

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: *JL for* Jennifer Steingasser
Deputy Director for Development Review & Historic Preservation

DATE: November 9, 2018

SUBJECT: ZC Case #18-12 – Setdown Report for a Petition to Rezone Square 2568, Lot 808 from RA-4 and RA-2 to only RA-2

I. BACKGROUND

This petition has been filed by the Keep Meridian Hill Green Association (“Petitioner”) to rezone the portion of the property at Square 2568, Lot 808, currently zoned RA-4 to RA-2¹. The property is located at the intersection of 16th Street and Belmont Street and 16th Street and Crescent Place, and is not owned by the Petitioner, but rather owned by Meridian House International (“MHI” or “Owner”)².

II. RECOMMENDATION

On its face the existing RA-4 zone is not inconsistent with the Comprehensive Plan as a whole. However, the petitioner has identified policy direction which can be interpreted as being supportive of a downzoning, and the relevant ANC, ANC 1C, has issued a memorandum in support of setdown (Exhibits 12 and 13). As such, if the Commission feels that the proposal has sufficient merit, OP recommends the following:

1. The case be set down for a public hearing to allow the issue to be fully vetted in a public forum.
2. An accompanying text amendment to Subtitle F § 301 also be set down that makes the property conforming to the BZA approval in case 19689:

¹ The property in question is currently split-zoned between RA-2 and RA-4

² The petition is for a rezoning of the land, that was also the subject of a Board of Zoning Adjustment (“Board” or “BZA”) case, which the Board approved on July 25, 2018. Regardless of the outcome of the present rezoning petition, the project is considered vested pursuant to Subtitle A § 301.7, which reads “*All applications for building permits authorized by orders of the Board of Zoning Adjustment may be processed in accordance with the Zoning Regulations in effect on the date the vote was taken to approve the application...*”. The Zoning Regulations are defined to include the Zoning Map (Subtitle A § 100), therefore applications for a building permit for the project could be processed in accordance with the Zoning Map that includes the RA-4 zone.

301 DEVELOPMENT STANDARDS

301.1 The development standards in Subtitle F §§ 302 through ~~307~~ **308** modify the general development standards in Subtitle F, Chapter 2.

308 MISCELLANEOUS

308.1 The expansion of the Meridian International Center, as well as construction of a new multifamily dwelling approved by the Board of Zoning Adjustment in case 19689, shall be considered a conforming use and structure in the RA-2 zone, but shall not be permitted to expand.

3. The property owner also be permitted to separately present its “case” and that whatever time is allowed the petitioner will also be allowed the owner.

Section 506.4 (c) of the Zoning Commission’s Rules of Practice and Procedure (Subtitle Z) permit the petitioner in a rulemaking proceeding to separately present its “case.” Because the petitioner in this case is not the owner of the property, and because this is a downzoning, the Office of Planning, with the concurrence of the Office of the Attorney General, recommend that the Notice of Public Hearing indicate that the property owner also will be permitted to separately present its “case” and that whatever time is allowed the petitioner to do that will also be allowed the owner.

III. APPLICATION-IN-BRIEF

Applicant	Keep Meridian Hill Green Association (KMHGA)
Proposed Map Amendment	A portion of the lot from RA-4 to RA-2 (the remainder of the lot is currently zoned RA-2)
Address	2300 16 th Street, NW
Ward and ANC	1, 1C
Legal Description	Square 2568, Lot 808
Property Size	32,983 sf (~12,995 sf RA-2, ~19,988 sf RA-4)
Generalized Policy Map Designation	Neighborhood Conservation Area
Future Land Use Map Designation	Moderate Density Residential
Historic District	Meridian Hill Historic District

IV. SITE AND AREA DESCRIPTION

The subject property is located on 16th Street between Belmont Street and Crescent Place. The following aerial photos help illustrate the neighborhood context of the site.



The property is currently used as a parking lot for the Meridian Center, which is housed in the two historic mansions to the west. Much of the site is today surrounded by a tall, brick retaining wall and fence. The site generally slopes down from north to south and from west to east. There is a sloping “parking” (landscaped”) area of over 50 feet in width separating the property from 16th Street NW. This stretch of 16th Street is characterized by larger-scale apartment buildings, with some lower-scale development like rowhouses also present, and the large NPS Meridian Hill Park. The immediately surrounding properties are as follows:

- North – The Envoy apartments
- West – White-Meyer House (historic mansion)
- South – Beekman Place Condominium (rowhouses)
- East – Meridian Hill Park

