

Adams Morgan for Reasonable Development

Hearing Testimony Re: BZA Case 18506

Feb. 26, 2013

This is the case of a project at 1700 Columbia Road NW. It involves a residential/commercial project that is 70 feet high not including rooftop structures. The developer is asking for variances from required parking and loading berths and a exception to rooftop structures.

We are requesting the Board either oppose these variances and requests or postpone the hearing until several other District agencies about the project and basic planning studies are conducted and analyzed vis-v-vis DC's Comprehensive Plan policies as well as ask the developer to submit further renderings depicting the project in a much clearer way.

There is simply not enough information the record to support this application. The Office of Planning did not coordinate and confer with other key District agencies pursuant to DCMR 11-725.

Other District agencies and subsequent analysis and reports are needed to determine how the variances and exceptions requested won't adversely impact the surrounding properties and public good.

For example, DC Fire and Emergency Services should have been conferred in on the elimination of the rear yard access point with a garage structure and how this may affect response time. In addition DC FEMS could weigh in on how having multiple roof structures may pose additional safety hazards as fires tend to escape to the roofs via stairwell.

Another agency not conferred with is the District Department of the Environment. With the rear yard half taken up by a new descending roadway, many cars will be passing just next to the adjacent lot. Comprehensive Plan policies call for a review of this impact to their air quality. Also, a review is needed to see how all of the individual rooftop patios meet the City's Stormwater Management planning. And, the garage vent and condensers in the rear yard should be reviewed for pollution and noise indexes.

FEB 26

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 18506 Board of Zoning Adjustment
District of Columbia
EXHIBIT NO. 30 CASE NO. 18506
EXHIBIT NO. 30

The Office of Planning also did not seek to follow DCMR 11-774.4 to truly gauge how this building, including the rooftop patios, impact the privacy of surrounding neighbors.

Finally, DC's Department of Housing and Community Development need to be brought in to best understand the location, sizes, numbers, covenants, and other value points to how the Inclusionary Zoning units will be constructed within this building. Affordable housing is not a secondary notion, and further this was required by DCMR 11-725.

Finally, basic Comprehensive Plan policies were not reviewed at all by the Office of Planning to help the applicant bring their project in line with the expected future planning of the District, such as growing an inclusive City, both in terms of our residential and commercial uses. This project represents luxury -- we don't know how this will destabilize land values for the surrounding small mom-and-pop businesses and low- and moderate- income housing.

Regards,

A handwritten signature in black ink, appearing to read 'Chris Otten', with a stylized, flowing script.

Adams Morgan for Reasonable Development

c/o Chris Otten

1830 Belmont Road NW, WDC 20009

202-670-2366

**Adams Morgan for Reasonable Development
BZA Case 18506
Attachment A**

★ 725 PLANNING OFFICE REVIEW (C-2)

725.1 Upon receiving an application for an approval under §§ 726 through 734, the Board of Zoning Adjustment shall submit the application to the D.C. Office of Planning for coordination, review, report, and impact assessment.

725.2 The Planning Office report shall be accompanied by reviews in writing of all relevant District of Columbia departments and agencies, including the Departments of Transportation and Housing and Community Development, and, if a historic district or historic landmark is involved, the State Historic Preservation Officer.

SOURCE: § 5102.5 of the Zoning Regulations, effective May 12, 1958; as amended by Final Rulemaking published at 47 DCR 9741-43 (December 8, 2000), incorporating by reference the text of Proposed Rulemaking published at 47 DCR 8335, 8396 (October 20, 2000).

774REA R YARDS (C)

774.1 Except as provided in this section, a rear yard shall be provided for each structure located in a Commercial District, the minimum depth of which shall be as prescribed in the following table:

ZONE DISTRICT AND STRUCTURE	MINIMUM DEPTH OF REAR YARD
C-1 All structures	20 feet
C-2-A, C-2-B, C-2-C All structures	15 feet
C-3-A, C-3-B, C-3-C, C-4, C-5 (PAD) All structures	2-1/2 inches per foot of vertical distance from the mean finished grade at the middle of the rear of the structure to the highest point of the main roof or parapet wall, but not less than 12 feet

★ 774.2 The Board of Zoning Adjustment may waive the rear yard requirements of this section pertaining to C-3-A, C-3-B, C-3-C, and C-4 Districts in accordance with the requirements of § 3104 for special exceptions; provided, that the standards in §§ 774.3 through 774.6 shall be met.

