

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Karen Thomas, Development Review Specialist  
*JLS*  
Jennifer Steingasser, Deputy Director, Development, Design and Preservation

**DATE:** August 22, 2024

**SUBJECT:** ZC #24-05 – 700 Monroe Street, NE – OP Hearing Report for the Proposed Map Amendment of the subject property from MU-3A to MU-2 zone

**I. RECOMMENDATION**

The Office of Planning (OP) recommends approval of the proposed **map amendment of Lots 827 and Lot 831 in Square 3657 from the MU-3A to the MU-2 zone and subject to IZ Plus.**

The site is designated in the Comprehensive Plan’s Future Land Use Map as appropriate for medium-density mixed-use residential and commercial, a designation consistent with the MU-2 zone. The uses and development types generally permitted by the MU-2 zone would be compatible with the surrounding community, and the remapping would also not be inconsistent with the written policies of the Comprehensive Plan when viewed through a racial equity lens, as reviewed here and in the setdown report, [Exhibit 13](#).

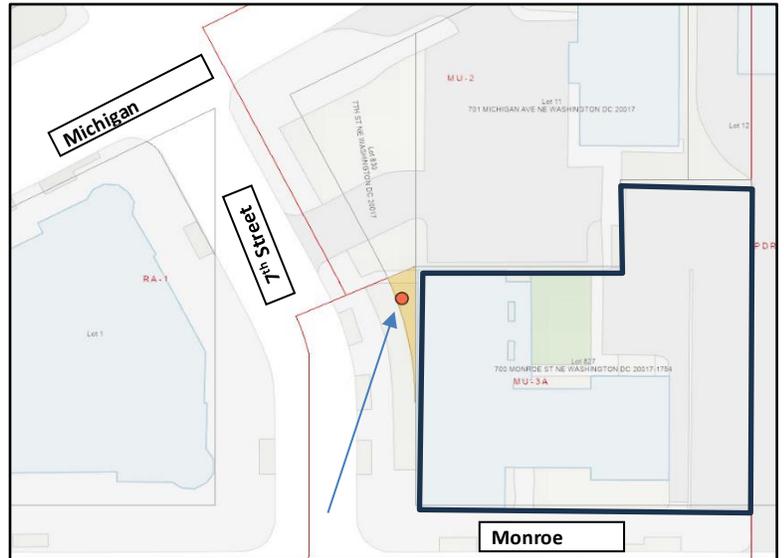
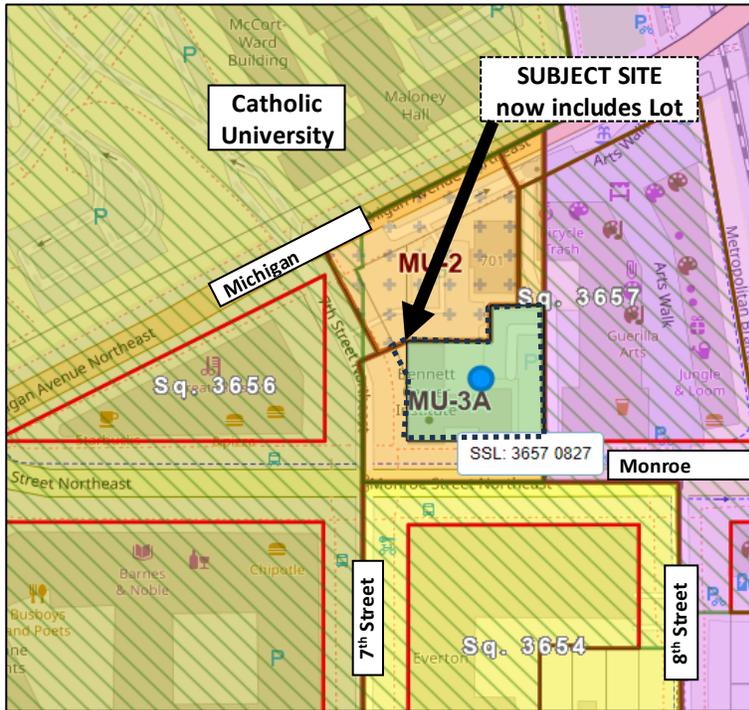
**II. BACKGROUND**

Since setdown, the Applicant included another lot, Lot 831 which abuts the larger lot and is 265 square feet in area. The OP report is adjusted to include this lot, including its area in its discussion. At the writing of this report there have been no other substantial changes or community comments regarding the amended application.

**III. APPLICATION**

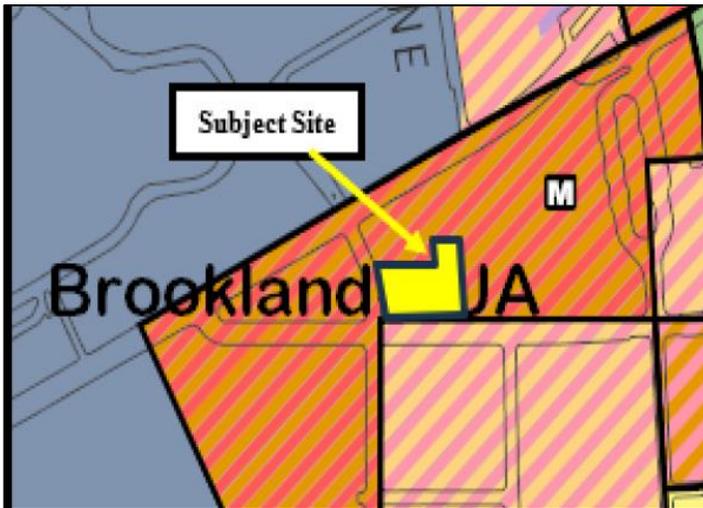
Applicant, Owner	The Bennett Corporation
Ward and ANC	5, 5F
Legal Description	Square 3657, Lot 827 and Lot 831 (265 sf – See Exhibit 16A)
Total Area	18,835 sf
Existing Zone	MU-3A (low-density, mixed use)
Proposed Zone	MU-2 (medium-density mixed-use with residential focus)

### Zoning and Vicinity Maps

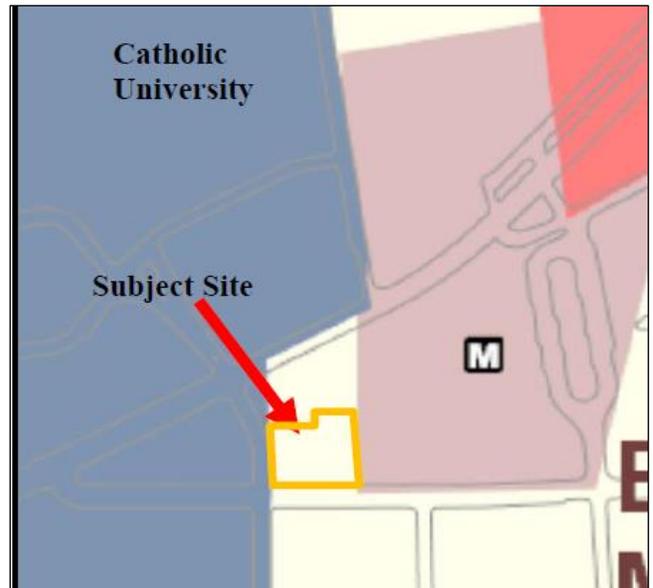


The original application was modified to include Lot 831, which resembles a 265 sf, triangular sliver of land at the upper left-hand corner of the lot. (See [Exhibit 16A](#))

### COMPREHENSIVE PLAN MAPS



Future Land Use Map



Generalized Policy Map

#### IV. COMPARISON OF EXISTING AND PROPOSED ZONES

The applicant proposes to rezone the property from MU-3A to MU-2. The following table compares the development data parameters of the two zones.

