

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

**STATEMENT IN SUPPORT OF
AN APPLICATION FOR A ZONING MAP
AMENDMENT
FROM THE RF-1 ZONE DISTRICT TO THE
ARTS-3 ZONE DISTRICT**

**1840 7TH STREET, N.W.
(SQUARE 417, LOTS 53 AND 54)**

SQUARE 417, LLC

November 15, 2019

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I.
INTRODUCTION

Square 417, LLC (the “Applicant”), the designated representative of the land owner, Howard University, submits this statement in support for an amendment of the Zoning Map of the District of Columbia (the “Zoning Map”) pursuant to 11-Z DCMR § 201.2(e) of the 2016 Zoning Regulations of the District of Columbia (“ZR16”). More specifically, the Applicant is seeking to rezone the property located at 1840 7th Street, N.W. (Square 417, Lots 53 and 54) (the “Subject Property”), from the RF-1 zone district to the ARTS-3 zone district (the “Application”). A building plat showing the lots to be rezoned is attached hereto as Exhibit A, and a portion of the Zoning Map showing the Subject Property is attached hereto as Exhibit B.

The proposed map amendment is appropriate for the Subject Property for the following reasons:

- The proposed rezoning is not inconsistent with the District Elements of the Comprehensive Plan for the Nation’s Capital (the “Comprehensive Plan”), the DUKE Plan, and the Convention Center Strategic Development Plan, which govern development at this location.
- The height and density of the proposed rezoning would be consistent with the height and density of surrounding improvements.
- The proposed uses – residential and retail – are compatible with the surrounding uses and further the Comprehensive Plan’s goals of producing new housing in the area, adding new affordable housing units to the area’s supply, creating new jobs, and improving the character and stability of the neighborhood.
- The addition of new housing units and retail uses at this location – across the street from the Shaw/Howard University Metro Station – furthers the zoning goal of mass-transit-oriented, mixed-use developments, and will encourage additional pedestrian activity at the Subject Property.

As demonstrated herein, the Application is not inconsistent with the Comprehensive Plan and other adopted public policies and active programs, including the DUKE Small Area Plan. Further, the requested rezoning will promote health, safety, and protect the general welfare, and have no adverse consequences. Rather, the proposal will create favorable conditions related to, among other things, land use, housing, transportation, and environmental protection.

II.
DESCRIPTION OF THE SUBJECT PROPERTY AND SURROUNDING AREA

The Subject Property is located in the northwest quadrant of the District and contains approximately 42,751 square feet of land area. It is bounded by 7th Street on the east; S Street on the south; a 10-foot wide public alley on the west; and T Street on the north. The Subject Property is located in Ward 1 and within the boundaries of Advisory Neighborhood Commission 1B01. As shown in Exhibit B, Square 417, including the Subject Property, is currently located in the RF-1

zone. The Subject Property is presently improved with a three-story building occupied by Howard University for office use. With a Transit Score of 83 (excellent transit) and a Walk Score of 98 (walker's paradise), the Subject Property is located within a pedestrian-oriented area with immediate proximity to transit. Indeed, the Subject Property is located immediately west of the Shaw-Howard University Metrorail station, and is also within 0.2 miles of 10 Metrobus routes.

The Subject Property is designated as Mixed-Use (Medium Density Commercial / Medium Density Residential) on the Comprehensive Plan Future Land Use Map ("FLUM"), a portion of which is attached hereto as Exhibit C. In addition, the Subject Property is designated as Neighborhood Enhancement Area on the Comprehensive Plan Generalized Policy Map ("GPM") (Exhibit D). The Subject Property is also within the boundaries of the Convention Center Area Strategic Development Plan (the "Convention Center Plan") and the Uptown Destination District (DUKE) Plan (the "DUKE Plan"), both being small area plans adopted by the D.C. Council (collectively referred to herein as the "Small Area Plans").

The properties to the north of the Subject Property, across T Street NW, are zoned ARTS-2, as are the properties to the northeast and southeast of the Subject Property. The property directly east of the Subject Property, across 7th Street, was rezoned to the ARTS/C-2-C zone district as part of a Planned Unit Development ("PUD") approved by the Zoning Commission pursuant to Z.C. Order No. 07-07, which entailed construction of a mixed-use development now called Progression Place, which has an approved density of 6.3 FAR (2.5 FAR devoted to office/retail/arts uses), and a maximum building height of 90 feet. It should be noted that the proposed ARTS-3 designation that we are seeking would result in less density on our site than at the Progression Place property directly across Seventh Street – both less FAR and a lower maximum height.

III. **EXISTING AND PROPOSED ZONING**

A. Existing Zoning

The Subject Property is currently zoned RF-1, which is described on the FLUM and the Zoning Regulations as a moderate-density residential zone. The maximum permitted building height, not including the penthouse, in the RF-1 zone district is 35 feet and 3 stories. 11-E DCMR § 303.1, except that new construction of three or more immediately adjoining residential row dwellings or flats, built concurrently on separate record lots, can have a maximum building height of 40 feet and 3 stories. 11-E DCMR § 303.2. The maximum permitted lot occupancy in the RF-1 zone is 60% for detached dwellings, semi-detached dwellings, row dwellings, flats, conversions of buildings or structures to an apartment house, and places of worship. For all other structures the maximum permitted lot occupancy is 40%. 11-E DCMR § 304.1. The minimum lot width for a row dwelling or flat is 18 feet (16 feet with Inclusionary Zoning ("IZ")), 30 feet for a semi-detached dwelling, and 40 feet for all other structures. 11-E DCMR § 201.1. The minimum lot area for a row dwelling or flat is 1,800 square feet (1,500 square feet with IZ), 3,000 square feet for a semi-detached dwelling, and 4,000 square feet for all other structures. *Id.*

B. Proposed Zoning

Pursuant to 11-Z DCMR § 201.2(e), the Applicant requests a Zoning Map amendment to rezone the Subject Property to the ARTS-3 zone district. The purposes of the ARTS Districts are, among other things, to encourage pedestrian activity, especially residential, retail, and entertainment uses; to expand business and job opportunities, and encourage development of residential and commercial buildings; and to strengthen the design character and identity of the area by means of physical design standards. 11-H DCMR § 800.1. Specifically, the ARTS-3 zone district is intended to permit medium-density, mixed-use development, with a focus on employment. 11-K DCMR § 800.4.