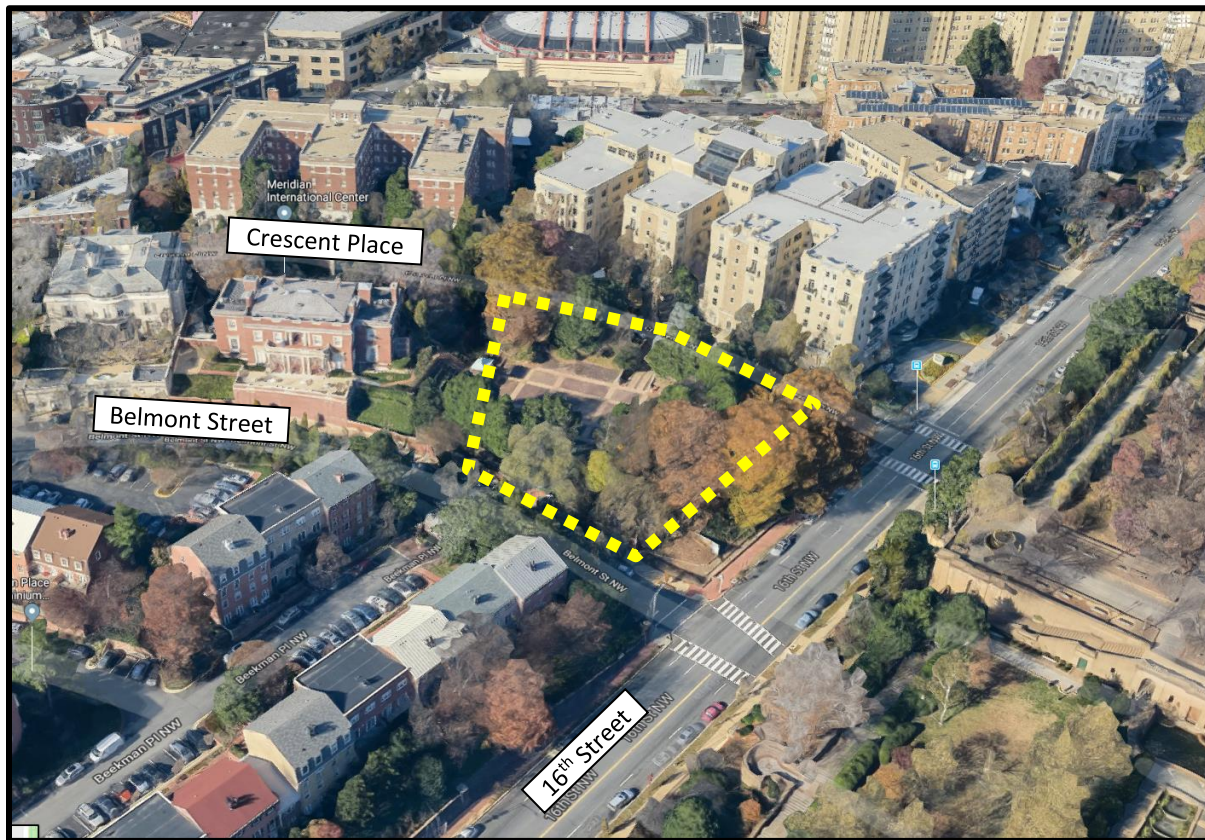


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V. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

Subtitle F § 300 describes the purposes of the RA zones:

300.1 The purposes of the RA-1, RA-2, RA-3, RA-4, and RA-5 zones are to:

- (a) Permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and*
- (b) Permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones.*

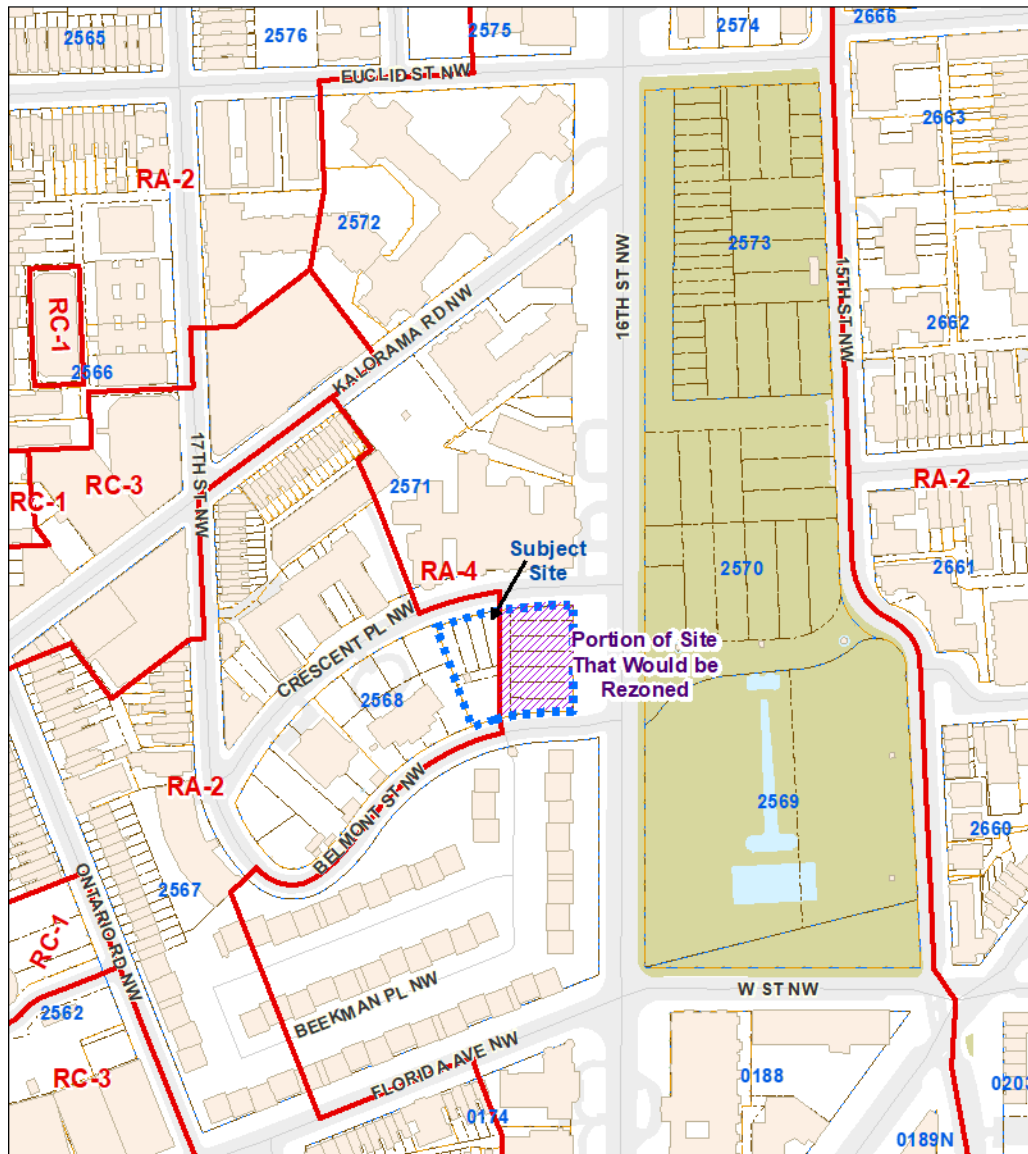
[...]