Item	MU-3A	MU-2
FAR G 402 and G 302	MOR – 1.0 IZ – 1.2	MOR – 6.0 IZ – 7.2
Height G 403 and G 303	40' 3 stories	90'
Penthouse Height G 403 and G 303	12'; 15' for mechanical  1 story; 2 <sup>nd</sup> story permitted for mechanical	20';  1 story plus mezzanine; 2 <sup>nd</sup> story permitted for mechanical
Lot Occupancy G 404 and G 304	60%	80% 90% (IZ)
Rear Yard G 405 and G 305	20'	Above 20' in height, 2.5 in. / ft. of height; 12' min.
Side Yard G 406 and G 306	None required	None required
GAR G 407 and G 307	0.3	0.3

#### V. IZ PLUS EVALUATION

IZ Plus requires a higher affordable housing set-requirement than regular IZ. An **IZ Plus set-aside requirement would be appropriate** pursuant to Subtitle X § 502 because:

1. The map amendment would rezone the property to MU-2, which allows a higher maximum permitted FAR than the existing MU-3A zone;
2. The 2019 Housing Equity Report<sup>1</sup> prepared by the Office of Planning and the Department of Housing and Community Development set a goal for the Upper Northeast Planning Area to produce 1,350 affordable housing units by 2025 (see table below); and
3. According to DC's Comeback Plan<sup>2</sup> (January 2023), the Upper Northeast Planning Area

Planning Area	Affordable Housing Production Goals	Affordable Housing Pipeline	Shortage of Affordable Housing	2025 Total Housing Production Goals*
Rock Creek West	1,990	80	1,910	1,260
Capitol Hill	1,400	280	1,120	3,270
Near Northwest	1,250	270	980	1,850
Mid-City	1,010	620	390	4,210
Rock Creek East	1,500	1,160	340	1,580
Central Washington	1,040	750	290	3,940
Upper Northeast	1,350	1,160	190	6,900
Lower Anacostia Waterfront & Near Southwest	850	910	on track	7,960
Far Southeast & Southwest	1,120	1,450	on track	2,040
Far Northeast & Southeast	490	1,290	on track	2,990
<b>Total</b>	<b>12,000</b>	<b>7,970</b>	<b>5,220</b>	<b>36,000</b>

Housing Equity Report 2025 Production Goals

has only achieved 53.4 percent of its 2025 affordable housing production goal.

<sup>1</sup> [Housing-Equity-Report](#)

<sup>2</sup> [DC's Comeback Plan, January 2023](#)

IZ Plus prescribes a set-aside requirement based on either:

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

The following two examples compare possible IZ Plus set-aside requirements between a new mixed-use building with ground floor retail and residential above, and an all-residential building on the subject site. Both examples assume Type I construction, given the 90’ height maximum of the proposed MU-2 zone.

**Regular IZ vs. IZ Plus Example 1 – Mixed Use Building Utilizes IZ Bonus Density**

Regular IZ Calculations	Lot Area	18,835 sf
	MOR FAR	6.0 (113,010 sf)
	FAR Built	7.2 IZ FAR (1.0 used for non-residential use) 135,612 sf total 116,777 sf residential 18,835 sf non-residential
	Regular IZ Set-Aside Requirement	<b>Greater of –</b> <ul style="list-style-type: none"> <li>• <b>50% of bonus density utilized ((135,612 – 113,010) * 0.5 = 11,301 sf)</b></li> <li>• 8% of residential GFA (0.08 * 116,777 = 9,342 sf)</li> </ul>
	Regular IZ Dwelling Units <sup>3</sup>	<b>11 units</b>
IZ Plus	Existing Zone MOR FAR	1.0
	Proposed Zone FAR Built	7.2
	Percent Increase in Total FAR Built <sup>4</sup>	620% (=> 18% IZ Plus requirement per C § 1003.4)
	IZ Plus Set-Aside Requirement	<b>Greater of –</b> <ul style="list-style-type: none"> <li>• 70% of bonus density utilized ((135,612 – 113,010) * 0.7 = 15,821 sf)</li> <li>• <b>18% of residential GFA (0.18 * 116,777) = 21,020 sf)</b></li> </ul>
	IZ Plus Dwelling units	<b>21 units</b>

**Regular IZ vs. IZ Plus Example 2 – Residential Building Utilizes IZ Bonus Density**

Regular IZ	Lot Area	18,835 sf
	MOR FAR	6.0 (111,777 sf)
	FAR Built	7.2 IZ FAR 135,612 sf total (all residential)
	Regular IZ Set-Aside Requirement	<b>Greater of –</b> <ul style="list-style-type: none"> <li>• <b>50% of bonus density utilized ((135,612 – 111,777) * 0.5 = 11,918 sf)</b></li> <li>• 8% of residential GFA (0.08 * 135,612 = 10,849 sf)</li> </ul>
	Regular IZ Dwelling Units	<b>11 units</b>
IZ Plus Calculations	Existing Zone MOR FAR	1.0
	Proposed Zone FAR Built	7.2
	Percent Increase in Total FAR Built	620% (=> 18% IZ Plus requirement per C § 1003.4)
	IZ Plus Set-Aside Requirement	<b>Greater of –</b> <ul style="list-style-type: none"> <li>• 70% of bonus density utilized ((135,612 – 111,777) * 0.7 = 16,685 sf)</li> <li>• <b>18% of residential GFA (0.18 * 135,612 = 24,410 sf)</b></li> </ul>
	IZ Plus Dwelling units	<b>24 units</b>

If IZ Plus is applied to the property, and depending on the development program, OP estimates

<sup>3</sup> OP typically uses a density factor 1,000 sq. ft. to estimate number of dwelling units.

<sup>4</sup> The percent increase between the maximum permitted FAR of the existing/prior zone (MU-3A), not including IZ bonus density, and the total FAR built in the IZ Plus Development.

that **over 20 IZ units** could be produced in a development on the subject site that maximizes the allowable FAR of the MU-2 zone.

## **VI. COMPREHENSIVE PLAN**

The proposal to remap the property from MU-3A to MU-2 would not be inconsistent with the Comprehensive Plan, including the Plan’s land use maps and several written policies. A full analysis of the rezoning’s conformance with the Plan, its maps and policies can be found in OP’s setdown report at [Exhibit 13](#).

### **Comprehensive Plan Analysis through a Racial Equity Lens and the Zoning Commission’s Racial Equity Tool**

The Commission requires evaluation of zoning actions through a racial equity lens utilizing its Racial Equity Tool. Parts 1, 3 and 4 of the tool require OP’s analysis of the relevant Comprehensive Plan policies and other planning documents, with provision of data that describe the racial and economic characteristics of the subject planning area, and analysis of factors related to equity. The requested information is provided on [Page 6-16 of OP’s setdown report at Exhibit 13](#). The applicant also provided a Racial Equity Analysis at [Exhibit 3](#).

