

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Maxine Brown-Roberts, Development Review Specialist  
*JS* Jennifer Steingasser, Deputy Director, Development, Design, and Preservation

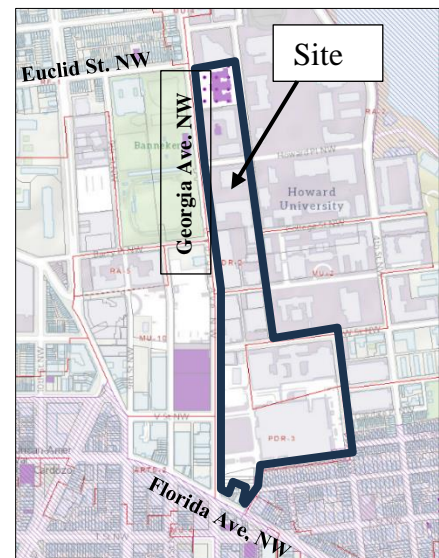
**DATE:** December 6, 2024

**SUBJECT:** OP Hearing Report – ZC 24-01 to rezone properties in the RA-2, PDR-2, and PDR-3 zones to the MU-9B and MU-10 zones for properties on the Howard University Campus fronting on Georgia Avenue, NW.

### **I. BACKGROUND**

Howard University and Howard University representing the Florida Avenue Baptist Church and the Trustees of Florida Avenue Baptist Church (“Howard” or “Applicant” or “University”) proposes a map amendment to rezone several properties fronting on the east side of Georgia Avenue, NW between Euclid Street, NW to the north and Florida Avenue, NW to the south from the RA-2, PDR-2, and the PDR-3 zones to the MU-9B and MU-10 zones.

The OP setdown report is at [Exhibit 12](#). The application was set down for a public hearing as a rulemaking case by the Zoning Commission (“ZC”) on March 28, 2024 at which time the ZC asked that the Applicant address how the properties owned by the Trustees of Florida Avenue Baptist Church and the Florida Avenue Baptist Church would fit into the overall redevelopment of the Howard Campus Plan and to further explain how the identified inconsistencies with policies of the Comprehensive Plan are overcome by other Comp Plan policies. The Applicant in their submission, [Exhibit 14](#), have represented that similar to properties within the campus plan, the Comprehensive Plan recommends Mixed-Use (Medium Density Commercial/Medium Density Residential) and Mixed-Use (High Density Residential/Medium Density Commercial/Institutional) on the FLUM and as a Main Street Mixed Use Corridor on the GPM and are zoned PDR-3. The inclusion of the Church properties is a matter of being efficient and that those properties would not be included in the Campus Plan or be part of any development within the campus.



The Applicant addressed the map amendment being inconsistent with a few Comp Plan policies which are overcome by many other Comp Plan policies at [Exhibit 3E](#) and [Exhibit 14B](#).

### **II. RECOMMENDATION**

The Office of Planning (“OP”) recommends that the Zoning Commission **approve** the proposed map amendment for the following squares and lots:

Square	Lot(s)	Existing Zone	Proposed Zone
3060	830 and 839	RA-2	MU-10
3064	45 and 837	RA-2	MU-10
3064	44 and 826	PDR-2	MU-10
3065	829-831, 833 and 834	PDR-3	MU-10
3074	11	PDR-3	MU-9B
3075	807	PDR-3/RA-2	MU-9B – western portion MU-10 – eastern portion
3078	17, 26-28, and 30	PDR-3	MU-10

The majority of the proposed area to be rezoned is governed by the Howard University 2020-2030 Central Campus Plan and the only housing allowed is for students, faculty and staff, so not subject to IZ. If any of the subject property were to be removed from the campus plan following the proposed rezoning, OP recommends that they be subject to IZ Plus. Square 3078, Lots 17, 26–28, and 30 are not within the Campus Plan and are subject to IZ+.

The proposed rezoning would not be inconsistent with the Comprehensive Plan Future Land Use Map (FLUM) which recommends Mixed Medium Density Residential/Medium Density Commercial/Institutional uses; High Density Residential/Medium Density Commercial/Institutional uses; and Medium Density Residential/Medium Density Commercial uses. The Generalized Policy Map recommends this portion of Georgia Avenue as a Main Street Mixed Use Corridor and a Multi-Neighborhood Center for different portions of the site.

The policies of the Comprehensive Plan as well as the recommendations of the Mid-City Element, the Mid-City Small Area Plan, and the Howard University 2020 -2030 Central Campus Plan together support changing the PDR and residential zones on these properties to allow an increase in density and accommodate the revitalization of this portion of Georgia Avenue through the redevelopment of the University’s properties to support their needs as well as those of the neighborhood and the City as a whole. The uses could include retail, service uses, and health care as well as improvements to the public realm.

### III. ISSUES RAISED BY THE ZC AT SETDOWN AND IN THE OP SETDOWN REPORT

Issue	Applicant Response	OP Comments
The ZC requested information as to how the properties owned by the Trustees of Florida Avenue Baptist Church and the Florida Avenue Baptist Church fit into the campus plan development.	The Applicant has provided additional information regarding the properties owned by the Trustees of Florida Avenue Baptist Church and the Florida Avenue Baptist Church at <a href="#">Exhibit 14</a> .	The Applicant provided that the properties owned by the Trustees of Florida Avenue Baptist Church and the Florida Avenue Baptist Church are outside of the campus boundary and would be developed independently of the University properties.
Detail on what specific policies in the Comprehensive Plan outweigh the Petition’s inconsistencies with the Comprehensive Plan.	The Applicant provided a detailed analysis at <a href="#">Exhibit 3E</a> and <a href="#">Exhibit 14B</a> on Comp Plan policies not being furthered by the map amendment but that	The applicant has identified four Comp Plan policies to which the proposed map amendment would be inconsistent. <ul style="list-style-type: none"> <li>• <i>LU-2.1.4: Rehabilitation Before Demolition</i></li> </ul>

	these are outweighed by other policy consistencies.	<ul style="list-style-type: none"> <li>• <i>LU-3.2.1: Retain Areas for Industrial Uses</i></li> <li>• <i>T-1.1.8: Minimize Off-Street Parking</i></li> <li>• <i>H-1.6.5: Net-Zero, Energy Efficient Housing</i></li> </ul> <p>However, the Comp Plan also provides many other policies which exempts some development from meeting these policies and greatly outweigh the results of meeting these policies.</p>
OP requested a map showing the exact boundary lines of the proposed zones prior to the public hearing.	The Applicant provided the requested map at <a href="#">Exhibit 14A</a> .	The Applicant confirmed that the zone boundaries shown in the OP Setdown Report are correct.

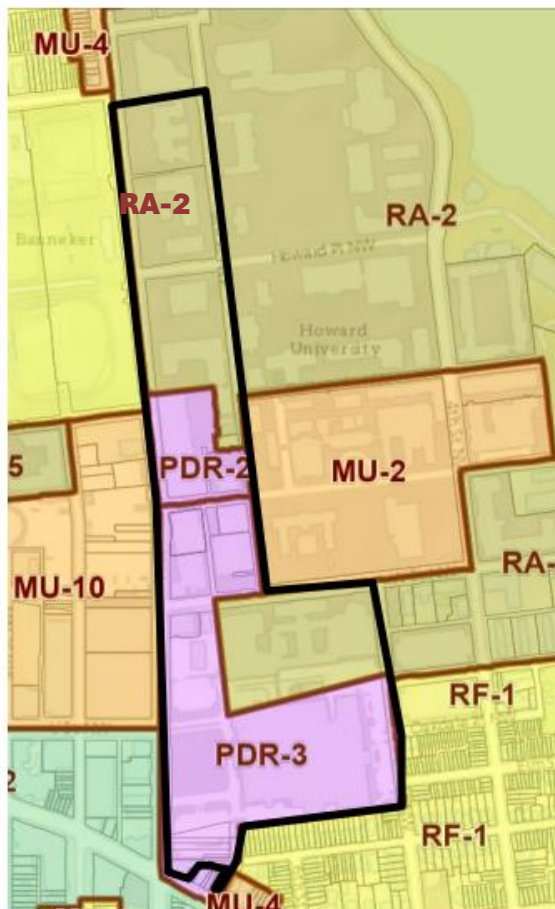
#### IV. APPLICATION-IN-BRIEF

<b>Applicant:</b>	Howard University, Florida Avenue Baptist Church and the Trustees of Florida Avenue Baptist Church represented by Holland & Knight.
<b>Address:</b>	Howard University, Georgia Avenue, NW
<b>Legal Description:</b>	Square 3060, Lots 830 and 839; Square 3064, Lots 44, 45, 826, and 837; Square 3065, Lots 829–831, 833, and 834; Square 3074, Lot 1; Square 3075, Lot 807; and Square 3078, Lots 17, 26–28, and 30.
<b>Ward and ANC:</b>	Ward 1/ANC-1B and ANC-1E
<b>Property Size:</b>	1,157,379 square feet (26.56 acres) combined.
<b>Future Land Use Map Designation:</b>	Mixed-Use - Medium Density Residential/Medium Density Commercial/Institutional Mixed-Use - High Density Residential/Medium Density Commercial/Institutional Mixed-Use - Medium Density Residential /Medium Density Commercial
<b>Generalized Policy Map Designation:</b>	Main Street Mixed Use Corridor Multi-Neighborhood Center Institutional
<b>Proposed Map Amendment:</b>	<p><b><u>RA-2 to MU-10</u></b></p> <ul style="list-style-type: none"> <li>- Square 3060, Lots 830 and 839;</li> <li>- Square 3064, Lots 837 and 45;</li> <li>- Square 3075, eastern portion of Lot 807</li> </ul> <p><b><u>PDR- 2 to MU-10</u></b></p> <ul style="list-style-type: none"> <li>- Square 3064, Lots 44, 826</li> </ul> <p><b><u>PDR-3 to MU-10</u></b></p> <ul style="list-style-type: none"> <li>- Square 3065, Lots 829–831, 833, and 834</li> <li>- Square 3078, Lots 17, 26–28, and 30.</li> </ul> <p><b><u>PDR-3 to MU-9B</u></b></p> <ul style="list-style-type: none"> <li>- Square 3074, Lot 11;</li> </ul> <p>Square 3075, western portion of Lot 807</p>