★ 774.3 Apartment and office windows shall be separated from other buildings that contain facing windows a distance sufficient to provide light and air and to protect the privacy of building occupants.

★ 774.4 In determining distances between windows in buildings facing each other, the angle of sight lines and the distance of penetration of sight lines into habitable rooms shall be sufficient to provide adequate light and privacy to the rooms.

411 ROOF STRUCTURES (R)

411.1 To exercise a reasonable degree of architectural control upon roof structures in all districts, housing for mechanical equipment, stairway and elevator penthouses, and, when not in conflict with An Act To Regulate the Height of Buildings in the District of Columbia, approved June 10, 1920 (36 Stat. 452; D.C. Official Code, §§ 6-601.01 to 6-601.09, on apartment building roofs, penthouses for (a) storage, showers, and lavatories incidental and accessory to roof swimming pools or communal recreation space located on that roof; and (b) other enclosed areas, within the area permitted as a roof structure, used for recreational uses accessory to communal rooftop recreation space, shall be subject to conditions and variable floor area ratio credit specified in this section.

411.2 When located below, at the same roof level with, or above the top story of any building or structure, penthouses (as outlined in § 411.1) shall be subject to the provisions of §§ 400.7, 530.4, 630.4, 770.6, 840.3, or 930.3 when applicable, and to the conditions and variable floor area ratio specified in this section.

★ 411.3 All penthouses and mechanical equipment shall be placed in one (1) enclosure, and shall harmonize with the main structure in architectural character, material, and color.

411.4 When roof levels vary by one (1) floor or more or when separate elevator cores are required, there may be one (1) enclosure for each elevator core at each roof level.

411.5 Enclosing walls from roof level shall be of equal height, and shall rise vertically to a roof, except as provided in § 411.6.

★ 411.6 When consisting solely of mechanical equipment, the equipment shall be enclosed fully as prescribed in §§ 411.3 and 411.5, except that louvers may be provided. A roof over a cooling tower need not be provided when the tower is located at or totally below the top of enclosing walls.

411.7 Solely for the uses designated in this section, an increase of allowable floor area ratio of not more than thirty-seven hundredths (0.37) shall be permitted.

★ 411.8 Roof structures shall not exceed one-third (1/3) of the total roof area for those districts where there is a limitation on the number of stories.

411.9 In addition to the floor area ratio allowed by § 411.7, mechanical equipment owned and operated as a roof structure by a fixed right-of-way public mass transit system shall be permitted in addition to roof structures permitted in this section.

411.10 [REPEALED]

★ 411.11 Where impracticable because of operating difficulties, size of building lot, or other conditions relating to the building or surrounding area that would tend to make full compliance unduly restrictive, prohibitively costly, or unreasonable, the Board of Zoning Adjustment shall be empowered to approve, as a special exception under § 3104, the location, design, number, and all other aspects of such structure regulated under §§ 411.3 through 411.6, even if such structures do not meet the normal setback requirements of §§ 400.7, 530.4, 630.4, 770.6, 840.3, or 930.3, when applicable, and to approve the material of enclosing construction used if not in accordance with §§ 411.3 and 411.5; provided, that the intent and purpose of this chapter and this title shall not be materially impaired by the structure, and the light and air of adjacent buildings shall not be affected adversely.

2601 DEFINITIONS

2601.1 When used in the Chapter, the following terms and phrases shall have the meanings ascribed:

★ Moderate-income household - a household of one or more individuals with a total annual income adjusted for household size equal to between fifty-one percent (51%) and eighty percent (80%) of the Metropolitan Statistical Area median as certified by the Mayor pursuant to the Act.