#### **Racial Equity Tool Part 1 – Comprehensive Plan Guidance**

The Comprehensive Plan requires the Zoning Commission and staff to examine city policies through a racial equity lens. Racial equity is a broad and encompassing goal of the entire District government. As explained in the Framework Element of the Plan,

*[t]he District seeks to create and support an equitable and inclusive city. Like resilience, equity is both an outcome and a process. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality. Framework Element, § 213.6*

Section 2501.8 of the Implementation Element calls for “the Zoning Commission to evaluate all actions through a racial equity lens as part of its Comprehensive Plan consistency analysis.” That analysis is intended to be based on the policies of the Comprehensive Plan and whether a proposed zoning action is “not inconsistent” with the Comp Plan. Whenever the Commission considers Comprehensive Plan consistency, the scope of the review and Comprehensive Plan policies that apply will depend on the nature of the proposed zoning action.

Equity is discussed throughout the Comprehensive Plan. In the context of zoning priorities include affordable housing, displacement, and access to opportunity. The Comprehensive Plan provides policies related to the development of this project which, when viewed through a racial equity lens, give the Commission a framework for evaluating the project. Please see a compilation of relevant policies in Attachment 1.

The Land Use Element of the Plan seeks to guide growth in such a way that it “expands access to affordable housing, education, transportation, employment, and services for communities of color,

low-income households, and vulnerable populations” (Comprehensive Plan, § 304.4). The proposed zoning action could enhance access to affordable housing and provide access to transportation, and therefore enhanced access to employment, for residents of a new building on the site.

**Housing:** A principal way in which the Comprehensive Plan seeks to address equity is by supporting additional housing development on underutilized sites near transit. The Plan describes that without increased housing, the imbalance between supply and demand will drive up housing prices that creates challenges for many residents, particularly low-income residents. Housing at this location, currently underutilized development, would not result in the displacement of any existing residents. The property is owned and operated by the Applicant in this case.

**Healthy Environment:** Because this zoning action does not involve a specific project, the environmental impacts of a Commission action are difficult to fully evaluate. However, any project facilitated by the proposed map amendment would likely create housing in a location proximate to transit, which would minimize the need for automobile trips and reduce pollution from cars. A project would also be likely to improve the stormwater runoff performance of the site, which currently has an older development and a surface parking lot. A healthier environment would benefit all residents of the District and further environmental equity.

**Urban Design:** Because this zoning action does not involve a specific project, the urban design impacts of a Commission action are difficult to fully evaluate. However, a project that takes advantage of the zoning parameters of the proposed MU-2 zone, could further Urban Design policies that call for improvements to the city’s major thoroughfares and neighborhood entry points. A new development at this location would also likely improve the pedestrian environment including its streetscape near the metro station.

**Upper Northeast Area Element:** The proposed map amendment, together with the IZ Plus designation, would help fulfill the Area Element policies that call for the creation of new mixed-use neighborhoods, including housing for a mix of incomes. The proposed zoning parameters would also help fulfill policies that seek to take advantage of underutilized property near metro and maximize the amount of housing within close distance to metro. Redevelopment of the site could also help to improve the streetscape around the site.

**Brookland / CUA Metro Station Small Area Plan:** The proposed zoning map amendment would also not be inconsistent with the Brookland small area plan (SAP). The SAP identifies the subject site as part of the “Monroe Street Sub-Area” of the plan. It states that new development can be of a higher density and could include a mix of retail, residential and cultural uses, and should enhance the urban design of this part of the neighborhood to increase connections and walkability (SAP, p. 46). In terms of equitable outcomes, a guiding principle of the SAP also seeks to bring additional residents close to multiple transportation options, while also being sensitive to existing residential development. The plan also sought to support existing small businesses with additional needed retail, services, and amenities to neighborhood residents. The design of new development should be in keeping with the greater street grid of the neighborhood to allow for ease of access and walkability, and should also achieve a high degree of sustainability, all of which would result in more equitable health outcomes for residents.

In summary, when evaluated through a racial equity lens, the proposed map amendment would not be inconsistent with the Comprehensive Plan and would further several policies of the above-referenced Plan elements and the Brookland/CUA Metro Station small area plan.

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

The Applicant has provided details of their ongoing outreach efforts to the ANC, community groups and neighborhood residents as part of [Exhibit 3E](#). The application states these meetings were initiated in January of 2024, and are ongoing. Exhibit 11 is a memo in support from ANC 5F, and at Exhibit 12 is a letter in support from the Edgewood Civic Association. Additional information was not included in the record at the writing of this report.

**Racial Equity Tool Part 3 – Planning Area Data - Upper Northeast Area**

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 following tables provide a summary of economic data and a population profile of the planning area. The data source is the **2018-2022 American Community Survey 5 Year Estimates**, available via the OP State Data Center ([opdatahub.dc.gov](http://opdatahub.dc.gov)). Part 3 also asks if the planning area is on track to meet affordable housing goals, and whether the data shows any “intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?”

**Table 1 Economic Data - Upper Northeast Area (2018-2022)**

	Population	Median Income	Unemployment Rate	Below Poverty Line	Owner Occupied	Renter Occupied	Housing Cost Burdened
DISTRICT TOTAL	670,587	101,722	7.1%	15.1%	41.4%	58.6%	36.1%
UNE TOTAL	73,167	\$82,016	9.2%	16.92%	45.1%	54.9%	40.9%
White Alone	15,917	\$158,586	3.9%	12.67%	58.1%	41.9%	-
Black or African American	46,405	\$69,018	12.2%	18.72%	42.8%	57.2%	-
American Indian & Alaska Native	436	\$65,718	0.0%	11.6%	46.2%	53.8%	-
Asian Alone	1,961	\$158,377	4.9%	5.42%	48.1%	51.9%	-
Native Hawaiian & Other Pacific Islander	96	N/Provided	0.0%	0.0%	100.0%	0.0%	-
Other Race	4,092	\$49,106	8.2%	17.69%	25.5%	74.5%	-
Two or More Races	4,260	\$82,994	6.3%	17.44%	35.6%	64.4%	-
Hispanic or Latino*	8,278	\$54,228	8.9%	18.7%	32.2%	67.8%	-

\*Hispanic or Latino can be of any race, and the data for this ethnicity is included in the disaggregated racial data above.

**Table 2. Population Profile - Upper Northeast Area (2018-2022)**

	Population	Median Age (years)	65 Years and Over	Disability Status	Education – Bachelor’s Degree or Higher
DISTRICT TOTAL	670,587	35.5	84,451	10.9%	62.6%
UNE TOTAL	73,167	35.2	9,927	13.75	47.1
Asian Alone	1,961	35.2	255	1.95	87.6
Black or African American	46,405	38.4	8,312	17.5	34.4
Hispanic or Latino	8,278	30.7	359	7.37	33.4
Indian and Alaska Native	436	40.1	12	13.07	44.9
Native Hawaiian and P/I	96		0	0	96.9
Some Other Race	4,092	26.8	102	8.03	21.6
Two or More Race	4,260	28.7	357	11.4	49.0
White Alone	15,917	35.2	889	6.52	83.8

\*Hispanic or Latino can be of any race, and the data for this ethnicity is included in the disaggregated racial data above.