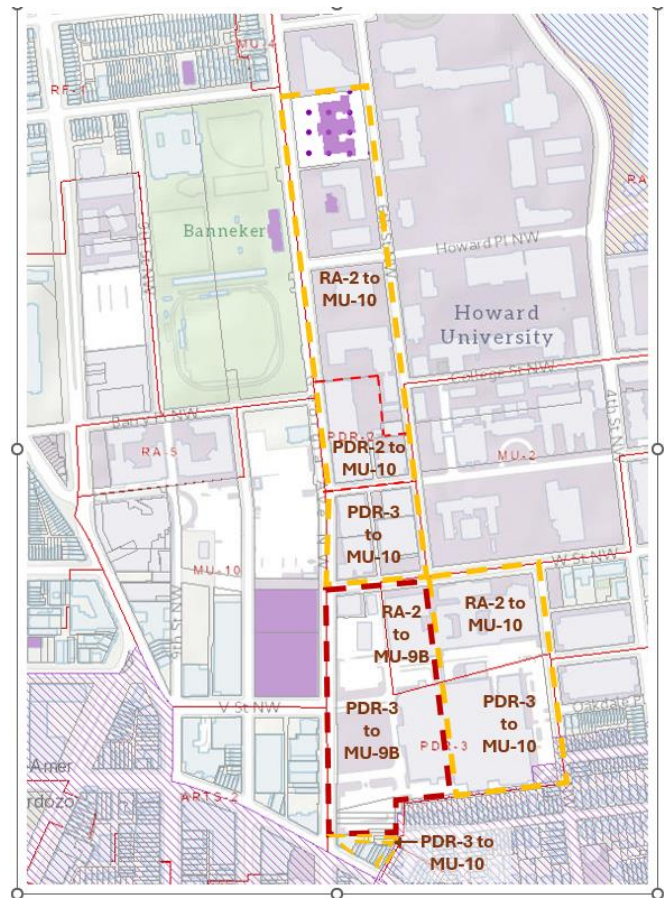
## V. SITE AND AREA DESCRIPTION

The properties to be rezoned are located on the east side of Georgia Avenue, NW between Euclid Street, NW on the north and Florida Avenue, NW on the south and primarily consists of the Howard University Hospital, the Howard University College of Medicine, Howard University auxiliary services, and various retail uses.

The properties combine for approximately 1,157,379 square feet of land area (approximately 26.56 acres). The properties are also governed by the 2020-2030 Howard University Central Campus ([ZC 20-08](#)).



Site with existing zoning



Site with approx. boundaries of proposed zoning

To the north of the subject sites are properties which are part of Howard University campus, various retail, office and residential uses. To the east, is the Howard University campus and single family residences in the LeDroit Park neighborhood. Properties to the south are developed with various small retail uses and some vacant properties along Florida Avenue, NW. On the west side of Georgia Avenue is a mixture of uses including the Banneker Recreation Center and multiple properties (Howard University owned) to house future mixed-use developments which have been approved or are being constructed. These future mixed-use developments include:

- The Bond Bread/WRECO [Bond Bread/WRECO](#) development would have:
  - 180 rooms hotel;
  - 469 residential units;
  - 20,000 square foot public plaza; and



- 49,000 square feet of retail space.
- National Research Center for Health Disparities mixed-use development [National Research Center for Health Disparities](#) (BZA 20850 [BZA 20850](#)) would have:
  - 200,000 square feet of office space;
  - 431 residences; and
  - 25,001 square feet of retail use.

## **VI. HOWARD UNIVERSITY 2020-2030 CENTRAL CAMPUS PLAN**

A synopsis of the Howard University 2020-2030 Central Campus Plan and its boundary is provided in the OP Setdown Report at [Exhibit 12](#), Section IV. The University states that the proposed rezoning would enable the development envisioned by the campus plan to come to fruition, and would meet the needs of the University, the neighborhood and the City as a whole.

## **VII. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES**

The Zoning Regulations classify the RA-2 zones as moderate-density residential areas and its intent is as follows:

- (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. (Subtitle F § 101.3):*

Since these properties are within the HU campus plan, the RA-2 zoned properties can accommodate residential use (in this case dormitories) and a variety of other non-residential uses. However, the moderate level of density that is allowed by the zoning along this corridor would not be consistent with the density envisioned by the Comprehensive Plan along the Main Street Mixed Use Corridor.

The Zoning Regulations classify the PDR-2 zone as allowing moderate-density production, distribution and repair (industrial, including heavy commercial, and manufacturing uses) and commercial uses, while the PDR-3 zone allows a medium-density level of these uses. Both zones are described as areas which employ a large workforce and require some heavy machinery. The intent of the PDR zones described in Subtitle J § 101.1 are to provide for:

- (a) *Heavy commercial and light manufacturing activities employing large numbers of people and requiring some heavy machinery under controls that minimize any adverse effect on other nearby, more restrictive zones; and*
- (b) *Areas suitable for development as heavy industrial sites, but at the same time protect those industrial developments from the intrusion of non-industrial uses that impede the full utilization of properly located industrial sites.*

The PDR-2 and PDR-3 zones do not support the existing developments and are now inconsistent with the intensity of development envisioned by the campus plan and the recent amendment to the Generalized Future Land Use Map designation of the site for mixed-use medium and high density residential/medium density commercial/institutional uses.

The development standards of the RA-2, PDR-2 and PDR-3 zones vs MU-9B and MU-10 are compared on the following table:

EXISTING				PROPOSED	
	RA-2 Zone	PDR-2 Zone	PDR-3 Zone	MU-9B Zone	MU-10 Zone
<b>Height</b>	50 ft. max	60 ft. max.	90 ft. max.	90 ft. 100 ft. w/ IZ	90 ft. 100 ft. w/ IZ
<b>Penthouse Height</b>	12 ft./1 story; except 15 ft./2 <sup>nd</sup> story for penthouse mechanical space	12 ft./1 story; except 18.5 ft./2 <sup>nd</sup> story for penthouse mechanical space	20 ft./1 story; plus, mezzanine; 2 <sup>nd</sup> story for penthouse mechanical space	20 ft./1 story; plus, mezzanine; 2 <sup>nd</sup> story for penthouse mechanical space	20 ft./1 story; plus, mezzanine; 2 <sup>nd</sup> story for penthouse mechanical space
<b>FAR</b>	1.8 2.16 IZ max.	3.0 max. restricted uses 4.5 max. nonrestricted us	4.0 max. restricted uses 6.0 max. nonrestricted us	6.5 7.8 IZ 6.5 for nonresidential use	6.5 7.8 IZ 1.0 max. for nonresidential us
<b>Lot Occupancy</b>	60% mzx.	N/A		N/A	75% 80% IZ
<b>Rear Yard</b>	4”/1 ft. of height; 15 ft. min.	2.5”/1 ft. of height; 12 ft. min.		2.5”/1 ft. of height; 12 ft. min.	2.5”/1 ft. of height; 12 ft. min. (for residential use only)
<b>Side Yard</b>	Varies.	N/A		None required. If provided; 5 ft. min. 8 ft. for detached or semi-detached units.	None required. If provided; 5 ft. min. 8 ft. for detached or semi-detached units.
<b>Transition Setback</b>	N/A	25 ft. setback for each lot line abutting a lot in a residential zone or developed with a residential use. 25 ft. setback for each lot line abutting an alley that serves as a boundary between PDR zone and a residential zone. 15 ft. setback for each lot line abutting a street less than 70 ft. in ROW width that serves as a boundary between PDR zone and a residential zone..		N/A	N/A
<b>Plaza</b>	N/A	N/A		N/A	8% of lot area for lots greater than 10,000 sq. ft.
<b>GAR</b>	0.40 min.	0.30 min. Except: (a) 1 story building = 0.1 min. (b) 2 story building = 0.2 min.		0.20 min.	0.20 min.

### VIII. IZ AND IZ PLUS

Residential development on the site by the University, such as dorms or housing for staff or faculty, would not be subject to IZ or IZ Plus, under the rules for the IZ program.

Subtitle C § 1001.6 (c) states:

*Housing developed by or on behalf of a local college or university exclusively for its students, faculty, or staff; and*

However, should the properties be no longer needed by the University and sold off for private development, IZ would automatically apply. In addition, Subtitle X § 502.1(a)(1), states that IZ Plus is applicable to map amendments that rezone properties from PDR zone to an ARTS, CG, D, **MU**, R, RA or RF zone. Subtitle X § 502.2(c) goes on to state when IZ Plus would not apply:

*(c) The Zoning Commission determines is not appropriate for IZ Plus due to the mitigating circumstances identified by the Office of Planning in its report recommending that the map amendment not be subject to IZ Plus;*

OP typically recommends that IZ Plus apply as part of any map amendment, and only recommends that it not be applied if the area has a particularly significant amount of dedicated affordable

housing already, and if the Comp Plan identifies the area for additional market-rate housing to provide a better balance. As such, in this case - although Subtitle C § 1001.6 (c) exempts universities from this provision and the proposed area to be rezoned is governed by a campus plan and the only housing allowed is for students, faculty and staff - the University has removed other properties from within the campus plan which are in zones that are subject to IZ requirements. If any of the subject property were to be removed in the future from the campus plan following the proposed rezoning, they would be subject to IZ, and OP would recommend that IZ Plus apply, consistent with the Racial Equity Analysis provided below.

The properties owned by the Florida Avenue Baptist Church and the Florida Avenue Baptist Church Trustees are outside of the campus plan and would be developed independently of the University and would therefore be subject to IZ+.

## IX. PLANNING CONTEXT

### Brief History of the Mid-City Planning Area

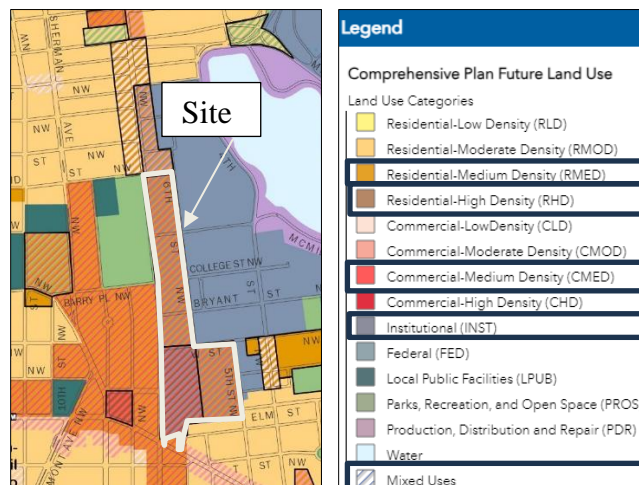
A history of the Mid-City Planning Area is outlined in the OP Setdown Report at [Exhibit 12](#), page 16. The OP Setdown Report, and Applicant filings at [Exhibit 3B, 3C, and 3E](#) also provide a complete analysis of the proposal against Comprehensive Plan policy direction, including when viewed through a Racial Equity Lens.