2603 SET-ASIDE REQUIREMENTS

★ 2603.4 Developments located in CR, C-2-B through C-3-C, USN, W-2 through W-3, and SP Zone Districts shall set aside one hundred percent (100%) of inclusionary units for eligible moderate-income households.

★ 2603.5 The Mayor or the District of Columbia Housing Authority shall have the right to purchase up to twenty-five percent (25%) of inclusionary units in a for-sale inclusionary development in accordance with such procedures as are set forth in the Act.

SOURCE: Final Rulemaking published at 53 DCR 7020 (August 25, 2006); as amended by Final Rulemaking published at 55 DCR 2616 (March 14, 2008); as amended by Notice of Final Rulemaking published at 58 DCR 4788, 4815 (June 3, 2011).

2605 DEVELOPMENT STANDARDS

★ 2605.6 Inclusionary units shall not be overly concentrated on any floor of a project.

SOURCE: Final Rulemaking published at 53 DCR 7013 (August 25, 2006); as amended by Notice of Final Rulemaking published at 58 DCR 822, 825 (January 28, 2011).

**Adams Morgan for Reasonable Development
BZA Case 18506
Attachment B**

Chapter 3

Land Use

Element

★ ***Policy LU-2.3.2: Mitigation of Commercial Development Impacts***

Manage new commercial development so that it does not result in unreasonable and unexpected traffic, parking, litter, shadow, view obstruction, odor, noise, and vibration impacts on surrounding residential areas. Before commercial development is approved, establish requirements for traffic and noise control, parking and loading management, building design, hours of operation, and other measures as needed to avoid such adverse effects. 311.4

★ ***Policy LU-2.3.3: Buffering Requirements***

Ensure that new commercial development adjacent to lower density residential areas provides effective physical buffers to avoid adverse effects. Buffers may include larger setbacks, landscaping, fencing, screening, height step downs, and other architectural and site planning measures that avoid potential conflicts. 311.5

★ ***Policy LU-2.3.4: Transitional and Buffer Zone Districts***

Maintain mixed use zone districts which serve as transitional or buffer areas between residential and commercial districts, and which also may contain institutional, non-profit, embassy/chancery, and office-type uses. Zoning regulations for these areas (which currently include the SP-1 and SP-2 zones) should ensure that development is harmonious with its surroundings, achieves appropriate height and density transitions, and protects neighborhood character. 311.6

★ ***Policy LU-2.4.8: Addressing Commercial Parking Impacts***

Ensure that the District's zoning regulations consider the traffic and parking impacts of different commercial activities, and include provisions to mitigate the parking demand and congestion problems that may result as new development occurs, especially as related to loading and goods delivery. 312.12



Housing Element

THE HOUSING ELEMENT OF THE COMPREHENSIVE PLAN 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. 500.1

The critical housing issues facing the District of Columbia are addressed in this Element. These include:

- Ensuring housing affordability
- Fostering housing production
- Conserving existing housing stock
- Promoting home ownership
- Providing housing for residents with special needs. 500.2

These issues affect every facet of the Comprehensive Plan. They influence land use and density decisions, shape infrastructure and community service needs, determine transportation demand, and even drive employment strategies for District residents. At the most basic level, it is the availability of safe, decent, affordable housing that will determine whether the District's vision for an inclusive city will be realized. The type of housing constructed and the cost of that housing will influence whether we as a city can attract families with children, maintain neighborhood diversity, and provide economic opportunity for all. 500.3

The city's housing stock is varied in type and size. Table 5.1 shows the number of units by type, year built, size, and vacancy rate. Of the city's 248,000 occupied housing units in 2000, 41 percent were owner-occupied and 59 percent were renter-occupied. Forty percent of the housing units in the city are single-family units and over 35 percent of the housing stock was built before 1940. 500.4

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. 505.6

H-2 Housing Conservation: Retaining Our Housing Stock 508

The District has been losing affordable housing rapidly over the past five years, both through the expiration of federal subsidies and through rising market rents and sales prices. In 2005, the DC Fiscal Policy Institute indicated that rising rents alone caused a loss of 7,500 units with rent levels under \$500 a month between 2000 and 2004. Over the same period, the number of homes valued at or below \$150,000 decreased by 9,400. Between 2000 and 2005, the area's annual median income rose by an average compounded rate of 1.25 percent a year, while housing prices rose at an average compounded rate of 14.4 percent a year. These changes have been especially hard on the District's poorest residents, particularly elderly renters and those on fixed incomes. 508.2

Chapter 5 Housing Element



What is Affordable Housing? 504.10

One of the most common requests made during Comprehensive Plan public meetings was to provide a clear definition of "affordable" housing.