The maximum density in the ARTS-3 zone district is 4.0 FAR (4.8 FAR with IZ), of which no more than 2.5 FAR can be devoted to non-residential uses. 11-K DCMR § 802. In addition, pursuant to 11-K DCMR § 802, bonus density may be achieved through the provision of preferred arts uses. The maximum permitted height in the ARTS-3 zone is 75 feet, subject to the following limitations: (i) no penthouse shall exceed a height of 83.5 feet above the measuring point used for the building; and (ii) if a lot abuts either a R, RF, or RA zone or an alley that serves as the zone district boundary line of an adjacent R, RF, or RA zone, no part of the building will project above a plane drawn at a 45 degree angle from a line located 50 feet directly above the property line that abuts the R, RF, or RA zone or the alley. 11-K DCMR § 803.3. The maximum lot occupancy for residential uses is 75% (80% with IZ). 11-K DCMR § 804.1.

IV.
STANDARDS APPLICABLE TO AN APPLICATION
FOR A ZONING MAP AMENDMENT

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 Zoning Map. The Zoning Act states that the Zoning Regulations are designed to “promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital” The Zoning Act further provides that:

“[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.

V.
EVALUATION OF PROPOSED MAP AMENDMENT AND COMPLIANCE WITH
STATUTORY STANDARDS

A. Comprehensive Plan

The rezoning of the Subject Property to the ARTS-3 zone district is not inconsistent with the policies and goals of the Comprehensive Plan, including the FLUM and GPM. The Plan guides the District’s development, both broadly and in detail. 10A DCMR § 103.2. The Plan includes maps and policies for the physical development of the District, and addresses social and economic issues that affect and are linked to the development of the city and its citizens. The Plan allows the District to ensure that its resources are used wisely and efficiently and that public investment is focused in the areas where it is needed most. 10A DCMR § 100.14. Subsection 226.1(d) of the Plan provides that the “zoning of any given area should be guided by the [FLUM], interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements, as well as approved Small Area Plans.”

The Plan is not intended to be a substitute for more detailed plans nor dictate what other plans must cover. Rather it is the one document that bridges all topics and is cross cutting in its focus. The Plan provides the “big picture” of how change will be managed in the years ahead and

thus is intended to be interpreted broadly, with implementation accomplished through agency strategic plans, operational plans, long-range plans on specific topics, and focused plans for small areas of the city. See 10A DCMR § 103.5. The Comprehensive Plan reflects numerous “occasionally competing policies and goals,” and, “[e]xcept where specifically provided, the Plan is not binding.” *Id.* at 1167, 1168 (internal quotation marks omitted). Thus “the Commission may balance competing priorities” in determining whether a project would be inconsistent with the Comprehensive Plan as a whole. *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm’n*, 73 A.3d 107, 126 (D.C. 2013). Thus, if an application arguably “conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole.” *Durant I v. Dist. Of Columbia Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013).

1. Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide a generalized guide for development and conservation decisions. 10A DCMR §§ 200.5 and 226.1. The land use category descriptions on the FLUM describe the general character of development in each area, and include building heights (in stories) that are generally considered appropriate in each category. However, the granting of density bonuses may result in heights that exceed those that are stated in the land use category descriptions. 10A DCMR § 226.1(c).

The Comprehensive Plan does not require that each block “strictly correspond” with the general description of the associated land use designation on the FLUM. See Z.C. Order No. 08-15, Finding of Fact No. 74(a). Further, the “Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements for setbacks, height, use, parking, and other attributes, the Future Land Use Map does not follow parcel boundaries and its categories do not specify allowable uses or dimensional standards. By definition, the [FLUM] is to be interpreted broadly.” 10A DCMR § 226.1(a).

As shown on Exhibit C, the FLUM designates the Subject Property as Mixed-Use Medium Density Residential / Medium Density Commercial. According to the Framework Element, the Medium Density Residential FLUM category describes “neighborhoods or areas where mid-rise (4-7 stories) apartment buildings are the predominant use. Pockets of low and moderate density housing may exist within these areas. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. The RA-2 and RA-3 zones are generally consistent with the Medium Density designation, although other zones may apply.”¹ 10A DCMR § 225.5. The Medium Density Commercial FLUM designation is used to define “shopping and service areas that are somewhat more intense in scale and character than the moderate-density commercial areas. Retail, office, and service businesses are the predominant uses. Areas with this designation generally draw from a citywide market area. Buildings are generally larger and/or taller than those in moderate density commercial areas but generally do not

¹ The RA-2 and RA-3 zones under ZR16 were formerly known as R-5-B and R-5-C under ZR58, respectively.

exceed eight stories in height. The corresponding zone districts are generally MU-5, MU-6, MU-7, and MU-8, although other districts may apply.”²

A variety of zone districts can be compatible with Mixed Use designated areas depending upon the desired combination of uses, densities, and intensities, the District has developed zones specifically to accommodate mixed-use development, including the ARTS-3 zone (formerly ARTS/C-3-A under the 1958 Zoning Regulations (“ZR58”). Under ZR58, the Subject Property was zoned ARTS/C-3-A, which is now the ARTS-3 zone under ZR16. Thus, the proposed ARTS-3 zone is consistent with the C-3-A zone that is specifically identified in the Framework Element as being consistent with the Medium Density Commercial designation on the FLUM. 10A DCMR § 225.10.

The preceding discussion focused on the individual land use categories that make up the Subject Property’s Mixed Use FLUM designation. However, a “Mixed Use” designation on the FLUM is not intended to be interpreted according to its separate land use categories. Rather, “Mixed Use” on the FLUM is a specific land use category, and is primarily intended for larger areas where no single use predominates, or areas where multiple uses are encouraged. The Mixed-Use designation is assigned to areas where the mixing of two or more land uses is encouraged, but is not mandatory, and is generally applied to: (i) established, pedestrian-oriented commercial areas that also include substantial amounts of housing; (ii) commercial corridors or districts which may not currently contain substantial amounts of housing but where more housing is desired, such as the Subject Property; and (iii) large sites where opportunities for multiple uses exist but a plan dictating the precise location of these uses has yet to be prepared. 10A DCMR § 225.18. The Subject Property is consistent with the locational characteristics of areas typically assigned a Mixed Use designation. The Subject Property is located along 7th Street, a pedestrian-oriented corridor that already contains residential and commercial uses, but where much more should, and can, be accommodated given the Subject Property’s proximity to multiple modes of transit, and the DUKE Plan’s emphasis on increasing pedestrian traffic along this section of the 7th Street corridor.