**Data Trends Over Time**

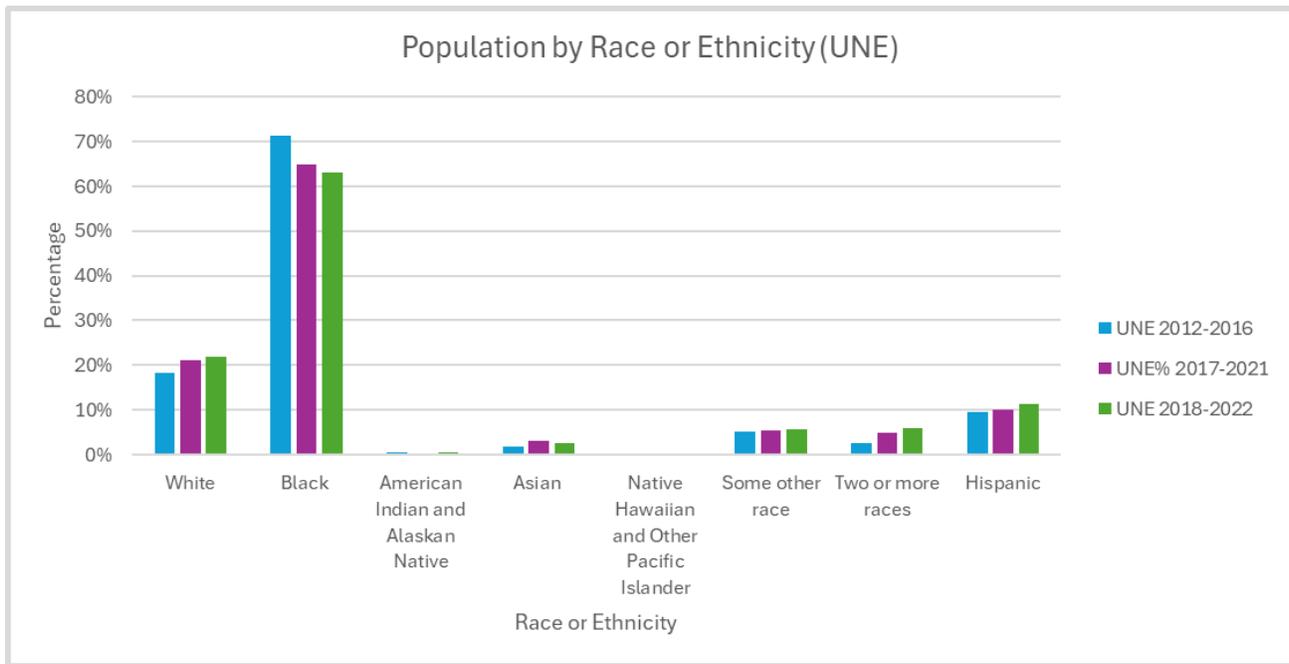
Analysis of data over time can yield other insights into trends in the planning area. The following data compares the 2018-2022 American Community Survey data described above with data from the 2012-2016 American Community Survey available from OP’s State Data Center. Each table below covers 3, 5-year periods and compares the data from the Upper Northeast planning area with District-wide data.

**Table 3**

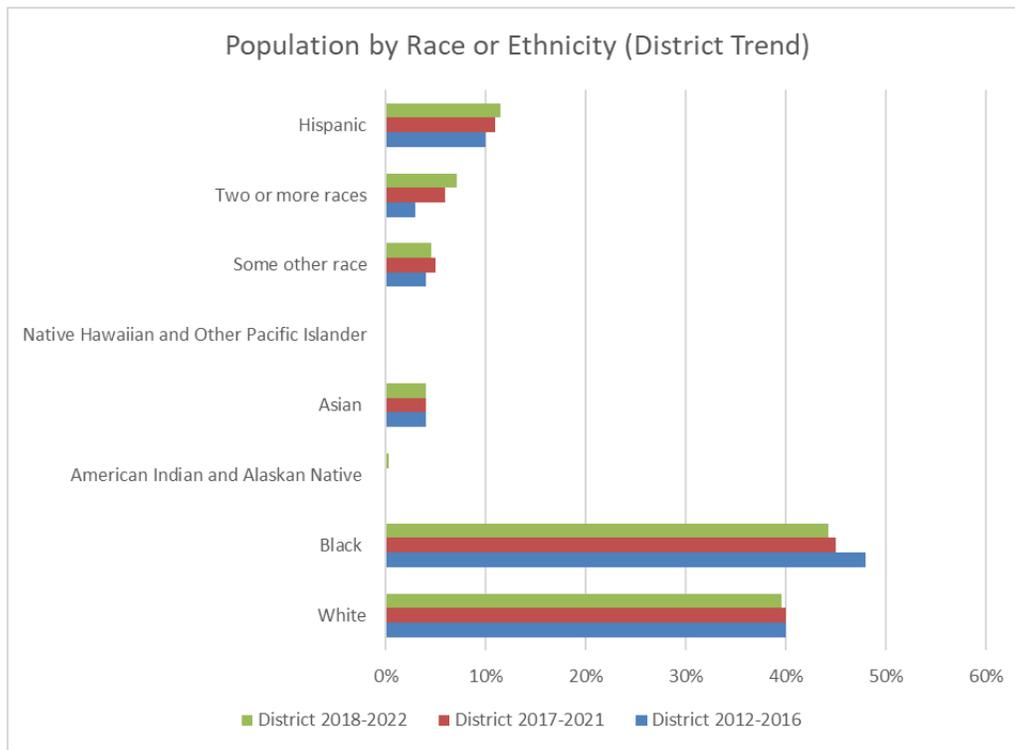
Race or Ethnicity	District 2012-2016	District 2017-2021	District 2018-2022	UNE 2012-2016	UNE 2017-2021	UNE 2018-2022
<b>Total</b>	<b>659,009</b>	<b>683,154</b>	<b>670,587</b>	<b>70,690</b>	<b>72,492</b>	<b>73,167</b>
<b>White</b>	266,035 (40%)	276,373 (40%)	265,633 (39.6%)	12,986 (18.40%)	15,380 (21%)	15,917 (22%)
<b>Black</b>	318,598 (48%)	50,454 (45%)	297,101 (44.3%)	50,454 (71.40%)	47,386 (65%)	46,405 (63%)
<b>American Indian and Alaskan Native</b>	2,174 0%	1,984 (0.3%)	2,209 (0.3%)	438 (0.60%)	254 (0.4)%	436 (0.60%)
<b>Asian</b>	24,036 (4%)	27,988 (4%)	27,067 (4%)	1,351 (1.90%)	1,840 (3%)	1,961 (2.70%)
<b>Native Hawaiian and Other Pacific Islander</b>	271 0%	359 0%	420 0%	12 0%	99 0%	96 0.13%
<b>Some other race</b>	29,650 (4%)	32,484 (5%)	30,879 (4.6%)	3,673 (5.20%)	3,912 (5.40%)	4,092 (5.60%)
<b>Two or more races</b>	18,245 (3%)	38,857 (6%)	47,278 (7.1%)	1,775 (2.50%)	3,622 (5%)	4,260 (5.80%)
<b>Hispanic</b>	69,106 (10%)	76,982 (11%)	77,168 (11.5%)	6,800 (9.60%)	7,576 (10%)	8,278 (11.30%)

