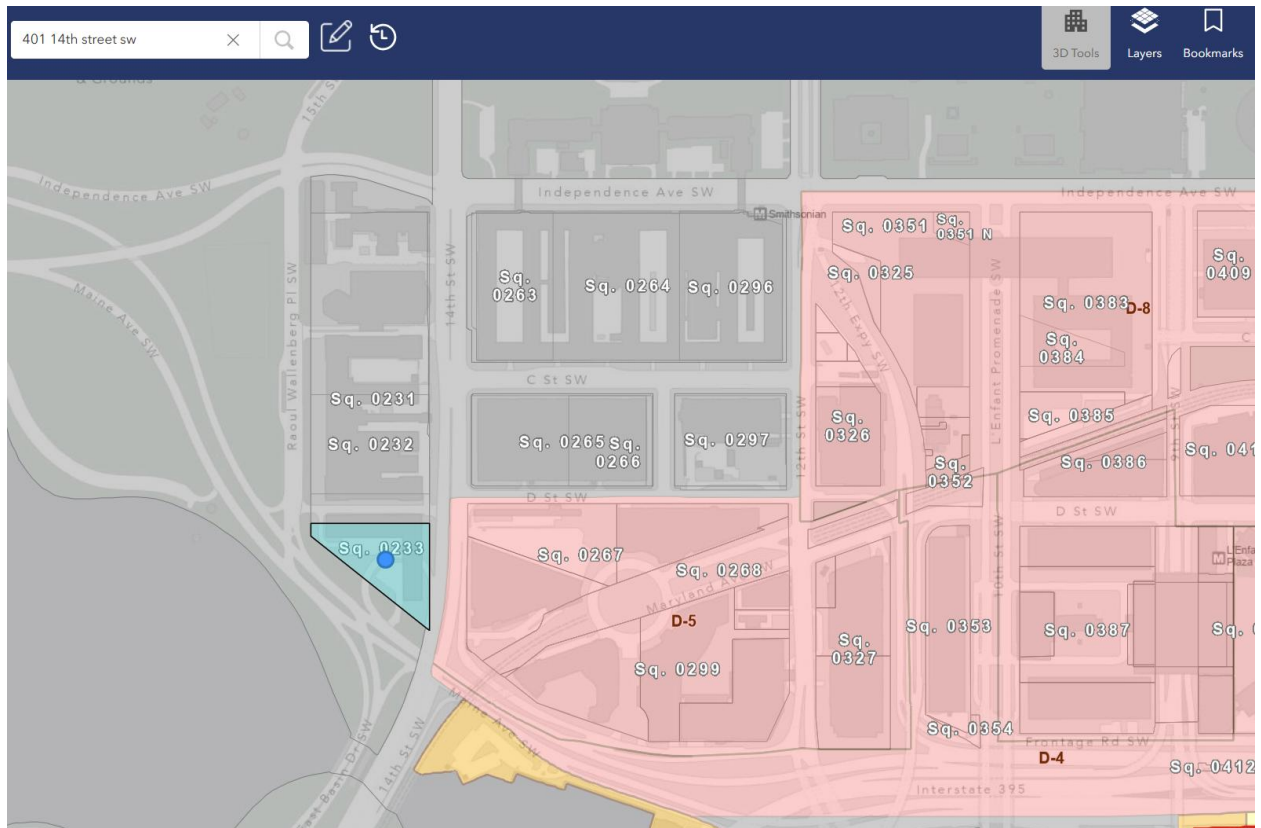
Pursuant to Subtitle A § 209.1 of the Zoning Regulations, no building permit or certificate of occupancy may be issued, and no use may be established, for property in private ownership until zoning has been designated by the Zoning Commission. Accordingly, the proposed map amendment is a necessary prerequisite to the Property's redevelopment and future use. Through this Application, the Applicant proposes to zone the Property to the D-8 Zone District. The Applicant consulted the Office of Planning in its decision to request D-8 zoning.

The D-8 Zone is intended to permit high-density, mixed-use development, including residential, commercial, cultural, and institutional uses, and to facilitate the transition of federally influenced areas to active, mixed-use environments with both public and private ownership. The zone also promotes improved pedestrian connectivity and the reestablishment of urban development patterns shaped by prior federal planning decisions. The proposed D-8 zoning is appropriate for the Property given its location within a dense, mixed-use area immediately adjacent to the National Mall, the Maine Avenue corridor, and the Wharf. The surrounding area is characterized by a mix of residential, office, hotel, and retail uses at a similar or greater scale, and the Property's current unzoned status does not reflect this established development pattern.

Under the D-8 Zone, development is generally governed by building height and bulk rather than a fixed maximum floor area ratio (“FAR”), provided certain residential use thresholds are met. Non-residential density is permitted up to 6.5 FAR, with additional density achievable where residential uses are incorporated or through Zoning Commission approval. Maximum building height is determined by the width of the adjacent street right-of-way and may reach up to approximately 130 feet, subject to detailed zoning requirements.

Importantly, any future development of the Property will remain subject to additional layers of review, including review by the U.S. Commission of Fine Arts, as well as applicable historic preservation requirements and easements. These processes will further shape the ultimate design, scale, and character of development on the Property.

Accordingly, the proposed D-8 zoning establishes an appropriate regulatory framework that reflects the Property’s location, surrounding context, and anticipated transition to private ownership, while ensuring that future development remains subject to rigorous design and preservation review.



Official Zoning Map of DC

II. STANDARDS APPLICABLE TO THE ZONING MAP AMENDMENT APPLICATION

The requested Zoning Map amendment is submitted as a contested case pursuant to 11-Z DCMR § 202.1(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 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 . . .” The Zoning Act further provides:

“[z]oning 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.

As set forth below, the proposed Map Amendment satisfies these standards.

A. Comprehensive Plan

As discussed in Section III, the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan, including the Future Land Use Map (“FLUM”), Generalized Policy Map (“GPM”), and other Applicable Plans. The proposed D-8 zoning is appropriate when the Comprehensive Plan is read as a whole and in the context of the Property’s location and surrounding development pattern.

B. Zoning Act Considerations

The proposed map amendment is consistent with the purposes of the Zoning Act and will promote the public health, safety, and general welfare. The Property is currently unzoned and does not reflect the surrounding high-density, mixed-use context. Establishing D-8 zoning will provide a regulatory framework that allows the Property to be developed in a manner consistent with the character of the surrounding area and the District’s planning objectives.

The proposed zoning will facilitate the redevelopment of the Property with uses that contribute to the surrounding neighborhood, including residential, commercial, and other mixed-use development. This will support efficient land use, improve the functionality of the site, and enhance the overall built environment. The map amendment will not result in adverse impacts. Rather, it will bring the Property into alignment with the surrounding zoning framework and planning context. Any future development will remain subject to applicable zoning, design, and

federal review processes, including review by the U.S. Commission of Fine Arts, which will ensure compatibility with the surrounding area.

Accordingly, the proposed map amendment advances the purposes of the Zoning Act by promoting appropriate land use, supporting orderly development, and contributing to the general welfare of the District.

III. COMPREHENSIVE PLAN ANALYSIS

A. Overview

Pursuant to 11-X DCMR § 500.3, the Zoning Commission shall find that the proposed 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 in Section IV and analysis herein, the evaluation explains why the map amendment is not inconsistent with the Property’s applicable designations under the Future Land Use Map (“**FLUM**”) and Generalized Policy Map (“**GPM**”), and relevant policies of the Central Washington Area and other Citywide elements.

As set forth below, the proposed map amendment is not inconsistent with the Comp Plan 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**”). 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. 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. 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.” 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.

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.

A. **Future Land Use Map**

The Future Land Use Map ("**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. 10-A DCMR §§ 200.5, 224.4. The land use category descriptions on the FLUM describe the general character of development in each area. **By definition, the FLUM is to be interpreted broadly,** and the land use categories identify desired objectives. 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. 10-A DCMR § 2504.5.

As shown in Exhibit B and below, the FLUM designates the Property as **Parks, Recreation, and Open Space ("PROS")**.

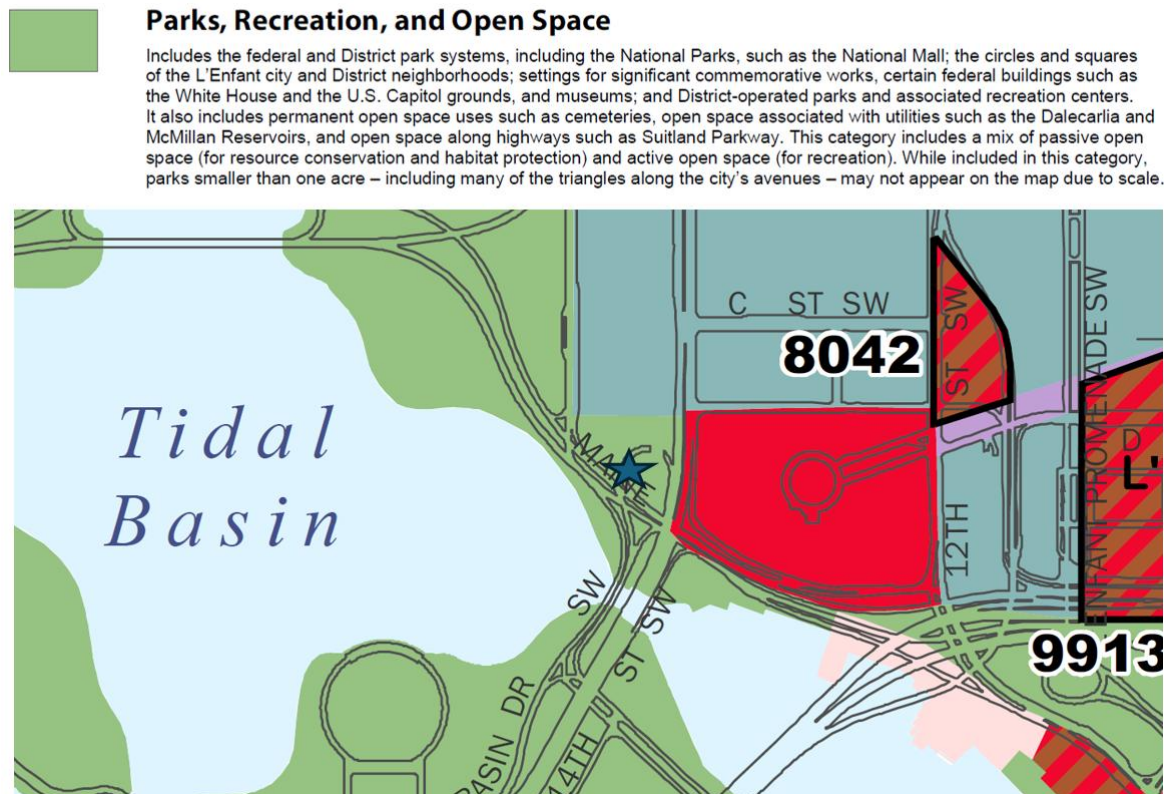


Figure 1: Future Land Use Map

The Framework Element describes this designation as follows:

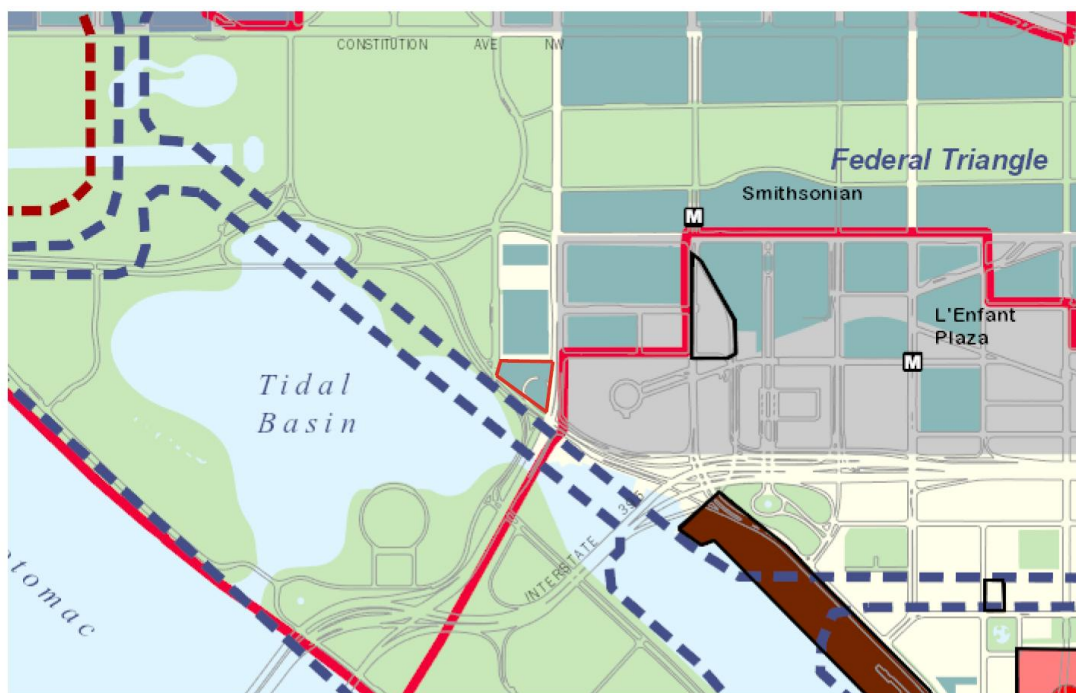
This designation includes the federal and District park systems, including the National Parks, such as the National Mall; the circles and squares of the L'Enfant city and District neighborhoods; settings for significant commemorative works, certain federal buildings such as the White House and the U.S. Capitol grounds, and museums; and District-operated parks and associated recreation centers. It also includes permanent open space uses such as cemeteries, open space associated with utilities such as the Dalecarlia and McMillan Reservoirs, and open space along highways such as Suitland Parkway. This category includes a mix of passive open space (for resource conservation and habitat protection) and active open space (for recreation). While included in this category, parks smaller than one acre – including many of the triangles along the city's avenues – may not appear on the map due to scale. Zoning designations for these areas vary. The federal parklands are generally unzoned, and District parklands tend to be zoned the same as surrounding land uses. 10A-227.19

The Property is in the process of transitioning from federal to private ownership. Consistent with the Framework Element's direction that the FLUM is to be interpreted broadly and in conjunction with other applicable policies, the PROS designation does not, in and of itself, restrict the Property from being rezoned in a manner consistent with surrounding development. As discussed further below (Section III.K), the Zoning Commission has approved similar map amendments for properties designated PROS where the Comprehensive Plan, when read as a whole, supported the requested zoning.

B. 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. 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.” 10-A DCMR § 225.2.

As shown in Exhibit B and below, the Property is designated as **Federal Lands**; it is also located in a **Resilience Focus Area**.



Other Map Elements

This map also identifies parks and open space, land owned by or under the jurisdiction of the District or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses.



Areas where future planning efforts are anticipated to ensure resilience to flooding for new development and infrastructure projects, including capital projects, especially in areas within the 100- and 500- floodplains. In the Resilience Focus Areas, the implementation of neighborhood-scale, as well as site-specific solutions, design guidelines and policies for a climate-adaptive and resilient city are encouraged and expected. Boundaries shown are for illustrative purposes. Final boundaries will be determined as part of any future analysis for each area.

Figure 2: Generalized Policy Map

Per 10-A DCMR § 225:

- The Generalized Policy Map also identifies parks and open space, land owned by or under the jurisdiction of the District or federal government, federal lands with federal buildings, Downtown Washington, and major institutional land uses. The fact that these areas are not designated as Conservation, Enhancement, or Land Use Change Areas does not mean they are exempt from the Comprehensive Plan or that their land uses will remain static. Public parks and public open space will be conserved and carefully managed in the future. Federal lands are called out to acknowledge the District's limited jurisdiction over them but are still discussed in the text of the District Elements. 10-A DCMR § 225.22

The Property is identified on the Generalized Policy Map as “Federal Lands” (or “Other”), which reflects its historic federal ownership and jurisdictional status. The Framework Element explains that such areas are designated to acknowledge the District’s limited jurisdiction over federal properties and are not classified as Conservation, Enhancement, or Land Use Change Areas. See 10-A DCMR § 225.22. Importantly, the Framework Element further clarifies that this

designation does not exempt such properties from the Comprehensive Plan or require that their uses remain static.

As the Property transitions from federal to private ownership, it becomes subject to the District's zoning framework and Comprehensive Plan policies. In this context, the proposed map amendment is consistent with the Generalized Policy Map, as it establishes zoning that reflects the Property's location, surrounding development pattern, and the planning objectives applicable to the area. Accordingly, the proposed zoning aligns with the Comprehensive Plan's treatment of former federal lands and supports the orderly integration of the Property into the surrounding mixed-use environment.

C. Other Policies Generally:

The Property is located in the Central Employment Area ("CEA"), the District's primary business, employment, and visitor destination center. The CEA encompasses a wide range of intensive urban uses, including major public and private offices, retail and service uses, cultural and entertainment facilities, and hospitality uses such as hotels and restaurants. It functions as a regional hub that attracts workers, residents, and visitors from throughout the metropolitan area. The proposed map amendment is consistent with the role of the CEA in supporting high-density, mixed-use development and the continued evolution of the District's core urban center.

The Property is located within the NCPC's 110-acre 2013 SW EcoDistrict planning area envisioned for transformation into a more connected, mixed-use district integrating neighborhood, workplace, and cultural destinations. The proposed map amendment advances the EcoDistricts Plan's goal of improving connectivity and activating underutilized areas by supporting the continued evolution of a cohesive urban environment linking the National Mall and the Southwest Waterfront. This approach is also consistent with the Monumental Core Framework Plan (2009), which provides long-range guidance for the National Mall and surrounding federal precincts and emphasizes improved connectivity, enhanced pedestrian circulation, and stronger linkages between the monumental core, downtown, and the Southwest waterfront. The proposed zoning supports these shared objectives by facilitating the reintegration of the Property into a more connected and coherent urban framework.

The Property's transition from federal to private ownership is part of a broader federal disposition process managed by the General Services Administration pursuant to applicable federal law and policy governing surplus federal property. As such, the proposed zoning is not occurring in isolation, but rather as part of an established framework for the reuse and integration of federally owned land into the District's urban fabric.

In addition, development of the Property will remain subject to review by the U.S. Commission of Fine Arts and, as applicable, other federal and District historic preservation requirements. These processes ensure that any redevelopment is consistent with the design, character, and planning context of the surrounding National Mall and Southwest waterfront areas.

Accordingly, the proposed map amendment operates within a broader regulatory and planning framework that both anticipates the transition of federal properties to private use and ensures that redevelopment occurs in a coordinated and context-sensitive manner.

D. Central Washington Area Element

1. Overview

The Property is located within the Central Washington Area Element of the Comprehensive Plan and the L'Enfant Plaza/Near Southwest/Maryland Avenue focus area. The Central Washington Planning Area is the core of the District, encompassing the National Mall, major federal buildings, and the city's primary downtown and employment centers, including Near Southwest, the East End, and emerging mixed-use neighborhoods such as NoMa and Mount Vernon Triangle. It serves as the region's economic, cultural, and governmental center, with a significant concentration of office space, retail, hotels, and employment, as well as major cultural and entertainment destinations. The area is also the hub of the region's transportation network, with extensive transit access and connectivity.

While much of Central Washington is built out, the area has undergone—and continues to experience—a shift from predominantly office and federal uses toward more mixed-use development, including residential, retail, and entertainment uses, particularly at its edges. This evolution reflects long-standing planning efforts to create a more vibrant, mixed-use downtown environment. Planning in Central Washington is conducted in coordination with the federal government, given the significant presence of federal land and institutions, and development is shaped by both local and federal oversight. See 10-A DCMR § 1600-1601

2. Demographics and Community Goals for the Area:

The Central Washington Planning Area is characterized by a high concentration of commercial, mixed-use, and federally owned land, with more than half of the area under public ownership and only a small percentage devoted exclusively to residential use. This pattern reflects the area's historic role as the District's federal and employment core, but also highlights the limited amount of housing relative to its size and importance.