Affordable housing is defined as housing in which occupancy is limited to households meeting special income guidelines. The price of this housing is maintained at a level below what the free market would demand using restrictive deeds, covenants, mortgage subsidies, vouchers, or other means tied to public financing or tax credits. Generally, the cost of affordable housing is limited to 30% of a household's income (which varies according to the number of people in the household); different affordable housing programs are "benchmarked", or targeted, to specific income groups as defined by the US Department of Housing and Urban Development.

The benchmarked incomes for the Washington Metropolitan Area in 2005 are shown in the table below. The list includes the major housing assistance programs that serve households in each group. In 2005, the areawide median income (AMI)* for a family of four was \$89,300. The terms "extremely low", "very low", "low", and "moderate" income correspond to up to 30%, 50%, 80%, and 120% of that amount, respectively.

Example: If a single mother earned \$7 per hour, her annual income would be \$14,560 and fall within the "extremely low income" category. If she spends 30% of her income on housing, she could afford to pay only \$364 per month on housing. Finding decent housing or any housing at this price range is a challenge in Washington.

Target Income	Family of 4 Income	HUD Income Group	"Affordable" Monthly Housing Cost	Programs
30% AMI	\$26,790	Extremely Low	\$670	DC Housing Authority
50% AMI	\$44,650	Very Low	\$1116	Housing Prod.Trust Fund (HPTF)
60% AMI	\$53,580		\$1339	Low Income Housing Tax Credit
65% AMI	\$58,000		\$1450	CDBG, HOME
80% AMI	\$71,440	Low	\$1776	HPTF, Inclusionary Zoning
95% AMI	\$84,835		\$2120	Home Purchase Assistance Program
120% AMI	\$107,160	Moderate	\$2679	Historic Home Investment Tax Credit (proposed)

By contrast, "market rate" housing is defined as housing with rents or sales prices that are allowed to change with market conditions, including increased demand. Some market rate housing may be affordable to moderate and some low income households. Rent-controlled apartments are counted as "market rate" units because there are no occupancy restrictions. The District's rent control law stipulates that rents on market rate apartments built prior to 1975 may rise only as fast as the Consumer Price Index (CPI).

* Regional Areawide Median Income (AMI) is used rather than DC's median income because it is the federal government benchmark commonly used to qualify for funding subsidies.

Chapter 6

Environmental Protection Element

★ Environmental protection has been part of planning in the District since the city's inception. In 1791, the L'Enfant Plan used the natural landscape to guide the location of avenues and principal buildings. Later plans in the 19th and 20th centuries created some of the most memorable parks in the country and designated thousands of acres for resource protection. In the 1870s, the District planted 60,000 trees, leading Harper's Magazine to dub Washington the "City of Trees." Today's post-card images of the District still portray a city of blue skies, pristine waters, and lush greenery. 600.3

★ E-3.1 Low Impact Development 613

Low Impact Development (LID) refers to a variety of construction and design techniques that conserve the natural hydrology of development or redevelopment sites. It includes small-scale practices that allow water to infiltrate, evaporate, or transpire on-site rather than flowing off and entering local storm drains and waterways. In urban areas like the District of Columbia, typical LID measures include green roofs (which absorb rainwater and also reduce energy costs), porous pavement, limits on impervious surface cover, rain barrels, and rain gardens. On larger development sites in the city, LID measures could include such features as artificial wetlands, stormwater detention ponds, and earthen drainage swales. 613.1

★ 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 stormwater and reduce urban runoff. 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 stormwater 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. 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. 613.4

Action E-3.1.A: Low Impact Development Criteria

Establish Low Impact Development criteria for new development, including provisions for expanded use of porous pavement, bioretention facilities, and green roofs. Also, explore the expanded use of impervious surface limits

Chapter 6

Environmental Protection Element

★ E-3.4 Reducing the Environmental Impacts of Development ⁶¹⁶

The District of Columbia Environmental Policy Act (DCEPA), modeled after the National Environmental Policy Act (NEPA), requires all District agencies to analyze and disclose the environmental effects of their major actions, including the permitting of new development.