#### **A. Comprehensive Plan Maps**

The District of Columbia Comprehensive Plan guides the District's development, both broadly and in detail, through maps and policies that establish priorities, key actions, and assumptions about the future of development, 10A DCMR §§ 103.2 and 103.3. The Guidelines for Using the Generalized Policy Map and the Future Land Use Map in the Framework Element state that the *“Generalized Policy Map and Future Land Use Map are intended to provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies.”* Additionally, *“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 demonstrated below, the proposed zoning map amendment would not be inconsistent with the map designations or the Citywide and Area Elements.

### Generalized Future Land Use Map (FLUM)

The Future Land Use Map (FLUM) indicates that the subject properties are appropriate for Mixed Uses - Medium or High Density Residential / Medium Density Commercial / Institutional.



**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 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*

**High Density Residential:** *This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. 227.8*

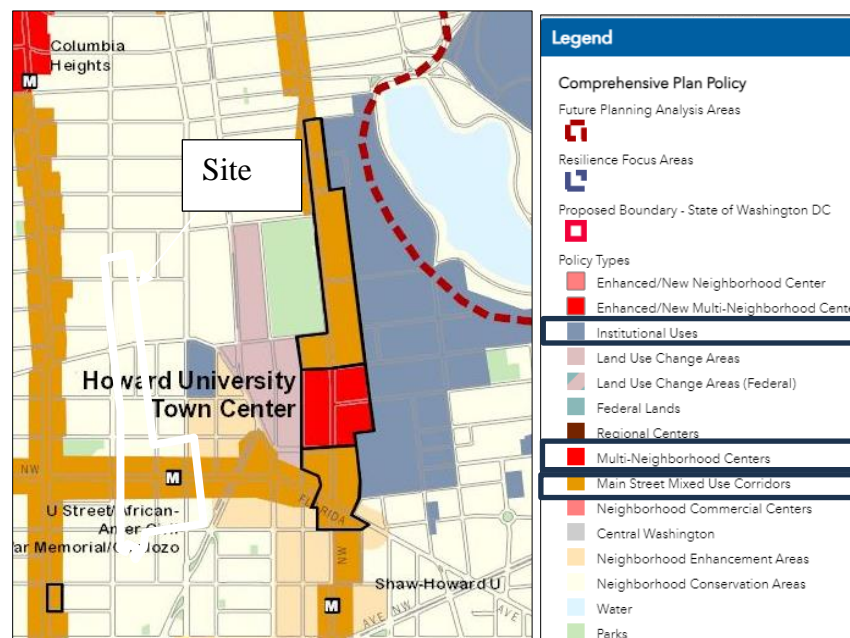
**Institutional:** *This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. While included in this category, smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. Institutional uses are also permitted in other land use categories. 227.18*

The Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226), states that the maps are intended to provide generalized guidelines for development decisions. The Framework Element identifies the MU-10 zones as a medium density residential and medium-density commercial zones and the MU-9 zone as a high density residential zone and recommends the RA-4 and RA-5 zone but states that other zones may apply. The MU-9 zone is appropriate in this case as it permits high-density mixed-use development including office, retail, and housing, with a focus on employment and residential use. The proposed zones are therefore not inconsistent with these designations.

### **Generalized Policy Map**

The Generalized Policy Map indicates that the area of the proposed map amendment is within the policy area designated as Main Street Mixed Use Corridor/Multi-Neighborhood Center/Institutional.





**Main Street Mixed Use Corridors:** These are traditional commercial business corridors with a concentration of older storefronts along the street. The area served can vary from one neighborhood (e.g., 14th Street Heights or Barracks Row) to multiple neighborhoods (e.g., Dupont Circle, H Street, or Adams Morgan). Their common feature is that they have a pedestrian oriented environment with traditional storefronts. Many have upper-story residential or office uses. Some corridors are underutilized, with capacity for redevelopment. Conservation and enhancement of these corridors is desired to foster economic and housing opportunities and serve neighborhood needs. Any development or redevelopment that occurs should support transit use and enhance the pedestrian environment. 225.14

**Multi-Neighborhood Centers:** Multi-Neighborhood Centers contain many of the same activities as Neighborhood Commercial Centers, but in greater depth and variety. The area served by a Multi-Neighborhood Center is typically one to three miles. These centers are generally found at major intersections and along key transit routes. These centers might include supermarkets, general merchandise stores, drug stores, restaurants, specialty shops, apparel stores, and a variety of service-oriented businesses. These centers also may include residential and office space for small businesses, although their primary function remains retail trade. 225.17

Examples of Multi-Neighborhood Centers include Hechinger Mall, Columbia Heights, Brentwood, and Skyland Shopping Centers. Mixed use infill development at these centers should be encouraged to provide new retail and service uses, and additional housing and job opportunities. Infrastructure improvements to allow safe access by all transportation modes to these centers are also important for increasing equitable access.

**Institutional Uses:** Much of the land identified as institutional on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites, including hospitals and religious orders, likewise may see new buildings or facilities added. Policies in the Land Use and the Educational Facilities Elements address the compatibility of such uses with surrounding neighborhoods.

The area to be rezoned is part of the larger Georgia Avenue Main Street Mixed Use Corridor. This portion of Georgia Avenue has traditionally been developed with university uses such as classroom, offices, open spaces, a hotel and some retail uses. Georgia Avenue is a pedestrian oriented roadway with multiple bus routes and is 0.25 miles away from the Shaw/Howard University Metro Station to the south and the U Street/African American Memorial/Cardozo Metrorail station to the west of the properties to be rezoned. Development of the sites would therefore support and enhance transit use. The redevelopment and reuse of some of the properties would help to keep this an active pedestrian area.

As will be discussed later in this report, the Comprehensive Plan; Mid-City Area Element, the *DUKE Development Framework for Cultural Destination District within Washington, DC's Greater Shaw/U Street* plan ("Duke Plan"), the Mid-City Small Area Plan and the Howard University Campus Plan all envision the redevelopment of this portion of Georgia Avenue with a mix of university uses specifically for the university but also with retail and other active uses that would serve the wider community. The development of the subject property with student housing (dormitory) and other economic uses would be in keeping with, and consistent with the existing and planned developments for the west side of Georgia Avenue.

The proposed MU-9B and MU-10 zones would not be inconsistent with the recommendations for Multi-Neighborhood Center on the properties between Bryant Street on the north and V Street on the south and would allow for more intense uses that is currently allowed by the PDR-3 zone. These properties would combine with properties to the west of Georgia Avenue to be the long awaited Howard Town Center. These properties are located near the major intersection of Georgia Avenue and Florida Avenue, NW, which are both major bus routes and are close to two Metro Stations. The Howard University Town Center is envisioned to be developed with a mix of residential, retail, office and service uses and would attract persons from beyond the adjacent neighborhoods. The properties within the Town Center in this application would be focused around the future Howard University Hospital and other supporting and auxiliary uses which would serve the university and the wider public. The density and intensity of the development that would be allowed under the MU-9B and MU-10 zones would be consistent with and complementary to projected development envisioned by the FLUM along Georgia Avenue.

As the majority of the properties are within the Campus Plan, many of the uses would serve the university, but also the wider community. Overall, the neighborhood character would be protected and enhanced by future development. As these are Howard University properties and also represent the Church, the developer of the property is required to work with the community organizations and nearby residential property owners to have buildings that are compatible. The mix of uses on this portion of the University and Church properties would improve the neighborhood and would not be inconsistent with the General Policy Map.

## **B. Small Area Plan**

### DUKE Plan

Some of the subject properties are within area of the [DUKE Framework for a Cultural Destination for Greater Shaw-U Street](#) ("DUKE Plan" "Plan") Small Area Plan, approved by the D.C. Council

on June 21, 2005 through Resolution 16-0209. The DUKE Plan provides direction to revitalize the neighborhood to achieve “*cohesive and memorable place with diverse subareas*”. The DUKE Plan recommends “*land use adjustments that can be implemented through amendments to the zoning map, planned unit developments, and amendments to the zoning text. This Plan provides additional guidance to the Zoning Commission as they consider zoning actions for the area.*” The DUKE Plan was approved and adopted by the D.C. Council in 2005, which is prior to the most recent 2021



Comprehensive Plan update, and many of its policies and recommendations were adopted in the Mid-City Area Element, or the Georgia Avenue Corridor and U Street/Uptown Policy Focus Area.

As shown on the map, the DUKE Plan outlines six sub-areas and the subject properties falls within the Howard Town Center Area and the Howard Theater Districts.

The Howard Town Center Area is envisioned as a university and neighborhood district, where the University and other property owners can develop their properties in accordance with the DUKE Plan. The DUKE Plan provides several guidelines for development in this area, including

the following that would apply to properties in this application:

- *Extend streets in an east-west system to connect the area to Howard University campus. Connect W Street on both sides.*
- *Include uses compatible with the rest of the Project Area, i.e. residential, restaurants, clubs and neighborhood-serving retail and services.*
- *Redevelop area with buildings up to 90 feet in height (matter of right) and density of 6.0 FAR. Ground floor retail heights should be consistent with the remainder of Project Area.*
- *Require neighborhood serving convenience retail and service uses (e.g., supermarket and drugstore) on the ground floors along Georgia Avenue and V Street, with space and mix sufficient to meet demand of surrounding residents and the Howard University community.*
- *Upper floors of buildings to be predominantly commercial, with some institutional and residential mixture.(page 30)*

The rezoning would allow for development at up to the recommended building heights and density and as envisioned in the campus plan. The proposal would allow for the integration of retail and service uses on the ground floor along with other university uses to serve the neighborhood as well as the students, faculty and visitors to the university. The recommendation to extend the streets to continue the City’s grid pattern of streets has been committed to in the campus plan and would be implemented as development takes place.