In recent years, the area has experienced significant population growth, with the number of residents increasing substantially and projected to more than double over the coming decades. This growth is expected to be driven largely by new high-density residential and mixed-use development, particularly in areas transitioning from underutilized or previously non-residential uses.

The area's population is relatively young, diverse, and renter-oriented, with a high proportion of multi-family housing and a strong presence of market-rate development. At the same time, the area continues to face challenges related to housing affordability, income diversity, and the need to maintain opportunities for a broad range of residents.

Community planning priorities for Central Washington emphasize the continued evolution of the area into a more balanced, mixed-use environment that includes housing, retail, cultural, and entertainment uses in addition to its traditional office and federal functions. These priorities

also include creating a more vibrant and inclusive downtown, improving connections between federal and local areas, supporting diverse economic opportunities, and ensuring that future growth benefits District residents.

Overall, the data and community priorities reflect a clear direction toward increased residential density, greater land use diversity, and the continued integration of underutilized and federally influenced sites into the broader mixed-use fabric of Central Washington.

3. Policies Advanced by the Map Amendment

The proposed map amendment advances several major planning objectives outlined in the Central Washington Area Element:

CW-1.1 Guiding Growth and Neighborhood Conservation

- CW-1.1.1: Promoting Mixed-Use Development
- CW-1.1.3: Incentives for Non-Office Uses
- CW-1.1.4: New Housing Development in Central Washington
- **CW-1.1.5: Central Washington Housing Diversity**
- CW-1.1.11: Reinforcing Central Washington's Characteristic Design Features

CW-1.2 Conserving and Enhancing Community Resources

- Policy CW-1.2.2: Preservation of Central Washington's Historic Resources

CW-2.7 L'Enfant Plaza/Near Southwest/Maryland Avenue SW

- CW 2.7.1 Enhancing Near Southwest: Work collaboratively with NCPC to redevelop SW Federal Center as a mixed-use community anchored with national civic and cultural uses. Plans for the area should identify streetscape and signage improvements, pedestrian circulation changes, measures to mitigate the scale of the area's monolithic buildings, guidelines for new (or replacement) buildings within the area, **and the potential for new residential uses if federal properties transfer from federal use.**
- CW-2.7.4: Restoring Maryland Avenue

4. Evaluation

The proposed zoning of the Property to the D-8 Zone District directly advances the Central Washington Area Element's emphasis on expanding mixed-use development, increasing housing, and facilitating the continued evolution of federally influenced areas into vibrant, integrated neighborhoods.

The Central Washington Area Element prioritizes the continued diversification of land uses to reinforce the area's role as the region's economic, cultural, and transportation hub. Policies such as CW-1.1.1 and CW-1.1.3 call for expanding the mix of uses—including residential, retail, cultural, and institutional uses—and specifically encourage the use of zoning and other regulatory mechanisms to incentivize non-office uses and create a more active and balanced urban environment. The proposed D-8 zoning directly supports these objectives by permitting a broad

range of uses and enabling a high-density, mixed-use development pattern consistent with the surrounding area.

The proposal also advances policies related to housing and residential growth in Central Washington. Policy CW-1.1.4 encourages the development of new high-density housing, including in the Near Southwest area, while Policy CW-1.1.5 emphasizes the importance of maintaining a mixed-income community and expanding housing opportunities. The D-8 Zone facilitates the development of new residential uses, including opportunities for additional housing and affordable housing, which will contribute to a more balanced and active neighborhood and support local services and businesses.

In addition, the proposed zoning is consistent with policies focused on urban design and the integration of new development into the character of Central Washington. Policy CW-1.1.11 calls for reinforcing the area's distinctive design features while accommodating a mix of historic and contemporary architecture. While the D-8 Zone allows for significant density, any future development of the Property will be subject to additional federal and local design review processes, ensuring that new construction is compatible with the surrounding context and contributes to the area's character.

Finally, the proposed map amendment supports the continued evolution of the Near Southwest area, consistent with Policy CW-2.7.1, which encourages the redevelopment of federally influenced areas as mixed-use communities, including the introduction of residential uses as properties transition from federal ownership. Similarly, Policy CW-2.7.4 supports redevelopment that enhances connectivity, strengthens the urban fabric, and recognizes the area's central location and proximity to transit. The proposed D-8 zoning provides the appropriate framework to achieve these objectives by enabling development that reinforces connectivity, supports transit use, and integrates the Property into the surrounding street network and urban environment.

Accordingly, the proposed zoning to the D-8 Zone District advances the Central Washington Area Element's goals of promoting mixed-use development, increasing housing opportunities, reinforcing urban design, and supporting the transformation of federally influenced areas into vibrant, connected neighborhoods, and is not inconsistent with the Comprehensive Plan.

E. Land Use Element

1. Overview

The Land Use Element is the cornerstone of the Comprehensive Plan, establishing the policies that guide the District's physical development and the allocation and use of land. It provides direction on a wide range of issues, including development patterns, land use compatibility, preservation, and the balance between competing demands for limited land resources. See 10-A DCMR § 300.1.

Through its policies, the Land Use Element addresses key planning priorities such as accommodating population and employment growth, promoting mixed-use development,

strengthening the District's core, supporting transit-oriented and sustainable development, and ensuring the equitable distribution of housing and economic opportunities. See 10-A DCMR § 300.2. More than any other element, the Land Use Element establishes how and where growth and change should occur in the District and integrates the policies of the other elements of the Comprehensive Plan. See 10-A DCMR § 300.3. Accordingly, it is afforded significant weight in evaluating proposed zoning actions and development patterns.

2. Policies Advanced by the Map Amendment:

LU-1.2 Strengthening the Core

- LU-1.2.1: Sustaining a Strong District Center
- LU-1.2.2: CEA
- LU-1.2.3: Appropriate Uses in the CEA
- LU-1.2.4: Urban Mixed-Use Neighborhoods
- LU-1.2.5: CEA Historic Resources
- LU-1.2.8: New Waterfront Development
- LU-1.2.E: Development on Former Federal Sites
- LU-1.2.F: Reuse of Existing Buildings
-

LU-1.4: Transit-Oriented and Corridor Development

- LU- 1.4.6: Development Along Corridors

LU-2.1: A District of Neighborhoods

- LU-2.1.1: Variety of Neighborhood Types
- **LU-2.1.2: Neighborhood Revitalization**
- LU-2.1.10: Multi-Family Neighborhoods
- LU-2.1.12: Reuse of Public Buildings

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances the Land Use Element's goals of strengthening Central Washington, promoting mixed-use development, facilitating the reuse of federal sites, and accommodating growth in high-density, centrally located areas.

The Land Use Element emphasizes the continued vitality of Central Washington as the District's primary employment, cultural, and mixed-use center and supports high-density development that reflects its national and regional significance. Policies LU-1.2.1, LU-1.2.2, and LU-1.2.3 encourage reinvestment in the Central Employment Area and promote a more balanced mix of uses to create a dynamic, active urban environment. The proposed D-8 zoning directly supports these objectives by permitting a mix of residential, commercial, and cultural uses on a currently unzoned, federally influenced site, allowing it to contribute to the broader evolution of Central Washington as a mixed-use district.

The Land Use Element also promotes the development of high-density, mixed-use neighborhoods and encourages growth in central locations and along major corridors. Policies LU-1.2.4 and LU-1.4.6 support the creation of pedestrian-oriented environments that include a mix of housing, retail, employment, and cultural uses. The proposed zoning enables this type of development by establishing a zoning framework that allows the Property to be integrated into the surrounding urban fabric and developed in a manner consistent with the scale and character of nearby mixed-use areas.

Importantly, the Land Use Element specifically addresses the transition and reuse of federal properties. Policy LU-1.3.3 and Action LU-1.2.E emphasize the importance of coordinating with federal agencies and integrating former federal sites into the surrounding context through mixed-use development and improved connectivity. The proposed map amendment directly advances these policies by facilitating the transition of the Property from federal to private ownership and establishing zoning that supports its redevelopment as part of the surrounding mixed-use environment.

The Land Use Element further recognizes the need to accommodate population growth and expand housing opportunities, particularly in central, high-opportunity areas. See 10-A DCMR § 304.1–304.3. By permitting residential uses at a high density, the proposed D-8 zoning creates the opportunity to introduce new housing in a location that is well-positioned to support additional residents, contributing to a more active and balanced urban environment.

Finally, the Land Use Element emphasizes the importance of resilience and adaptive design, particularly in waterfront areas. Policy LU-1.2.8 encourages development that responds to flood risk through appropriate siting and design measures. Future development of the Property will be required to incorporate these considerations, ensuring consistency with the District’s broader sustainability and resilience goals.

Accordingly, the proposed zoning advances the Land Use Element’s policies by promoting mixed-use development, supporting the reuse of federal land, encouraging residential growth, and reinforcing the role of Central Washington as a high-density, mixed-use urban center.

F. Transportation Element

1. Overview

The Transportation Element provides policies and actions to maintain and improve the District’s transportation system and to enhance travel choices for residents, workers, and visitors. These policies are closely integrated with the Land Use, Urban Design, and Environmental Protection Elements, recognizing that transportation and land use are fundamentally interconnected in shaping development patterns, mobility, and accessibility in the District. See 10-A DCMR §§ 400.1, 402.1. The overarching goal of the Transportation Element is to create a safe, sustainable, equitable, efficient, and multimodal transportation system that meets access and mobility needs while supporting economic prosperity and enhancing quality of life. See 10-A DCMR § 401.1.

2. Policies Advanced by the Map Amendment

T-1.1 Land Use: Transportation Coordination

- T-1.1.4: Transit-Oriented Development

T-1.2 Transforming Corridors

- T-1.2.1: Major Thoroughfare Improvements
- T-1.2.2: Targeted Investment

T-1.3 Regional Smart Growth

- T-1.3.1: Transit-Accessible Employment

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances key policies of the Transportation Element by supporting transit-accessible development, improving connectivity along major corridors, and reinforcing the relationship between land use and the District's multimodal transportation system.

