

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Stephen J. Mordfin, Development Review Specialist
JLS
 Jennifer Steingasser, AICP
 Deputy Director, Development Review & Historic Preservation

DATE: July 18, 2022

SUBJECT: ZC Case 22-22: Setdown Report for a Petition to Rezone 1100 6th Street, N.W. from RA-2 to MU-8

I. RECOMMENDATION

The Office of Planning recommends the Zoning Commission **set down this petition** to rezone Square 449, Lot 64, located at 1100 6th Street, N.W., from RA-2 to MU-8. The proposal would not be inconsistent with the Comprehensive Plan.

II. BACKGROUND

The subject property was the subject of a Planned Unit Development (PUD), ZC Case 06-28, that was effective September 28, 2007 for a residential development with an FAR of 2.56, a building height of 46 feet, and 982 square feet of affordable housing at 80% AMI. The Commission approved a minor modification to that PUD, ZC 06-28A, that took effect on March 3, 2009, reducing the number of required on-site parking spaces from 10 to 9 to accommodate a second means of egress from the building as required by the Building Code. ZC 06-28B, effective July 3, 2009, extended the validity of the PUD to September 28, 2011, with construction to begin no later than September 28, 2012. That PUD is now expired and the four lots that previously consisted of the subject property have since been consolidated into one record lot, Lot 64.

III. APPLICATION-IN-BRIEF

Applicant	PRESERVATION DC L&6 LLC
Proposed Map Amendment	From RA-2 to MU-8
Address	1100 6 th Street, N.W.
Ward and ANC	Ward 6, ANC 6E
Legal Description	Square 449, Lot 64
Property Size	8,586 square feet
Future Land Use Map Designation	Mixed Use: Medium Density Residential and Medium Density Commercial

Generalized Policy Map Designation	Neighborhood Conservation Area
Historic District	Mount Vernon Square

IV. SITE AND AREA DESCRIPTION

The north side of L Street, in which the subject property is located, is generally improved with low-rise residential buildings up to three or four stories in height, although the adjacent property to the west is a two-story commercial structure and a church is located several lots to the north on 6th Street. South of L Street, across from the subject property is a high-rise mixed use office and retail building. To the east, across 6th Street, are two and three-story row houses, flats and small apartment buildings.

The site is improved with an historic three-story brick building that includes a commercial space on the first floor. Attached on the northern and western facades are one-story additions. A portion of the site on the north side of the lot is unimproved and fenced-in with a curb cut providing vehicular access from 6th Street.



V. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The applicant’s petition would rezone Lot 64, Square 449 from RA-2 to MU-8.

“The RA-2 zone provides for areas developed with predominantly moderate-density residential.” (Subtitle F Sec.300.3)

“The MU zones are designed to provide facilities for housing, shopping, and business needs, including residential, office, service, and employment centers.” (Subtitle G Sec. 100.2)

The following table summarizes the standards of the proposed MU-8 zone in comparison to the existing RA-2 zone.

	Existing Zone: RA-2	Proposed Zone: MU-8
Permitted Uses	Subtitle U, Chapter 4	Use Group F
Height	50-foot max.	70-foot max.
Lot Area	None Prescribed	None Prescribed
Lot Width	None Prescribed	None Prescribed
FAR	1.8 max. 2.16 max.(IZ)	5.0 max. 6.0 max. (IZ), and 1.0 max. nonresidential
Penthouse Height	12-foot max. 15-foot mechanical max.	20-foot max. 2 nd story permitted for mechanical
Lot Occupancy	60% max.	100% max.
Rear Yard	4 in./ft. of bldg. height, with a 15-ft. min.	2.5 in./ft. of bldg. ht., with a 12-ft. min.
Side Yard	None required, but 4 ft. min. if provided None required on side street for corner lot	None required, but 2 in. min./ft. bldg. ht., but not <5 ft. if provided
Vehicle Parking	Residential: 1/3 d.u.’s in excess of 4 min. Retail: 1.33 spaces/1,000 sq. ft. in excess of 3,000 sq. ft. min.	Residential: 1/3 d.u.’s in excess of 4 min. Retail: 1.33 spaces/1,000 sq. ft. in excess of 3,000 sq. ft. min.
Long Term Bicycle Parking	Residential: 1 space/3 d.u.’s min. Retail: 1/10,000 sq. ft. min.	Residential: 1 space/3 d.u.’s min. Retail: 1/10,000 sq. ft. min.
Loading	Residential: >50 units: 1 berth & 1 service/delivery space min. Retail: 5,000-20,000 GFA: 1 berth min.	Residential: >50 units: 1 berth & 1 service/delivery space min. Retail: 5,000-20,000 GFA: 1 berth min.
GAR	0.3 min.	0.25min.