300.3 The RA-2 zone provides for areas developed with predominantly moderate density residential.

[...]

300.5 The RA-4 zone provides for areas developed with predominantly medium- to high-density residential.

Below is a zoning map of the subject site and surrounding area, showing the current zoning.



The following table describes the differences in development standards between RA-4 and RA-2.

	Existing Zone: RA-4	Proposed Zone: RA-2	Difference
Permitted Uses	Subtitle U Chapter 4, principally multi-family residential	Subtitle U Chapter 4, principally multi-family residential	No change
FAR F § 302	3.5 max. 4.2 max. w/ IZ	1.8 max. 2.16 max. w/ IZ	-1.7 FAR -2.04 FAR
Height F § 303	90 feet max.	50 feet max.	-40 feet
Penthouse Height F § 303.2	20 feet max.	12 feet max. 15 feet mechanical max	-5 to 8 feet
	1 story plus mezzanine, plus additional story for mech	1 story, plus additional story for mech.	- mezzanine

	Existing Zone: RA-4	Proposed Zone: RA-2	Difference
Lot Occupancy F § 304	75 % max.	60 % max.	-15%
Rear Yard F § 305	4 in./ft. of height 15 feet min.	4 in./ft. of height 15 feet min.	No change
Side Yard F § 306	None required 4 feet min. if provided	None required 4 feet min. if provided	No change
GAR F § 307	0.3 min.	0.4 min.	+0.1
Vehicle Parking C § 701.5	For multifamily residential: 1 per 3 units in excess of 4 units	For multifamily residential: 1 per 3 units in excess of 4 units	No change
Bike Parking C § 802.1	For multifamily residential: Long term: 1 space for each 3 d.u. Short term: 1 space for each 20 d.u.	For multifamily residential: Long term: 1 space for each 3 d.u. Short term: 1 space for each 20 d.u.	No change
Loading C § 901.1	Multifamily > 50 units 1 loading berth and 1 delivery space	Multifamily > 50 units 1 loading berth and 1 delivery space	No change

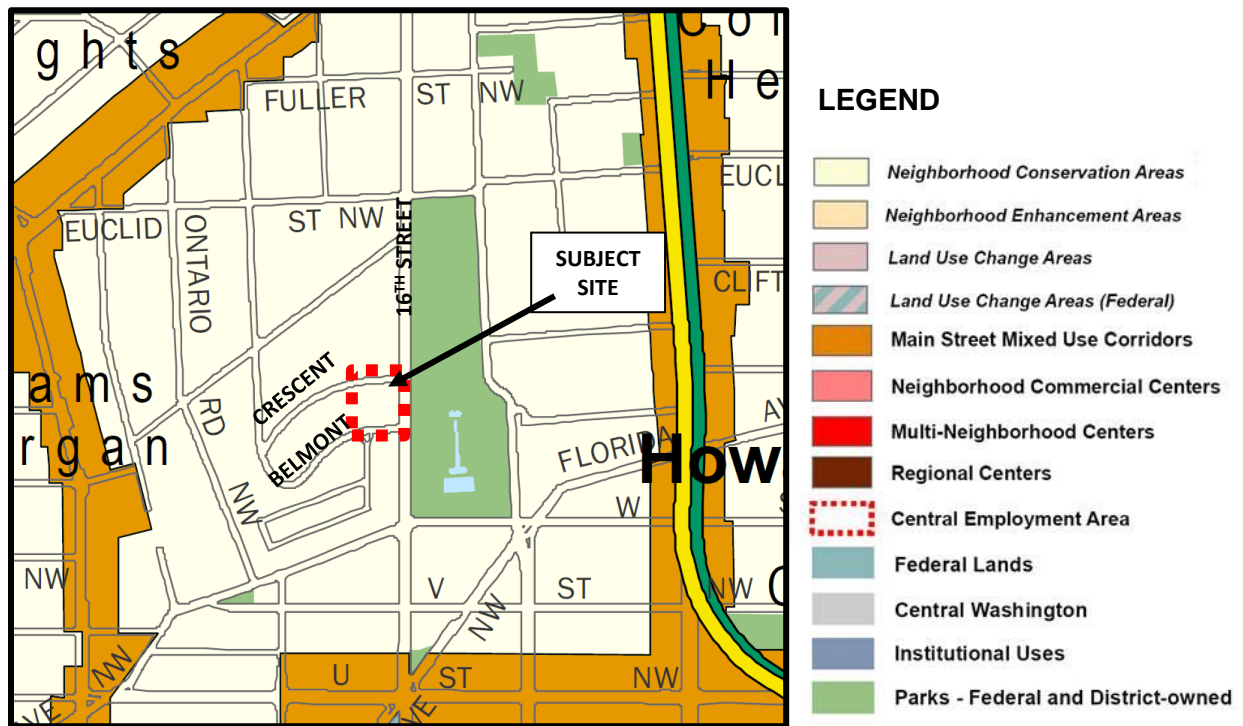
VI. COMPREHENSIVE PLAN

A. COMPREHENSIVE PLAN MAPS

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226; Attachment I), the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps. The maps, in and of themselves, do not establish detailed requirements or permissions for a development’s physical characteristics including building massing, density or height; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

Generalized Policy Map

The Comprehensive Plan’s Generalized Policy Map describes the subject area as a Neighborhood Conservation Area.