Policy T-1.1.4 promotes transit-oriented development and improved pedestrian and bicycle connections to transit infrastructure. While the Property is not immediately adjacent to a Metrorail station, it is located within approximately one-half mile of the Smithsonian Metro Station and is well-served by Metrobus routes and surrounding transportation infrastructure. The proposed zoning enables higher-density, mixed-use development that supports transit usage and creates opportunities for improved pedestrian and bicycle connectivity, including last-mile connections to nearby transit facilities and activity centers.

The Property is also located at the intersection of principal arterial roadways, which serve major activity centers and carry a significant portion of the District's traffic volumes. In this context, Policy T-1.2.1 and Policy T-1.2.2 support coordinated improvements to major corridors that enhance mobility, safety, and urban design. The proposed zoning facilitates redevelopment that can incorporate streetscape improvements, pedestrian safety measures, and enhanced walkability, helping to transform these corridors into safer and more attractive multimodal environments while reinforcing their role as key gateways within the District.

Policy T-1.3.1 encourages transit-accessible employment and more efficient use of the region's transportation infrastructure. The proposed D-8 zoning supports a mix of high-density uses, including office, residential, and retail, in a centrally located area within the Central Employment Area. This allows future development to capitalize on existing transportation infrastructure and expand access to jobs, services, and amenities, consistent with the goal of improving transit accessibility and reducing reliance on single-occupant vehicles.

More broadly, the Transportation Element emphasizes the integration of land use and transportation planning to improve mobility, accessibility, and safety. See 10-A DCMR § 402.1. The proposed zoning advances this objective by enabling development on a currently unzoned site in a location already designed to accommodate high volumes of movement and access, thereby

making more efficient use of existing infrastructure and supporting a more connected, walkable urban environment.

Accordingly, the proposed map amendment is consistent with the Transportation Element, as it supports transit-accessible, mixed-use development; enhances connectivity along major corridors; and promotes safe, efficient, and multimodal transportation outcomes in Central Washington.

G. Housing Element

1. Overview

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. 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. 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. 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. 10-A DCMR § 502.5.

2. Policies Advanced by the Map Amendment

H-1.1 Expanding Housing Supply

- Policy H-1.1.1: Private Sector Support
- Policy H-1.1.3: Balanced Growth
- Policy H-1.1.4: Mixed-Use Development
- Policy H-1.1.5: Housing Quality
- Policy H-1.1.9: Housing for Families

H-1.2 Ensuring Housing Affordability

- Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- **Policy H-1.2.2: Production Targets**
- **Policy H-1.2.3: Mixed-Income Housing**
- Policy H-1.2.5: Moderate-Income Housing

- **Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas**
- **Policy H-1.2.11: Inclusive Mixed-Income Neighborhoods**

H-1.3 Diversity of Housing Types

- **Policy H-1.3.1: Housing for Larger Households**
- **Policy H-1.3.2: Tenure Diversity**

H-1.4: Housing and Neighborhood Revitalization

- **Policy H-1.4.2: Opportunities for Upward Mobility**

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances the Housing Element's goals of expanding housing supply, increasing affordability, and promoting a diverse mix of housing types in high-opportunity, centrally located areas.

The Housing Element emphasizes the importance of increasing the District's overall housing supply through private sector development and balanced growth. Policies **H-1.1.1**, **H-1.1.2**, and **H-1.1.3** support the use of zoning and other regulatory tools to facilitate new housing production and ensure that growth is distributed across the District. The proposed zoning directly advances these policies by establishing a zoning framework that allows for increased residential density on a currently unzoned site, enabling new housing in a location that is well-positioned to accommodate additional development.

The Housing Element also prioritizes the production of affordable and mixed-income housing. Policies **H-1.2.1**, **H-1.2.2**, and **H-1.2.3** identify affordable housing production as a civic priority and call for increased housing opportunities across income levels. The proposed D-8 zoning, in conjunction with the District's Inclusionary Zoning program, creates the opportunity for new affordable housing units in a high-opportunity area with access to employment, services, and transportation infrastructure. This supports the goal of expanding housing access while promoting more equitable distribution of housing opportunities across planning areas.

In addition, the Housing Element encourages a diversity of housing types and the creation of inclusive, mixed-income communities. Policies **H-1.3.1**, **H-1.3.2**, and **H-1.2.11** support the development of a range of housing options, including family-sized units and both rental and ownership opportunities. The proposed zoning allows for a mix of housing types that can accommodate a variety of household sizes and incomes, contributing to a more balanced and inclusive neighborhood.

Finally, the Housing Element recognizes the importance of leveraging redevelopment opportunities to support housing production and upward mobility. Policy **H-1.4.2** encourages development that expands access to economic opportunity and neighborhood amenities. As the Property transitions from federal to private ownership, the proposed zoning facilitates its redevelopment as a mixed-use site that can include new housing and support the continued evolution of Central Washington into a more vibrant, mixed-use, and residentially integrated environment.

Accordingly, the proposed map amendment advances the Housing Element by increasing housing supply, supporting affordable housing production, promoting a diverse range of housing types, and expanding access to housing in a centrally located, high-opportunity area.

H. Environmental Protection Element

1. Overview

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC'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. 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. 10-A DCMR § 601.1.

2. Policies Advanced by the Map Amendment

E-1.1 Preparing for and Responding to Natural Hazards

- Policy E-1.1.2: Urban Heat Island Mitigation

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

Policy E-2.1.2: Tree Requirements in New Development

Policy E-2.1.3: Sustainable Landscaping Practices

E-3.2 Conserving Energy and Reducing GHG Emissions

- Policy E-3.2.3: Renewable Energy
- Policy E-3.2.7: Energy-Efficient Building and Site Planning

E-4 Promoting Environmental Sustainability

- Policy E-4.1.1: Maximizing Permeable Surfaces
- Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
- Policy E-4.2.1: Support for Green Building

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances the Environmental Protection Element by facilitating redevelopment that can incorporate modern sustainability practices, improve environmental performance, and respond to site-specific conditions, including flood risk.

The Environmental Protection Element emphasizes the importance of designing development that mitigates environmental impacts and improves resilience. The Property is located within the 100-year and 500-year floodplains, making policies related to adaptive design and stormwater management particularly relevant. Policies E-4.1.1 and E-4.1.2 support the use of permeable surfaces, landscaping, and green infrastructure to reduce runoff and improve stormwater management. The proposed zoning enables redevelopment that can incorporate these features, resulting in improved environmental performance compared to existing conditions.

The Environmental Protection Element also promotes energy efficiency and the reduction of greenhouse gas emissions. Policies E-3.2.3 and E-3.2.7 encourage the use of renewable energy and energy-efficient building design. Redevelopment of the Property under the D-8 zoning framework provides the opportunity to incorporate modern building systems and sustainable design practices that reduce energy consumption and contribute to the District's climate goals.

In addition, policies E-2.1.2 and E-2.1.3 support the integration of urban forestry and sustainable landscaping into new development. Future redevelopment of the Property can include enhanced streetscape improvements, tree planting, and landscaping that contribute to urban heat island mitigation and improve the public realm, consistent with Policy E-1.1.2.

Finally, Policy E-4.2.1 encourages the use of green building practices. Any future development of the Property will be required to comply with the District's Green Building Act and applicable sustainability standards, ensuring that redevelopment is consistent with District-wide environmental goals.

Accordingly, the proposed map amendment advances the Environmental Protection Element by enabling redevelopment that improves stormwater management, incorporates sustainable design and energy-efficient systems, enhances urban landscaping, and responds to the Property's environmental context.

I. Economic Development Element

1. Overview

The Economic Development Element addresses the future of Washington, DC'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. 10-A DCMR 700.1

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. 10-A DCMR 701.1

2. Policies

ED-1.1: Diversifying the Economic Base

ED-1.1.4: Promote Local Entrepreneurship

ED-1.1.5: Build Capacity and Opportunities

ED-2.1

E.D.2.1.1: Office Growth

ED-2.2: The Retail Economy

ED-2.2.3: Neighborhood Shopping

ED-2.2.4: Support Local Entrepreneurs

ED-2.2.5: Business Mix

ED-3.2: Small and Locally Owned Businesses

ED-3.2.8: Certified Business Enterprise Programs

ED-4.2: Increasing Workforce Development Skills

ED-4.2.1: Linking Residents to Jobs

ED-4.2.3: Focus on Economically Disadvantaged Populations

ED-4.2.6: Entry-Level Opportunities

ED-4.2.12: Local Hiring Incentives

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances the Economic Development Element by supporting job growth, expanding economic opportunity, and reinforcing Central Washington's role as the District's primary economic and employment center.

The Economic Development Element emphasizes the importance of maintaining a strong and diverse economic base, particularly within Central Washington and the Central Employment Area ("CEA"). Policies ED-1.1.4, and ED-1.1.5 support economic diversification, entrepreneurship, and the creation of new business opportunities. The proposed zoning advances these objectives by enabling a broader mix of uses, including office, retail, and service uses, on a currently unzoned site, thereby supporting continued economic activity and reinvestment in the District's core.

The proposal also supports the continued vitality of the retail and service economy. Policies ED-2.2.3, ED-2.2.4, and ED-2.2.5 encourage a diverse business mix and support opportunities for local and small businesses. By allowing a range of commercial uses within a high-density, mixed-use framework, the proposed D-8 zoning creates opportunities for a variety of businesses to locate in the area, contributing to a more active and economically vibrant environment.

In addition, the Economic Development Element emphasizes the importance of workforce development and equitable access to employment. Policies ED-4.2.1, ED-4.2.3, and ED-4.2.6 support linking residents to jobs, including entry-level and accessible employment opportunities.

The proposed zoning facilitates development that can generate new employment opportunities in a central, transit-accessible location, expanding access to jobs and supporting the District's economic inclusion goals.

Finally, the proposed zoning reinforces the role of Central Washington as the region's economic hub. By enabling high-density mixed-use development in a location within the Central Employment Area, the map amendment supports efficient use of land and infrastructure while strengthening the District's core as a center for employment, commerce, and economic activity.