The Howard Theatre District is intended to “*be a vibrant center focused upon a revived Howard Theatre.*” This sub-district would “*complement and support a “complete” destination with restaurants, outdoor cafes/dining, intimate music clubs, bars, bookstores, art galleries, modest*

priced retail and other destination uses” (page 14). The specific recommendations for buildings located at the northeast corner of Florida Avenue and Georgia Avenue include:

- *Demolish HU’s 125 bed site and allow mixed use development, including active ground floor retail, which complement other proposed destination uses and optimize density.*
- *Develop mixed use project near Howard University Hospital. Include structured parking for shared use with Howard Theatre.*

The proposed map amendment has the potential to advance these recommendations as the proposed MU-9B and MU-10 zones would allow mixed-use development that could include many of the uses recommended.

## **X. ANALYSIS THROUGH A RACIAL EQUITY LENS AND THE ZONING COMMISSION’S RACIAL EQUITY TOOL**

The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. 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.

The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

*Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant. Equitable development holistically considers land-use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, health care, technology, workforce development, and employment opportunities. As the District grows and changes, it must do so in a way that encourages choice, not displacement, and builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes and share in the benefits of the growth, while not unduly bearing its negative impacts. 213.7*

The Commission four-part Racial Equity Tool outlines information to be provided to assist in the evaluation of zoning actions through a racial equity lens. The Applicant Racial Equity Analysis is provided as part of [Exhibit 3E](#), and is provided below in relation to the proposed zoning map change from the RA-2, PDR-2 and PDR-3 zones to the MU-9B and MU-10 zones. While it can be difficult to assess the actual impact that would result from any development on these sites, the potential impacts – positive or negative - of new development that would result from the proposed rezoning can be assessed, on the assumption that development consistent with permissions of the new zones would, at some point, be done.

### **Racial Equity Tool Part 1 - Comprehensive Plan Policies**

In the context of zoning, certain priorities of equity are explicit throughout the Comprehensive Plan, including affordable housing, displacement, and access to opportunity. Below is an outline of Comprehensive Plan policies relative to this proposal which, when viewed through a racial equity lens, provides the framework for evaluating the proposed map amendment. Please refer to Attachment I to the [OP Setdown Report](#) for the full text of each policy statement, or refer to the [Comprehensive Plan](#) available on the Office of Planning website – [www.planning.dc.gov](http://www.planning.dc.gov).

As noted above, the proposal would be not inconsistent with both Comp Plan Generalized Policy Map and Future Land Use Map. The map amendment proposal is also, on balance, not inconsistent with the Citywide Elements of the Comprehensive Plan and would further the policies of the Land Use, Transportation, Housing, Environmental Protection, Economic Development and Educational Facilities Elements.

### ***Land Use Element***

The proposed rezoning to the MU-9B and MU-10 zones would facilitate the redevelopment of underutilized land with a mix of uses that would enhance the surrounding neighborhood and revitalize and the lower Georgia Avenue, NW corridor. Neither the Comprehensive Plan Maps, the Mid-City Element and Focus Policy Areas nor the Howard University Campus Plan anticipate PDR uses on the site. The rezoning would allow for redevelopment with a mix of neighborhood-serving retail, university housing, office, and other institutional uses that would serve the university as well as existing and future residents of the surrounding neighborhood, and thus help to create a vibrant corridor experience.

### ***Transportation Element***

The Howard University Campus Plan incorporates many of the goals and policies of the Transportation Element which would be implemented through any new development or redevelopment along Georgia Avenue. Although some improvements are underway, many more are associated with the redevelopment of the properties in this application. Movements related to buses, vehicles and bicycle would be assessed as part of any redevelopment. The Transportation Element encourages cross street connections which are being implemented through the campus plan and would be furthered by any new development. As this would be an area of active uses, improvements to facilitate pedestrian movements and streetscape improvements would also be implemented to enhance the walkability of the area and discourage auto-orientated uses. Given that the properties are located along a major transit corridor near various forms of public transit, future redevelopment would provide increased access to neighborhood-serving commercial uses and institutional uses within the surrounding area.

### ***Housing Element***

In general, the proposed rezoning from the PDR zones to the MU-9B and MU-10 zones would allow for additional housing and affordable housing, although the properties are also governed by the Howard University Campus Plan which only allows student and faculty housing. The additional density through the rezoning would allow for a larger number of students to reside on campus and thus allowing the available housing units to go to other residents. The University has a number of properties to the west of Georgia Avenue, outside of the campus plan, which are planned or are under development with housing and affordable housing.

### ***Environmental Protection Element***

With any future development or redevelopments of the properties, there is a requirement to comply with the Green Building Act, the District's storm water management regulations, and would be consistent with the Sustainable DC Plan in addition to any other requirements by the Department of Energy and the Environment (DOEE). The buildings would be required to incorporate energy efficient systems to reduce energy use and provide alternative energy sources to contribute to the District's energy efficiency goals. Redevelopment of the properties would also include new landscaping and environmentally friendly enhancements to the adjoining streetscape and would



meet the City’s Environmental Protection goals.

### ***Economic Development Element***

The proposed map amendment has the potential to provide new retail, office and service opportunities in a transit-accessible area. Additional office space could allow for the expansion of healthcare and research uses associated with the university. The map amendment has the potential to create significant retail and service space to support the needs of the university and residents in the area. Furthermore, future uses can support institutional growth and programs associated with the university and also assist in revitalizing the Georgia Avenue corridor.

### ***Educational Facilities***

The University is supportive of many of the City’s goal for improvement in education, preservation of the environment, encouraging and supporting the use of public transportation and reducing the use of single-occupancy vehicles and would incorporate these measures in the future developments. The University is also involved in the community with student volunteers in many areas and they would continue to serve District resident through the many services they provide in addition to retail opportunities to serve address the need of the University’s as well as the surrounding community. The rezoning would allow a significant increase in on-site housing opportunities for both lower and upper-class students. The proposed level of development is anticipated by the campus plan.

### ***What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?***

The Applicant at [Exhibit 14B](#) identified Comprehensive Plan policies with which the proposed map amendment would not advance and several policies which would overcome these inconsistencies and make the proposal map amendment not inconsistent with the Comprehensive Plan. The Applicant identified the following policies and OP agrees that the following policies would not be advanced by the proposed rezoning but could be mitigated:

#### ***LU-2.1.4: Rehabilitation Before Demolition***

The Applicant envisions that some of the existing buildings within the area of the map amendment would be demolished because of their age, deterioration, structural challenges, or a lack of architectural or historical significance. Adaptive reuse can also be economically unviable when the cost of renovating a building exceeds the cost of new construction to bring it up to current code and make structural modifications. Additionally, in some cases the additional density granted by the map amendment may not be supported by existing structures making rehabilitation of existing structures infeasible. Policies which encourage revitalization through replacement buildings include:

- *MC-2.1.1: Revitalization of Lower Georgia Avenue NW;*
- *LU-1.5.1: Infill Development;*
- *LU-2.2.3: Restoration or Removal of Vacant and Abandoned Buildings*
- *LU-2.2.4: Neighborhood Beautification; and*
- *E-3.2.7: Energy-Efficiency Building and Site Planning.*

***Policy LU-3.2.1: Retain Areas for Industrial Uses***

Policy LU-3.2.1 seeks to retain an adequate supply of industrial land for PDR uses to meet the District's current and future PDR needs, which could include public works functions, warehousing, transportation storage and maintenance, construction staging, and back-office service needs. However, for the subject area, the original PDR uses are no longer in existence on the properties, the approved campus plan does not envision or plan for PDR uses, and neither the FLUM nor the Policy Map designate these properties for PDR uses.

***Policy H-1.1.1: Private Sector Support***

This policy statement calls for the private sector production of new market rate and affordable housing as part of new developments. In this case, the proposed rezoning would not result in new market rate or affordable housing with the associated density permitted by the new zones. This inconsistency is overcome by the properties being governed by a campus plan that only allows housing for students and faculty on campus. However, this inconsistency is mitigated by the following:

- The University owns other properties to the west of Georgia Avenue, not within the campus boundary, where new development would provide housing and affordable housing;
- New student or staff housing on these properties could “free up” existing housing off-site, including existing naturally occurring affordable housing; and
- Should the properties ever be deemed by the University to be not required and made available for private development, the zoning would allow significant new housing, including affordable housing.

***Policy H-1.6.5: Net-Zero, Energy Efficient Housing***

***Policy E-3.2.2: Net-Zero Buildings***

The Applicant has identified these policies which encourages new housing units and other buildings in the District to be net-zero energy and water efficient. The Applicant states that at this time they are unable to verify that all future development will consist of net-zero buildings but will continue to evaluate options and opportunities as building design progresses, but that future developments would comply with the Green Building Code, resulting in energy efficient features. However, these measures may not all result in Net-Zero buildings. Further, future developments would comply with the Green Building Act, the District's storm water management regulations, and would be consistent with the Sustainable DC 2.0 Plan.

***Policy T-1.1.8: Minimize Off-Street Parking***

The Applicant identifies Policy T-1.1.8: Minimize Off-Street Parking as an inconsistency as future development could result in additional vehicular trips contrary to this policy. All new development would generate additional trips but there are also policies which would help to minimize the need for off-street parking and include:

- *MC-1.1.8: Multimodal Connections;*
- *LU-1.4.1: Station Areas as Neighborhood Centers;*
- *LU-1.4.2: Development Around Metrorail Stations;*
- *LU-1.4.3: Housing Around Metrorail Station;*
- *LU-2.4.5: Encouraging Nodal Development;*
- *T-1.1.4: Transit-Oriented Development;*

- *T-1.1.7: Equitable Transportation Access;*
- *T-1.2.3: Discouraging Auto-Oriented Uses;*
- *T-2.4.1: Pedestrian Network;*
- *T-2.4.2: Pedestrian Safety;*
- *T-2.6.1: Transportation Access; and*
- *T-2.6.2: Transit Needs.*

### **Mid-City Area Element**

The proposal would particularly further the following Area Element policy objectives:

- *Policy MC-1.1.2: Directing Growth*
- *Policy MC-1.1.3: Infill and Rehabilitation*
- *Policy MC-1.1.4: Local Services and Small Businesses*

The proposed rezoning to the MU-9B and MU-10 zones would provide for increased development potential, which would enhance and support the economic vitality of the surrounding area. The rezoning would allow for higher density growth as envisioned by the Comprehensive Plan Policy Map and Future Land Use Map along the Georgia Avenue corridor and help to preserve the row house character of the adjacent residential neighborhoods of LeDroit Park, Shaw, and Pleasant Plain. As envisioned in the campus plan, the revitalization and redevelopment of properties fronting on the Georgia Avenue, NW corridor would provide opportunities to enhance facades and buildings, and pedestrian and bicycle connections. New development would also include improvement to stormwater infrastructure, street trees, green roofs, pervious surfaces, and bioretention areas.