VI. IZ PLUS

An IZ Plus set-aside requirement would be appropriate pursuant to Subtitle X § 502 because:

1. The map amendment would rezone the property to MU-8, which allows a higher maximum permitted FAR than the existing RA-2 zone; and
2. The 2019 Housing Equity Report¹ prepared by the Office of Planning and the Department of Housing and Community Affairs reports that:

¹ [Housing-Equity-Report](#)

- a. ANC 6E, within which the subject property is located, only had 0.4 percent of the District’s total number of affordable housing units as of 2018; and
- b. Ward 6 had a median rent of \$2,143 in 2019, in excess of the Districtwide median of \$1,603.

IZ Plus requires a higher affordable housing set-requirement than Regular IZ and prescribes a set-aside requirement based on either:

- a sliding-scale that is correlated to the total floor area built, or
- the amount of IZ bonus density built.

Rezoning applications only consider consistency with the Comprehensive Plan and do not include a specific development proposal. The OP has provided two examples below to demonstrate possible IZ Plus set-aside requirements pursuant to Subtitle C § 1003.3 if a new residential development was built under the MU-8 zone at the subject property. The examples are based on an apartment house that is stick-built (non-Type 1 construction) on the subject property (8,586 square feet).

Example 1 – Utilizes IZ Bonus Density

FAR Built:	6.0 IZ FAR
Regular IZ Set-Aside Requirement	75% bonus density or 6,439.5 sq. ft.
Regular IZ Dwelling Units ²	6 units
Percent Increase in Total FAR Built ³	233%
IZ Plus Set-Aside Requirement	20% or 8,586 sq. ft.
IZ Plus Dwelling Units	9 units

Example 2 – Does Not Utilize IZ Bonus Density

FAR Built	5.0 FAR
Regular IZ Set-Aside Requirement	10% or 3,434 sq. ft.
Regular IZ Dwelling Units	3 units
Percent Increase in Total FAR Built	178%
IZ Plus Set-Aside Requirement	20% or 6,868 sq. ft.
IZ Plus Dwelling Units	7 units

In both examples above, the set-aside requirement would be 20 percent, which is the maximum IZ Plus set-aside requirement. The amount of residential floor area built in any future development under the MU-8A zone would determine the actual IZ Plus set-aside requirement. However, given the large increase in maximum FAR permitted by the zone change, it is likely that under the majority of development scenarios that the set-side requirement could be, or close to, 20 percent.

² The OP typically uses a density factor 1,000 sq. ft. to estimate number of dwelling units.

³ The percent increase between the maximum permitted FAR of the existing/prior zone (RA-2), not including IZ bonus density, and the total FAR built in the IZ Plus Development.

VII. COMPREHENSIVE PLAN

a. COMPREHENSIVE PLAN POLICIES

Equity

Background

The Implementation Element calls for “*the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis*”^{2501.8}. Achieving equity and more specifically racial equity, requires a broad range of policies and tools, some of which fall under the zoning authorities granted to the Zoning Commission and some of which do not.

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about a zoning action’s equitable impact. And as is the case whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action.

A map amendment establishes what can be allowed and potentially developed on a property, but it cannot guarantee how many units will ultimately be built or at what price point. Nor can it guarantee socio-economic outcomes like health care or work force development for the occupants. In the case of a map amendment, the Commission does not know whether and when the subject site will be redeveloped, or whether the site would still be redeveloped if proposed rezoning were to be denied. Thus, a racial equity evaluation will only be able to analyze the potential development, uses, and impacts under the proposed zone compared to the existing zone.