★ *Policy E-3.4.2: Transparency of Environmental Decision-Making*

Ensure that discussions and decisions regarding environmental impacts and mitigation measures occur through a transparent process in which the public is kept informed and given a meaningful opportunity to participate. ^{616.4}

★ *Policy E-3.4.3: Environmental Assessments*

Ensure full and meaningful compliance with the District of Columbia Environmental Policy Act of 1989, effective October 18, 1989 (D.C. Law 8-36; D.C. Official Code § 8-109.01 et seq.), including the use of procedures to assess the environmental impacts of major development projects comparable to the regulations developed by the Council on Environmental Quality for the National Environmental Policy Act of 1969, approved January 1, 1970 (83 Stat. 852; 42 U.S.C. 4321 et seq.). The environmental review should include all pertinent information about the effects of the project on the human environment, including information about existing conditions, projected impacts, and mitigation measures. Carbon dioxide and other greenhouse gas (GHG) emissions impacts should be included in the environmental impact assessments. The process should ensure that such information is available when a development is proposed and is available to the public and decision-makers before any decision is made. ^{616.5}

★ *Policy E-3.4.4: Monitoring of Operational and Construction Impacts*

Strengthen District government programs that monitor and resolve air pollution, water pollution, noise, soil contamination, dust, vibration, and other environmental impacts resulting from commercial uses, industrial uses, trucking, construction activities, and other activities around the city that could potentially degrade environmental quality. ^{616.6}

Chapter 6 Environmental Protection Element

★ Action E-3.4.B: Strengthening Environmental Screening and Assessment Procedures

Implement a program to strengthen the environmental screening, assessment, impact statement, and notification requirements in the District of Columbia. Based on an analysis of existing practices in the District and "best practices" around the country, recommend statutory and procedural changes to more effectively document and mitigate the environmental impacts of development and infrastructure projects, and to ensure that impacted residents, businesses, and DC agencies have adequate opportunities for review and comment. In adoption of any new environmental standards or procedures, consideration should be given to the cost of compliance for affected businesses, the opportunities for public participation, and the cost to the environment if the standards/procedures are not implemented. 616.8

Action E-3.4.C: Environmental Enforcement

Undertake an interagency effort to improve compliance with the District's existing environmental laws and regulations. This effort should include public education, compliance assistance, and the convening of an environmental crime and enforcement working group. 616.9

★ E-4 Reducing Environmental Hazards 617

Environmental hazards in the District of Columbia include air and water pollution, contaminated soils, hazardous materials, noise, disease vectors, flooding, light pollution, and electromagnetic fields. The overall purpose of Comprehensive Plan policies on these topics is to minimize the potential for damage, disease, and injury resulting from these hazards. Environmental hazards define basic constraints to land use that must be reflected in how and where development takes place. The severity of these hazards also helps define the priority for future remediation and abatement programs. 617.1

The presence of environmental hazards in the city also means that up-to-date emergency response planning is essential. As indicated in the Community Services and Facilities Element, the District's Emergency Management Agency is charged with preparing and implementing these plans, and ensuring that District agencies, residents, and businesses are informed and prepared in the event of a disaster or other emergency. Other agencies, including the Environmental Health Administration and the District Department of Transportation, also are actively involved in emergency planning and response. 617.2

Policy E-4.1.3: Evaluating Development Impacts On Air Quality

Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb carbon monoxide and other pollutants. 618.8