Within the Mid-City Area Element, portions of the subject site are also within two policy focus areas - the *Georgia Avenue Corridor* and the *U Street /Uptown Policy Focus Area* which include a number of specific recommendations for the area's development.

- *Policy MC-2.1.1: Revitalization of Lower Georgia Avenue NW*
- *Policy MC-2.1.2: Georgia Avenue NW Design Improvements*
- *Policy MC-2.1.3: Howard University*
- *Policy MC-2.1.5: Cross-Town Connectivity*
- *Action MC-2.1.A: Corridor Identity*
- *Action MC-2.1.C: Howard Town Center*
- *Action MC-2.1.D: Great Streets Improvements*
- *Policy MC-2.3.2: Uptown Subareas*

The proposed rezoning would meet the policy for the revitalization of the Lower Georgia Avenue area. To implement the revitalization, the Campus Plan envisions uses such as ground floor retail or other active uses; university offices; housing for students and faculty; improvement to building facades, as well as reorganization of some buildings to have frontage on Georgia Avenue.

The University, through the Howard University Community Association has committed to continue working with the residents of adjacent neighborhoods, the ANC, and other community organization to have open and responsive communications in relation to student who live within the community, traffic, events and the proposed development. The University would continue to foster a relationship of trust and openness.

A portion of the area to be rezoned is within the area recommended for the Howard Town Center to be developed with a mix use development. Although the properties to be rezoned would be devoted

to university use, uses such as medical and cultural uses would serve the needs of residents in the neighborhood as well as the City as a whole.

In conjunction with DDOT, the University proposes to introduce additional landscaping along Georgia Avenue and the University has committed to working with DDOT to implement the recommendations of the Georgia Avenue Great Streets Initiative which includes landscape improvements which would complement the developments along this important transportation corridor. The University is also working with DDOT to implement the recommendations of the Cross-Town Multimodal Transportation Study by making street connections between its properties on the east and west side of Georgia Avenue.

A portion of the subject site is also identified as being within the U Street/Uptown area which is envisioned as an area to enhance and promote DC's Black cultural history. A mixed-use center would be able to accommodate uses such as arts establishments, restaurants, and shops along the Georgia Avenue frontage to serve residents and visitors to the area.

### **Racial Equity Tool Part 2 – Applicant/Petitioner Community Outreach and Engagement**

The Applicant has provided details of their ongoing outreach efforts as at [Exhibit 25](#). The property is within Advisory Neighborhood Commission ("ANC") 1B and ANC 1E. The Applicant has outlined the meetings with both ANCs and both has voted to recommend approval of the proposal. At [Exhibit 22](#), ANC-1E provided a resolution of support.

The record also outlines the Applicant's meetings with the LeDroit Park Civic Association. At [Exhibit 25A](#) and [Exhibit 25B](#) are signed Memorandums of Agreement between the LeDroit Park Civic Association and Howard University and LeDroit Park Civic Association and the Trustees of Florida Avenue Baptist Church and Florida Avenue Baptist Church.

The agreement with Howard is in regards the hospital site and covers transition setbacks, transition heights, and an ambulance tunnel to mitigate noise, light, pollution and any other nuisance causing conditions on the LeDroit Park community. The agreement would also limit uses such as restaurant, bars, tavern or club, loading docks, mechanical equipment and service entrances within 100 feet of any residential lot line along U Street Alley, Bohrer Street, and the 2000 and 2100 Block of 5<sup>th</sup> Street, NW is referred to as the "Impacted Residential Area."

The agreement with the Trustees of Florida Avenue Baptist Church and Florida Avenue Baptist Church includes building height and setback restrictions along the lot lines on the east side of Bohrer Street, NW. The agreement also includes restrictions such as restaurant, bars, tavern or club, loading docks, mechanical equipment and service entrances within 100 feet of any residential lot line along the east side of Bohrer Street, NW. The signed agreements were in response to the community's concerns regarding the impacts of future development, facilitated by the map amendment, on adjacent to lower density residential use.

The Applicant also made presentation to the Howard University Community Advisory Council ("Howard CAC") regarding the proposal. The Howard CAC is comprised of several organizations including: Shaw Main Street, Lower Georgia Avenue Main Street, Councilmember's Office, Florida Ave Baptist Church, LeDroit Park Civic Association, Georgia Avenue Thrive, District Bridges, Uniting Our Youth, Pleasant Plains Civic Association, HU Alumni-members of the OEA Community Advisory Council, and HU Interim Dean Bradford Grant- College of Architecture.

### **Racial Equity Tool Part 3 – Mid-City Planning Area Data**

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens. The area of the map amendment is in the Mid City Planning Area (“planning area”) as mapped in Chapter 20 of the Comprehensive Plan. At the time of the OP Setdown Report, the State Data Center had not yet processed and formatted the most recent American Community Survey date ([ACS DATA](#)); this data is now available and used in this report. As such, the following tables compare the 2018-2022 American Community Survey data with data from the 2012-2016 period, available from [OP’s State Data Center](#). Each table below covers both 5-year periods and compares the data from the Mid-City planning area, in which the subject site is located, with District-wide data. Part 3 also asks if the planning area is on track to meet affordable housing goals. Additional demographic data is provided in the tables of Attachment I.

The Comprehensive Plan notes that, between 2000 and 2017, the Mid-City Planning Area experienced a shift in population characteristics. In 2000, Black residents were Mid-City’s predominant racial group at 52 percent, and the Hispanic/Latino population was 22 percent. By 2017, the Black population decreased to 31 percent of the total population, the white population increased from 27 percent to 52 percent of the total population, and approximately 18 percent of the population was Hispanic/Latino.<sup>2003.2</sup>

#### ***Population by Race or Ethnicity***

In the 2018 to 2022 study period, the Mid-City planning area was almost evenly split between the White population and other populations. The percentage of both White and Black populations has decreased from the 2012-2016 study period, with other minority groups increasing their share of the total population. The White population decreased from 52% to 50.5%; The Black population decreased from 32.6% to 26.1%, which is reflective of but more significant than the District-wide trend during this period.

Although not providing any IZ units on properties within the campus boundary, housing for students, faculty and staff on campus could free up affordable housing within the neighborhood for other residents. Any IZ units created by the development on the properties outside of the campus boundary would provide increased opportunity for lower-income families to remain in the District and the planning area, and in particular could provide home-ownership opportunities for residents wishing to remain in the District. Given the income data by race, it can be inferred that the families benefiting the most from the IZ housing on the site would be Black or other minority groups, which could have some impact on the present trends of declining Black population in the planning area.

***Table 1: Population/Race or Ethnicity Districtwide and in the Mid-City Planning Area***

<b>Race or Ethnicity</b>	<b>District 2012-16</b>	<b>District % 2012-16</b>	<b>District 2018-22</b>	<b>District % 2018-22</b>	<b>MC 2012-16</b>	<b>MC % 2012-16</b>	<b>MC 2018-22</b>	<b>MC % 2018-22</b>
<b>Total Population</b>	659,009	100%	<b>670,587</b>	<b>100%</b>	94,786	100%	<b>92,773</b>	<b>100.0%</b>
<b>Asian Alone</b>	24,036	4%	<b>27,067</b>	<b>4.0%</b>	4,183	4.4%	<b>5,466</b>	<b>5.9%</b>
<b>Black or African American</b>	318,598	48%	<b>297,101</b>	<b>44.3%</b>	30,940	32.6%	<b>24,201</b>	<b>26.1%</b>
<b>Hispanic or Latino</b>	69,106	10%	<b>77,168</b>	<b>11.5%</b>	17,148	18.1%	<b>16,724</b>	<b>18.0%</b>



Race or Ethnicity	District 2012-16	District % 2012-16	District 2018-22	District % 2018-22	MC 2012-16	MC % 2012-16	MC 2018-22	MC % 2018-22
American Indian and Alaskan Native	2,174	0%	2,209	0.3%	101	0.0%	413	0.4%
Native Hawaiian and Other Pacific Islander	271	0%	420	0.1%	116	0.0%	79	0.1%
Some Other Race	29,650	4%	30,879	4.6%	7,184	7.6%	7,151	7.7%
Two or More Races	18,245	3%	47,278	7.1%	2,986	3.2%	8,587	9.3%
White Alone	266,035	40%	265,633	39.6%	49,277	52.0%	46,877	50.5%

### *Median Income*

The Mid-City planning area has a higher median income than the District as a whole, as evidenced by data from both the 2012-2016 and 2018-2022 survey periods. The planning area median income, however, increased faster than the citywide median, but these gains were not distributed evenly across racial groups. The median income of some groups saw significant increases, while other groups saw more modest gains, or, in the case of those identifying as American Indian and Alaskan Native, a decrease.

*Table 2: Median Income Districtwide and in the Mid-City Area (2012-2016 and 2018-2022)*

Median Household Income	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
Total Median	\$72,935	\$101,722	\$85,848	\$123,368
Asian Alone	\$91,453	\$123,660	\$100,759	\$114,726
Black or African American	\$40,560	\$57,076	\$44,132	\$58,755
Hispanic or Latino	\$60,848	\$94,203	\$48,567	\$87,105
American Indian and Alaskan Native	\$51,306	\$60,390	\$59,277	\$37,047
Native Hawaiian and Other Pacific Islander	n/a	n/a	n/a	n/a
Some Other Race	\$48,047	\$61,851	\$42,385	\$62,944
Two or More Races	\$83,243	\$108,455	\$90,434	\$126,995
White	\$119,564	\$160,745	\$111,338	\$160,264

### *General Characteristics*

Between 2012-2016, the unemployment rate in the Planning Area was at 6%, which was lower than the District at 8.7% (Table 3). Although the rate of both the District and the Planning Area fell in 2018-2022, the Planning Area's unemployment rate at 4.4% remained well below that of the District as a whole.