The Plan defines Neighborhood Conservation Areas as follows.

Neighborhood Conservation areas have very little vacant or underutilized land. They are primarily residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will be modest in scale and will consist primarily of scattered site infill housing, public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated.... 223.4

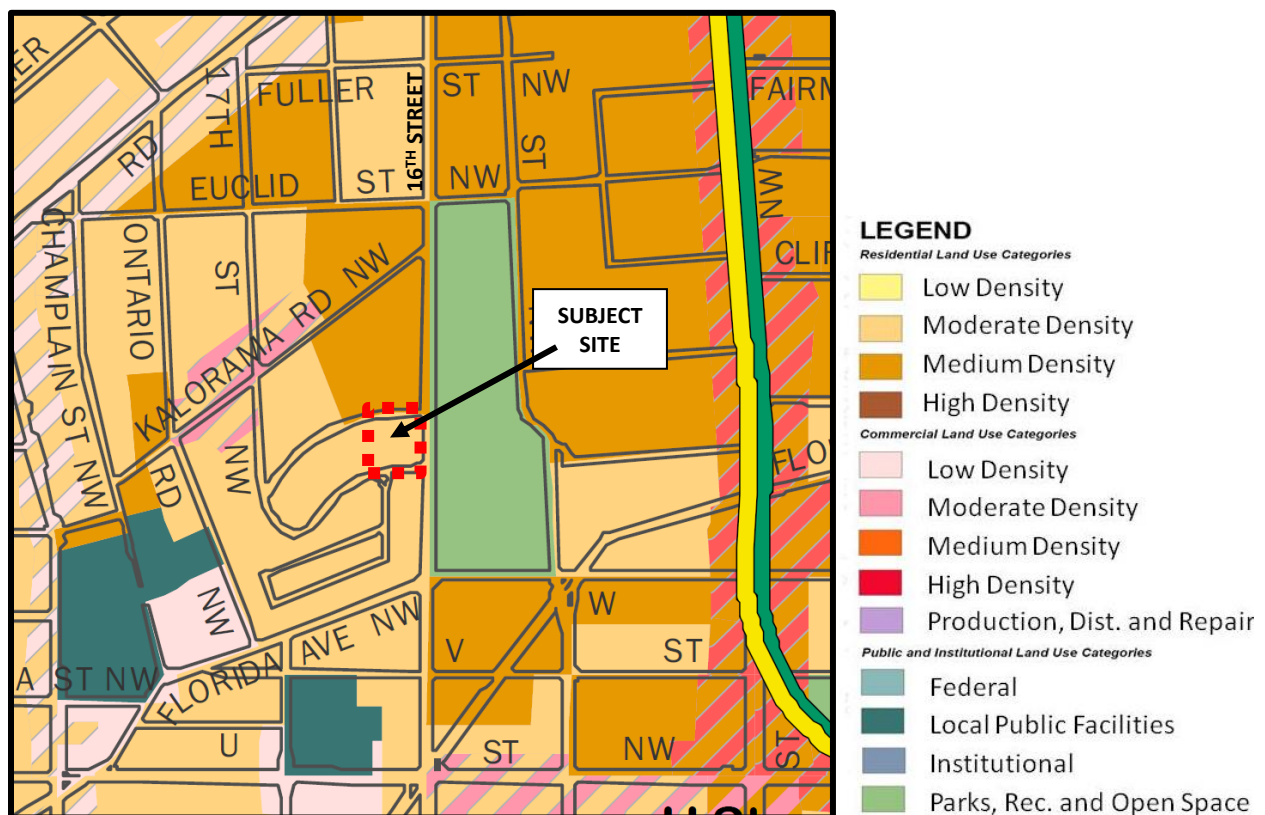
The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas but they are small in scale. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map. 223.5

At this location, development at heights and densities permitted by the RA-4 zone meets the intent of the Neighborhood Conservation Area designation. RA-4 allows uses that maintain the existing land uses and community character, and the site proposed for the downzoning is an infill property where change can occur. The existing zoning does not constitute a change in density over current conditions, particularly since this zone has been in place for many decades. The designation does anticipate new development, and, consistent with this designation, the site is small in scale and development at the RA-4 level would be compatible with the existing scale and architectural character. Existing development on this part of 16th Street tends to be larger-scale buildings, with some lower scale construction, such as rowhouses, mixed in. The HPRB found that development of an 80'-tall building on the subject site would be compatible with not only the larger buildings

characteristic of the historic district, but also the more moderately scaled landmarked mansions to the west of the subject site. While development at densities and heights allowed by the proposed RA-2 zone could also be viewed as not inconsistent with this designation, and could be compatible with the rowhouses south of Belmont Street, much of that square is also zoned RA-4, including all of the portion of that site along 16th Street NW, directly to the south of the area proposed for downzoning.

Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for Moderate Density Residential uses.