Action E-4.2.A: Stormwater Management Plan

Create a comprehensive multi-agency stormwater management plan covering such topics as low impact development (LID), maintenance of LID infrastructure, education, impervious surface regulations, fees, and water quality education. The plan should include output and outcome measures that achieve specific water quality standards, reevaluate and clarify stormwater standards to eliminate confusion, and propose fee levels that are sufficient to maintain an effective stormwater management program and encourage residents and businesses to reduce stormwater pollution. 619.13

★ Policy E-4.2.3: Control of Urban Runoff

Continue to implement water pollution control and "best management practice" measures aimed at slowing urban runoff and reducing pollution, including the flow of sediment and nutrients into streams, rivers, and wetlands. 619.8

★ E-4.3 Controlling Noise 620

Noise affects the general health and well-being of District residents. High noise levels can create a host of problems, ranging from stress to hearing loss. Noise can also impact urban wildlife. In the noisiest parts of the city, the sounds of cars, trucks, buses, helicopters, and sirens may seem almost constant. Even in relatively quiet parts of the city, household noise sources like car alarms and leaf blowers can be a source of annoyance. Regardless of density, the maintenance of "peace and quiet" is a basic expectation in most District neighborhoods. 620.1

★ Policy E-4.3.5: Noise and Land Use Compatibility

Avoid locating new land uses that generate excessive noise adjacent to sensitive uses such as housing, hospitals, and schools. Conversely, avoid locating new noise-sensitive uses within areas where noise levels exceed federal and District guidelines for those uses. 620.8

★ Action E-4.3.E: Measuring Noise Impacts

Require evaluations of noise impacts and noise exposure when large-scale development is proposed, and when capital improvements and transportation facility changes are proposed. 620.13

Chapter 9

Urban Design

Element

★ *Action UD-2.2.B: Using Zoning to Achieve Design Goals*

Explore zoning and other regulatory techniques to promote excellence in the design of new buildings and public spaces. Zoning should include incentives or requirements for facade features, window placement, courtyards, buffering, and other exterior architectural elements that improve the compatibility of structures, including roof structures, with their surroundings while promoting high architectural quality. 910.26

★ *Policy UD-3.1.2: Management of Sidewalk Space*

Preserve the characteristically wide sidewalks of Washington's commercial districts. Sidewalk space should be managed in a way that promotes pedestrian safety, efficiency, comfort, and provides adequate space for tree boxes. Sidewalks should enhance the visual character of streets, with landscaping and buffer planting used to reduce the impacts of vehicle traffic. 911.9

Chapter 20

Mid-City

Area Element



Mid-City neighborhoods like Adams

Parts of the Mid-City have changed rapidly during the last ten years. Some 2,000 housing units were added between 2000 and 2005, and about 1,500 units are in some stage of construction today. While this change has been welcomed by some, it has also created concerns about a loss of community identity and the displacement of residents. Homeowners have faced sharp increases in property taxes, and many renters have faced soaring rents and low vacancies. The median sales price of a home in the Columbia Heights ZIP code rose a staggering 63 percent between 2004 and 2005 alone. Clearly, these kinds of increases are not sustainable and over the long run will threaten the diversity that makes the Mid-City neighborhoods so unique. 2000.6

The Mid-City Planning Area is a cultural melting pot, with a strong international flavor. It is the heart of the city's Latino community, the home of some of Washington's most important African American landmarks and cultural resources, and a gateway for immigrants from across the globe. It includes the vibrant nightlife and ethnic restaurants of 18th Street and the "New U" Street, and other walkable neighborhood centers that embody the best qualities of urban living. The area is well-served by the District's transportation system, including the Metro Green Line, numerous bus lines, and several crosstown arterials. 2000.3

The community delivered several key messages during these meetings, summarized below: 2007.2

- a. The distinct and eclectic character that defines Mid-City neighborhoods should be protected as infill development takes place. The communities of the Mid-City welcome community reinvestment, but are worried that the rapid pace of redevelopment may be changing the fabric of the community too quickly. The loss of neighborhood diversity was the greatest concern expressed at almost every Comp Plan meeting in the Mid-City area, and was raised in many different contexts—from the need for affordable housing to concerns about the influx of chain stores and decline of neighborhood businesses.