The housing cost burden in the Planning Area was approximately 3 and 6 percentage points lower than that of the District during the 2012-2016 and 2018-2022 time periods. The poverty rate of the Planning Area 2012-2016 was lower than the District as a whole but in the 2018-2022 the poverty rate in the District fell to 15.1% while that of the Planning Area increased to 15.1% making poverty level in the District as a Whole and the Planning Area even or the same.

**Table 3: General Characteristics of the Planning Area and District**

Characteristic	District 2012-2016	MC 2012-2016	District (2018-2022)	MC (2018-2022)
Unemployment Rate	8.70%	6.0%	7.11%	4.4%
Cost Burdened Households	38.60%	36.1%	36.12%	30.9%
Poverty Rate	17.90%	13.5%	15.10%	15.1%

### ***Median Age and Vulnerable Populations***

The Mid-City planning area’s median age decreased slightly between the two study periods. It was slightly younger than the District’s median age in both study periods. When race is considered, the data shows that the Black residents were older than most of the other groups during the ten-year period. The Mid-City planning area had a similar or lower percentage of vulnerable residents than the District as a whole. Over the 10-year period, the number of residents 65 and older stayed nearly constant, as did the number of people who identified as disabled. In this planning area there are also fewer people over 65, and fewer people under 18, than District-wide.

**Table 4: Median Age**

Median Age	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
Total Population	37.7	35.5	36.8	34.0
Asian Alone	36.5	35.6	38.1	34.7
Black or African American	33.4	38.1	46.0	39.9
Hispanic or Latino	28.4	32.2	36.2	32.0
American Indian and Alaskan Native	32.2	41.1	36.6	40.8
Native Hawaiian and Other Pacific Islander	30.8	n/a	n/a	n/a
Some Other Race	28.0	28.8	35.3	30.4
Two or More Races	19.8	30.8	31.1	31.0
White Alone	40.4	35.3	35.5	33.4

**Table 5: Age/Vulnerable Populations in the District and the Planning Area**

Vulnerable Population	District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
Persons 65 and Older	11.4%	12.6%	7.5%	7.4%
Persons Under 18	17.4%	18.5%	12.3%	14.3%
Percent Disable	11.3%	11.0%	8.0%	7.9%

### ***Housing Tenure***

Fewer residents in the Mid-City planning area own their home than in the District as a whole – 38.3% compared to 41.4%. The homeownership rate in the planning area increased slightly over the two survey periods, similar to the District-wide trend. The homeownership rate among White households went up, as opposed to citywide, where White ownership went down by a fraction of a percent. Black homeownership decreased in the planning area, although somewhat less than the citywide trend. Homeownership also went up among several other racial groups.

**Table 6- Owner Occupied and Rental Households Districtwide and in the Planning Area**

Owners/ Renters		District 2012-2016	District 2018-2022	MC 2012-2016	MC 2018-2022
<b>Total</b>	Owner Households	40.7%	<b>41.4%</b>	36.9%	<b>38.3%</b>
	Renter Households	59.3%	<b>58.6%</b>	63.1%	<b>61.8%</b>
<b>Asian Alone</b>	Owner Households	43.1%	<b>42.4%</b>	43.7%	<b>36.3%</b>
	Renter Households	56.9%	<b>57.6%</b>	56.3%	<b>63.7%</b>
<b>Black or African American</b>	Owner Households	46.6%	<b>35.9%</b>	37.1%	<b>30.5%</b>
	Renter Households	53.4%	<b>64.1%</b>	62.9%	<b>69.5%</b>
<b>Hispanic or Latino</b>	Owner Households	30.9%	<b>35.3%</b>	23.6%	<b>30.1%</b>
	Renter Households	69.1%	<b>64.7%</b>	76.4%	<b>69.9%</b>
<b>American Indian and Alaskan Native</b>	Owner Households	32.8%	<b>25.8%</b>	0.0%	<b>27.3%</b>
	Renter Households	67.2%	<b>74.2%</b>	100.0%	<b>72.7%</b>
<b>Native Hawaiian and Other Pacific Islander</b>	Owner Households	9.1%	<b>64.2%</b>	0%	<b>100.0%</b>
	Renter Households	90.9%	<b>35.8%</b>	0%	<b>0.0%</b>
<b>Some Other Race</b>	Owner Households	17.5%	<b>26.6%</b>	8.6%	<b>25.2%</b>
	Renter Households	82.5%	<b>73.4%</b>	91.4%	<b>74.8%</b>
<b>Two or More Races</b>	Owner Households	32.7%	<b>43.9%</b>	34.9%	<b>43.9%</b>
	Renter Households	67.3%	<b>56.2%</b>	65.1%	<b>56.1%</b>
<b>White Alone</b>	Owner Households	47.8%	<b>47.4%</b>	39.3%	<b>42.4%</b>
	Renter Households	52.2%	<b>52.6%</b>	60.7%	<b>57.6%</b>

According to the Comprehensive Plan: *Parts of the Mid-City Planning Area have changed rapidly during the last 10 years. Already one of the densest areas in Washington, DC, Mid-City contains approximately 19 percent of the District's new housing units, and almost 14 percent of the area's housing units are affordable. Although Mid-City is close to having a fair amount of affordable housing, the distribution of that affordable housing has been concentrated in a few neighborhoods such as Columbia Heights, Reed-Cooke, and the U Street corridor. Additionally, many of these affordable units are at risk of expiring; thus, Mid-City will be a target rich area for investments by the administrators of the Housing Preservation Trust Fund, which is to be used to preserve affordable housing units when their covenants of affordability are expiring.* 2000.6

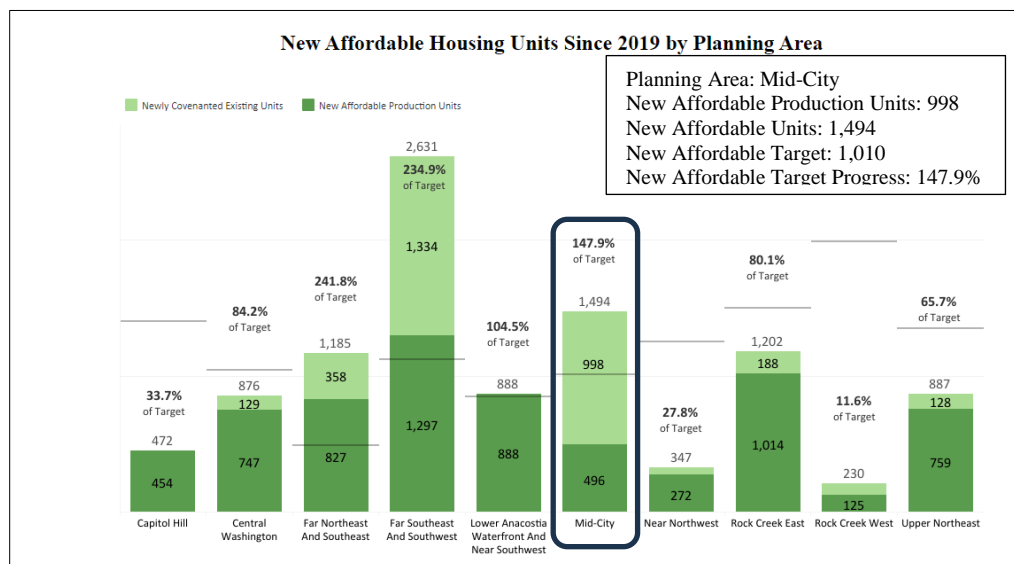
While this proposal would not provide opportunities for new housing other than dormitories or housing for university staff and faculty, adding this housing on campus could free up other housing off-campus and relief housing pressure overall. Over the long term, if any of this land is deemed by

the University as being available for private development, housing including affordable housing consistent with the densities anticipated by the zone and the Comp Plan could be constructed.

### ***Progress Toward Meeting the Mayor’s 2025 Housing Equity Goals***

Part 3 also asks if the planning area is on track to meet affordable housing goals. The Mayor’s housing goals include the production of 12,000 new affordable units citywide for households earning below 80% of Median Family Income (MFI). As of October 2024, the District had produced 10,212 new affordable units, reaching 85% of this goal. With over 2,500 units currently under construction, the District expects to meet the Mayor’s affordable housing target by the end of 2025.

The Deputy Mayor for Planning and Economic Development (DMPED) provides regular updates on how each planning area is progressing in meeting their portion of the affordable housing target. The most recent update (October, 20204) indicates that the Planning Area has already exceeded its target by providing 1. 494 affordable units, or 147.5% of the target amount ([DMPED 36,000 by 2025 Dashboard](#)). The area covered by the proposed map would not directly produce new housing that would further this goal, as any housing would be for students, staff, or faculty only. However, the area is currently exceeding the housing targets. It is also important to note that the housing equity goals are designed to achieve a minimum of 15% in a planning area, and that they are minimums only.



### **Racial Equity Tool Part 4 – Zoning Commission Evaluation Factors**

***When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action? Note: Additional themes may also apply.***

<b>Factor</b>	<b>Question</b>	<b>OP Response</b>
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The proposed map amendment would not result in physical displacement of residents as the majority of the area is within and governed by the Howard University Campus and does not include any residential use. The existing retail uses which currently serve the students, faculty and staff as well as residents of the area would be retained and additional retail uses could be included in other building in the future.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	<p>OP does not anticipate indirect displacement as a result of this zoning action. The area along this portion of Georgia Avenue is predominantly university uses. There is a lack of retail and service uses on both sides of the street, and therefore there should be no displacement.</p> <p>The rezoning, consistent with the Comp Plan, Small Area Plan and Campus Plan, provides a clear path to have a mix of uses along Georgia Avenue that would address university needs as well as those of the surrounding neighborhood and the District as a whole.</p>
Housing	Will the action result in changes to: <ul style="list-style-type: none"> <li>▪ Market Rate Housing</li> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	The zoning action would not result in any changes to Market Rate Housing, Affordable Housing or Replacement Housing on the subject properties as there will be only student and faculty housing provided. However, OP is recommending that IZ Plus be applied, in the event that properties are in the future removed from the campus and made available for private development of housing.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Urban Design Improvements</li> <li>▪ Streetscape Improvements</li> </ul>	New development and redevelopment on the properties would result in improved streetscape and pedestrian realm in public space along Georgia Avenue and other cross streets. Each building would be subject to the Campus Plan Further Processing review of the design compatibility with the surrounding buildings and the standard for development along a major street corridor. The non university properties would be subject to similar reviews at the time of Building Permit.
Access to Opportunity	Is there a change in access to opportunity? <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> <li>▪ Healthcare</li> <li>▪ Addition of Retail/Access to New Services</li> </ul>	The proposal would not limit access to jobs, healthcare or new services. In fact, development on these properties would provide opportunities for residents of the neighborhood, the City and the university. The approved Campus Plan envisions this area as being redeveloped with healthcare and research facilities, retail and other service uses provided by the university. The University, as an educational institution, would be providing job training as well as the creation of job opportunities in the retail establishments as well as in offices.