Equity is conveyed throughout the Comprehensive Plan, particularly in the context of zoning, where certain priorities stand out. These include affordable housing, displacement, and access to opportunity. One of the key ways the Comprehensive Plan seeks to address equity is by supporting additional housing development. The Comprehensive Plan recognizes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. The Comprehensive Plan further recognizes the importance of inclusionary zoning requirements in providing affordable housing opportunities for households of varying income levels.

Analysis

The Commission’s racial equity tool serves as a guide to analyzing the Comprehensive Plan and considering potential impacts. The tool starts by asking “What is the expected goal of the zoning action?” and then “What are the anticipated positive and negative impacts and/or outcomes of the zoning action?”. The zoning action requested by this application is for the approval of a zoning map change from RA-2 to MU-8.

The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family and senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (§ 205.3). Scarcity of land increases the cost

of building new housing, limits the availability of housing, and intensifies housing cost burdens, especially for lower- and middle-income households. The Comprehensive Plan states that “*residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement*” (§ 206.4).

The Comprehensive Plan defines affordable housing as housing available to households earning 80 percent or less of the median family income (“MFI”) (§ 304.3). A key piece of this map amendment is the potential to create additional affordable housing through an IZ Plus set-aside requirement. It is likely that the rezoning will require a 20 percent set-aside requirement resulting in 7 to 9 affordable housing units. The IZ program requires affordable housing units to be available to households earning either no more than 60 percent MFI for rental housing or 80 percent MFI for ownership housing. The potential affordable housing units that could be created under the requested MU-8 zone is substantially higher than if the property was not rezoned. Making room for affordable housing has the potential to benefit non-white populations who on average have lower incomes than white residents.

The Near Northwest Area (“Planning Area”), where the subject property is located, has a Black population of 13.2 percent and a Hispanic population of 12.1 percent. The 2020 Census identifies the median household income as \$98,082 in the Planning Area, and \$117,752 for Ward 6, while the District-wide median household income was \$131,164. The following table breaks down the 2020 Median Household Income data for Ward 6 by race, and the percent of each racial group that lived in poverty between 2016 and 2020.

	2020 Median Household Income – Ward 6 ⁴	Residents Living in Poverty Between 2016 and 2020 – Districtwide
White	\$ 148,936	5.6 %
Asian	\$ 121,944	13.7 %
Hispanic and Latino	\$ 120,830	12.1 %
Black	\$ 50,140	24.2%

Fifty-nine percent (59%) of households in Ward 6, were either cost burdened⁵ or severely cost burdened and city-wide 52% of households were either cost burdened or severely cost burdened in 2020. With a median home value of \$545,160, and a median rent of \$2,077, much of the housing within the planning area would likely be out of reach to a portion of the population.

The existing RA-2 zone permits moderate density residential uses. The proposed map amendment has the potential to increase the total supply of housing units in the Planning Area, which could alleviate pressure on housing costs overall. It also has the potential to create a greater range of housing sizes, increasing the ability to provide housing for a variety of household sizes and income levels.

⁴ US Census American Community Survey 2016-2020

⁵ Cost burden is defined as spending more than 30% of household income on housing; severely cost burden is defined as spending more than 50 % of household income on housing.

Citywide Elements

As described in the Introduction (Chapter 1 Introduction, Section 103, Attachment I), the Comprehensive Plan is the centerpiece of a “Family of Plans” that guide public policy in the District. The Introduction goes on to note three “Tiers” of Planning (Chapter 1 Introduction, Section 104, Attachment II), including:

- a. Citywide policies
- b. Ward-level policies
- c. Small area policies.

