

COMPREHENSIVE PLAN CONSISTENCY STATEMENT

Pursuant to Subtitle Z § 304.7(d)

Proposed Zoning Map Amendment from RA-2 to MU-10

Property	611 L Street NW, Washington, DC 20001
Square / Lot	Square 0449, Lot 0052
Applicant	611 L Street, LLC
Existing Zone	RA-2
Proposed Zone	MU-10
Future Land Use Map	CMED / RMED – Commercial Medium Density / Residential Medium Density
Generalized Policy Map	Central Washington

I. Summary

The Applicant requests a Zoning Map amendment to rezone the property located at 611 L Street NW from RA-2 to MU-10. The requested map amendment is not inconsistent with the District of Columbia Comprehensive Plan, including the Future Land Use Map (“FLUM”), the Generalized Policy Map (“GPM”), and the Comprehensive Plan’s broader policies supporting mixed-use development, efficient land use, housing opportunity, neighborhood-serving commercial activity, and reinvestment in areas near downtown, transit, and established mixed-use corridors.

II. The Property’s FLUM Designation Is a Dual Designation

The property is designated CMED and RMED on the FLUM, meaning Commercial Medium Density and Residential Medium Density. This is a dual designation. It identifies the property for both commercial and residential land use, and the Comprehensive Plan contemplates that both components will be implemented.

The existing RA-2 zone is a residential apartment zone. It implements the residential component of the designation and does not implement the commercial component. That mismatch between the property’s zone and its designation is the basis for this application.

The mismatch is dimensional as well as functional. The RA-2 zone establishes a minimum lot area of 1,800 square feet. The property contains approximately 1,620 square feet and therefore does not meet the minimum lot area requirement of the zone in which it is currently placed, as reflected in the Zoning Report issued for the property by the Office of Zoning. The property is a pre-existing lot of record that does not conform to the dimensional requirements of its own zone, which is a further indication that RA-2 was not calibrated for a parcel of this size or character.

The MU-10 zone is expressly intended to permit medium- to high-density mixed-use development with a balance of uses conducive to a higher quality of life and environment for residents, businesses, employees, and institutions, and to be applied to areas where a mixture of uses and building densities is intended to carry out elements of the Comprehensive Plan. 11-G DCMR §§ 400.9(a), 400.9(b). A balanced land use designation is properly implemented by a zone whose stated purpose is balance.

III. The MU-10 Zone Secures a Residential Component

The MU-10 zone permits a maximum density of 6.0 FAR (7.2 FAR with Inclusionary Zoning), of which no more than 3.0 FAR may be devoted to non-residential use. 11-G DCMR § 402.1. At least half of the permitted density is therefore reserved for residential use. Applied to the property's lot area of approximately 1,620 square feet, the MU-10 zone reserves approximately 4,860 square feet of permitted density for housing.

This matters for Comprehensive Plan consistency. The Mount Vernon Triangle Small Area Plan establishes a policy and urban design agenda directed toward a livable, majority residential, mixed-use neighborhood. A zone that reserves at least half of its permitted density for residential use serves that majority-residential objective directly, and does so as a matter of zone text rather than as a matter of commitment by any individual applicant.

IV. The FLUM Is a Generalized Guide

The Comprehensive Plan's Future Land Use Map is intended to provide generalized guidance for future land use and is not a zoning map. The map's own guidance states that it does not follow parcel boundaries, that its categories do not specify allowable uses or development standards, and that some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. 10-A DCMR § 225.19.

For that reason, a zoning map amendment may be appropriate where existing zoning no longer matches the future land use direction for a site. Here, the requested MU-10 zoning would better align the property with both components of its dual designation and with the Comprehensive Plan's policy direction for growth in central, transit-accessible areas.

The Applicant acknowledges that the MU-10 zone's maximum density of 6.0 FAR exceeds the density range typically associated with the Moderate Density Commercial designation (2.5 to 4.0 FAR). 10-A DCMR § 227.11. The Comprehensive Plan recognizes that greater density is possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development, and that the FLUM is a generalized guide not intended to set precise density limits. 10-A DCMR §§ 227.11, 225.19. The property is also a small lot of approximately 1,620 square feet located within the Mount Vernon Square Historic District, where any construction is subject to review by the Historic Preservation Review Board regardless of zone.

V. Efficient Use of Land in a Transit-Accessible Location

The requested rezoning supports Comprehensive Plan policies encouraging more efficient use of land in appropriate locations. The property is not located in a low-density residential neighborhood context. It is located near major activity centers, employment areas, transit access, and established mixed-use development, approximately 0.1 miles from the Mount Vernon Square / 7th Street – Convention Center Metrorail Station.

The property is currently improved with a small two-story building. The site is underutilized relative to its central location, transit access, and surrounding development context. Rezoning this property to MU-10 would help concentrate future growth in a location that can reasonably accommodate it, rather than pushing growth pressure into lower-density residential areas.

VI. Consistency with the Generalized Policy Map

The property is designated Central Washington on the GPM. The Central Washington Area Element of the Comprehensive Plan (10-A DCMR § 1600 et seq.) addresses the Mount Vernon Triangle and Mount Vernon Square areas as part of downtown Washington's broader mixed-use environment, supports increased residential and mixed-use development in the area, notes the presence of excellent transit access, and encourages the continued evolution of the area toward a vital, pedestrian-friendly, mixed-use neighborhood. The requested MU-10 zoning is not inconsistent with that designation.

VII. Development Standards Protective of Adjoining Properties

The MU-10 zone applies a maximum lot occupancy for residential use of 75 percent (80 percent with IZ), and requires a rear yard for residential use established no lower than the first level of residential use. 11-G DCMR §§ 404.1, 405.7. The minimum Green Area Ratio for the MU-10 zone is 0.20. 11-G DCMR § 407.3. These standards operate to protect adjoining properties and to preserve open area on the lot.

VIII. Conclusion

The requested map amendment would not be inconsistent with the Comprehensive Plan when viewed as a whole. The rezoning would help implement the Plan's goals for mixed-use development, housing opportunity, neighborhood vitality, economic activity, and efficient land use, and would bring the zoning of the property into closer alignment with both components of its dual CMED/RMED designation.

For these reasons, the Applicant submits that the proposed Zoning Map amendment from RA-2 to MU-10 is not inconsistent with the Comprehensive Plan and is appropriate for the property at 611 L Street NW.

Respectfully submitted,

Rich Tynes
On Behalf of: 611 L Street, LLC
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