Factor	Question	OP Response
Community	How did community outreach and engagement inform/change the zoning action? ▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)	The Applicant outlines their community outreach and coordination at <a href="#">Exhibit 3E</a> and updated at <a href="#">Exhibit 25</a> . The property is within ANC-1B and ANC-1E. ANC-1E has provided a letter of support to the record. The Applicant has Memorandums of Agreement with the LeDroit Park Civic Association relating to future development on portions of the site. The University has also made presentations to the Howard CAC whose members comprises several community organizations.

## **XI. SUMMARY OF PLANNING ANALYSIS**

The Comprehensive Plan analysis indicates that the map amendment proposal from RA-2, PDR-2 and PDR-3 to the MU-9B and MU-10, on balance, would not be inconsistent with Comprehensive Plan. Specifically, the FLUM and Generalized Policy Map, the Mid-City Element, the DUKE Plan and the Howard University Campus Plan support the change from the residential and industrial zones to allow a mix of university uses along with retail, office and other service uses, along a major transit corridor. This rezoning would allow for the revitalization of this lower portion of Georgia Avenue with improved retail services, landscaping and improvements to the public realm.

The proposed map amendment would be consistent with the District's and the University's desire to further the redevelopment of the University properties to serve the University needs as well as that of the neighborhood and the City. New development on the University and non-university properties would support jobs in healthcare, research, office and retail, as well as construction jobs over varying construction periods.

## **XII. AGENCY REFERRALS**

The proposal was referred to several agencies. DDOT will submit its report under separate cover. The Department of the Environment and Energy (DOEE) responded verbally, indicating that their review would take place when the Applicant files submits their Further Processing or Building Permit applications for the redevelopment of the site.

## **XIII. ANC COMMENTS**

The property is within ANC 1E. The ANC submitted a letter recommending approval of the proposed map amendments at [Exhibit 22](#).

## **XIV. COMMUNITY COMMENTS**

At [Exhibit 25A](#) and [Exhibit 25B](#) are Memorandums of Agreement between the LeDroit Park Citizens Association and Howard University and LeDroit Park Citizens Association and the Trustees of Florida Avenue Baptist Church and Florida Avenue Baptist Church provided by the Applicant in relation to future developments on properties within the requested map amendment area.

## **ATTACHMENT**

Attachment 1 – Demographic Data – District and Mid-City Planning Area

**ATTACHMENT I – DEMOGRAPHIC DATA – DISTRICT AND MID-CITY PLANNING AREA**

SELECTED DEMOGRAPHIC AND SOCIOECONOMIC DATA FOR DISTRICT OF COLUMBIA BY AREA ELEMENTS: 2018-2022 ACS (5-YEAR ESTIMATES)			
RACE AND ETHNICITY	VARIABLE	DISTRICT TOTAL	MID-CITY
	<b>TOTAL POPULATION / SELECTED AGE GROUPS / MEDIAN AGE</b>		
<b>Total Population</b>	<b>Total</b>	<b>670,587</b>	<b>95,773</b>
	Under 18 years	124,056	13,276
	Percent under 18 years	18.5	14.3
	65 years and over	84,451	6,834
	Percent 65 years and over	12.6	7.4
	Median age	35.5	34.0
<b>White alone</b>	<b>Total</b>	<b>265,633</b>	<b>46,887</b>
	Under 18 years	31,383	4,345
	Percent under 18 years	11.8	9.3
	65 years and over	31,132	2,321
	Percent 65 years and over	11.7	5.0
	Median age	35.3	33.4
<b>Black or African American alone</b>	<b>Total</b>	<b>297,101</b>	<b>26,931</b>
	Under 18 years	65,759	4,601
	Percent under 18 years	22.1	17.1
	65 years and over	46,467	3,474
	Percent 65 years and over	15.6	12.9
	Median age	38.1	44.4
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>2,209</b>	<b>394</b>
	Under 18 years	310	45
	Percent under 18 years	14.0	11.4
	65 years and over	498	110
	Percent 65 years and over	22.5	27.9
	Median age	41.1	48.4
<b>Asian alone</b>	<b>Total</b>	<b>27,067</b>	<b>5,466</b>
	Under 18 years	2,208	367
	Percent under 18 years	8.2	6.7
	65 years and over	2,234	208
	Percent 65 years and over	8.3	3.8
	Median age	35.6	34.7
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>420</b>	<b>79</b>
	Under 18 years	16	0
	Percent under 18 years	3.8	0.0
	65 years and over	47	0
	Percent 65 years and over	11.2	0.0
	Median age	NA	NA

<b>Some Other Race alone</b>	<b>Total</b>	<b>30,879</b>	<b>7,151</b>
	Under 18 years	10,450	2,236
	Percent under 18 years	33.8	31.3
	65 years and over	1,098	342
	Percent 65 years and over	3.6	4.8
	Median age	28.8	30.4
<b>Two or More Races</b>	<b>Total</b>	<b>47,278</b>	<b>8,587</b>
	Under 18 years	13,930	2,236
	Percent under 18 years	29.5	26.5
	65 years and over	2,975	328
	Percent 65 years and over	6.3	3.8
	Median age	30.8	31.0
<b>Hispanic or Latino</b>  (Hispanics can be of any race and are included in race categories above)	<b>Total</b>	<b>77,168</b>	<b>16,724</b>
	Under 18 years	21,334	4,304
	Percent under 18 years	27.6	25.7
	65 years and over	4,868	1,256
	Percent 65 years and over	6.3	7.5
	Median age	32.2	32.0
<b>EDUCATIONAL ATTAINMENT (Population 25 Years and Over)</b>			
<b>Total</b>	<b>Total</b>	<b>484,596</b>	<b>71,199</b>
	Less than high school diploma	35,377	4,828
	Percent	7.3	6.8
	High school graduate (includes equivalency)	72,816	6,343
	Percent	15.0	8.9
	Some college or associate's degree	72,871	5,953
	Percent	15.0	8.4
	Bachelor's degree or higher	303,532	54,075
	Percent	62.6	76.0
<b>White alone</b>	<b>Total</b>	<b>209,259</b>	<b>39,255</b>
	Less than high school diploma	2,908	817
	Percent	1.4	2.1
	High school graduate (includes equivalency)	5,078	844
	Percent	2.4	2.2
	Some college or associate's degree	10,379	1,256
	Percent	5.0	3.2
	Bachelor's degree or higher	190,894	36,337
	Percent	91.2	92.7
<b>Black or African American alone</b>	<b>Total</b>	<b>204,800</b>	<b>16,882</b>
	Less than high school diploma	23,792	1,981
	Percent	11.6	11.7
	High school graduate (includes equivalency)	60,827	3,985
	Percent	29.7	23.6
	Some college or associate's degree	54,090	3,185
	Percent	26.4	18.9
	Bachelor's degree or higher	66,091	7,730
	Percent	32.3	45.8

<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>1,694</b>	<b>394</b>
	Less than high school diploma	243	80
	Percent	14.3	20.3
	High school graduate (includes equivalency)	271	102
	Percent	16.0	25.9
	Some college or associate's degree	537	0
	Percent	31.7	0
	Bachelor's degree or higher	643	212
	Percent	38.0	53.8
<b>Asian alone</b>	<b>Total</b>	<b>21,541</b>	<b>4,753</b>
	Less than high school diploma	989	348
	Percent	4.6	7.3
	High school graduate (includes equivalency)	981	207
	Percent	4.6	5.9
	Some college or associate's degree	1,193	208
	Percent	5.5	4.7
	Bachelor's degree or higher	18,378	3,918
	Percent	85.3	82.4
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>361</b>	<b>65</b>
	Less than high school diploma	0	0
	Percent	0.0	0.0
	High school graduate (includes equivalency)	43	0
	Percent	11.9	0.0
	Some college or associate's degree	63	13
	Percent	17.5	20.4
	Bachelor's degree or higher	255	52
	Percent	70.6	79.6
<b>Some Other Race alone</b>	<b>Total</b>	<b>17,520</b>	<b>4,040</b>
	Less than high school diploma	5,549	1,233
	Percent	31.7	30.5
	High school graduate (includes equivalency)	3,121	748
	Percent	17.8	18.5
	Some college or associate's degree	2,273	431
	Percent	13.0	10.7
	Bachelor's degree or higher	6,577	1,628
	Percent	37.5	40.2
<b>Two or More Races</b>	<b>Total</b>	<b>29,421</b>	<b>5,811</b>
	Less than high school diploma	1,896	369
	Percent	6.4	6.4
	High school graduate (includes equivalency)	2,495	456
	Percent	8.5	7.9
	Some college or associate's degree	4,336	788
	Percent	14.7	13.6
	Bachelor's degree or higher	20,694	4,198
	Percent	70.3	72.2
<b>Hispanic or Latino</b>	<b>Total</b>	<b>48,773</b>	<b>11,129</b>
	Less than high school diploma	9,200	2,509