★ **Policy MC-1.1.7: Protection of Affordable Housing**

Strive to retain the character of Mid-City as a mixed income community by protecting the area's existing stock of affordable housing units and promoting the construction of new affordable units. 2008.8

MC-1.2 Conserving and Enhancing Community Resources 2009

★ **Policy MC-1.2.1: Cultural Diversity**

Maintain the cultural diversity of Mid-City by encouraging housing and business opportunities for all residents, sustaining a strong network of social services for immigrant groups, and retaining affordable housing within the Planning Area. 2009.1

Elsewhere in the neighborhood, there are still concerns about the conversion of row houses to apartments, over concentration of bars, the loss of affordable housing units, and inadequate buffering between residential and commercial uses. Public-private redevelopment of the Marie Reed School campus is currently under consideration. The project provides an opportunity for a new school and community facility—and possibly new affordable housing, but has raised concerns about additional density, congestion, and the loss of open space. The continued strong involvement of the Advisory Neighborhood Commission, local community organizations, and individual residents will be important as these conflicts and challenges are addressed. 2014.4



★ **Policy MC-2.4.2: Preference for Local-Serving Businesses**

Enhance the local-serving, multi-cultural character of the 18th Street/ Columbia Road business district. Encourage small businesses that meet the needs of local residents, rather than convenience stores, large-scale commercial uses, and concentrations of liquor-licensed establishments. Consistent with this policy, the conversion of restaurants to night clubs or taverns and the expansion of existing night clubs or taverns into adjacent buildings should be discouraged. 2014.6

★ **Action MC-2.4.D: Local Business Assistance**

Explore the feasibility of amending tax laws or developing tax abatement and credit programs to retain neighborhood services and encourage small local-serving businesses space along 18th Street and Columbia Road. 2014.14

Chapter 7

Economic Development Element

Policy ED-3.2.6: Commercial Displacement

Avoid the displacement of small and local businesses due to rising real estate costs. Programs should be developed to offset the impacts of rising operating expenses on small businesses in areas of rapidly rising rents and prices. 714.11

Policy ED-3.2.1: Small Business Retention and Growth

Encourage the retention, development, and growth of small and minority businesses through a range of District-sponsored technical and financial assistance programs. 714.6

Action ED-3.2.B: Business Incentives

Use a range of financial incentive programs to promote the success of new and existing businesses, including enterprise zones, minority business set-asides, loans and loan guarantees, low interest revenue bonds, federal tax credits for hiring District residents, and tax increment bond financing. 714.16

Action ED-3.2.C: Shopsteading Program

Investigate the feasibility of a shopsteading program that would enable entrepreneurs and small businesses to open shop in currently vacant or abandoned commercial space at greatly reduced costs. 714.17

Action ED-3.2.D: Small Business Needs Assessment

Conduct an assessment of small and minority business needs and existing small business programs in the District. The study should include recommendations to improve existing small business programs and to develop new programs as needed. 714.18

CONVERGANCE OF ZONING REGULATIONS AND COMPREHENSIVE PLAN

10-A108. HOW TO USE THE COMPREHENSIVE PLAN.

108.5 The policies and actions of the Comprehensive Plan are principally intended to guide the decisions of District government.

Volume 3 of the Comprehensive Plan Implementation Element Chapter 25

10-A2504. IM-1.3 ZONING REGULATIONS AND CONSISTENCY.

2504.5 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.