The Plan defines Moderate Density Residential as follows:

This designation is used to define the District’s row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations. 225.4 (emphasis added)

Zones mentioned in the above paragraph refer to the ZR58 zone names, with their ZR16 names

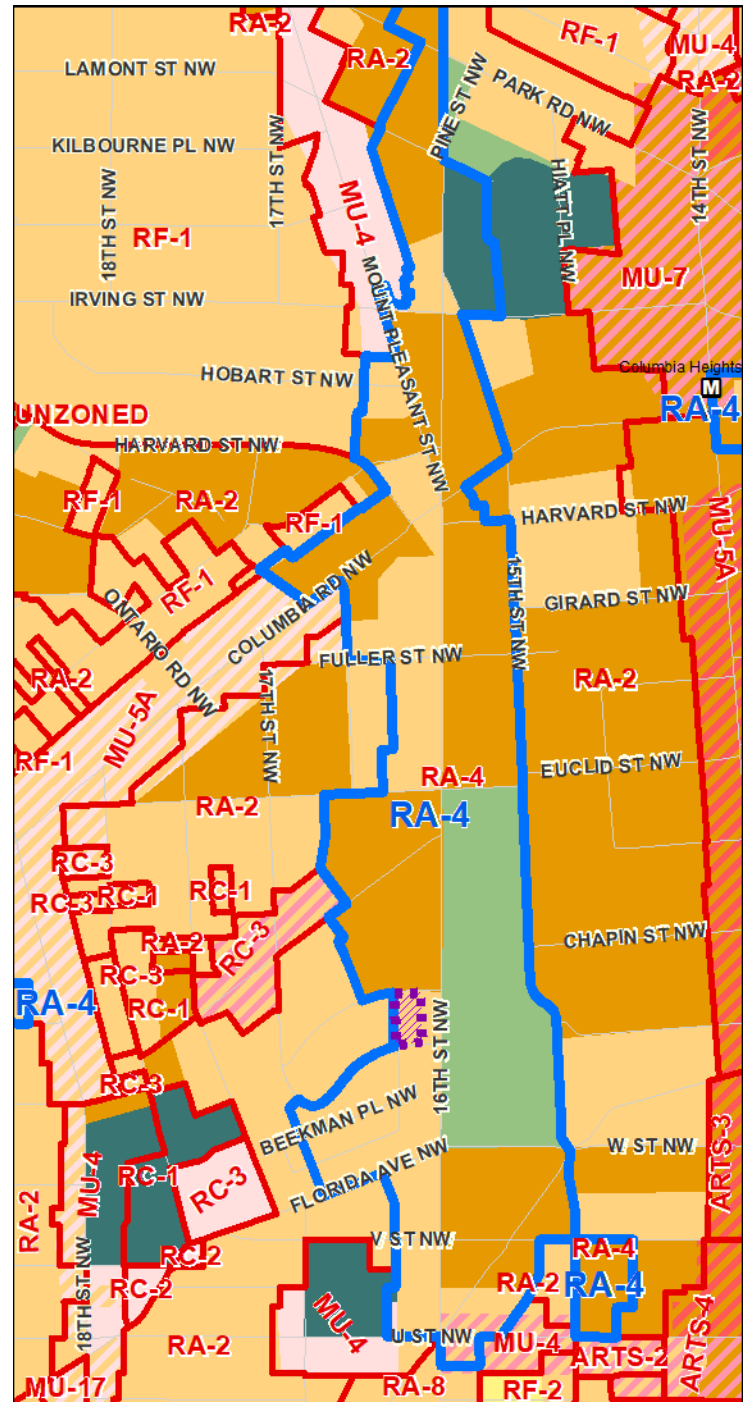
according to the following table:

ZR58 Zone Name	ZR16 Zone Name
R-3	R-3
R-4	RF-1
R-5-A	RA-1
R-5-B	RA-2

RA-4 is not typically considered a moderate density zone, but rather is noted as more typically a medium density residential zone. However, the list of potentially applicable moderate density zones is not exhaustive, and specifically notes that “*other zones may also apply in some locations*”.

In this case, the existing RA-4 zone is not inconsistent with the designation when read in conjunction with the Policy Map and the Comprehensive Plan text, as the Framework Element instructs. As defined above, moderate density may apply to other zones not listed, and can also apply to older neighborhoods developed with existing multi-story apartments.

It is also instructive to view the FLUM and zoning designations for this section of the 16th Street corridor. Most properties that front onto 16th Street between U Street NW and Spring Place NW – a section of 16th Street that is about 1.4 miles in length - are zoned RA-4, including many properties shown on the FLUM for Moderate Density. The east-west depth of the RA-4 zoning from 16th Street varies considerably but is relatively narrow at the subject site. In the immediate vicinity of the portion of the property proposed for downzoning, the lots to the south generally along 16th Street NW and across Belmont Street NW, share the Moderate Density Residential / RA-4 combination, as do the lots between Euclid Street and Columbia Road. In the immediate area, there are also extensive areas of land designated on the FLUM for medium density development, but zoned moderate density RA-2, including to the north



of Euclid Street, and to the east of 15th Street NW. This reinforces the Comp Plan direction that the maps are intended to provide generalized guidelines and are not parcel-specific like zoning maps.

OP reviewed previous Comprehensive Plans, former zoning maps, and orders. The moderate density designation on this site dates to July 7, 1992. The site had a high-density zoning from 1960 until November 13, 1992 when the zoning was lowered to the medium-high R-5-D (now called RA-4) zoning it now has. The medium-high zoning was done as part of a comprehensive rezoning that came from purposeful amendments to the R-5 zones in ZC Case 91-10.

In ZC Order Number 721 from that case, the Commission states:

The Commission further believes that its proposed decision to approve the R-5 Text Amendments is in the best interest of the District of Columbia, is consistent with the intent and purpose of the Zoning Regulations and the Zoning Act, and is not inconsistent with the Comprehensive Plan for the National Capital, as amended.