<b>(Hispanics can be of any race and are included in race categories above)</b>	Percent	18.9	22.6
	High school graduate (includes equivalency)	6,467	1,632
	Percent	13.3	14.7
	Some college or associate's degree	5,962	1,179
	Percent	12.2	10.6
	Bachelor's degree or higher	27,144	5,809
	Percent	55.7	52.2
	<b>DISABILITY STATUS (Civilian noninstitutionalized population)</b>		
<b>Total</b>	<b>Total</b>	<b>661,596</b>	<b>92,448</b>
	Total population with a disability	72,659	7,282
	Percent with a disability	10.98	7.88
	Under 18 years	123,804	13,219
	With a disability	5,302	468
	Percent with a disability	4.28	3.54
	18 to 64 years	455,562	72,505
	With a disability	40,513	4,655
	Percent with a disability	8.89	6.42
	65 years and over	82,230	6,724
	With a disability	26,844	2,159
	Percent with a disability	32.65	32.10
<b>White alone</b>	<b>Total</b>	<b>262,457</b>	<b>46,720</b>
	Total population with a disability	14,048	1,959
	Percent with a disability	5.35	4.19
	Under 18 years	31,244	4,309
	With a disability	477	82
	Percent with a disability	1.53	1.9
	18 to 64 years	200,445	40,104
	With a disability	7,140	1,437
	Percent with a disability	3.56	3.59
	65 years and over	30,768	2,037
	With a disability	6,431	440
	Percent with a disability	20.9	19.06
<b>Black or African American alone</b>	<b>Total</b>	<b>292,222</b>	<b>24,067</b>
	Total population with a disability	49,642	4,031
	Percent with a disability	16.99	16.75
	Under 18 years	65,675	4,026
	With a disability	3,590	293
	Percent with a disability	5.47	7.29
	18 to 64 years	181,881	16,583
	With a disability	27,625	2,208
	Percent with a disability	15.19	13.32
	65 years and over	44,666	3,458
	With a disability	18,427	1,530
	Percent with a disability	41.26	44.24
<b>American Indiana and Alaska Native alone</b>	<b>Total</b>	<b>2,209</b>	<b>413</b>
	Total population with a disability	365	88
	Percent with a disability	16.52	21.33



	Under 18 years	310	412
	With a disability	13	0
	Percent with a disability	4.19	0.0
	18 to 64 years	1,401	320
	With a disability	297	85
	Percent with a disability	21.2	26.6
	65 years and over	498	81
	With a disability	55	3
	Percent with a disability	11.04	12.7
<b>Asian alone</b>	<b>Total</b>	<b>72,659</b>	<b>5,458</b>
	Total population with a disability	72,659	131
	Percent with a disability	10.98	2.39
	Under 18 years	123,804	367
	With a disability	5,302	0
	Percent with a disability	4.28	0.0
	18 to 64 years	455,562	4,883
	With a disability	40,513	98
	Percent with a disability	8.89	2
	65 years and over	82,230	208
	With a disability	26,844	33
	Percent with a disability	32.65	15.86
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>410</b>	<b>79</b>
	Total population with a disability	30	30
	Percent with a disability	7.32	37.81
	Under 18 years	16	0
	With a disability	0	0
	Percent with a disability	0	0.0
	18 to 64 years	355	79
	With a disability	30	30
	Percent with a disability	8.45	37.81
	65 years and over	39	0
	With a disability	0	0
	Percent with a disability	0	0.0
<b>Some Other Race alone</b>	<b>Total</b>	<b>30,703</b>	<b>7,146</b>
	Total population with a disability	2,435	523
	Percent with a disability	7.93	7.32
	Under 18 years	10,435	2,234
	With a disability	745	93
	Percent with a disability	7.14	4.16
	18 to 64 years	19,195	4,570
	With a disability	1,521	426
	Percent with a disability	7.92	9.32
	65 years and over	1,073	342
	With a disability	169	4
	Percent with a disability	15.75	1.17
<b>Two or More Races</b>	<b>Total</b>	<b>46,843</b>	<b>8,565</b>
	Total population with a disability	4,689	521
	Percent with a disability	10.01	6.08
	Under 18 years	13,916	2,271
	With a disability	419	0
	Percent with a disability	3.01	0

	18 to 64 years	29,968	5,966
	With a disability	3,081	372
	Percent with a disability	10.28	6.24
	65 years and over	2,959	328
	With a disability	1,189	149
	Percent with a disability	40.18	45.35
<b>Hispanic or Latino</b>	<b>Total</b>	<b>76,587</b>	<b>16,888</b>
<b>(Hispanics can be of any race and are included in race categories above)</b>	Total population with a disability	5,891	1,204
	Percent with a disability	7.69	7.2
	Under 18 years	21,309	4,298
	With a disability	1,022	129
	Percent with a disability	4.8	3
	18 to 64 years	50,457	11,134
	With a disability	3,175	756
	Percent with a disability	6.29	6.79
	65 years and over	4,821	1,256
	With a disability	1,694	318
	Percent with a disability	35.14	25.33
	<b>UNEMPLOYMENT RATE (Population 16 years and over)</b>		
<b>Total</b>	Unemployment rate	<b>7.1</b>	4.4
<b>White alone</b>	Unemployment rate	2.6	1.7
<b>Black or African American alone</b>	Unemployment rate	14.0	11.7
<b>American Indian and Alaska Native alone</b>	Unemployment rate	2.8	0.0
<b>Asian alone</b>	Unemployment rate	2.7	1.5
<b>Native Hawaiian and Other Pacific Islander alone</b>	Unemployment rate	2.8	0.0
<b>Some Other Race alone</b>	Unemployment rate	8.0	9.3
<b>Two or More Races</b>	Unemployment rate	4.7	5.7
<b>Hispanic or Latino</b>	Unemployment rate	5.3	5.9
	<b>POVERTY STATUS</b>		
<b>Total population</b>	Population for whom poverty status is determined	<b>649,184</b>	89,921
	Income in the past 12 months below poverty level	98,039	10,160
	Percent in poverty	15.1	11.3
<b>White alone</b>	Population for whom poverty status is determined	<b>256,129</b>	43,352
	Income in the past 12 months below poverty level	14,374	1,648
	Percent in poverty	5.61	3.63
<b>Black or African American alone</b>	Population for whom poverty status is determined	<b>288,885</b>	22,121
	Income in the past 12 months below poverty level	68,985	5,851
	Percent in poverty	23.88	26.45

<b>American Indian and Alaska Native alone</b>	Population for whom poverty status is determined	<b>2,159</b>	413
	Income in the past 12 months below poverty level	512	94
	Percent in poverty	23.71	22.79
<b>Asian alone</b>	Population for whom poverty status is determined	<b>25,320</b>	5,379
	Income in the past 12 months below poverty level	3,379	343
	Percent in poverty	13.35	6.38
<b>Native Hawaiian and Other Pacific Islander alone</b>	Population for whom poverty status is determined	<b>390</b>	65
	Income in the past 12 months below poverty level	53	30
	Percent in poverty	13.59	45.91
<b>Some Other Race alone</b>	Population for whom poverty status is determined	<b>30,340</b>	7,101
	Income in the past 12 months below poverty level	5,472	1,386
	Percent in poverty	18.04	19.52
<b>Two or More Races</b>	Population for whom poverty status is determined	<b>45,961</b>	8,491
	Income in the past 12 months below poverty level	5,264	771
	Percent in poverty	11.45	9.08
<b>Hispanic or Latino</b>  (Hispanics can be of any race and are included in race categories above)	Population for whom poverty status is determined	<b>75,004</b>	16,524
	Income in the past 12 months below poverty level	9,600	2,565
	Percent in poverty	12.8	15.52
	<b>MEDIAN HOUSEHOLD INCOME</b>		
<b>Total households</b>	Median household income (dollars)	<b>101,722</b>	1213,368
<b>White alone</b>	Median household income (dollars)	160,745	160,264
<b>Black or African American alone</b>	Median household income (dollars)	75,942	58,755
<b>American Indian and Alaska Native alone</b>	Median household income (dollars)	<b>60,390</b>	37,047
<b>Asian alone</b>	Median household income (dollars)	123,660	114,726
<b>Native Hawaiian and Other Pacific Islander alone</b>	Median household income (dollars)	N/A	N/A
<b>Some Other Race alone</b>	Median household income (dollars)	61,851	62,994
<b>Two or More Races</b>	Median household income (dollars)	108,455	126,995

<b>Hispanic or Latino</b>	Median household income (dollars)	94,203	87,105
	<b>TENURE</b>		
<b>Total householder</b>	<b>Total</b>	<b>315,785</b>	<b>45,630</b>
	Owner occupied	130,865	17,453
	% owner occupied	184,920	38.3%
	Renter occupied	41.4	14,574
	% renter occupied	58.6	61.8%
<b>White alone</b>	<b>Total</b>	<b>140,029</b>	<b>25,133</b>
	Owner occupied	66,420	10,738
	% owner occupied	73,609	43.1%
	Renter occupied	47.4	14,301
	% renter occupied	52.6%	57.6%
<b>Black or African American alone</b>	<b>Total</b>	<b>131,600</b>	<b>11,019</b>
	Owner occupied	47,195	3,358
	% owner occupied	35.9	30.5%
	Renter occupied	84,405	7,661
	% renter occupied	64.1	69.5%
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>1,269</b>	<b>252</b>
	Owner occupied	327	69
	% owner occupied	942	27.3%
	Renter occupied	25.8	183
	% renter occupied	74.2	72.7%
<b>Asian alone householder</b>	<b>Total</b>	<b>13,886</b>	<b>3,162</b>
	Owner occupied	5,884	1,147
	% owner occupied	42.4	36.3%
	Renter occupied	8,002	2,014
	% renter occupied	57.6	63.7%
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>81</b>	<b>30</b>
	Owner occupied	52	30
	% owner occupied	29	0.0%
	Renter occupied	64.2	100
	% renter occupied	35.8	0.0%
<b>Some Other Race alone</b>	<b>Total</b>	<b>9,836</b>	<b>2,458</b>
	Owner occupied	2,618	619
	% owner occupied	26.6	25.2%
	Renter occupied	7,218	1,840
	% renter occupied	73.4	78.4%
<b>Two or More Races householder</b>	<b>Total</b>	<b>19,084</b>	<b>3,395</b>
	Owner occupied	8,369	619
	% owner occupied	43.9	25.2%
	Renter occupied	10,715	1,840
	% renter occupied	56.2	74.8%

<b>Hispanic or Latino</b>	<b>Total</b>	<b>29,336</b>	<b>6,664</b>
<b>(Hispanics can be of any race and are included in race categories above)</b>	Owner occupied	10,358	2,006
	% owner occupied	35.3	30.1%
	Renter occupied	18,978	4,658
	% renter occupied	64.7	69.9%
	<b>HOUSING COST BURDEN</b>		
<b>Total</b>	Total Households	<b>315,785</b>	<b>45,630</b>
	Cost Burdened Households	110,215	13,760
	Not Computed	10,634	1,032
	Percent of households spending 30% or more of their income on housing	36.1	30.9
<b>Notes: Housing cost burden by race is not available; Hispanics can be of any race and are included in race categories above;</b> <i>Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates</i>			