The Framework Element states that the general density and intensity of development within Mixed-Use designated areas are determined by the specific mix of uses shown on the FLUM. If the desired outcome is to emphasize one use over another, the FLUM may note the dominant use by assigning it a higher density. The Area Elements may also provide detail on the mix of uses envisioned for a site. 10A DCMR § 225.19. In this case, the FLUM does not indicate a preference as both commercial and residential categories are assigned to medium density. The Near Northwest Area Element, within which the Subject Property is located, provides further guidance as to whether there is a preference for one use over another. Specifically, the Subject Property is located within the Shaw/Convention Center Area Policy Focus Area (the “Focus Area”), which includes policies that are informed by the Convention Center Plan and the DUKE Plan, both of which are discussed in further detail below. Like the Small Area Plans, the policies of the Focus Area promote residential use on the Subject Property by recommending, among other things, the creation of new quality housing, production of new affordable housing, and mixed-income residential development adjacent to the Shaw/Howard Metro station. Thus, while the FLUM does

² The MU-5, MU-6, MU-7, and MU-8 zones under ZR16 were formerly known as C-2-B, C-2-C, C-3-A, and C-3-B under ZR58, respectively.

not express a preference for either residential or commercial uses, the policies and recommendations provided by the Near Northwest Area Element and the Small Area Plans clearly promote increased residential use more than they do commercial use. Thus, the Applicant's request to rezone the Subject Property to the ARTS-3 zone district is consistent with the FLUM since the ARTS-3 zone generally favors residential use over commercial use by allowing an overall density of 4.2 FAR, but capping non-residential density at 2.5 FAR.

The proposed rezoning of the Subject Property is also consistent with the surrounding neighborhood context. As stated above, the area to the west of the Subject Property is zoned RF-1, a moderate density residential zone. Thus, owing to its ability to be a transitional zone between lower density areas and higher-density mixed use corridors, the proposed ARTS-3 zone will allow development on the Subject Property that will provide a transition between the adjacent RF-1 neighborhood and the PUD across 7th Street that is 90 feet in height and has a density of 6.3 FAR. Further, in the ARTS-3 zone, no part of the building can project above a plane drawn at a 45 degree angle from a line located 50 feet directly above the property line that abuts an R, RF, or RA zone or the alley. Consequently, the proposed ARTS-3 zone will require additional setbacks along the west side of the Subject Property, thus shifting the massing of any future building towards the higher density development along 7th Street.

2. Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. 10A DCMR § 223.1. It highlights areas where more detailed policies are necessary, both within the Comprehensive Plan and in follow-up plans, to manage this change. *Id.* The GPM is intended to “guide land use decision-making in conjunction with the Comprehensive Plan text, the FLUM, and other Comprehensive Plan maps.” *Id.* at § 223.2. Boundaries on the map are to be interpreted in concert with these other sources, as well as the actual physical characteristics of each location shown. *Id.*

As indicated on Exhibit D, the GPM designates the Subject Property as a Neighborhood Enhancement Area. The Comprehensive Plan's Framework Element describes Neighborhood Enhancement Areas as follows:

“Neighborhood Enhancement Areas are neighborhoods with substantial amounts of vacant residentially zoned land. They are primarily residential in character. Many of these areas are characterized by a patchwork of existing homes and individual vacant lots, some privately owned and others owned by the public sector or non-profit developers. These areas present opportunities for compatible small-scale infill development, including new single family homes, townhomes, and other density housing types. Land uses that reflect the historical mixture and diversity of each community should be encouraged.” 10A DCMR § 223.6.

The proposed Zoning Map amendment is consistent with the objectives for Neighborhood Enhancement Areas since it will support future redevelopment of the Subject Property with a mixed-use building that is consistent with the height and densities that exist along 7th Street and compatible with the moderate density area to the west. Additional height and density at the Subject property will allow for development that includes pedestrian-oriented ground floor storefronts and

upper story residential use. This type of redevelopment of a currently underutilized property will foster both economic and housing opportunities and serve neighborhood needs. Moreover, redevelopment of the Subject Property will support transit use given its proximity to Metrorail and other transit options; and improvements to the surrounding public space in connection with the redevelopment will enhance the pedestrian experience. As recommended for Neighborhood Enhancement Areas, the Subject Property presents an excellent opportunity for development of an infill lot that will include new housing, including affordable housing, thus enabling the type of housing diversity encouraged by the District, and most recently by the Mayor's housing initiative.

Moreover, the proposed ARTS-3 zone is not inconsistent with the Recommended Amendments to the Comprehensive Plan Future Land Use Map and the Generalized Policy Map. For the proposed Future Land Use Map, OP has recommended the Property be designated Mixed Use Medium Density Residential/Medium Density Commercial, for which ARTS-3 is a corresponding zone district. For the proposed Generalized Policy Map, OP has recommended the Property be designated Main Street Mixed Use Corridors, which are described as having a pedestrian-oriented environment with traditional storefronts. Many have upper story residential or office uses. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment. The uses and development standards permitted in the ARTS-3 Zone district promote the planning objectives of the Main Street Mixed Use Corridors designation. For reference, the relevant portions of the Recommended Amendments to the Future Land Use Map and Generalized Policy Map are attached as Exhibits E and F, respectively.

3. Near Northwest Area Element

The Subject Property is located within the Near Northwest Area Element of the Comprehensive Plan. The potential development of the Subject Property would help to foster a number of the policies listed within the Near Northwest Area Element as discussed below.

- *Policy NNW-1.1.1: Residential Neighborhoods - Maintain and enhance the historic, architecturally distinctive mixed density character of Near Northwest residential neighborhoods, including Burleith, Georgetown, Foggy Bottom, Dupont Circle, Sheridan-Kalorama, Logan Circle, Mount Vernon Square, and Shaw. Ensure that infill development within these areas is architecturally compatible with its surroundings and positively contributes to the identity and quality of each neighborhood. 10 DCMR § 2108.2.*

Replace an characterless office building with no retail area, the Zoning Map amendment will allow for new multi-family residential development at the Subject Property that will contribute to the Shaw neighborhood. Consistent with the goals of Policy NNW-1.1.1, new development will be located on an infill site and, through the height, density, and setbacks required under the proposed ARTS-3 zone district, will be compatible with surrounding development.