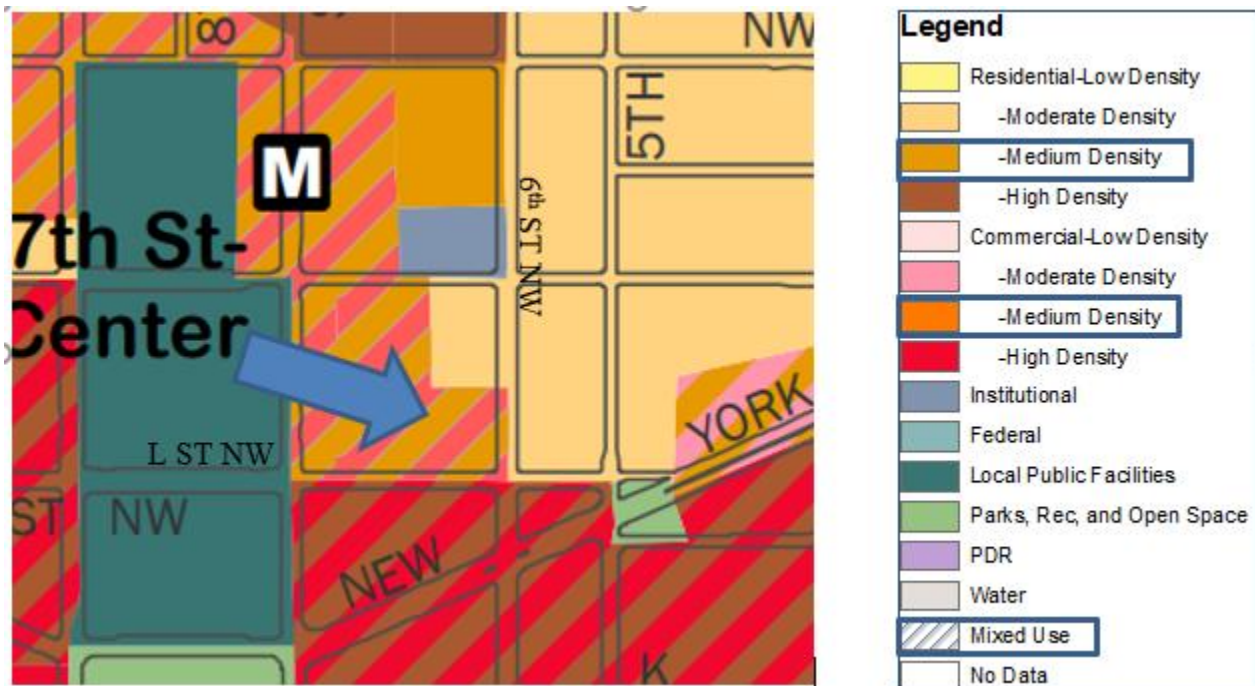
A. COMPREHENSIVE PLAN MAPS

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226, Attachment III), 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; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development’s physical characteristics including building massing or density; 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.

As described below, the proposed zoning map amendment would be not inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the site is appropriate for mixed use: Medium Density Residential and Medium Density Commercial land uses.



Medium Density Residential: *This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent Low Density Residential open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-3 Zone District is consistent with the Medium Density Residential category, and other zones may also apply. 227.7*

Medium Density Commercial: *This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Moderate Density Commercial areas. Retail, office, and service businesses are the predominant uses, although residential uses are common. Areas with this designation generally draw from a citywide market area. Buildings are larger and/or taller than those in Moderate Density Commercial areas. Density typically ranges between a FAR of 4.0 and 6.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The MU-8 and MU-10 Zone Districts are consistent with the Medium Density category, and other zones may also apply. 227.12*

Mixed Use Categories: *The Future Land Use Map indicates areas where the mixing of two or more land uses is encouraged. The particular combination of uses desired in a given area is depicted in striped patterns, with stripe colors corresponding to the categories defined on the previous pages. The Mixed Use category generally applies in the following three circumstances:*