It was determined that the R-5-D (now RA-4) zone “*is not inconsistent with the Comprehensive Plan*”

B. COMPREHENSIVE PLAN POLICIES

There are many sections within the text of the Comprehensive Plan that support retention of the long existing zoning of this property and area. Should the Commission set down the case for public hearing, a detail analysis will be provided in an OP hearing report. Many of the sections cited below, which include ones cited within the petition (Exhibit 2), are open to interpretation, and OP would solicit input from other relevant bodies in the analysis.

OP’s analysis leads us to conclude that the existing RA-4 zoning is not inconsistent with the Comprehensive Plan, particularly when the policy statements are read on balance with the FLUM and Policy map designations and the zoning history of the site. This includes policies within the Land Use, Transportation, Housing, Urban Design, and Historic Preservation Citywide Elements, and the Mid-City Area Element.

With regards to Land Use, many of the policies refer to development that is compatible with the neighborhood and prevailing development patterns. In this case, as noted above, there are a range of land uses and buildings types fronting onto this section of 16th Street, including tall multi-family apartment buildings, older historic mansions, the rowhouse development to the south of the subject site, and the large Meridian Hill Park. The neighborhood character includes many buildings, including adjacent buildings, which are consistent with the existing RA-4 zoning.

With regards to the Historic Preservation Element, OP notes that the Historic Preservation Review Board reviewed a project under the existing zoning and in 2017 found it to be compatible with the Meridian Hill Historic District.

Because there are references to this as “green space”, it is important to also note that this is private property zoned for residential development. No evidence has been provided to indicate that it was ever intended to be park or open space, and OP has also not found such evidence. A portion of the subject site is currently used as parking, and both the current RA-4 and the proposed RA-2 zone would allow development of the site (although the RA-2 zone would permit

a lower lot occupancy). There is the extensive Meridian Hill Park directly across the street which will remain as public park and is identified for park purposes on both the Generalized Policy and Future Land Use maps. There is also an extensive green area between the sidewalk and the subject site, which would also remain green space and which would preserve views along the street and towards the Meridian Hill Park.

Chapter 3 Land Use

The Land Use Goal is to: *“Ensure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents, institutions, 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.* 302.1

Policy LU-1.2.7: Protecting Existing Assets on Large Sites: *Identify and protect existing assets such as historic buildings, historic site plan elements, important vistas, and major landscape elements as large sites are redeveloped.* 305.12

LU-1.4 Neighborhood Infill Development: *Infill development on vacant lots is strongly supported in the District of Columbia, provided that such development is compatible in scale with its surroundings and consistent with environmental protection and public safety objectives. In residential areas, infill sites present some of the best opportunities in the city for “family” housing and low-to moderate-density development.* ...307.2

In both residential and commercial settings, infill development must be sensitive to neighborhood context. High quality design standards should be required, the privacy of neighboring structures should be respected, and density and scale should reflect the desired character of the surrounding area. 307.3

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.* 307.5

Policy LU-1.4.3: Zoning of Infill Sites: *Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development.* 307.7

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.*

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.* 309.8

Policy LU-2.1.10: Multi-Family Neighborhoods: *Maintain the multi-family residential character of the District's Medium and High-Density residential areas. Limit the encroachment of large scale, incompatible commercial uses into these areas, and make these areas more attractive, pedestrian-friendly, and transit accessible.* 309.15

Chapter 4 Transportation

Policy T-1.1.2: Land Use Impact Assessment: *Assess the transportation impacts of development projects using multimodal standards rather than traditional vehicle standards to more accurately measure and more effectively mitigate development impacts on the transportation network. Environmental and climate change impacts, including that of carbon dioxide, should be included in the assessment to land use impacts.* 403.8

Policy T-1.2.1: Boulevard Improvements: *Continue to work across District agencies to beautify and stabilize selected boulevards by implementing coordinated transportation, economic development, and urban design improvements.* 404.6

Chapter 5 Housing

The Housing Element describes the importance of housing to neighborhood quality in the District of Columbia and the importance of providing housing opportunities for all segments of our population... 500

H-1.1 Expanding Housing Supply: *Expanding the housing supply is a key part of the District's vision to create successful neighborhoods. Along with improved transportation and shopping, better neighborhood schools and parks, preservation of historic resources, and improved design and identity, the production of housing is essential to the future of our neighborhoods. It is also a key to improving the city's fiscal health. The District will work to facilitate housing construction and rehabilitation through its planning, building, and housing programs, recognizing and responding to the needs of all segments of the community. The first step toward meeting this goal is to ensure that an adequate supply of appropriately zoned land is available to meet expected housing needs.* 503.1

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.* 503.2

Chapter 9 Urban Design

The Urban Design Element addresses the District's physical design and visual qualities... 900

Policy UD-1.2.4: View Protection: *Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods.* 904.6

Policy UD-1.4.1: Avenues/Boulevards and Urban Form: *Use Washington's major avenues/boulevards as a way to reinforce the form and identity of the city, connect its neighborhoods, and improve its aesthetic and visual character. Focus improvement efforts on*

avenues/ boulevards in emerging neighborhoods, particularly those that provide important gateways or view corridors within the city. 906.6

Policy UD-1.4.3: Avenue/Boulevard Vistas and View Corridors: *Protect views and view corridors along avenues/boulevards, particularly along streets that terminate at important civic monuments or that frame distant landmarks. Vistas along such streets should be accentuated by creating more well-defined street walls, improving landscaping, and requiring the highest architectural quality as development takes place. (see Figure 9.7). 906.9*

Policy UD-2.2.1: Neighborhood Character and Identity: *Strengthen the defining visual qualities of Washington's neighborhoods. is should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context. 910.6*