Population by Race/Ethnicity

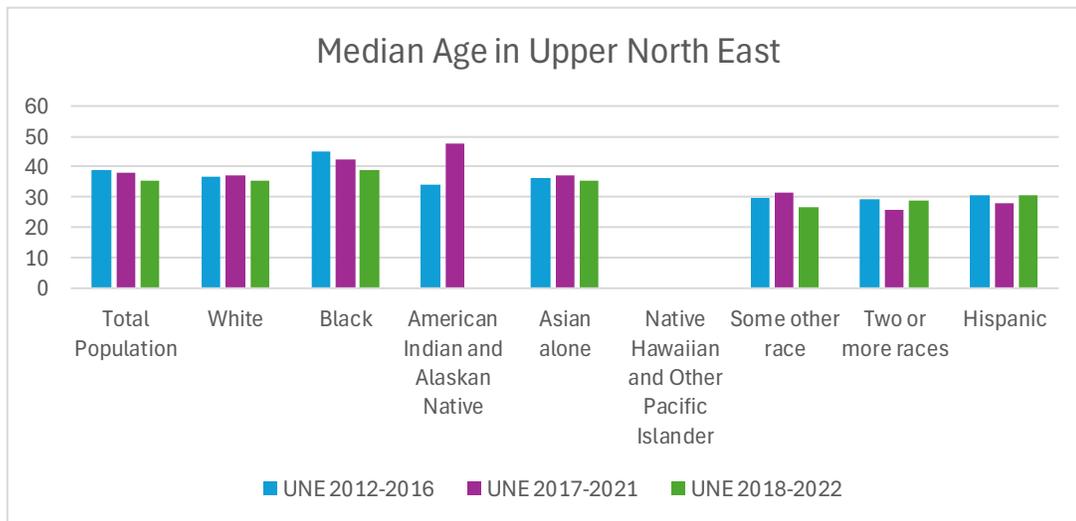
The Upper Northeast planning area has a majority minority population with 63% of the PA’s residents being Black and 11% of its residents being Hispanic in the latest 2022 period. Though in the majority, the Black UNE population is showing a decline from 71.4% to 65% (2012 to 2021) and to 63% recorded in 2022, which is reflective of the District-wide trend during this period<sup>5</sup>. The White population increased from 18.4% to 22%. With IZ Plus applied to the subject site, there would be an increased opportunity for lower-income families to remain in the District and the planning area. Given the income data by race, it can be inferred that the families benefiting the most from the IZ Plus housing on the site would be Black or other minority groups, which could impact the declining trend of the Black population in the planning area.



<sup>5</sup> See Appendix 2: Population by Race or Ethnicity (District Trend)



Data applied from tables above.

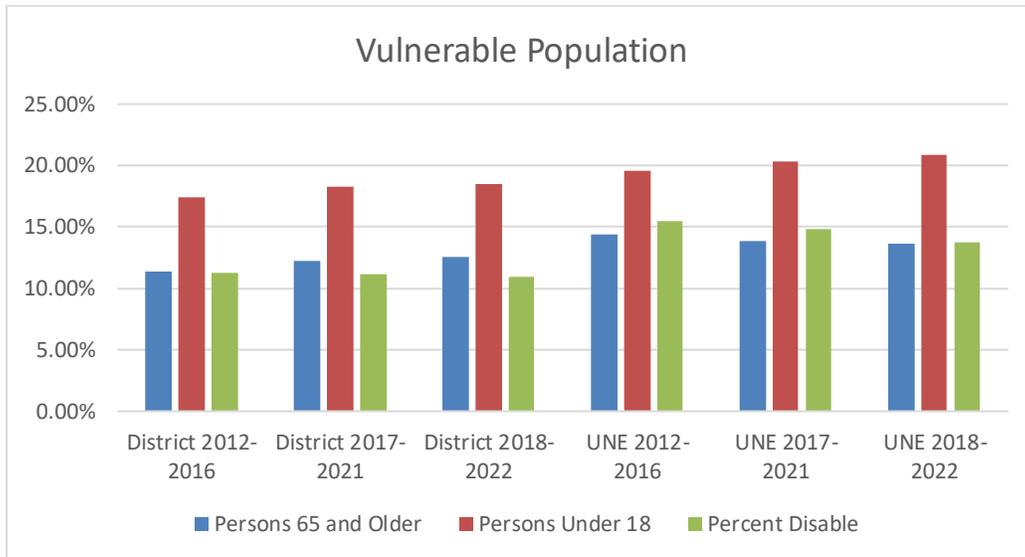


Age & Vulnerable Population

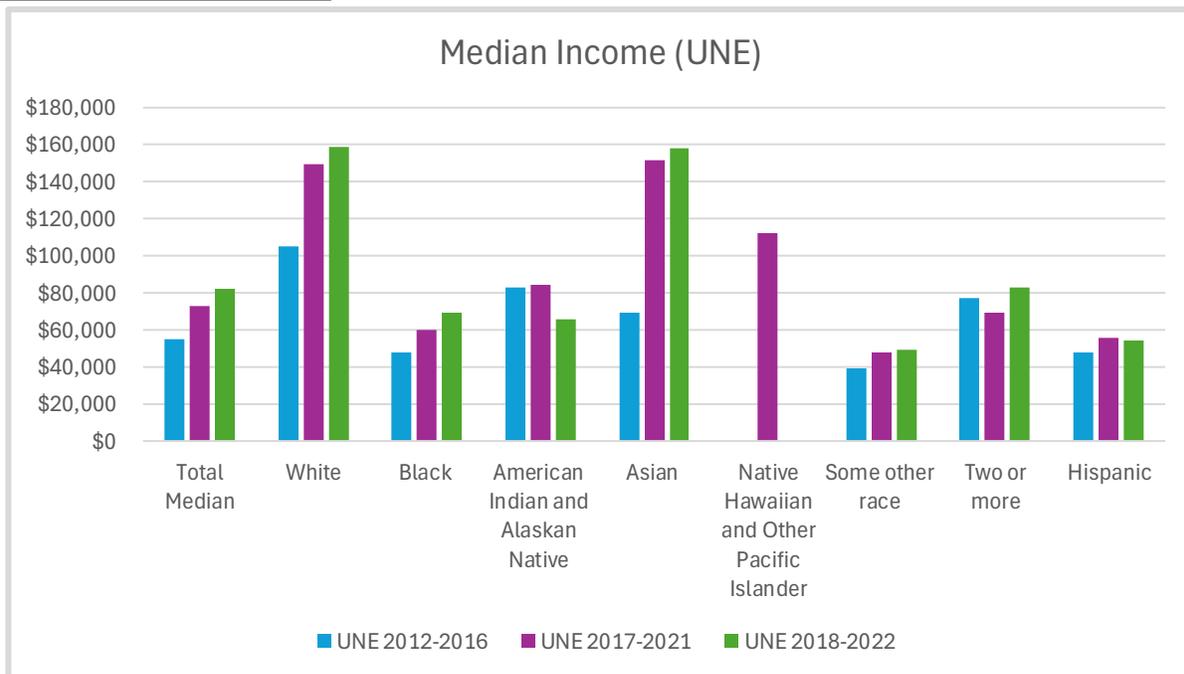
The Northeast planning area’s median age was slightly older than the Districtwide median during the various 5-year periods. While the District’s median age dropped by over three years between study periods, UNE’s median age went down by less than one year. When race is considered, the data shows that the Black residents in Upper North-East Area were older than most of the other groups during the ten-year period. ([See Table 2.](#))