- *Policy NNW-1.1.2: Directing Growth - Generally direct growth within the Near Northwest Planning Area to the eastern side of the Planning Area (Logan Circle and*

Shaw), given the strong market demand and limited land available on the west side, and the need for reinvestment and renovation on the east side. 10 DCMR § 2108.3.

The Zoning Map amendment is consistent with this Policy's goal of directing growth to Shaw. Increased height and density at the Subject Property will allow for development that appropriately responds to the area's strong residential market and need for reinvestment in this portion of the Near Northwest Area Element's planning area.

- *Policy NNW-1.1.4: Neighborhood Commercial Revitalization - Improve the neighborhood shopping areas along 7th, 9th, and 11th Streets NW. The success of the established businesses on these streets should be strongly encouraged, and new businesses that provide needed goods and services to area residents should be attracted. 10 DCMR § 2108.5.*

The Zoning Map amendment will allow for the construction of a mixed-use building containing neighborhood-serving retail use on the ground floor facing 7th Street. This type of targeted retail development and use will create new opportunities for local businesses to establish in Shaw and provide easily-accessible goods and services to area residents.

- *Policy NNW-1.1.9: Affordable Housing - Protect the existing stock of affordable housing in the Near Northwest Planning Area, particularly in the Shaw and Logan Circle neighborhoods. Sustain measures to avoid displacement, such as tax relief and rent control, and to encourage the production of new affordable housing throughout the community. 10 DCMR § 2108.10.*

The Zoning Map amendment will allow for the construction of a multi-family residential building. The proposed Zoning Map amendment will not cause additional displacement since the existing building does not currently include residential uses.

4. Shaw/Convention Center Area Policy Focus Area

In addition to being consistent with the Near Northwest Area Element, the Zoning Map amendment is also consistent with the Shaw/Convention Center Area Policy Focus Area within the Near Northwest Area Element. As part of its description of this Policy Focus Area, the Comprehensive Plan references the Convention Center Plan, which is intended to guide private and public investment in the area. The Comprehensive Plan identifies several issues for the area, including the need to generate new quality housing, revitalize local businesses, improve sidewalks and public space, and upgrade parks and public facilities. 10A DCMR § 2111.3. Consistent with these goals, the Zoning Map amendment will foster the development of quality new housing and ground floor retail and service uses. Redevelopment of the Subject Property will also incorporate public space improvements adjacent to the Subject Property that will enhance the pedestrian experience.

The Comprehensive Plan establishes a number of policies in response to the goals and recommendations set forth in the Convention Center Plan. The Comprehensive Plan notes that the Convention Center Plan defines specific actions and municipal programs to preserve and enhance the quality of life for residents living in the study area. For example, the Convention Center Plan

“calls for maintaining the current number of affordable housing units, targeting commercial development to sites where it is most likely to benefit the community, and providing a clear hierarchy of streets and public spaces.” 10A DCMR § 2111.4. The proposed Zoning Map amendment will enable these goals by allowing for development of additional affordable housing at the Subject Property with neighborhood-serving retail use at the ground floor to benefit the community.

Moreover, the Zoning Map amendment is consistent with a variety of policies within the Shaw/Convention Center Area Policy Focus Area of the Comprehensive Plan as discussed below.

- *Policy NNW-2.1.1: Affordable Housing - Protect existing affordable housing within the Shaw/Convention Center area, and produce new affordable housing and market rate housing on underutilized sites. Use a range of tools to retain and develop affordable housing in the study area, including tenant organization and public education, inclusionary zoning, renewing project-based Section 8 contracts, tax abatements, public-private partnerships, and including affordable housing when development on publicly owned land includes a residential component. 10 DCMR § 2111.5.*

The Zoning Map amendment will help foster the development of new affordable housing at the Subject Property, which is currently underutilized.

- *Policy NNW-2.1.3: Shaw/Howard University and Mount Vernon - Square Metro Stations Encourage mixed-income residential development with underground parking adjacent to the Shaw/Howard and Mount Vernon Square Metro stations, particularly on existing surface parking lots. 10 DCMR § 2111.7.*

As specifically recommended by Policy NNW 2.1.3, the Zoning Map amendment will encourage the development of a mixed-income residential project adjacent to the Shaw/Howard University Metrorail station.

- *Policy NNW-2.1.5: 7th and 9th Street Corridors - Locate retail development within the Shaw/Convention Center Area in a manner that best serves residents, creates the best environment for businesses to succeed, and uses land already zoned for commercial uses. Continuous ground floor retail uses should be encouraged along sections of 7th and 9th Streets as designated in the 2005 Strategic Development Plan to create a traditional pedestrian-oriented Main Street pattern and establish a unified identity for the community. These corridors should attract convention-goers, residents, and visitors, and should include both new and existing businesses. 10 DCMR § 2111.9.*

Consistent with the objectives of Policy NNW-2.1.5, the Zoning Map amendment will allow for retail development along 7th Street as recommended in the Convention Center Plan. This will create a pedestrian-oriented, “main street” experience and attract a variety of residents, visitors, and businesses to the area.

- *Action NNW-2.1.D: New Housing - Provide incentives for mixed-income housing above retail space on 7th and 9th streets, and encourage development of multi-family apartments and condominiums on parcels that are vacant or that contain buildings identified as non-contributing to the Shaw Historic District on 11th Street. 10 DCMR § 2111.16.*

Consistent with this action element, the Zoning Map amendment will allow for the development of mixed-income housing above ground floor retail on 7th Street. These proposed uses will be enabled through development of a new multi-family building on an underutilized parcel, which is fully consistent with the goal of producing new housing in the area.

5. Land Use Element

The Land Use Element is the cornerstone of the Comprehensive Plan. It establishes the basic policies guiding the physical form of the city, and provides direction on a range of development, conservation, and land use compatibility issues. The Land Use Element describes the balancing of priorities that must take place in order to accommodate a multiplicity of land uses within the boundaries of the District of Columbia. 10A DCMR § 300.1. Because the Land Use Element integrates the policies and objectives of all the other District Elements, “it should be given greater weight than the other elements as competing policies in different elements are balanced.” 10A DCMR § 300.3.