Policy UD-2.2.4: Transitions in Building Intensity: *Establish gradual transitions between large-scale and small-scale development. The relationship between taller, more visually prominent buildings and lower, smaller buildings (such as single family or row houses) can be made more pleasing when the transition is gradual rather than abrupt. The relationship can be further improved by designing larger buildings to reduce their apparent size and recessing the upper floors of the building to relate to the lower scale of the surrounding neighborhood. 910.11*

Policy UD-2.2.6: Maintaining Facade Lines: *Generally maintain the established facade lines of neighborhood streets by aligning the front walls of new construction with the prevailing facades of adjacent buildings. Avoid violating this pattern by placing new construction in front of the historic facade line, or by placing buildings at odd angles to the street, unless the streetscape is already characterized by such variations. Where existing facades are characterized by recurring placement of windows and doors, new construction should complement the established rhythm. 910.14*

Policy UD-2.2.7: Infill Development: *Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs. 910.15*

Policy UD-2.2.9: Protection of Neighborhood Open Space: *Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. 910.18*

Policy UD-3.1.11: Private Sector Streetscape Improvements: *As appropriate and necessary, require streetscape improvements by the private sector in conjunction with development or renovation of adjacent properties. 913.18*

Chapter 10 Historic Preservation

The Historic Preservation Element guides the protection, revitalization and preservation of the city's valuable historic assets..1000.1.

Policy HP-1.3.1: Designation of Historic Properties: *Recognize and protect significant historic properties through official designation as historic landmarks and districts under both District and federal law, maintaining consistency between District and federal listings whenever possible. 1005.6*

Policy HP-1.3.4: Historic District Designation: *Use historic district designations as the means to recognize and preserve areas whose significance lies primarily in the character of the*

community as a whole, rather than in the separate distinction of individual structures. Ensure that the designation of historic districts involves a community process with full participation by affected Advisory Neighborhood Commissions, neighborhood organizations, property owners, businesses, and residents. 1005.9

The District preservation law (Act 2-144) is the basis for review of most preservation projects, but others are considered under the federal Section 106 process or the preservation tax incentive program. The Act establishes that the test for alterations/additions and new construction is “compatibility with the character of the historic district.” Coordination with cooperating agencies—the Commission of Fine Arts and its Old Georgetown Board, the National Capital Planning Commission, and the National Park Service—is a key factor in this review. 1011.3

Whether applying District or federal standards, the city’s preservation officials encourage an approach to rehabilitation and architectural design based on the premise of compatibility with the historic context. This does not mean that additions or new construction should try to mimic historic buildings, but rather should achieve harmony with the historic surroundings through basic good design and close attention to the characteristics and design principles of the historic environment. Good contemporary architecture can fit within this context; in fact, it is necessary in an evolving and dynamic city and is welcomed as an expression of our time. 1011.4

Policy HP-2.4.2: Adaptation of Historic Properties for Current Use: *Maintain historic properties in their original use to the greatest extent possible. If this is no longer feasible, encourage appropriate adaptive uses consistent with the character of the property.* 1011.7

Policy HP-2.4.3: Compatible Development: *Preserve the important historic features of the District while permitting compatible new infill development. Within historic districts, preserve the established form of development as evidenced by lot coverage limitations, yard requirements open space, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, repair, maintenance, and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail.* 1011.8

Policy HP-2.4.4: Suitability to the Historic Context: *...Exercise greater restraint in residential historic districts and areas with a clear prevailing development pattern or architectural style. Allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more dramatic new design, for example, in non-residential areas and in areas without a significant design pattern.* 1011.9

Policy HP-2.4.6: Preservations Standards for Zoning Review: *Ensure consistency between zoning regulations and design standards for historic properties. Zoning for each historic district shall be consistent with the predominant height and density of contributing buildings in the district. Where needed, specialized standards or regulations should be developed to help preserve the characteristic building patterns of historic districts and minimize design conflicts between preservation and zoning controls.* 1011.11

Action HP-2.4.C: Zone Map Amendments in Historic Districts: *Identify areas within historic districts that may be “overzoned” based on the scale and height of contributing buildings, and pursue rezoning of such areas with more appropriate designations.* 1011.14

Policy HP-2.5.2: Historic Landscapes: *Preserve the distinguishing qualities of the District’s historic landscapes, both natural and designed. Protect public buildings and monument grounds,*

parks and parkway systems, government and institutional campuses, gardens, cemeteries, and other historic landscapes from deterioration and incompatible development. 1012.3

Policy HP-2.5.6: Historic Open Space: *Retain landscaped yards, gardens, estate grounds, and other significant areas of green space associated with historic landmarks whenever possible. If development is permitted, retain sufficient open space to protect the setting of the historic landmark and the integrity of the historic property. 1012.7*

Policy HP-3.2.1: Preservation and Community Development: *Promote historic preservation as a tool for economic and community development. 1017.3*

Policy HP-3.2.2: Preservation and Neighborhood Identity: *Recognize the potential for historic preservation programs to protect and enhance the distinct identity and unique attractions of District neighborhoods. 1017.4*

Chapter 20 Mid-City Area Element:

The site is within the Mid-City Area but not within a specific policy focus area.