The UNE planning area had a higher percentage of vulnerable residents than the District as a whole. Over the identified period, the number of residents 65 and older and the number of

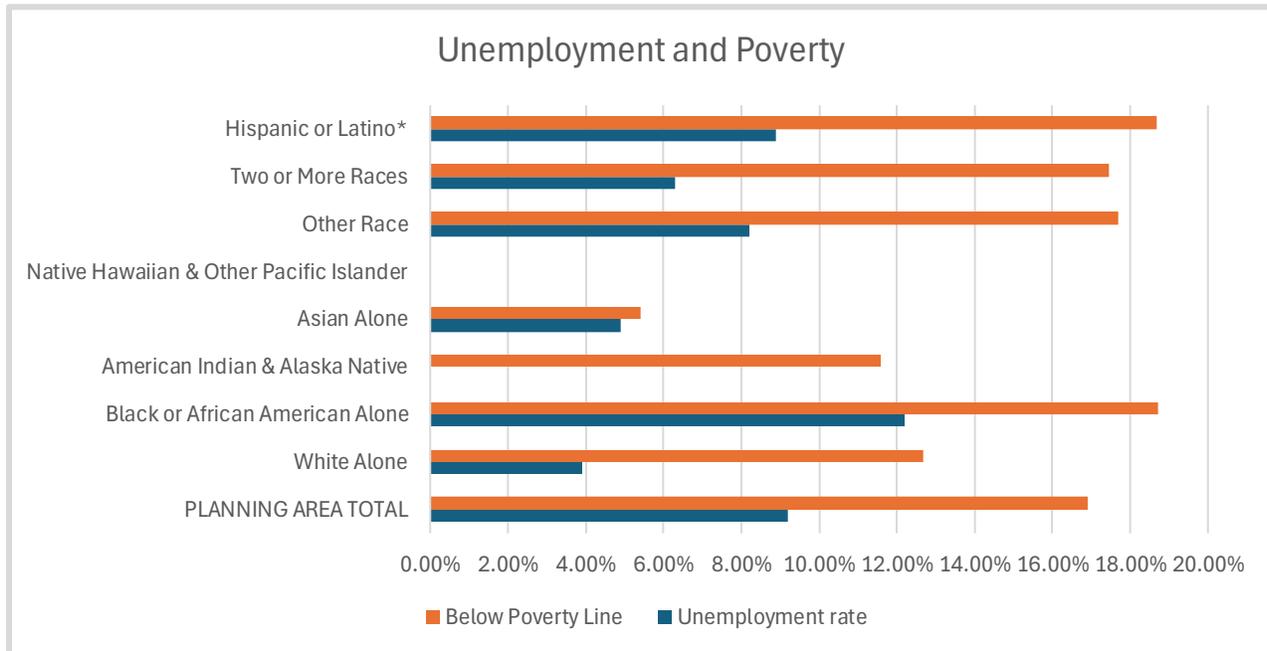
residents who identified as disabled slightly decreased in the planning area, but the number of residents under 18 also showed a slight increase in the local UNE population.



Median Household Income



The UNE planning area has a significantly lower median income than the District as a whole, as evidenced by data from the 2012-2016, 2017-2021 and 2018-2022 survey periods. The planning area median income, however, tracked with the citywide trend and increased significantly over the 10-year period, although those gains were not distributed evenly across racial groups. The median income of White and Asian residents saw significant increases, while other groups saw more modest gains, such as those identifying as Some Other Race or Two or more races. (See also related data tables in the Attachment of the OP setdown Report - Exhibit 13.)



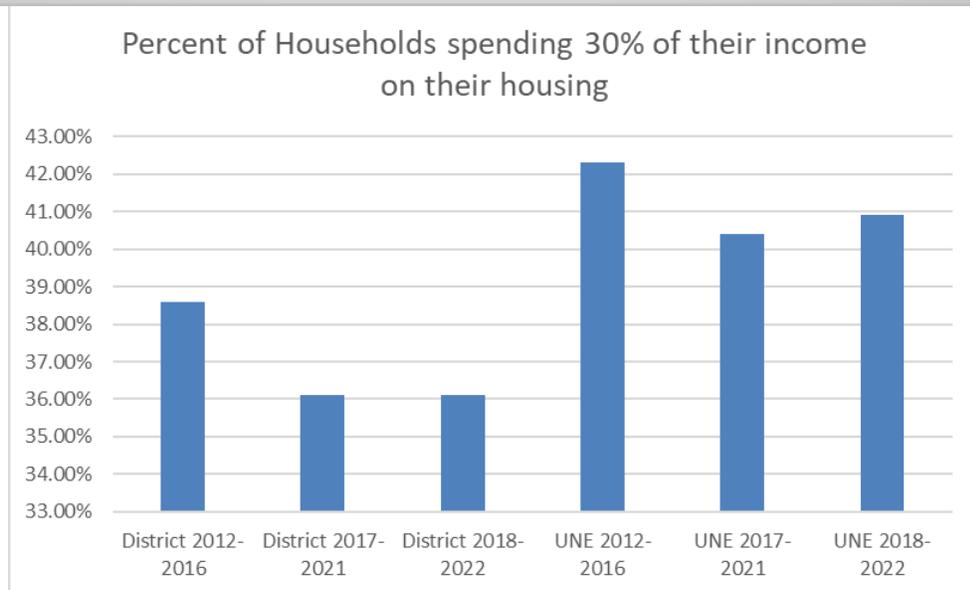
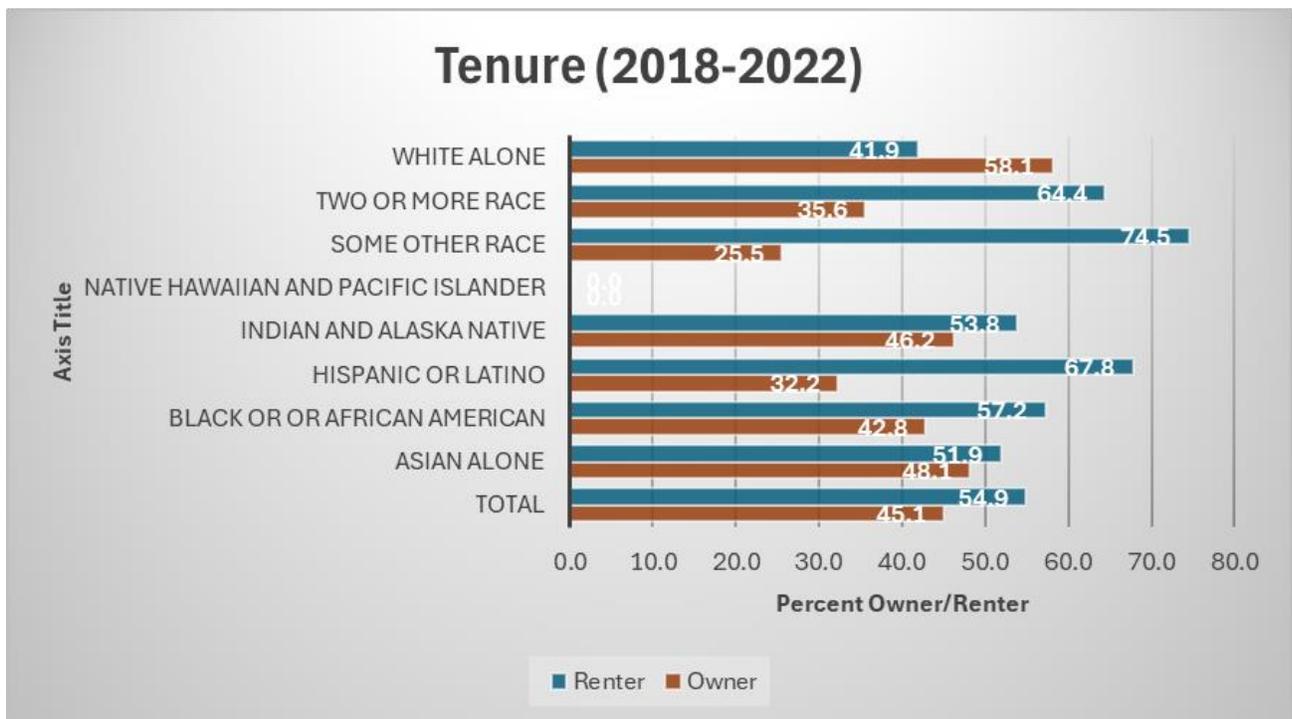
The unemployment rate among minorities as shown in the chart may suggest a correlation that is reflected in the working poor in the planning area.