The District’s underlying goal of the Land Use Element is to:

[e]nsure the efficient use of land resources to meet the long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries. 10A DCMR § 302.1.

The proposed Zoning Map amendment will advance this important goal by complying with the policies listed below and set forth in the Land Use Element of the Comprehensive Plan.

- *Policy LU-1.3.2: Development Around Metrorail Stations - Concentrate redevelopment efforts on those Metrorail station areas which offer the greatest opportunities for infill development and growth, particularly stations in areas with weak market demand, or with large amounts of vacant or poorly utilized land in the vicinity of the station entrance. Ensure that development above and around such stations emphasizes land uses and building forms which minimize the necessity of automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. 10A DCMR § 306.11*

The proposed Zoning Map amendment will support new multifamily development around Metrorail stations. The Subject Property is located across the street from the Shaw-Howard University Metrorail station and on land that is underutilized. Due to its transit-oriented location,

future development enabled by the Zoning Map amendment will minimize automobile use and maximize transit ridership.

- *Policy LU-1.3.3: Housing Around Metrorail Stations - Recognize the opportunity to build senior housing and more affordable “starter” housing for first-time homebuyers adjacent to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations. 10A DCMR § 306.12*

Consistent with this policy, the Zoning Map amendment will allow for multifamily development at the Subject Property that will include new affordable housing in proximity to the Shaw-Howard Metrorail station. New multifamily development in this location will reduce the need to own a private vehicle and thus decrease overall household expenses for residents who are impacted the most.

- *Policy LU-1.4.1: Infill Development - Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create “gaps” in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern. 10A DCMR § 307.5*

Future redevelopment of the Subject Property permitted by the proposed Zoning Map amendment will allow for additional development on land that is underutilized and creates a gap in the surrounding urban fabric. New development will be consistent with the ARTS-3 zone district, which is a zone that allows for heights and densities that are consistent with the surrounding neighborhood, and will complement the established character of the area.

- *Policy LU-2.1.1: Variety of Neighborhood Types - Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future. 10A DCMR § 309.5*

Redevelopment of the Subject Property under the ARTS-3 zone district will not have negative impacts on the existing identity and character of the neighborhood because it will rehabilitate and activate the site, provide much-needed new market-rate and affordable housing, and generally be a positive attribute that helps to improve the area. Moreover, through upper-level setbacks required under the ARTS-3 zone district the density and massing of any future building on the Subject Property will be weighted towards 7th Street, and away from the moderate density residential area to the west.

- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods - Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to “create successful neighborhoods” in all parts of the city*

requires an emphasis on conservation in some neighborhoods and revitalization in others. 10A DCMR § 309.8

The proposed Zoning Map amendment will allow for increased housing supply, including affordable housing, and will utilize sustainable elements to help restore the environment since any development on the Subject Property will have to comply with the District of Columbia's Green Building Act of 2006 (D.C. Official Code §6-1451.01 *et seq.* (2012)) and the District's storm water management regulations (Title 21 DCMR, Chapter 5 and Title 20 DCMR, Chapter 31).

- *Policy LU-2.2.4: Neighborhood Beautification - Encourage projects which improve the visual quality of the District's neighborhoods, including landscaping and tree planting, façade improvement, anti-litter campaigns, graffiti removal, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements. 10A DCMR § 310.5*

As part of any redevelopment project enabled by the Zoning Map amendment, the public streetscape surrounding the Subject Property will be improved to meet the District Department of Transportation ("DDOT") standards and will beautify the public space adjacent to the Subject Property.

6. Housing Element

The District's overarching goal for housing is to "[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia. 10A DCMR § 501.1. The proposed Zoning Map amendment will advance this goal and several policies within the Housing Element of the Comprehensive Plan as discussed below.

- *Policy H-1.1.1: Private Sector Support - Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 10A DCMR § 503.2*

Through the Zoning Map amendment, the Subject Property can be developed with new market-rate and affordable housing to help meet the needs of present and future District residents. Under the existing RF-1 zone district, multi-family dwellings are only permitted in a very limited number of circumstances, which significantly limits the ability to take advantage of the Subject Property's proximity to transit and several other amenities. Consistent with the Mayor's housing initiative, the proposed Zoning Map amendment will allow for greater amounts of new housing in a "high opportunity" location. The proposed location for new housing is consistent with the District's land use goals, as noted above, as well as with related transportation goals, which encourage development surrounding public transportation options.

- *Policy H-1.1.3: Balanced Growth - Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing. 10A DCMR § 503.4*

The Zoning Map amendment will allow for the development of new multifamily housing on underutilized land. The proposed Zoning Map amendment, which is consistent with the FLUM, will help to ensure that the Subject Property is appropriately zoned to help the city meet its long-term housing needs.

- *Policy H-1.1.5: Housing Quality - Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood. 10A DCMR § 503.6*

Any future affordable housing developed at the Subject Property, and enabled by the Zoning Map amendment, would be included as part of the building's overall design, creating mixed income building in which affordable units will be indistinguishable from market rate units when viewing the building's facades and thus achieving the same high-quality standards required for the market-rate housing.

- *Policy H-1.2.1: Affordable Housing Production as a Civic Priority - Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city. 10A DCMR § 504.6*
- *Policy H-1.2.3: Mixed Income Housing - Focus investment strategies and affordable housing programs to distribute mixed income housing more equitably across the entire city, taking steps to avoid further concentration of poverty within areas of the city that already have substantial affordable housing. 10A DCMR § 504.8*

The proposed ARTS-3 zone district will allow for the future development of new affordable housing at the Subject Property.

- *Policy H-1.2.5: Workforce Housing - In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, fire fighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city. 10A DCMR § 504.12*

The proposed ARTS-3 zone district will enable the development of affordable housing at the Subject Property, including housing that is affordable for individuals working in the public service professions with wages insufficient to otherwise afford market-rate housing.

- *Policy H-1.3.1: Housing for Families - Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments. 10A DCMR § 505.6*

- *Policy H-1.3.2: Tenure Diversity - Encourage the production of both renter-occupied and owner-occupied housing. 10A DCMR § 505.7*

The ARTS-3 zone district will enable the future development of a range of housing types and tenures, including larger units for families.