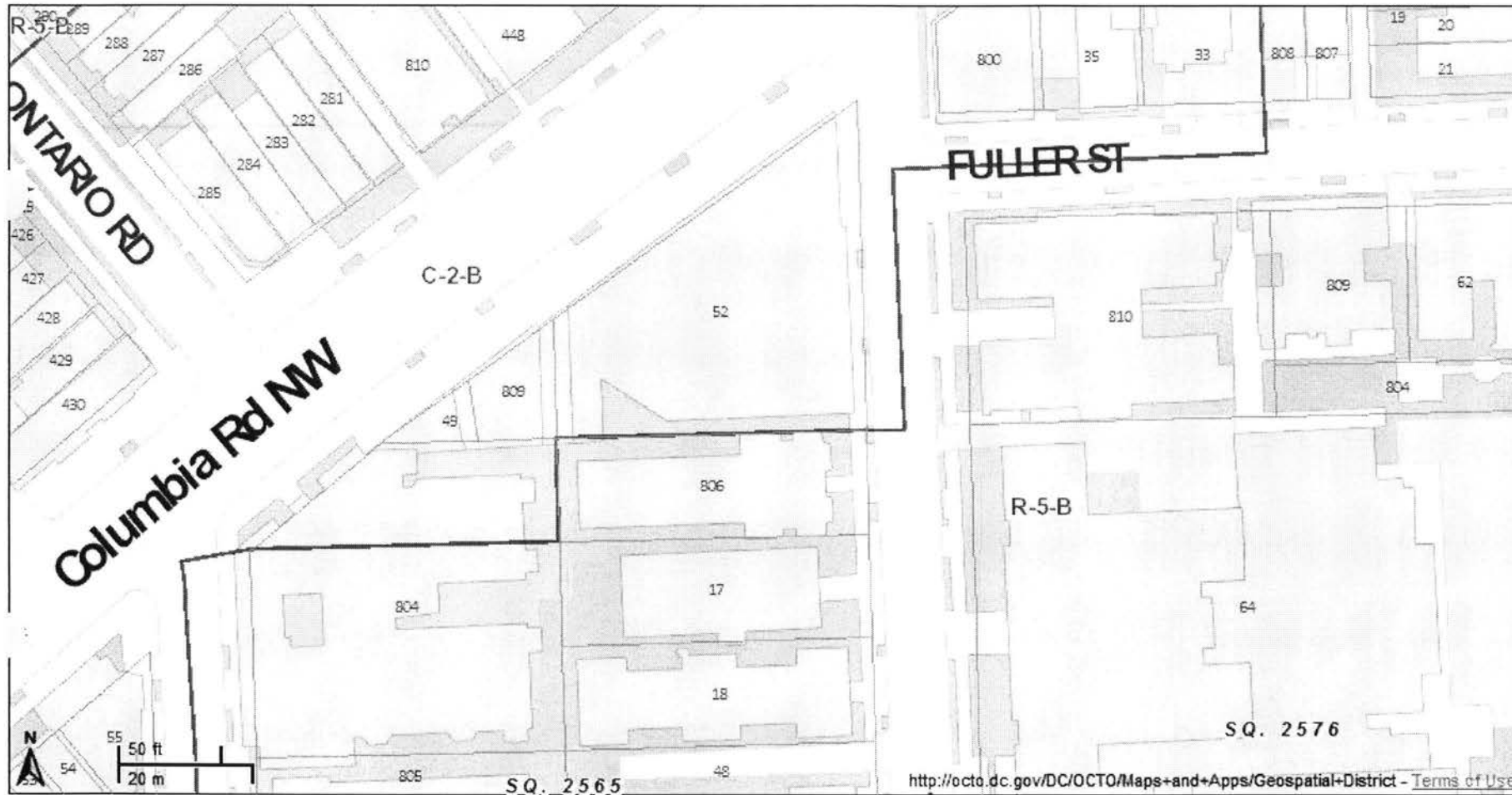
Policy IM-1.3.5: District Government Compliance

2504.7 Ensure continued compliance by the government of the District of Columbia with the provisions and standards of its building and zoning regulations in all parts of the city.

**Adams Morgan for Reasonable Development
BZA Case 18506
Attachment C**



District of Columbia Office of Zoning
EXTRACT OF THE DISTRICT OF COLUMBIA ZONING MAP
February 22, 2013



<http://ocfo.dc.gov/DC/OCTO/Maps+and+Apps/Geospatial+District> - Terms of Use

**Zoning
Layers**

Zone Districts	Overlays Districts	TDRs	Air Rights Zone
Pending Zones	Pending Overlay Districts	Pending PUDs	Baist Index
Historic Districts	Campus Plans	Active PUDs	CEA

To certify zoning on any property in order to satisfy a legal requirement, contact the Office of Zoning at (202) 727-6311.