Accordingly, the proposed map amendment advances the Economic Development Element by promoting economic growth, supporting local businesses, expanding employment opportunities, and reinforcing the economic vitality of Central Washington.

J. Historic Preservation Element

1. Overview

The Historic Preservation Element addresses the protection, enhancement, and continued use of the District's historic and cultural resources, including buildings, sites, neighborhoods, and landscapes that reflect Washington, DC's heritage as the nation's capital and as a living city. It establishes policies that integrate historic preservation into broader planning, land use, and economic development decisions. 10-A DCMR 1000.1

The overarching goal for historic preservation in the District is to recognize, protect, enhance, and encourage the continued use, public appreciation, and economic vitality of the District's heritage resources, while supporting compatible growth and reinvestment that respects the character of historic places. 10-A DCMR 1001.1

2. Policies

HP-1.1: Preservation Planning

HP-1.1.1: Recognition of Heritage Resources

HP-1.1.5: Planning for Historic Federal Properties

HP-1.2: The District's Historic Preservation Program

HP-1.2.3: Coordination with the Federal Government

HP-2.2: Historic Landscapes and Open Space

HP-2.2.6: Historic Open Space

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

3. Evaluation

The proposed zoning of the Property to the D-8 Zone District advances the Historic Preservation Element by supporting the continued use and reinvestment of a (soon to be formerly) federal building, ensuring that future redevelopment will occur within a robust preservation review framework, and reinforcing the District's longstanding policy of integrating historic preservation with planning and economic development objectives in Central Washington.

Accordingly, the proposed map amendment advances the Historic Preservation Element by enabling the continued use of an historic building, supporting compatible reinvestment in the Monumental Core, and integrating the Property into the District's coordinated preservation, planning, and zoning review framework.

K. Analysis of Potential Inconsistencies with the Comprehensive Plan

Notwithstanding the numerous policies across the Comprehensive Plan that are advanced by the proposed Zoning Map amendment, an evaluation of potential inconsistencies is required to demonstrate that the proposed D-8 Zone is “not inconsistent with the Comprehensive Plan.” 11-X DCMR § 500.3.

As established by the District of Columbia Court of Appeals, a determination of consistency with the Comprehensive Plan requires more than identifying supportive policies. Because the Plan contains numerous, and at times competing, policies, the Zoning Commission must also identify and evaluate any potential inconsistencies and determine whether, on balance, the proposal is consistent with the Plan as a whole. See *Wisconsin-Newark Neighborhood Coal. v. D.C. Zoning Comm’n*, 33 A.3d 382, 394 (D.C. 2011); *Durant v. D.C. Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013); *Friends of McMillan Park v. D.C. Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016). **Even where a proposal may be inconsistent with one or more individual policies, the Commission may approve the application if it finds that those inconsistencies are outweighed by other policies and considerations when the Comprehensive Plan is read as a whole.**

Potential Inconsistency – FLUM (PROS Designation)

The primary potential inconsistency relates to the Property’s designation on the Future Land Use Map as “Parks, Recreation, and Open Space” (“PROS”), while the proposed Zoning Map amendment would permit high-density, mixed-use development through the D-8 Zone District.

As described in the Framework Element, the PROS designation includes federal parkland, civic open space, and other publicly owned lands, and acknowledges that such areas are often unzoned due to their federal ownership. See 10-A DCMR § 227.19. The designation reflects the Property’s historic federal status rather than a determination that the site must remain as permanent open space.

In this case, the Property is in the process of being transferred from federal to private ownership, and therefore presents a unique circumstance where the existing FLUM designation

does not reflect the site’s future use or planning context. As such, the PROS designation must be interpreted in conjunction with the broader policies of the Comprehensive Plan, rather than as a strict limitation on redevelopment.

Balancing of Policies and Precedent

When read as a whole, the Comprehensive Plan strongly supports the proposed zoning. As demonstrated throughout this Statement, the map amendment advances numerous policies, including but not limited to those related to mixed-use development, housing production, economic growth, transportation efficiency, and the reuse of federal land within Central Washington.

Moreover, the Office of Planning and the Zoning Commission have previously evaluated similar circumstances where properties designated as PROS on the FLUM were rezoned to allow development following a transition from federal to private ownership. In those cases, the Office of Planning concluded that, although the FLUM designation alone may not support redevelopment, the proposed zoning was not inconsistent with the Comprehensive Plan when evaluated in its entirety, particularly in light of surrounding land use patterns and broader planning objectives. See, e.g., Z.C. Case Nos. 19-08 and 20-22 (Office of Planning Reports).

These cases demonstrate that the PROS designation, in and of itself, does not preclude redevelopment where other Comprehensive Plan policies support a different outcome and where the designation reflects historical ownership rather than long-term land use intent.

Conclusion

Any potential inconsistency with the FLUM designation is limited and is outweighed by the substantial number of policies advanced by the proposed map amendment. The D-8 Zone District establishes a zoning framework that reflects the Property’s central location, surrounding high-density mixed-use context, and transition from federal to private ownership.

Accordingly, when the Comprehensive Plan is read as a whole, the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan.

IV. RACIAL EQUITY AND THE COMPREHENSIVE PLAN

A. Overview.

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.” 10-A DCMR § 213.7. Indeed, the importance of equity to District residents was made abundantly clear when the DC Office of Planning (“OP”) conducted its DC 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. 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. 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 in 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.” 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.” 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 zoning is not inconsistent with the Comp Plan as a whole.

General Highlights:

- When evaluated through a racial equity lens, the proposed map amendment creates favorable outcomes by enabling the redevelopment of a currently unzoned, federally influenced site with the potential to include new housing, including affordable housing, and neighborhood-serving uses in a centrally located, high-opportunity area.
- The proposed D-8 zone, when evaluated in the context of the Comprehensive Plan as a whole, is not inconsistent with the Property’s FLUM and GPM designations.
- The proposed map amendment advances numerous policies within the Central Washington Area Element and Citywide Elements, particularly those related to housing production, mixed-use development, economic opportunity, and transportation access.

- The outcomes of the map amendment will advance racial equity by expanding access to housing, jobs, and services in a centrally located area with strong infrastructure and connectivity.

The Property's transition from federal to private ownership presents a unique opportunity to advance racial equity objectives through the introduction of new housing and economic activity in a high-opportunity, centrally located area.

B. 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. 10-A DCMR § 213.7. The Applicant will engage with the Advisory Neighborhood Commission and community stakeholders throughout the map amendment process to ensure meaningful participation and consideration of community priorities.

C. 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.” 10-A DCMR § 213.6. As stated above, under the recently adopted Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens.

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

1. Racial Equity Analysis Submissions (Comp Plan)
2. Applicant/Petitioner Community Outreach and Engagement
3. Disaggregated Data Regarding Race and Ethnicity
4. Criteria to Evaluate Zoning Action through a Racial Equity Lens

PART ONE: RACIAL EQUITY COMP PLAN ANALYSIS

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

PART TWO: APPLICANT'S COMMUNITY OUTREACH AND ENGAGEMENT

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

As required by Part Two the Racial Equity Tool, the Applicant will conduct outreach to the affected Advisory Neighborhood Commission (“ANC”), community groups, and individuals in the neighborhood. The Applicant’s team mailed the Notice of Intent to File on April 1, 2026. The Applicant emailed the Chairperson of ANC 2A on April 29, 2026, and again on May 13, 2026. At the time of this filing, the Applicant has not heard back from the ANC.

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 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, Public Square.

What community is impacted by the zoning action?

The Property at 401 14th Street SW is located within the Central Washington Planning Area, along the 14th Street SW corridor immediately south of the National Mall and the Smithsonian museums, east of the Tidal Basin and the Jefferson Memorial, west of L'Enfant Plaza, and north of the Southwest Waterfront and The Wharf. The site sits within a highly urbanized federal and mixed-use environment characterized by large-scale federal office buildings (including the U.S. Department of Agriculture, the Bureau of Engraving and Printing, and the Forrestal Building), hotels, the L'Enfant Plaza complex, and the emerging mixed-use redevelopment along Banneker Overlook and 10th Street SW.

Accordingly, the community most directly impacted by the proposed zoning action consists of those with a daily, proximate connection to the Property and the surrounding blocks of 14th Street SW. This includes the federal agencies and their employees occupying the adjacent office buildings along the 14th Street SW corridor (notably the U.S. Department of Agriculture, the Forrestal Building, and the Bureau of Engraving and Printing); the hotel operators, staff, and guests at lodging properties in the immediate vicinity; and the limited number of ground-floor retail and service businesses operating in the blocks surrounding the Property.

What specific factors define the impacted community?

Site Characteristics: The Property is located in the southwest quadrant of Washington, DC, within the Central Washington Planning Area and immediately adjacent to the Monumental Core. The surrounding area is characterized by large-block, high-density development dominated by federal office uses, institutional buildings, and hospitality uses, with limited ground-floor retail historically but with active efforts underway to introduce more vibrant street-level activity. Unlike the low- and medium-density residential fabric of the Southwest neighborhood further south (along

4th Street SW, M Street SW, and the Waterfront), the 14th Street SW corridor reflects a monumental, federal-scale urban environment with wide rights-of-way, superblocks, and significant daytime employment populations. The Property lies within walking distance of the National Mall, the Tidal Basin, the Jefferson Memorial, the Smithsonian museums, L'Enfant Plaza, and the Southwest Waterfront/Wharf. Transit access is widely available, with the L'Enfant Plaza and Smithsonian Metrorail stations nearby, multiple Metrobus routes serving the corridor, and proximity to the VRE and Amtrak service at L'Enfant.

Prominent neighborhood anchors include the U.S. Department of Agriculture headquarters, the Bureau of Engraving and Printing, the Forrestal Building, The U.S. Holocaust Memorial Museum, the Smithsonian Institution's museums on the National Mall, the Jefferson Memorial, the Tidal Basin, L'Enfant Plaza, the International Spy Museum, and The Wharf. The area is widely recognized as the civic and monumental heart of the nation's capital, with a concentration of federal institutions, cultural destinations, and tourism-related uses of national and international significance.