7. Transportation Element

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

The proposed Zoning Map amendment advances this goal by allowing for new residential development on property located one block away from a major District corridor and in immediate proximity to a Metrorail station and multiple Metrobus routes. The Zoning Map amendment also advances the specific policies discussed below.

- *Policy T-1.1.4: Transit-Oriented Development - Support transit-oriented development by investing in pedestrian-oriented transportation improvements at or around transit stations, major bus corridors, and transfer points. 10A DCMR § 403.10*
- *Policy T-2.4.1: Pedestrian Network - Develop, maintain, and improve pedestrian facilities. Improve the city’s sidewalk system to form a network that links residents across the city. 10A DCMR § 410.5*

The Zoning Map amendment will support transit-oriented development by allowing for the construction of new mixed-use development within immediate proximity to the Shaw-Howard Metrorail station and multiple Metrobus routes that connect to all areas of the District. As part of redevelopment of the Subject Property, the Applicant will also improve the streetscape surrounding the Subject Property to ensure that pedestrians have safe and convenient pathways to access the public transportation options.

- *Action T-1.1.B: Transportation Improvements - Require transportation demand management measures and transportation support facilities such as crosswalks, bus shelters, transit resource and information kiosks, and bicycle facilities in large development projects and major trip generators, including projects that go through the Planned Unit Development (PUD) Process. 10A DCMR § 403.14*
- *Policy T-3.1.1: Transportation Demand Management (TDM) Programs - Provide, support, and promote programs and strategies aimed at reducing the number of car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system. 10A DCMR § 414.8*

If the Zoning Map amendment is granted, the Applicant will be able to redevelop the Subject Property, which will involve collaboration with DDOT to ensure that appropriate Transportation

Demand Management measures and transportation support facilities are implemented in connection with development of the Subject Property.

- *Action T-2.3.A: Bicycle Facilities - Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users. 10A DCMR § 409.11*

Future redevelopment of the Subject Property will include both long- and short-term bicycle parking spaces for residents as well as retail employees and end users.

8. Environmental Protection Element

The Environmental Protection Element addresses the protection, restoration, and management of the District's land, air, water, energy, and biologic resources. 10A DCMR § 600.1. The overarching goal for environmental protection is to "[p]rotect, restore, and enhance the natural and man-made environment in the District of Columbia, taking steps to improve environmental quality, prevent and reduce pollution, and conserve the values and functions of the District's natural resources and ecosystems." 10A DCMR § 601.1. The proposed Zoning Map amendment is consistent with this goal and with the specific policies discussed below.

- *Policy E-1.1.1: Street Tree Planting and Maintenance - Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods. 10A DCMR § 603.4*
- *Policy E-1.1.2: Tree Requirements in New Development - Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. 10A DCMR § 603.5*
- *Policy E-1.1.3: Landscaping - Encourage the use of landscaping to beautify the city, enhance streets and public spaces, reduce storm water runoff, and create a stronger sense of character and identity. 10A DCMR § 603.6*
- *Policy E-2.2.1: Energy Efficiency - Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve reductions in per capita energy consumption by DC residents and employees. 10A DCMR § 610.3*
- *Policy E-2.2.4: Alternative Energy Sources - Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuel cells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide*

opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. 10A DCMR § 610.6

- *Policy E-2.2.5: Energy Efficient Building and Site Planning - Include provisions for energy efficiency and for the use of alternative energy sources in the District's planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals. 10A DCMR § 610.7*
- *Policy E-3.1.1: Maximizing Permeable Surfaces - Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb storm water and reduce urban runoff. 10A DCMR § 613.2*
- *Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff - Promote an increase in tree planting and landscaping to reduce storm water runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. 10A DCMR § 613.3*
- *Policy E-3.1.3: Green Engineering - Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. 10A DCMR § 613.4*
- *Policy E-3.2.1: Support for Green Building - Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. 10A DCMR § 614.2.*

In accordance with the Policies listed above, future development of the Subject Property enabled by the Zoning Map amendment, will incorporate energy-efficient systems to reduce energy use and provide alternative energy sources to contribute to the District's energy efficiency goals. Redevelopment of the Subject Property will be required to comply with the Green Building Act and the District's storm water management regulations, and will be consistent with the Sustainable DC Plan.

B. Small Area Plans

The Comprehensive Plan requires zoning to be "interpreted in conjunction with... approved Small Area Plans." 10A DCMR § 266.1(d). The Comprehensive Plan also states that small area policies appear in "separately bound Small Area Plans for particular neighborhoods and business districts. As specified in the city's municipal code, Small Area Plans provide supplemental guidance to the Comprehensive Plan. Prior to 2006, the Subject Property was designated as Mixed-Use (Low Density Commercial / Moderate Density Residential) on the FLUM. However, during the 2006 Comprehensive Plan amendment cycle the policies and recommendations of the Convention Center Plan and the Duke Plan were incorporated into the

Comprehensive Plan and the Subject Property was designated Mixed Use (Medium Density Commercial / Medium Density Residential).