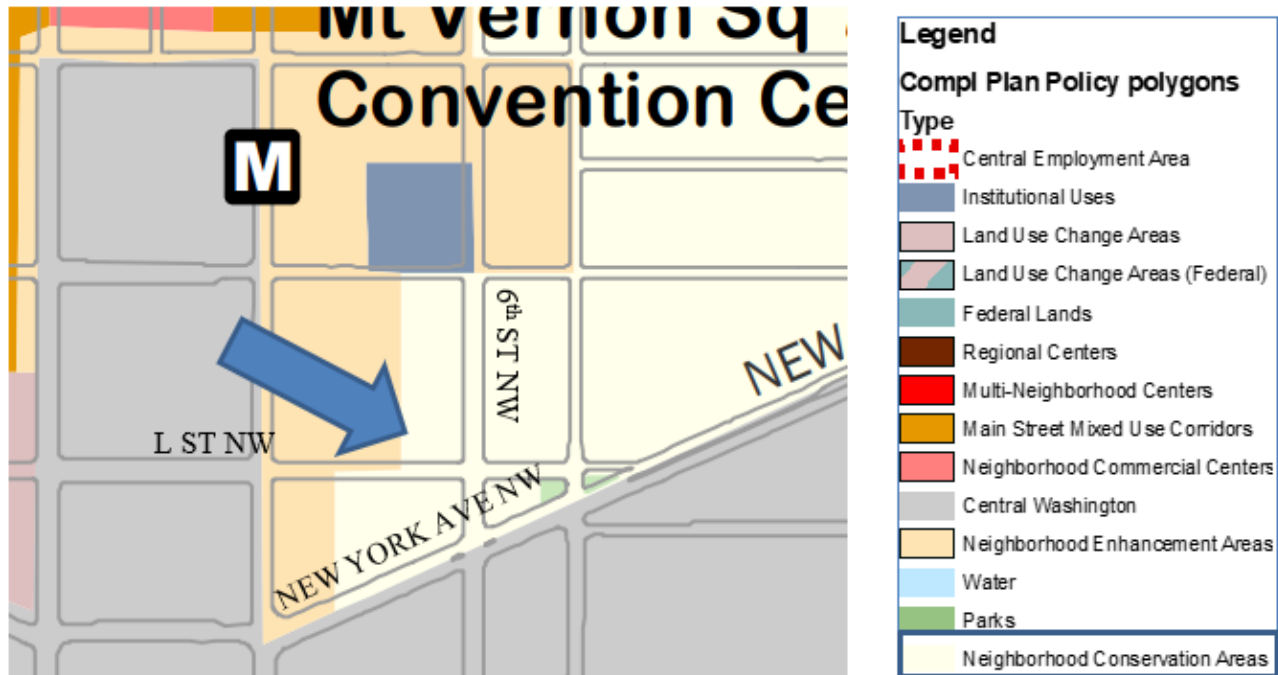
- a. *Established, pedestrian-oriented commercial areas which also include substantial amounts of housing, typically on the upper stories of buildings with ground floor retail or office uses;*
- b. *Commercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future. The pattern envisioned for such areas is typically one of pedestrian-oriented streets, with ground floor retail or office uses and upper story housing; and*
- c. *Large sites (generally greater than 10 acres in size), where opportunities for multiple uses exist but a plan dictating the precise location of these uses has yet to be prepared. 225.18*

The general density and intensity of development within a given Mixed Use area is determined by the specific mix of uses shown. If the desired outcome is to emphasize one use over the other (for example, ground floor retail with three stories of housing above), the Future Land Use Map may note the dominant use by showing it at a slightly higher density than the other use in the mix ... 225.19

A variety of zoning designations are used in Mixed Use areas, depending on the combination of uses, densities, and intensities. ... 225.21

Generalized Policy Map

The Generalized Policy Map indicates that the site is located within the Neighborhood Conservation Areas designation.



Neighborhood Conservation Areas Neighborhood Conservation areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. 225.4 The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5

B. COMPREHENSIVE PLAN POLICIES

Citywide Elements:

Land Use Element

Policy LU-1.4.1: Station Areas as Neighborhood Centers

Encourage the development of Metro stations as anchors for residential, economic, and civic development and to accommodate population growth with new nodes of residential development, especially affordable housing, in all areas of the District in order to create great new walkable places and enhance access and opportunities for all District residents. The establishment and growth of mixed-use centers at Metrorail stations should be supported as a way to provide access to housing opportunities at all income levels and emphasizing affordable housing, improve air quality, increase jobs, provide a range of retail goods and services, reduce reliance on the automobile, enhance neighborhood stability, create a stronger sense of place, provide civic gathering places, and capitalize on the development and public transportation opportunities that the stations provide. Station area development should have population and employment densities guided, but not dictated, by desired levels of transit service. This policy should be balanced with other land use policies, which include conserving neighborhoods. The Future Land Use Map expresses the desired intensity and mix of uses around each station, and the Area Elements (and in some cases Small Area Plans) provide more detailed direction for each station area. (§ 307.9)