Demographic Information:³ Historically, the southwest waterfront area was the site of one of the most significant and painful episodes of urban renewal in American history, when mid-twentieth century federal and District redevelopment efforts displaced a predominantly Black and working-class community of thousands of residents and hundreds of small businesses. (*See* 10-A DCMR § 1901.6 *et seq.*, Near Southwest Area Element; DC Office of Planning, Central Washington Area Element.)

Today, the Southwest community is racially and economically diverse, with a mix of market-rate, cooperative, and income-restricted housing, including significant legacy affordable housing stock (such as Greenleaf Gardens, Syphax Gardens, and James Creek) alongside newer market-rate development at The Wharf, Waterfront Station, and the Southwest Ecodistrict. (*See* U.S. Census Bureau, American Community Survey (ACS) 5-Year Estimates, Tables DP05, DP03, and DP04; Censusreporter.org; DC Office of Planning, Central Washington Area Element.) The population includes a substantial Black community with deep historical ties to the neighborhood, a growing population of young professionals drawn by waterfront amenities and transit access, a significant federal workforce, and resident populations associated with cooperatives and mixed-income housing. A substantial majority of residents live in multi-family buildings, and renters represent a larger share of households than in the District overall. (*See* U.S. Census Bureau, ACS 5-Year Estimates, Tables DP04; Censusreporter.org.)

While household incomes in portions of the Southwest Waterfront have increased in recent years with new development, economic diversity remains a defining characteristic, with significant

³ The Property itself is located within a predominantly federal and institutional precinct, and the nearest residential developments (by the Wharf) are separated from the Property by Maine Avenue SW, the I-395 freeway, and the Washington Channel. The broader Southwest community is discussed here to provide demographic and historical context for the area, while recognizing that the Property's immediate surroundings are federal rather than residential in character.

concentrations of both market-rate and income-restricted housing present in the broader planning area. (See 10-A DCMR §§ 1900; DC Office of Planning, Central Washington Area Element and Near Southwest Area Element; U.S. Census Bureau, ACS Table DP03.) Educational attainment levels vary, reflecting the area's mix of long-term residents, federal employees, and newer households. (See U.S. Census Bureau, ACS Table DP02; Censusreporter.org.) Community identity continues to be shaped by long-standing cultural institutions, tenant and cooperative associations, faith-based organizations, and civic groups committed to honoring the neighborhood's history—including the legacy of urban renewal displacement—while accommodating ongoing reinvestment.

Planning documents, including the Central Washington Area Element, the Near Southwest Area Element, the Monumental Core Framework Plan, the SW Ecodistrict Plan, and the Maryland Avenue SW Small Area Plan, consistently emphasize the area's civic and cultural significance, transit accessibility, and role as a federal and mixed-use destination district, while calling for greater residential population, more vibrant street-level activity, enhanced sustainability, and improved connections between the Monumental Core and the Southwest neighborhood. (See 10-A DCMR §§ 1900 *et seq.* and 1600 *et seq.*; SW Ecodistrict Plan (2013); Monumental Core Framework Plan (2009); Maryland Avenue SW Small Area Plan (2013).) Community engagement in recent planning efforts has reflected strong interest in managing growth in a way that supports housing affordability, honors the neighborhood's history and the legacy of urban renewal, improves the public realm, and reinforces connections to the waterfront and the Monumental Core. (See SW Ecodistrict Plan at pp. 20–40; DC Comprehensive Plan Framework Element §§ 100.3, 102.5.)

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

The Property consists of a currently vacant federal office building (the former Liberty Loan Building) and an adjacent tract of open space, located on a block dominated by federal and institutional uses, including the U.S. Bureau of Engraving and Printing and the U.S. Holocaust Memorial Museum to the north and the U.S. Department of Agriculture beyond. There are no residential tenants on site and no commercial tenants whose operations would be affected by the map amendment; as a result, the proposed zoning action does not involve direct displacement of any residents or businesses. The nearest residential developments are located The Wharf. That area is separated from the Property by Maine Avenue SW and the I-395 freeway. The Property is within the jurisdiction of the U.S. Commission of Fine Arts (“CFA”), and any future redevelopment will be subject to CFA review and to applicable historic preservation requirements, ensuring that redevelopment is carefully tailored to its sensitive civic context.

On balance, however, the proposed zoning action is far more likely to benefit the surrounding community than to burden it. Converting a vacant federal building into a high-density, mixed-use property will introduce new residents, ground-floor activity, and eyes on the street along a corridor that today empties out after business hours. The proposed D-8 zoning will be subject to the District’s Inclusionary Zoning requirements applicable to residential development in the

Downtown zones, supporting production of new affordable housing units in a transit-accessible, high-opportunity location immediately adjacent to the Monumental Core, within walking distance of the Smithsonian and L'Enfant Plaza Metrorail stations, and immediately south of the National Mall. Adding housing supply in an area currently dominated by single-use federal office buildings directly advances the District's housing goals without displacing existing residential uses.

To the extent redevelopment contributes over time to incremental increases in nearby property assessments, District programs administered by the Office of Tax and Revenue provide robust relief mechanisms for eligible homeowners, including the Assessment Cap Credit, Senior Assessment Cap Credit, Homestead Deduction, Individual Income Property Tax Credit, Lower Income Homeownership Tax Abatement, Lower Income Long-Term Homeowners Tax Credit, and Low-Income Senior Citizen Property Tax Deferral. *See* DC Office of Tax and Revenue, Real Property Tax Relief and Credits Programs.

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

The broader Central Washington and Near Southwest community would benefit from redevelopment that enables additional residential density, including new affordable housing through the Inclusionary Zoning program, in a highly transit-accessible location immediately adjacent to the Monumental Core, within walking distance of the Smithsonian and L'Enfant Plaza Metrorail stations, and immediately south of the National Mall. Introducing housing along the 14th Street SW corridor—an area historically dominated by single-use federal office buildings—directly advances the long-standing planning vision articulated in the SW Ecodistrict Plan, the Monumental Core Framework Plan, and the Central Washington Area Element, each of which calls for greater residential population, 24-hour activity, and a more vibrant, mixed-use environment in this part of the city.

The proposed D-8 zoning would also facilitate enhanced ground-floor retail, active street-level uses, and improved public realm conditions along 14th Street SW and surrounding streets. Such reinvestment has the potential to strengthen the corridor's vitality, support new and existing businesses, improve pedestrian connections between the National Mall, the Tidal Basin, L'Enfant Plaza, and the Southwest Waterfront, and reinforce the area's role as a civic and mixed-use destination district. By aligning zoning with the Comprehensive Plan's vision for high-density, transit-oriented, mixed-use development in Central Washington, the map amendment can promote inclusive growth that benefits both existing residents of the Southwest community and future community members.

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?

Yes. The Southwest Washington neighborhood surrounding the Property carries one of the most consequential legacies of race-based land use policy in American history. Before the mid-twentieth century, Southwest DC was a densely populated, racially and ethnically diverse, predominantly Black and working-class neighborhood, with a rich network of churches, schools, small businesses, row houses, alley dwellings, and community institutions built up over more than a century.

Beginning in the late 1940s and accelerating through the 1950s and 1960s, the federal government and the District, acting under the Redevelopment Act of 1945 and the United States Supreme Court's decision in *Berman v. Parker*, 348 U.S. 26 (1954), designated a large portion of Southwest DC for comprehensive "slum clearance" and urban renewal. This was among the first large-scale applications of federal urban renewal authority in the nation, and it became an influential template for similar projects across the country. The program demolished much of the existing neighborhood—displacing thousands of residents, the majority of whom were Black, along with hundreds of small businesses—and replaced the historic street grid and building stock with superblocks of federal office buildings, modernist high-rise apartments, and arterial roadways, including 14th Street SW and Maine Avenue SW, both of which are directly adjacent to the Property. See DC Office of Planning, Near Southwest Area Element, 10-A DCMR § 1900 *et seq.*; Howard Gillette, *Between Justice and Beauty: Race, Planning, and the Failure of Urban Policy in Washington, D.C.* (1995); *Berman v. Parker*, 348 U.S. 26 (1954).

Displaced residents received minimal relocation assistance, and the overwhelming majority were unable to return to the rebuilt neighborhood; many were pushed to Anacostia and other neighborhoods east of the river, contributing to patterns of racial segregation that persist in the District today. The destruction of Southwest's Black community, its churches, its businesses, and its social networks represents a direct, documented harm caused by explicit government action, carried out on the very blocks surrounding the Property.

The physical legacy of that policy is still visible in the urban form immediately around 401 14th Street SW: the superblock scale, the single-use federal office character, the lack of ground-floor activity, the severed street grid, and the freeway (I-395/the Southwest Freeway) that physically cut the rebuilt Southwest residential neighborhood off from the Monumental Core and the rest of downtown. Planning documents adopted by the District acknowledge this history directly. The Near Southwest Area Element recognizes that twentieth-century redevelopment resulted in the displacement of thousands of residents and the loss of a historic neighborhood, and both the Central Washington Area Element and the SW Ecodistrict Plan call for reinvestment that knits the neighborhood back together, restores street-level activity, and honors the community's history. See 10-A DCMR §§ 1900–1910, 1600.1–1610; SW Ecodistrict Plan (2013); Monumental Core Framework Plan (2009).

Today, although significant reinvestment has occurred in portions of Southwest—most visibly at The Wharf, Waterfront Station, and the emerging Southwest Ecodistrict—concerns about housing affordability, cultural continuity, and the preservation of legacy affordable housing (including Greenleaf, Syphax Gardens, and James Creek) reflect the continuing legacy of mid-

century displacement. Accordingly, any zoning action in Central Washington and the Near Southwest area must be evaluated within this documented historical context, recognizing both the profound harm inflicted on the area's historic Black community and the opportunity—and obligation—for contemporary reinvestment to contribute to inclusive, affordable, and connected growth rather than repeating past mistakes.