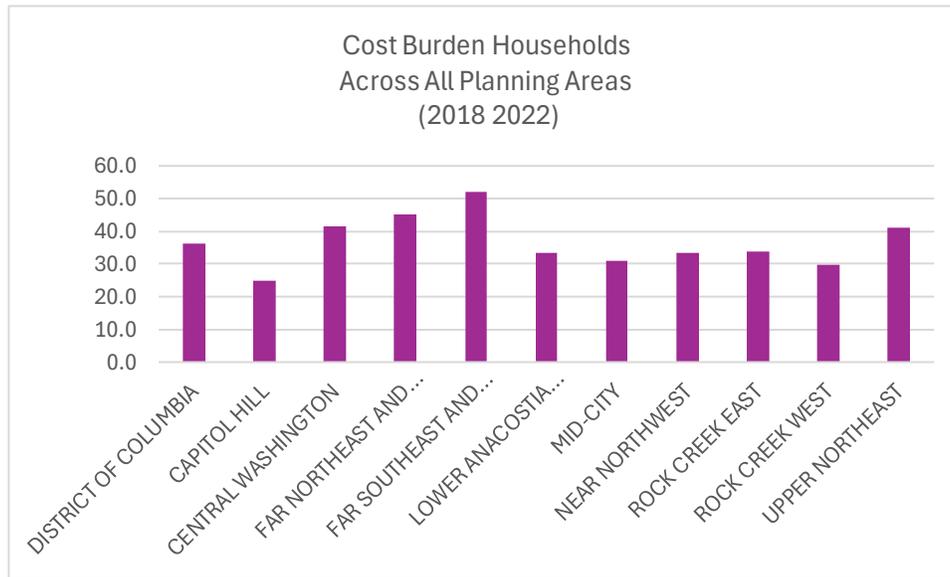
Tenure

More residents in the UNE planning area own their home than in the District as a whole – 45.7% compared to 41.4%. The homeownership rate in the planning area remained virtually unchanged over the survey periods, while the overall rate in the District went up slightly. The homeownership rate among Black households in the planning area went down from 45.9% to 42.8%, while other racial groups, such as American Indian and Alaskan Native, and Asian, saw dramatic increases in the homeownership rate. These trends seem to be particular to the planning area; District-wide, Black homeownership decreased more significantly than in UNE, and for both American Indian and Alaskan Native, and Asian, homeownership rates citywide went down. The planning area’s percentage of households that are housing-cost-burdened is higher than the citywide rate, although that percentage decreased between the study periods.

Owners/ Renters	Households	District 2012-2016	District 2017-2021	District 2018-2022	UNE 2012-2016	UNE 2017-2021	UNE 2018-2022
Total	Owner	40.7%	41.5%	41.4%	45.9%	45.7%	45.1%
	Renter	59.3%	58.5%	58.6%	54.1%	54.3%	54.9%
White	Owner	47.8%	48%	47.4%	53.5%	59.8%	58.1%
	Renter	52.2%	52%	52.6%	46.5%	40.2%	41.9%
Black	Owner	46.6%	36%	35.9%	45.9%	42.7%	42.8%
	Renter	53.4%	64%	64%	54.1%	57.3%	57.2%
American Indian and Alaskan Native	Owner	32.8%	29.7%	25.8%	21.1%	55.1%	46.2%
	Renter	67.2%	70.3%	74.2%	78.9%	44.9%	53.8%
Asian	Owner	43.1%	41.2%	68.5%	32.2%	56.8%	48.1%
	Renter	56.9%	58.8%	31.5%	67.8%	43.2%	51.9%
Native	Owner	9.1%	97%	64.2%	0%	100%	-

Owners/ Renters	Households	District 2012-2016	District 2017-2021	District 2018-2022	UNE 2012-2016	UNE 2017-2021	UNE 2018-2022
Hawaiian and Other Pacific Islander	Renter	90.9%	3%	35.8%	0%	0%	-
Some Other Race	Owner	17.5%	24.2%	26.6%	26.4%	29.6%	25.5%
	Renter	82.5%	75.8%	73.4%	73.6%	70.4%	74.5%
Two or More Races	Owner	32.7%	42.8%	43.9%	40.5%	35.2%	35.6%
	Renter	67.3%	57.2%	56.2%	59.5%	64.8%	64.4%
Hispanic or Latino	Owner	30.9%	34.8%	50.3%	30.5%	34.1%	32.2%
	Renter	69.1%	65.2%	49.7%	69.5%	65.9%	67.8%





Upper Northeast, Far Southeast, Far Northeast and Central Washington show the highest cost burden for residents among all the planning areas.

Cost Burdened Households	District 2012-2016	District 2017-2021	District 2018-2022	UNE 2012-2016	UNE 2017-2021	UNE 2018-2022
% of Households spending 30% of their income on their housing	38.6%	36.1%	36.1%	42.3%	40.4%	40.9%

- *Is the area on track to meet the Mayor’s 2025 affordable housing goal?*

The table below, excerpted from the Mayor’s January 2023 DC’s Comeback Plan, p. 22, indicates that the Upper Northeast planning area is projected to nearly reach its affordable housing goal, although at present it is just over halfway towards that goal.