Policy LU-1.4.2: Development Around Metrorail Stations

In developments above and around Metrorail stations emphasize land uses and building forms that minimize the need for automobile use and maximize transit ridership while reflecting the design capacity of each station and respecting the character and needs of the surrounding areas. (§ 307.10)

Policy LU-1.4.3: Housing Around Metrorail Stations

Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. (§ 307.11)

Policy LU-1.5.1: Infill Development

Encourage infill development on vacant land within Washington, DC, 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 reflect high-quality design, complement the established character of the area and should not create sharp changes in the physical development pattern. (§ 308.6)

Policy LU-1.5.2: Long-Term Vacant Sites

Facilitate the reuse of vacant lots that have historically been difficult to develop due to infrastructure or access problems, inadequate lot dimensions, fragmented or absentee ownership, or other constraints. Explore lot consolidation, acquisition, and other measures that would address these constraints. (§ 308.7)

Policy LU-2.1.2: Neighborhood Revitalization

Facilitate neighborhood revitalization by focusing District grants, loans, housing rehabilitation efforts, commercial investment programs, capital improvements, and other government actions in those areas that are most in need, especially where projects advance equitable development and racial equity, as described in Section 213 of the Framework Element, and create opportunities for disadvantaged persons and for deeply affordable housing. Engage and partner in these efforts with the persons intended to be served by

revitalization, especially residents. Use social, economic, and physical indicators, such as the poverty rate, the number of abandoned or substandard buildings, the crime rate, and the unemployment rate, as key indicators of need. (§ 310.9)

The proposed rezoning would permit an increase in uses permitted, including commercial and office uses and an increase in the number of potential housing units, including affordable housing units under IZ Plus at a location within a census tract with a high poverty rate that would also take advantage of the investment in Metrorail. Although the applicant is unable to consolidate the subject property with adjacent lots to improve the development potential of this long vacant site, as those lots are all currently developed and in active use, the rezoning of the subject property would increase the potential that the site would be put back to active use. As a long vacant site for which a PUD had been approved but never constructed, the proposed rezoning has the potential to revitalize this underutilized corner property.

Housing Element

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. (§ 503.3)

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District 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. (§ 503.5)

Policy H-1.2.2: Production Targets

Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in Washington, DC from 2018 to 2030, or approximately 20,000 units, should be affordable to persons earning 80 percent or less of the area-wide MFI. In aggregate, the supply of affordable units shall serve low-income households in proportions roughly equivalent to the proportions shown in Figure 5.8: 30 percent at 60 to 80 percent MFI, 30 percent at 30 to 60 percent MFI, and 40 percent at below 30 percent MFI. Set future housing production targets for market rate and affordable housing based on where gaps in supply by income occur and to reflect District goals. These targets shall acknowledge and address racial income disparities, including racially adjusted MFIs, in the District, use racially disaggregated data, and evaluate actual production of market rate and affordable housing at moderate, low, very-low, and extremely-low income levels. (§ 504.9)

Policy H-1.2.3: Affordable and Mixed-Income

Housing Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create

housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements. (§ 504.10)

Policy H-1.3.1: Housing for Larger Households

Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail. (§ 505.8)

Through an increase in the permitted density, the requested map amendment would permit an increase in the amount of market rate and affordable housing on the subject property than currently could be constructed under the existing zoning. Although the site provides for market rate and affordable apartments, due to the small size of the subject property and the requested mixed-use zoning, it is not likely to result in a larger mix of housing types, such as single-family homes or duplexes. However, the IZ regulations have incentives for providing larger family-size units with more than two bedrooms.