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

District-wide efforts include:

Districtwide Racial Equity Action Plan (REAP): In February 2025, Mayor Muriel Bowser announced the launch of the Districtwide Racial Equity Action Plan, a three-year roadmap outlining steps the District will take to reduce racial inequities and improve life for all Washingtonians. The plan emphasizes policy decisions and programs evaluated through a racial equity lens, aiming to close racial equity gaps and measure progress toward a more equitable D.C. mayor.dc.gov

Office of Racial Equity (ORE): Established in 2021, the Mayor's Office of Racial Equity focuses on developing an infrastructure to ensure policy decisions and District programs are evaluated through a racial equity lens. ORE collaborates with District agencies, residents, and external stakeholders to make meaningful progress toward a more racially equitable city. ore.dc.gov

Mapping Segregation in Washington D.C.: Prologue DC's "Mapping Segregation" project documents the historic segregation of D.C.'s housing, schools, and public spaces. By making this history accessible, the project educates the public and informs current discussions on racial equity, including in neighborhoods like Southwest. mappingsegregationdc.org

Black Homeownership Strike Force (“BHSF”): [The Black Homeownership Strike Force](#) (“BHSF”) acknowledges that DC’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.

Upward Mobility Action Plan (“UMAP”): This program 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 *Id.* at 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.* at 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.

These efforts work in combination with other existing programs within the District that provide resources for housing, including the Inclusionary Zoning 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.

Efforts specific to the Southwest and Central Washington area include:

The SW Ecodistrict Plan (2013), prepared by the National Capital Planning Commission in coordination with the District and federal partners, establishes a long-term framework for transforming the federal precinct south of the National Mall—including the blocks surrounding the Property—into a sustainable, mixed-use, walkable neighborhood that reconnects to the residential Southwest community, adds housing (including affordable housing), activates the street level, and reintroduces a fine-grained urban fabric. The Plan explicitly frames this transformation as a response to the superblock, single-use pattern imposed by mid-century urban renewal. See SW Ecodistrict Plan at 20–40.

The Monumental Core Framework Plan (2009), jointly prepared by NCPC and the Commission of Fine Arts, similarly calls for introducing residential uses, ground-floor retail, and improved public realm conditions in the federal precincts surrounding the Mall, expressly to reverse the isolating effects of twentieth-century federal redevelopment.

The Maryland Avenue SW Small Area Plan (2013) provides additional guidance for redevelopment of federal and air-rights parcels in the immediate vicinity of the Property, with similar emphasis on housing, affordability, connectivity, and public realm.

The Near Southwest Area Element of the Comprehensive Plan acknowledges the neighborhood's history of urban renewal displacement and calls for reinvestment that supports housing affordability, protects legacy affordable housing (including Greenleaf, Syphax Gardens, and James Creek), and strengthens connections between the residential neighborhood and the federal precinct to the north. *See* 10-A DCMR § 1900 *et seq.*

District-wide housing policies also play a central role in addressing displacement pressures in transit-rich areas of Central Washington. The Inclusionary Zoning ("IZ") program applies to residential development in the Downtown (D) zones and requires set-asides of affordable housing units in qualifying projects, ensuring that reinvestment contributes to mixed-income communities rather than exclusively market-rate growth. *See* 11-C DCMR Chapter 10; DC Office of Planning, Inclusionary Zoning Program Overview, <https://planning.dc.gov/page/inclusionary-zoning-iz-affordable-housing-program>. In addition, the Property is within the jurisdiction of the U.S. Commission of Fine Arts, and any future redevelopment will be subject to CFA review and to applicable historic preservation requirements, providing additional procedural safeguards to ensure that redevelopment is carried out thoughtfully and in dialogue with the area's civic and historical context.

Together, these ongoing efforts reflect an intentional policy framework designed to ensure that continued growth in Central Washington and the Near Southwest advances inclusive development, housing affordability, and reconnection of a neighborhood historically severed by discriminatory land use policy.

C. Community Participation/ Outreach Efforts

The planning policies applicable to the Property and the surrounding Central Washington/Near Southwest area stem from extensive public engagement conducted during the 2021 Comprehensive Plan update process, as well as prior planning efforts focused on the federal precinct south of the National Mall. These include the SW Ecodistrict Plan (2013), the Monumental Core Framework Plan (2009), the Maryland Avenue SW Small Area Plan (2013), the Near Southwest Area Element, and the Central Washington Area Element. Residents, federal stakeholders, civic organizations, and planning agencies consistently identified priorities focused on reconnecting the federal precinct to the surrounding residential neighborhoods, adding residential population and ground-floor activity to an area historically dominated by single-use federal office buildings, improving pedestrian connections to the National Mall and the Southwest Waterfront, and advancing sustainability and public realm goals. *See* 10-A DCMR §§ 1900 *et seq.*,

1600-1610; SW Ecodistrict Plan at 20–40; Monumental Core Framework Plan; Maryland Avenue SW Small Area Plan.

Community and stakeholder input during these planning processes emphasized the importance of housing production—including affordable housing—in a transit-rich, high-opportunity area directly adjacent to the Monumental Core, as well as the need to restore an active, pedestrian-oriented street life along corridors like 14th Street SW that today function primarily as federal office thoroughfares. The Central Washington Area Element and the Near Southwest Area Element recognize these priorities and call for strategies that expand housing and mixed-use opportunities while honoring the neighborhood's history and strengthening its connection to the broader Southwest community. *See* 10-A DCMR §§ 1900–1910; 1600-1610 et seq..

Participants in prior planning processes also highlighted the importance of sensitive design in proximity to the Monumental Core, recognizing that any redevelopment in this area must be responsive to the civic character of the National Mall, the Tidal Basin, and surrounding federal institutions. The SW Ecodistrict Plan and the Monumental Core Framework Plan specifically call for reintroducing a fine-grained, mixed-use fabric to the federal precinct while preserving the dignity of the civic setting. *See* SW Ecodistrict Plan at 20–40; Monumental Core Framework Plan.

The proposed map amendment responds to these identified priorities by aligning zoning at the Property with the Comprehensive Plan's vision for high-density, transit-oriented, mixed-use development in Central Washington. By enabling mixed-use redevelopment subject to Inclusionary Zoning requirements in the Downtown zones, the proposed D-8 designation has the potential to expand housing supply—including affordable units—activate the 14th Street SW streetscape, and reinforce the area's role as a civic and mixed-use destination district, consistent with community- and stakeholder-identified goals.

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

The context surrounding 401 14th Street SW differs in important respects from a typical neighborhood zoning action. The Property is a vacant federal office building located on a block dominated by federal and institutional uses, including the U.S. Bureau of Engraving and Printing and the U.S. Holocaust Memorial Museum, with no residential tenants on site and no commercial tenants whose operations would be affected by the map amendment. The nearest residential developments are located near the Wharf area and separated from the Property by Maine Avenue SW, and the I-395 freeway. At the same time, the Property sits within the jurisdiction of the U.S. Commission of Fine Arts (“CFA”), and any future redevelopment enabled by the map amendment will be subject to CFA review and to applicable historic preservation requirements, in addition to the standard District zoning and building review processes.

These factors shaped the Applicant's outreach approach in two ways. First, because there are no residents or small business tenants on site, the Applicant's outreach will likely focus on the civic and institutional stakeholders who are most directly engaged with this area: Advisory Neighborhood Commission 2A, adjacent federal agencies and property stakeholders along the 14th

Street SW corridor; and if applicable, civic organizations engaged with Central Washington and Southwest planning.

How were your outreach efforts proactive in terms of meeting community needs and circumstances? And what was the overall timeframe and frequency of your outreach?

Recognizing the importance of early community engagement, the Applicant initiated outreach prior to filing by contacting ANC 2A leadership, including the Chair and the Single Member District Commissioner. The Applicant provided an overview of the proposed map amendment, clarified the procedural nature of the amendment and its relationship to the Comprehensive Plan and the Future Land Use Map, and explained the zoning process and anticipated timeline. This early communication was intended to ensure transparency and provide an opportunity for questions and feedback at the outset.

D. Community Input 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?***
- ***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?***
- ***What input from the community was shared but not incorporated into the zoning action? Why?***

Engagement with the ANC is still in its early stages, but the Applicant will provide an update to this section as it works more closely with the ANC and stakeholders.

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

There will be no direct or indirect displacement as a result of the proposed map amendment. The Property is a vacant federal office building with no residential tenants on site and no legacy small businesses or neighborhood-serving commercial tenants whose operations would be affected by the amendment. The Property is located in a predominantly federal and institutional area, with the U.S. Bureau of Engraving and Printing and the U.S. Holocaust Memorial Museum immediately to the north and the U.S. Department of Agriculture beyond. The nearest residential developments are located near the Wharf and are separated from the Property by Maine Avenue SW and the I-395 freeway.

While no specific project is currently proposed in connection with this amendment, the zoning could pave the way for new investment that aligns with long-standing community and planning priorities—such as mixed-use redevelopment, increased housing supply (including affordable units subject to the District's Inclusionary Zoning requirements in the Downtown

zones), and ground-floor uses that activate 14th Street SW. Any future redevelopment will also be subject to CFA review and any applicable historic preservation requirements, providing additional procedural safeguards. This process is being approached with intentional transparency and early outreach to ensure that, should a future project move forward, it reflects the goals of inclusive growth without displacement.

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

As noted above, the Applicant is in its early stages of ANC engagement. It does not have a specific project in mind and the amendment is based on the FLU Map. 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?

The zoning action is not anticipated to create negative outcomes, particularly given the absence of residential tenants or legacy small businesses on site, the physical separation of the Property from established residential neighborhoods, and the layered review framework (ANC, Zoning Commission, CFA, and applicable historic preservation review) applicable to any future redevelopment. If any concerns are raised through continued community engagement, the Applicant will address them in a subsequent filing outlining community outreach and responses closer to the set-down date.

V. PART THREE: DISAGGREGATED DATA REGARDING RACE AND 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.

VI. 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?***

The policies related to racial equity as identified in the Equity Crosswalk have been **bolded** in Part One of the Racial Equity Analysis and include:

- LU-2.1.2: Neighborhood Revitalization
- H-1.2.2: Production Targets
- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- ED-3.2.8: Certified Business Enterprise Programs
- ED-4.2.3: Focus on Economically Disadvantaged Populations
- CW-1.1.5: Central Washington Housing Diversity

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

The other policies identified on the Equity Crosswalk would be policies related to racial equity that will potentially not be advanced because of the zoning action as they are not applicable or relevant for this particular Map Amendment either given the existing/proposed zoning, or the location.