1. The Convention Center Strategic Development Plan

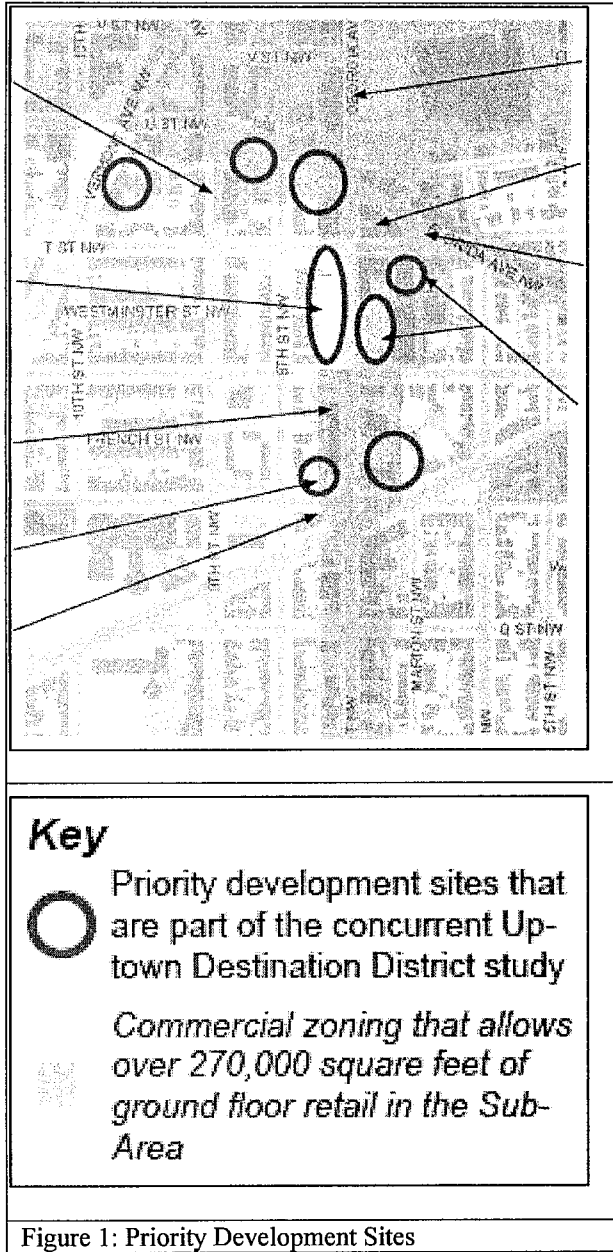


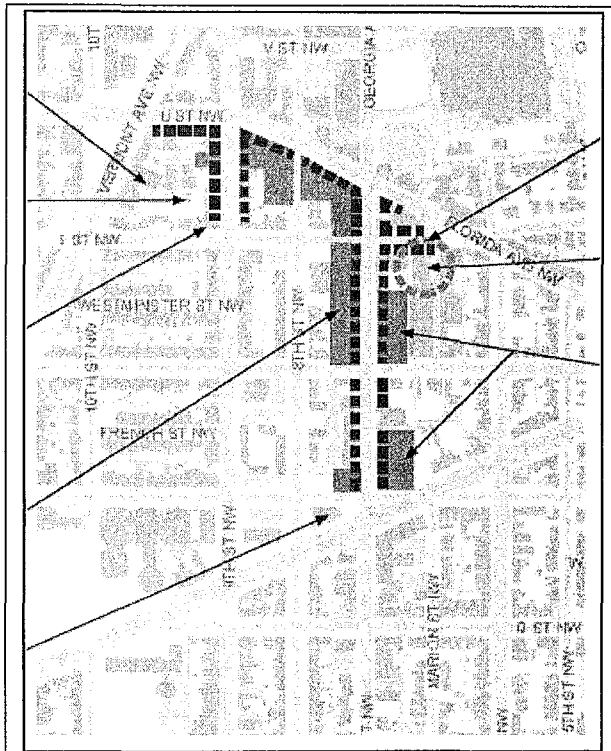
Figure 1: Priority Development Sites

The Subject Property is located within the boundaries of the Convention Center Plan, which was prepared to help the District and the community guide development to realize several key objectives. Among those objectives is to: (i) generate quality housing that will ensure that the community remains demographically diverse and offers a wide range of housing types; and (ii) strengthen neighborhood businesses by attracting new businesses in Shaw through capital investment that meets the needs of visitors and tourists and creates job opportunities and tax revenues for local services. *See* Convention Center Plan, p. 2.

Consistent with these stated objectives, the proposed Zoning Map amendment will enable development of high quality housing and affordable housing on an underutilized site to ensure that the community remains demographically diverse. The Zoning Map Amendment will also facilitate development of ground floor retail use on 7th Street, which is a street specifically prioritized in the Convention Center Plan for new mixed-use development. Doing so will strengthen the local economy by creating space for new retailers, generating job opportunities for District residents, producing additional tax revenue for the city, and providing goods and services to meet the needs of visitors and residents to the neighborhood.

The Subject Property is located within the Convention Center Plan’s Uptown Destination District sub-area, where streets are “lined with ground floor shops, restaurants and clubs. Activity spills onto the sidewalks, which are furnished with new trees, lights and public art.” *Id.* at 36. The upper level of some buildings within the Uptown Designation District are “residential; the larger projects include affordable units.. As shown on the map on page 36 of the Convention Center Plan (Figure 1), the Subject Property is highlighted as a “priority development site,” and as shown on the map on page 37 (Figure 2), the Subject Property is designated as a

“potential site for high and medium density residential development.” *Id.* at 37 (emphasis added). Moreover, the Subject Property is located along 7th



Encourage new and infill construction with ground floor retail and residences above with target for 20-30% of units being affordable.

Key



Preferred location of ground floor retail



Potential sites for high and medium density residential

Figure 2: Sites for High and Medium Density Residential

Street, NW, which is identified as a “preferred location of ground floor retail.” In these locations, the Convention Center Plan encourages new and infill construction with ground floor retail and residences above.

The Zoning Map amendment will enable the exact type of development envisioned for the Subject Property by the Convention Center Plan. The Subject Property is specifically identified as a “priority development site” for medium and high density residential development, and is a “preferred location of ground floor retail.” Consistent with this vision, the Zoning Map amendment will facilitate construction of a medium-density mixed use project containing residential and ground floor retail uses. The increased height and density will allow for the incorporation of significant new affordable housing.

The Zoning Map amendment will also help to advance the more general policies set forth in the Convention Center Plan for future development of the neighborhood. The Convention Center Plan’s Development Guide Framework sets forth the following recommendations and implementation tools to create dense residential and retail development in the study area: (i) maintain or increase the existing number of affordable housing units; (ii) concentrate multi-unit buildings in areas with good access to mass transit; (iii) maximize development opportunities on sites suitable for multiple-unit buildings; and (iv) reinforce existing patterns of residential development. *Id.* at 23.