Planning Area	Affordable Unit Goal	% of Progress Towards Goal (Jan 2023)	Projected Percent of Goal by 2025
Far Southeast and Southwest	1,120	182.2 %	369.5 %
Far Northeast and Southeast	490	208.2 %	322.4 %
Lower Anacostia Waterfront & Near Southwest	850	51.6 %	161.3 %
Mid-city	1,010	51.9 %	131.8 %
<b>Upper Northeast</b>	<b>1,350</b>	<b>53.4 %</b>	<b>97.2 %</b>
Central Washington	1,040	44.9 %	94.6 %
Rock Creek East	1,500	57.9%	84.4 %
Near Northwest	1,250	10.7 %	37.2 %
Capitol Hill	1,400	14.9 %	34.6 %
Rock Creek West	1,990	3.6 %	13.8 %
<b>Total</b>	<b>12,000</b>	<b>54.1 %</b>	<b>110.00 %</b>

Table 1: 2025 Dedicated Affordable Housing Production Goals and Projections by Planning Area (Projections as of December 2022)

- *What do available data sources show about the intersectionality of factors such as race, ethnicity, age, income, gender, or sexual orientation within the area of the zoning action and how might the zoning action impact the intersection of those factors?*

The population of the planning area increased from 2012 to 2022, with a related increase in the White population but a slight decrease in the black population. While the Area’s median income in 2022 rose to \$80,000 during this period, the White population’s median income rose twice of the Area’s and well above the Black median income, which remained well below the Area’s median income ([See Median Income Chart](#)). The ability to increase homeownership among the Black population would be more difficult given their income status. Thus, it can be extrapolated that the approximately 41% cost burdened population in the Planning Area could most likely be attributed to the Black and other lower income population of the Area.

The proposed map amendment could help to alleviate some degree of inequity, especially regarding housing costs and the number of families that are housing-cost-burdened. Data on the number of households burdened by housing costs is not disaggregated by race but given unemployment and income levels it can be inferred that additional affordable housing provided by the IZ Plus regulations would help to further equitable outcomes.

Another benefit of development facilitated by the map amendment would be the provision of residential units near several transportation modes, which can help populations of any skill or educational level reach employment opportunities and reduce transportation costs.

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

According to the Racial Equity Tool, the Commission will use the following criteria, themes and questions, along with the above data, in its evaluation of a zoning action’s consistency with the Comprehensive Plan, as viewed through a racial equity lens.

- *What Comprehensive Plan policies related to racial equity will potentially be advanced by approval of the zoning action?*

The following policies will potentially be advanced by the requested rezoning: Please refer to Attachment 1 for the full text of each policy, and OP’s analysis above under Part 1 of the Racial Equity Tool discussion.

#### **Land Use Element**

- **Policy LU-1.4.1: Station Areas as Neighborhood Centers**
- **Policy LU-1.4.2: Development Around Metrorail Stations**
- **Policy LU-1.4.3: Housing Around Metrorail Stations**
- **Policy LU-1.4.6: Development Along Corridors**

#### **Transportation Element**

- **Policy T-1.1.4: Transit-Oriented Development**
- **Policy T-1.1.5: Joint Development**
- **Policy T-1.1.7: Equitable Transportation Access**
- **Policy T-1.2.1: Major Thoroughfare Improvements**

**Housing Element**

- **Policy H-1.1.1: Private Sector Support**
- **Policy H-1.1.2: Production Incentives**
- **Policy H-1.1.3: Balanced Growth**
- **Policy H-1.1.4: Mixed-Use Development**
- **Policy H-1.1.8: Production of Housing in High-Cost Areas**
- **Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority**
- **Policy H-1.2.2: Production Targets**
- **Policy H-1.2.3: Affordable and Mixed-Income Housing**
- **Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas**
- **Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods**

**Environmental Protection Element**

- **Policy E-5.1.5: Improving Air Quality Through Transportation Efficiency**

**Urban Design Element**

- **Policy UD-1.4.1: Thoroughfares and Urban Form**
- **Policy UD-1.4.2: District Gateways**

**Upper Northeast Area Element**

- **Policy UNE-1.1.1: Neighborhood Conservation**
- **Policy UNE-1.1.3: Metro Station Development**
- **Policy UNE-1.2.1: Streetscape Improvements**
- **Policy UNE-2.6.1: Brookland/CUA Metro Station Area**

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

An analysis of the Comprehensive Plan does not indicate any policies related to racial equity that would be impaired by the proposed zoning action.

- *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.*

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The site has no residential uses, so the proposed zoning map amendment would not result in any direct displacement of residents. The owner operates a beauty training vocational school at the location.

<b>Factor</b>	<b>Question</b>	<b>OP Response</b>
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 provision of a large quantity of market rate and affordable housing should help to ease upward pressure on housing costs in the vicinity. Research shows that there is a positive relationship between the provision of more housing and the ability of residents to remain in a neighborhood.</p> <p>With respect to potential commercial displacement, the property and the main commercial activity (trade school) is owned by the Applicant. The Applicant has been a long-standing community participant in Brookland.</p>
Housing	<p>Will the action result in changes to:</p> <ul style="list-style-type: none"> <li>▪ Market Rate Housing</li> <li>▪ Affordable Housing</li> <li>▪ Replacement Housing</li> </ul>	The zoning action would result in the ability to provide more market rate housing on the site than under current zoning. The implementation of IZ Plus would result in a higher percentage of affordable units than would occur in a matter of right development, or under a rezoning with only regular IZ. In general, the provision of market rate and affordable housing should help to ease upward pressure on housing costs in the vicinity.
Physical	<p>Will the action result in changes to the physical environment such as:</p> <ul style="list-style-type: none"> <li>▪ Public Space Improvements</li> <li>▪ Infrastructure Improvements</li> <li>▪ Arts and Culture</li> <li>▪ Environmental Changes</li> <li>▪ Streetscape Improvements</li> </ul>	It is likely that a redevelopment of the site would result in an improved streetscape and pedestrian realm around the property. Redevelopment would improve the site’s environmental performance by complying with up-to-date green building regulations such as the Green Building Act.
Access to Opportunity	<p>Is there a change in access to opportunity?</p> <ul style="list-style-type: none"> <li>▪ Job Training/Creation</li> <li>▪ Healthcare</li> <li>▪ Addition of Retail/Access to New Services</li> </ul>	It is likely that a new development at the site would result in new residents in the neighborhood, who would support local shops, arts, and services. Residents at the site would have excellent access to transit and bicycle infrastructure, to provide access to employment centers.
Community	<p>How did community outreach and engagement inform/change the zoning action?</p> <ul style="list-style-type: none"> <li>▪ (e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.?)</li> </ul>	See Section VII – Community Engagement below.

## **VII. COMMUNITY ENGAGEMENT**

The Applicant met with the community through the ANC 5F at its regularly held meeting on 04/15/2024. The ANC voted unanimously to support the application. There is no indication of community requests for changes to the proposal. ([Exhibit 11](#))

The Edgewood Civic Association also included its letter in support of the proposal as it envisions a mixed-use development in the future “consistent with the ECA’s goals to increase additional housing and retail opportunities.” ([Exhibit 12](#))

## **VIII. SUMMARY AND RECOMMENDATION**

The subject site is in an area considered appropriate for the MU-2 zone, based on the Comprehensive Plan maps and policies. On balance, the proposal, which remains essentially unchanged since setdown is not inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens, and OP recommends that the Commission approve the map amendment including an IZ Plus designation.