Urban Design Element

Policy NNW-1.1.8: Affordable Housing

Preserve the existing stock of affordable housing in the Near Northwest Planning Area, by bringing to bear new measures to preserve and produce affordable housing in a way that advances fair housing goals and minimizes displacement. (§2108.8)

Policy NNW-2.1.1: Affordable Housing

Preserve existing affordable housing within the Shaw/Convention Center area and produce new affordable housing and market rate housing on underutilized and future development sites. Use a range of tools to retain and develop affordable housing in the Planning Area, including tenant organization and public education, inclusionary zoning, renewing project based public housing contracts, tax abatements, public-private partnerships, and affordable housing when development on publicly- owned land includes a residential component. (§2111.5)

Policy NNW-2.1.2: Reinforce Existing Development Patterns

Stabilize and maintain existing moderate-density row house areas within the Shaw/Convention Center area. Locate multi-unit buildings in areas already zoned for greater density, including areas near the Mount Vernon Square and Shaw/Howard University Metro stations, and on publicly owned land with the potential for housing. Ensure that development on infill sites scattered throughout the row house portions of the Shaw/Convention Center area is sensitive to and complements the neighborhood's character. (§ 2111.6)

Policy UD-2.2.5: Infill Development

New construction, infill development, redevelopment, and renovations to existing buildings should respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. Avoid overpowering contrasts of scale and height as infill development occurs. (§ 909.10)

Although the requested rezoning of the subject property does not include a specific development proposal, the property has an existing historic building and will accommodate additional infill housing and consequently affordable housing. Adjacent to a rowhouse neighborhood directly to the north, the requested rezoning to an MU zone would not be expected to result in the construction of new row houses but would allow for residential development and a building height that could bridge the difference between the row house neighborhood and the larger mixed-use office and commercial buildings to the south, across L Street.

Historic Preservation Element

Policy HP-2.5.2: Adaptation of Historic Properties for Current Use

Maintain historic properties in their original use when possible. If this is no longer feasible, encourage appropriate adaptive uses consistent with the character of the property. Recognize the value and necessary function of special-purpose structures, such as utility buildings, and allow structural modifications and other alterations compatible with historic character when needed for the property to continue functioning in its original use. (§ 1014.8)

The requested map amendment would have the potential to facilitate the redevelopment of the subject property, including the renovation of the existing vacant historic structure on the property and its expansion.

Area Element: Near Northwest

Near Northwest Area Element

Policy NNW-2.1.1: Affordable Housing

Preserve existing affordable housing within the Shaw/Convention Center area and produce new affordable housing and market rate housing on underutilized and future development sites. Use a range of tools to retain and develop affordable housing in the Planning Area, including tenant organization and public education, inclusionary zoning, renewing project based public housing contracts, tax abatements, public-private partnerships, and affordable housing when development on publicly- owned land includes a residential component. (§ 2111.5)

The site is located within the Shaw-Convention Policy Focus Area. The requested map amendment for the site could facilitate the construction of new affordable and market rate housing on an existing underutilized site. Any new development on the site would be subject to the inclusionary zoning regulations.

C. SUMMARY OF PLANNING CONTEXT ANALYSIS

On balance, the proposal would be consistent with the Comprehensive Plan. The subject property is designated for mixed-use on the Future Land Use Map for a combination of Medium Density

Residential and Medium Commercial, consistent with the proposed MU-8 zoning. Pursuant to Subtitle G § 400.7, the MU-8 zone is intended to “*permit medium-density mixed-use development with a focus on employment and residential use,*” consistent with the Comprehensive Plan designation.

The Generalized Policy Map identifies the location of the requested map amendment as “Neighborhood Conservation Area.” Neighborhood Conservation Areas are defined as those that are generally residential in character. Change is anticipated to be “modest in scale and will consist primarily of infill housing, public facilities, and institutional uses.” Therefore, the proposed MU-8 zone for the subject property would be consistent with Comprehensive Plan.

JS/sjm

Attachment I

Comprehensive Plan Chapter 1 - Introduction

The Family of Plans 103

The Comprehensive Plan can be thought of as the centerpiece of a “Family of Plans” that guide public policy in the District (See Figure 1.1). In the past, there has been a lack of clarity over the relationship between the Comprehensive Plan and the many other plans prepared by District agencies. This has reduced the Plan’s effectiveness and even resulted in internal inconsistencies between agency plans. 103.1

Under the DC Code, the Comprehensive Plan is the one plan that guides the District’s development, both broadly and in detail. Thus it carries special importance in that it provides overall direction and shapes all other physical plans that District government adopts. In fact, all plans relating to the city’s physical development should take their lead from the Comprehensive Plan, building on common goals and shared assumptions about the future. For example, the growth projections contained in the Comprehensive Plan should be incorporated by reference in other plans that rely on such forecasts. 103.2