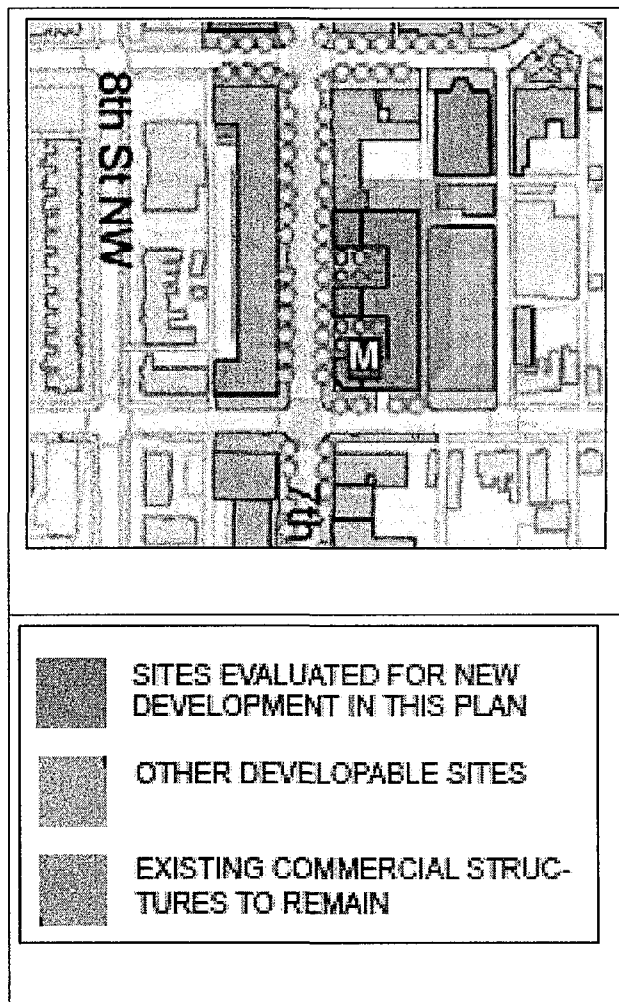
The requested Zoning Map amendment is consistent with the principles listed above because it will allow for dense residential

development with significant new housing and affordable housing on an underutilized site. New development at the Subject Property will be located in very close proximity to multiple forms of public transportation, including the Shaw-Howard University Metrorail station and numerous

Metrobus routes. Moreover, the Subject Property is located at the intersection of several active, mixed-use streets, such that the density and height achieved through the proposed Zoning Map

Amendment will enable development of a building that will reinforce existing development patterns in the neighborhood.

The Convention Center Plan's Development Guide Framework also establishes principles for guiding retail growth to best serve residents and create the best environment for businesses to exceed. These principles include: (i) concentrating ground floor retail in locations that reinforce a traditional main street pattern of commercial development and creates a unified identify for the community; (ii) develop a retail corridor that will attract convention goers, tourists and residents from other parts of the DC metropolitan area; and (iii) create a successful retail environment that includes mixed-use developments with old and new businesses. *Id.*



The Development Guide Framework also states that the streets, parks, and other open spaces in the study area should be conducive to the types of activities that promote community, attract visitors, and address multiple needs. Increased height and density at the Subject Property will generate new development with ground floor retail that will reinforce and extend the traditional main street pattern of commercial use along 7th Street and provide new opportunities for local businesses to thrive. Retail at the Subject Property could be developed as either destination or neighborhood-serving retail, which will attract visitors from all parts of the region in addition to local residents of the immediate area. Consistent with the Convention Center Plan's specific recommendation, the Zoning Map amendment will facilitate a successful retail environment within a mixed-use development.

Figure 3: Sites Evaluated for New Development

2. The DUKE Plan

The Subject Property is located within the boundaries of the DUKE Plan. The DUKE Plan provides direction to the community, private sector and public agencies in revitalizing the neighborhood to achieve a cohesive and inclusive district that meets the community and District government development goals. *See* Duke Plan at p. 4. The Duke Plan calls for “land use adjustments that can be implemented through amendments to the zoning map, planned unit developments, and amendments to the zoning text [and] [t]his Plan provides additional guidance to the Zoning Commission as they consider zoning actions for the area.” *Id.* at 37.

As shown on the map at [Figure 3](#), the Duke Plan identifies the Subject Property as an “other developable site.” *Id.* 9-10. In addition, The Duke Plan places the Subject property within the Howard Theater sub-district. The Howard Theater Sub-district recommends demolishing Howard’s “125 bed site [to] allow mixed-use redevelopment, including active, ground floor retail, which complement other proposed destination uses and optimized density. *Id.* at pg. 14.

C. Health, Safety, and General Welfare

The proposed Zoning Map amendment would further the public health, safety, and general welfare of the District of Columbia. The requested rezoning to the ARTS-3 zone district will provide for the redevelopment of an underutilized site that will put the Subject Property back to productive use and contribute to the Shaw neighborhood in a manner that is compatible with surrounding development and previous development on the Subject Property. By permitting medium density, mixed-use development at the Subject Property, the proposed Zoning Map amendment will protect the health and safety of District residents by rehabilitating an underutilized property with an active use that will provide new housing and affordable housing and generate additional activity in the neighborhood. The Zoning Map amendment will also promote the general welfare through the jobs created as a result of the redevelopment of the Subject Property, both short-term and long-term, and through new revenue for the District government generated by individual income tax, property tax, and sales taxes.

D. No Adverse Consequences

The Zoning Map amendment will not result in the overcrowding of land or the undue concentration or population, nor will it have any significant adverse impacts on traffic congestion in the surrounding area. The Zoning Map amendment will allow redevelopment of an underutilized site with immediate access to Metrorail and Metrobus. It will return an underutilized property to a more active, productive use, thereby enhancing the quality of the entire community and increasing revenue for the District. The Zoning Map amendment will not generate any negative external effects, but will instead promote the efficient use of high-value land in a manner that will, among other things, enhance the city's affordable housing stock and preservation of historic assets.

E. Proposed ARTS-3 Zone Would Create Favorable Conditions


As discussed above, the proposed Zoning Map amendment will advance a number of policies embodied in the various elements of the Comprehensive Plan. The Zoning Map amendment will not generate any negative external effects, but will instead promote the efficient use of high-value land in a manner that will, among other things, enhance the city's affordable housing stock and preservation of historic assets.

**VI.
CONCLUSION**

For all of the reasons stated herein, the Applicant submits that the proposed rezoning of the Subject Property from the RF-1 zone district to the ARTS-3 zone district meets all of the requirements for an amendment to the Zoning Map. The proposed Zoning Map amendment is consistent with the District's plans and policies for the Subject Property. Furthermore, the proposed rezoning is not inconsistent with the Comprehensive Plan and will further each of the specific objectives set forth in the Zoning Act. Accordingly, the Applicant respectfully requests that the Commission schedule a public hearing on this application and grant the requested Zoning Map amendment.

Respectfully submitted,

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By: 
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