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?

Theme	Question	Anticipated Positive/Negative or Neutral Impacts
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	No displacement. The Property is a vacant federal office building with no residential tenants and no legacy small businesses or neighborhood-serving commercial tenants on site. The map amendment will not cause direct displacement of any residents or small businesses. The zoning creates the potential for future mixed-income housing, including affordable units subject to the District's Inclusionary Zoning requirements applicable in the Downtown zones, which can contribute to housing stability and expand options for

		District residents in a transit-rich, high-opportunity location.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Positive: The amendment will be subject to the District's Inclusionary Zoning requirements in the Downtown zones, supporting the production of affordable housing units in a high-opportunity, transit-accessible location and helping to mitigate broader displacement pressures in Central Washington. The introduction of mixed-use development can also create construction, operations, and retail employment opportunities. Negative (but mitigable): Over time, incremental increases in property values in the vicinity of the Property could contribute to higher tax assessments for nearby homeowners. However, DC offers a robust suite of tax relief programs (detailed above) that provide meaningful protections for eligible homeowners. In addition, the nearest established residential communities of Southwest DC are separated from the Property by I-395 and multiple blocks of federal development and function as a distinct submarket, limiting the likelihood of meaningful rent pressure resulting from this map amendment.

Housing	Will the action result in changes to: - Market Rate Housing - Affordable Housing - Replacement Housing	Positive: The Property currently contains no residential units, so no housing will be lost. The zoning enables the creation of housing that is not currently possible on the site, including both market-rate and affordable units subject to Inclusionary Zoning. Adding residential units in Central Washington advances the District's housing production goals and introduces residential population to a corridor historically dominated by single-use federal office buildings. New density may also support continued public investment in transit, infrastructure, and public realm improvements in the surrounding area. Neutral/No Impact: There is no existing housing on site, so there would be no replacement housing.
Physical	Will the action result in changes to the physical environment such as: - Public Space Improvements - Infrastructure Improvements - Arts and Culture - Environmental Changes - Streetscape Improvements	Positive: Future redevelopment enabled by the map amendment could lead to significant public realm improvements along 14th Street SW, including improved streetscapes, upgraded pedestrian infrastructure, and better connections between the National Mall, the Tidal Basin, L'Enfant Plaza, and the Southwest Waterfront. The Downtown zoning designation supports ground-floor activation and the potential introduction of arts, culture, and civic-supportive

		uses. Any future redevelopment will be subject to review by the U.S. Commission of Fine Arts and applicable historic preservation requirements, providing additional procedural safeguards to ensure that physical changes are carefully tailored to the area's civic context.
Access to Opportunity	Is there a change in access to opportunity? - Job Training/Creation - Healthcare - Addition of Retail/Access to New Services	Positive: A mixed-use redevelopment enabled by the D-8 zone could introduce ground-floor retail, restaurant, and service uses along 14th Street SW that are currently absent from this portion of the federal precinct. These amenities would expand daily access to neighborhood-serving retail in an area that functions today primarily as a single-use federal office corridor. Job creation in construction, building operations, retail, and hospitality could benefit District workers, and the Property's exceptional transit access (with the L'Enfant Plaza and Smithsonian Metrorail stations within walking distance) supports access to employment and services across the region.
Community	How did community outreach and engagement inform/change the zoning action? <i>(e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response</i>	The Applicant initiated outreach before filing, engaging ANC 2A leadership, including the Chair and the SMD Commissioner, to explain the procedural nature of the map amendment and begin a dialogue. The

	<i>to community input/priorities etc.)?</i>	Applicant is following the Commissioner's lead in structuring additional outreach and remains available to present at an ANC meeting or meet with interested stakeholders. While no specific design is yet proposed, this early engagement reflects a commitment to transparency and responsive, community-informed development. Any future redevelopment will also be subject to CFA review and applicable historic preservation requirements, providing additional structured opportunities for public and expert input into design outcomes.
Other Themes	See below	

While not listed directly in the Racial Equity tool, the Applicant has identified other themes related to racial equity in which the zoning action would create an overall positive impact:

• **Transportation and Mobility.** *How will the zoning action affect transportation infrastructure, transit access, and pedestrian safety?* The Property is located along 14th Street SW within walking distance of both the L'Enfant Plaza Metrorail station (Blue, Orange, Silver, Green, and Yellow lines) and the Smithsonian Metrorail station (Blue, Orange, and Silver lines), and is served by multiple Metrobus routes as well as VRE and Amtrak service at L'Enfant. The proposed zoning to D-8 supports high-density, transit-oriented mixed-use development in one of the most transit-rich locations in the District, consistent with Comprehensive Plan transportation policies. While the zoning change itself does not directly fund infrastructure improvements, enabling mixed-use redevelopment in this exceptionally transit-accessible location encourages walkability, reduces reliance on automobiles, and supports higher transit ridership. Future redevelopment could include streetscape enhancements, improved lighting, upgraded sidewalks, and safer pedestrian crossings along 14th Street SW, contributing to an improved public realm and stronger pedestrian connections between the National Mall, the Tidal Basin, L'Enfant Plaza, and the Southwest Waterfront.

Commercial Activation and Economic Opportunity. *How will the zoning action impact access to commercial opportunities and the economic vitality of the corridor?* The proposed D-8 zoning would permit a broader and more active mix of residential, retail, restaurant, service, and office

uses than is currently realized along this portion of 14th Street SW, which functions today primarily as a single-use federal office corridor. Aligning the zoning with the Comprehensive Plan's vision for Central Washington may enhance commercial activity along 14th Street SW and support the broader revitalization of the federal precinct envisioned by the SW Ecodistrict Plan and the Monumental Core Framework Plan. The introduction of residents and ground-floor commercial uses has the potential to support new and existing businesses in the broader Central Washington and Southwest area, including small-scale and minority-owned enterprises, consistent with the planning vision for a vibrant, mixed-use civic destination district.

Public Services and Infrastructure Capacity. *Will the zoning action affect the demand for public services (schools, emergency services, utilities, etc.)?* Any future redevelopment enabled by the D-8 zone could incrementally increase demand for public services, including schools, emergency services, and utilities. However, the Property is located within an established, transit-served urban corridor with robust existing infrastructure capacity. Additional residential and commercial development would contribute to the District's tax base, supporting continued investment in public services and neighborhood amenities. The extent of impact would depend on the scale of any future development proposal, which would be subject to additional review processes as applicable.

Environmental Sustainability and Resilience. *How will the zoning action impact environmental factors such as stormwater management, air quality, and green space?* The proposed zoning supports compact, mixed-use development in an exceptionally transit-rich area, which aligns with District sustainability goals by encouraging walking, cycling, and transit use over automobile dependence. Future development under D-8 zoning would be required to comply with current stormwater management regulations, green building standards, and energy efficiency requirements, and the SW Ecodistrict Plan specifically identifies this part of the city as a priority area for sustainability-focused reinvestment. Redevelopment could incorporate green roofs, tree planting, and other site improvements that enhance stormwater retention and reduce urban heat island effects. By directing density to a corridor already designated for growth immediately adjacent to the Monumental Core, the map amendment promotes efficient land use and environmental sustainability consistent with the Comprehensive Plan.

Crime Prevention and Public Safety. *Could the zoning action impact safety, lighting, and perceptions of crime in the neighborhood?* The 14th Street SW corridor today is characterized by single-use federal office buildings that empty out after business hours, resulting in limited pedestrian activity and minimal "eyes on the street" during evenings and weekends. The transition to D-8 zoning may facilitate the introduction of residents and active ground-floor uses along 14th Street SW, contributing to increased pedestrian activity and natural surveillance in the public realm. Improvements to lighting, storefront activation, and streetscape design that often accompany redevelopment may further support pedestrian comfort and visibility. While crime trends are influenced by many factors beyond zoning, encouraging active, mixed-use frontage

along this corridor can contribute positively to overall public safety conditions and help reverse the isolating effects of the mid-century urban form imposed on the area.

CONCLUSION

In light of the foregoing analysis, the Applicant submits that the proposed map amendment advances numerous Comprehensive Plan policies related to racial equity, transit-oriented growth, and the long-standing planning vision for Central Washington and the federal precinct south of the National Mall. Zoning the Property to D-8 will better align the zoning with the Property's designation on the Future Land Use Map and its designation on the Generalized Policy Map, and with the vision articulated in the Central Washington Area Element, the Near Southwest Area Element, the SW Ecodistrict Plan, the Monumental Core Framework Plan, and the Maryland Avenue SW Small Area Plan. The D-8 zone will permit high-density, mixed-use development—including housing subject to Inclusionary Zoning requirements—consistent with the Comprehensive Plan's vision for this part of the city.

At the same time, the zoning facilitates the conversion of a vacant federal office building into a mixed-use property that can introduce new residents, affordable housing units, ground-floor activity, and improved public realm conditions to a corridor that today functions primarily as a single-use federal office precinct. By directing growth to an established, exceptionally transit-accessible location immediately adjacent to the Monumental Core, the proposed map amendment promotes inclusive development, expands housing opportunities, and advances the reconnection of the federal precinct to the surrounding Southwest community in a manner that is consistent with the Comprehensive Plan when read as a whole, and that contributes meaningfully to the District's racial equity objectives.

Accordingly, the proposed zoning represents a logical and appropriate evolution of the 14th Street SW corridor. The requested D-8 zoning aligns the Property with the Comprehensive Plan's vision for high-density, transit-oriented, mixed-use development in Central Washington, advances the policies of the Central Washington Area Element, the Near Southwest Area Element, the SW Ecodistrict Plan, the Monumental Core Framework Plan, and the Maryland Avenue SW Small Area Plan, and supports the continued revitalization of the surrounding federal precinct. Accordingly, the Applicant respectfully requests that the Zoning Commission approve the proposed map amendment.

Respectfully Submitted,

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