MC-1.1.1 Neighborhood Conservation: *Retain and reinforce the historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and walkable neighborhood shopping districts. The area's rich architectural heritage and cultural history should be protected and enhanced. 2008.2*

Policy MC-1.1.3: Infill and Rehabilitation: *Encourage redevelopment of vacant lots and the rehabilitation of abandoned structures within the community, particularly along Georgia Avenue, Florida Avenue, 11th Street, and North Capitol Street, and in the Shaw, Bloomingdale, and Eckington communities. Infill development should be compatible in scale and character with adjacent uses. 2008.4*

Action MC-1.1.A: Rezoning Of Row House Blocks: *Selectively rezone well-established residential areas where the current zoning allows densities that are well beyond the existing development pattern. The emphasis should be on row house neighborhoods that are presently zoned R-5-B or higher, which include the areas between 14th and 16th Streets NW, parts of Adams Morgan, areas between S and U Streets NW, and sections of Florida Avenue, Calvert Street, and 16th Street. 2008.11*

Policy MC-1.2.5: Neighborhood Greening: *Undertake neighborhood greening and planting projects throughout the Mid-City Area, particularly on median strips, public triangles, and along sidewalk planting strips. 2009.5*

Policy MC-1.2.6: Mid-City Historic Resources: *Protect the historic resources of the Mid-City area, with particular attention to neighborhoods that are currently not protected by historic district designation. Historic resources to be protected also include the Taft and Ellington Bridges, Meridian Hill Park, the First Church Christ Scientist, and the historic Holt House. The design integrity of the bridges shall be preserved, and Meridian Hill/Malcolm X Park and the area around it shall be managed to preserve historic vistas and view corridors, as well as historic park features. 2009.6*

Chapter 25 Implementation Element:

The petitioner also cited the following sections from the Implementation Element, which support ensuring zoning consistency with the FLUM, and that it shall be read in conjunction with the text of the Plan.

Policy IM-1.3.2: Zone Map Consistency: *Consistent with the Home Rule Charter, ensure that the Zone Map is not inconsistent with the Comprehensive Plan Future Land Use Map. Make appropriate revisions to the Zone Map to improve its alignment with the Future Land Use Map and to eliminate clear inconsistencies. 2504.4*

Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions: *Require the Board of Zoning Adjustment, the Zoning Commission, the Zoning Administrator, and other District agencies or decision making bodies regulating land use to look to the District Elements of the Comprehensive Plan and its accompanying Maps. Decisions on requests for rezoning shall be guided by the Future Land Use Map read in conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. 2504.5*

VII. ATTACHMENT

Attachment I – Guidelines for Using the Generalized Policy Map and the Future Land Use Map

JS/mrj

Attachment I
Comprehensive Plan Chapter 2 – Framework Element
Guidelines for Using the Generalized Policy Map and the Future Land Use Map 226

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guides for development and conservation decisions. Several important parameters, defined below, apply to their use and interpretation.

- a. 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 Map is to be interpreted broadly.*
- b. The Future Land Use Map is a generalized depiction of intended uses in the horizon year of the Comprehensive Plan, roughly 20 years in the future. It is not an “existing land use map,” although in many cases future uses in an area may be the same as those that exist today.*
- c. The densities within any given area on the Future Land Use Map reflect all contiguous properties on a block—there may be individual buildings that are higher or lower than these ranges within each area. Similarly, the land use category definitions describe the general character of development in each area, citing typical building heights (in stories) as appropriate. It should be noted that the granting of density bonuses (for example, through Planned Unit Developments) may result in heights that exceed the typical ranges cited here.*
- d. The zoning of any given area should be guided by the Future Land Use Map, 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.*
- e. The designation of an area with a particular land use category does not necessarily mean that the most intense zoning district described in the land use definitions is automatically permitted. A range of densities and intensities applies within each category, and the use of different zone districts within each category should reinforce this range. There are more than twice as many zone districts (about 30, plus more than a dozen overlay zones) as there are Comprehensive Plan land use categories. For example, there are at least three zone districts corresponding to “Low Density Residential” and three zone districts corresponding to “Moderate Density Residential.” Multiple zones should continue to be used to distinguish the different types of low- or moderate-density residential development which may occur within each area.*
- f. Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the existing C-2-A zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area and the adjacent uses. A correspondence table indicating which zones are “clearly consistent”, “potentially consistent” and “inconsistent” with the Comprehensive Plan categories should be prepared to assist in Comprehensive Plan implementation and future zoning actions (see Action LU-4.3.B).*
- g. The intent of the Future Land Use Map is to show use rather than ownership. However, in a number of cases, ownership is displayed to note the District’s limited jurisdiction. Specifically, non-park federal facilities are shown as “Federal” even though the actual*

uses include housing and industry (e.g., Bolling Air Force Base), offices (e.g., the Federal Triangle), hospitals (e.g., Walter Reed), and other activities. Similarly, the “Local Public” designation includes high-impact uses such as solid waste transfer stations and stadiums, as well as low-impact uses such as schools. Other maps in the Comprehensive Plan are used to show the specific types of public uses present in each area.

- h. The Map does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity, unless otherwise stated in the Comprehensive Plan Area Elements or an approved Campus Plan.*
- i. Streets and public rights-of-way are not an explicit land use category on the Future Land Use Map. Within any given area, the streets that pass through are assigned the same designation as the adjacent uses.*
- j. Urban renewal plans remain in effect for parts of the District of Columbia, including Shaw, Downtown, and Fort Lincoln. These plans remain in effect and their controlling provisions must be considered as land use and zoning decisions are made.*
- k. Finally, the Future Land Use Map and the Generalized Policy Map can be amended. They are not intended to freeze future development patterns for the next 20 years. The Comprehensive Plan is intended to be a dynamic document that is periodically updated in response to the changing needs of the city. Requests to amend the maps can be made by residents, property owners, developers, and the District itself. In all cases, such changes require formal public hearings before the DC Council, and ample opportunities for formal public input. The process for Comprehensive Plan amendments is described in the Implementation Element. 226.1*