As the guide for all District planning, the Comprehensive Plan establishes the priorities and key actions that other plans address in greater detail. The broad direction it provides may be implemented through agency strategic plans, operational plans, long-range plans on specific topics (such as parks or housing), and focused plans for small areas of the city. 103.3

The Comprehensive Plan is not intended to be a substitute for more detailed plans nor dictate precisely what other plans must cover. Rather it is the one document that bridges all topics and is Where appropriate, this Comprehensive Plan includes cross-references and text boxes to highlight other documents in the “Family of Plans.” Some examples include the federally-mandated State Transportation Plan (known as the “Transportation Vision Plan”), the Historic Preservation Plan, the Parks and Recreation Master Plan, and the Public Facilities Plan. Other agency plans may be guided by Comprehensive Plan policies but are outside of the city government’s direct control. These include the District of Columbia Public Schools Master Facilities Plan. 103.6

Attachment II

Comprehensive Plan Chapter 1 - Introduction

The Three “Tiers” of Planning 104

Since the late 1980s, the District has maintained a three-tiered system of city planning comprised of:

- a. Citywide policies*
- b. Ward-level policies*
- c. Small area policies. 104.1*

In the past, the Comprehensive Plan has been the repository for the citywide and ward-level policies. The small area policies, meanwhile, have appeared 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 and are not part of the legislatively adopted document. 104.2

The 2006 Comprehensive Plan retains three geographic tiers but incorporates a number of changes to improve the plan’s effectiveness and readability. Probably the most important change is the replacement of “Ward Plans” with “Area Elements.” While Ward Plans were an effective way to express local priorities within the Comp Plan, the boundaries changed dramatically in 1990 and 2000 due to population shifts. Redistricting will occur again after the Censuses in 2010, 2020, and so on. Moreover, the city’s wards are drawn to ensure an equal number of residents in each Council district rather than to provide a coherent rationale for planning the city. Thus, places like Downtown Washington (divided by a ward boundary) and the Anacostia River (divided by four ward boundaries) have been covered in multiple places in past Comprehensive Plans. This has resulted in redundancy and fragmented policies for many of Washington’s most important places. The relationship between the Comprehensive Plan and the three tiers is described below. 104.3

Tier One: The Citywide Elements

The Comprehensive Plan includes 13 Citywide Elements, each addressing a topic that is citywide in scope, followed by an Implementation Element. 104.4

Tier Two: The Area Elements

The Comprehensive Plan includes 10 Area Elements, shown on Map 1.1. Taken together, these ten areas encompass the entire District of Columbia. ... 104.5

Although the Citywide and Area Elements are in separate sections of this document, they carry the same legal authority. The Area Elements focus on issues that are unique to particular parts of the District. Many of their policies are “place-based,” referencing specific neighborhoods, corridors, business districts, and local landmarks. However, the policies are still general in nature and do not prescribe specific uses or design details. Nor do the Area Elements repeat policies that already appear in the citywide elements. They are intended to provide a sense of local priorities and to recognize the different dynamics at work in each part of the city. 104.6

Tier Three: The Small Area Plans

As noted above, Small Area Plans are not part of the Comprehensive Plan. As specified in the DC Code, Small Area Plans supplement the Comprehensive Plan by providing detailed direction for areas ranging in size from a few city blocks to entire neighborhoods or corridors. In the past, Small Area Plans have been prepared for places in the city where District action was necessary to manage

growth, promote revitalization, or achieve other long-range planning goals. Examples include the H Street NE corridor, the Takoma Metro station area, and the Shaw/Convention Center area. Small Area Plans are adopted by the DC Council by resolution. The Comprehensive Plan is adopted in a different manner—by legislation—and becomes part of the DC Municipal Regulations. 104.8

In the future, additional Small Area Plans will be developed. The Implementation Element of this Comprehensive Plan outlines where and under what conditions such plans should be undertaken. Existing Small Area Plans are cross-referenced in the Comprehensive Plan Area Elements and should be consulted for further detail about the areas they cover. 104.9

Attachment III

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*