

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Shepard Beamon, Development Review Specialist, Office of Planning
JL for Jennifer Steingasser, Deputy Director, Development Review & Historic Preservation

DATE: May 23, 2025

SUBJECT: ZC Case 24-14 – Public Hearing Report for a Petition to Rezone 1459 Columbia Road NW from RA-2 to RA-4.

I. BACKGROUND

At its March 27, 2025 public meeting, the Zoning Commission set down for a public hearing zoning map amendment case 24-04, which would rezone the property at 1459 Columbia Road NW from the RA-2 zone to the RA-4 zone, with the application of IZ Plus.

The subject site is designated on the Comprehensive Plan's Future Land Use Map (FLUM) as appropriate for Medium-Density Mixed-Use development, a designation consistent with the RA-4 zone. As this is a zoning map amendment request, the applicant has not provided plans for the development of the site, however, the application states the existing building will be used for residential units. Since setdown, the proposal has not been modified and the applicant has submitted a pre-hearing statement.

At [Exhibit 11](#) is the OP Setdown report with a full review and analysis of the proposed map amendment, with a review of Comprehensive Plan policy, including through a Racial Equity lens.

II. RECOMMENDATION

The Office of Planning recommends that the Zoning Commission **approve** this request. The uses and development types generally permitted by the RA-4 zone would be compatible with the surrounding community, and the map amendment would not be inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens.

III. APPLICATION-IN-BRIEF

Applicant	Emory United Methodist Church
Proposed Map Amendment	RA-2, a moderate density residential zone, to RA-4, a medium to high density residential zone
Address	1459 Columbia Road NW
Ward and ANC	Ward 1, ANC 1A
Legal Description	Square 2672, Lot 718
Property Description	19,460 square feet with a 20 ft, wide building restriction line along Columbia Road NW; a 20 ft. wide rear alley.

Future Land Use Map Designation	Medium-Density Residential
Generalized Policy Map Designation	Neighborhood Conservation Area
Historic District	None
Surrounding Area	Multi-family residential, neighborhood retail, and commercial uses

IV. COMMENTS FROM SET-DOWN MEETING

The following summarizes comments and requests for additional information from the setdown meeting. The Applicant has provided responses as part of their Statement of Support (Exhibit 3) and Pre-Hearing Statement (Exhibit 14):

Comment	Applicant Response	OP Analysis
ZC – Explanation why RA-4 is more appropriate than RA-3.	The Applicant response notes that the RA-4 zone would permit additional residential density and would facilitate development opportunities envisioned by the District.	Both the RA-2 and RA-4 zones allow flexibility in design and housing types. The RA-4 allows a higher FAR of 3.5, or 4.2 with IZ. The Comprehensive Plan notes RA-3 as an appropriate zone for the Medium Density Residential land use, however, other zones can also be considered appropriate and not inconsistent with this designation. Although the proposed RA-4 zone permits a maximum building height of 90 feet, the applicant proposes to keep and use the existing building, which is similar in height to the surrounding neighborhood. The applicant does not propose additional height and would meet the IZ Plus requirements. Therefore, the proposed RA-4 would facilitate additional dwelling units, including affordable units, consistent with Comprehensive Plan direction, and would, on balance, be not inconsistent with the FLUM designation.
ZC - Would this map amendment shape or shift the neighborhood demographics?	N/A	OP does not anticipate that the map amendment would have a significant impact on neighborhood demographics by displacing existing residents or increasing housing cost burdens. The applicant has committed to providing new housing opportunities for area residents and, at a minimum, meeting IZ Plus requirements.

V. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The applicant's request would rezone the subject property from RA-2 to RA-4. Although no plans have been submitted, the applicant has stated the intended use of the site would be residential.

The following table summarizes the RA-2 zone in comparison to the RA-4 zone:

	Existing Zone: RA-2	Proposed Zone: RA-4
Height	50 ft.	90 ft.
Floor Area Ratio (FAR)	1.8 max. 2.16 max. (IZ)	3.5 max. 4.2 max. (IZ)
Penthouse Height	12 ft., except 15 ft. mechanical space	20 ft. max.
Lot Occupancy	60% max.	75% max.
Rear Yard	4 in. per 1 ft. of principal building height but not less than 15 ft. min.	4 in. per 1 ft. of principal building height but not less than 15 ft. min.
Side Yard	None required, but min. 4 feet if provided	None required, but min. 4 feet if provided
GAR	0.4	0.3

VI. IZ PLUS EVALUATION

IZ Plus is triggered through a map amendment request and establishes an affordable unit set-aside requirement higher than regular IZ. For IZ+ to apply, the rezoning must result in a zone that permits higher density (FAR) development than what was permitted by the former zone and not be located in an area that has an overconcentration of existing affordable housing. As discussed in the OP Setdown Report, OP recommends that this map amendment be subject to IZ Plus.

VII. PLANNING CONTEXT

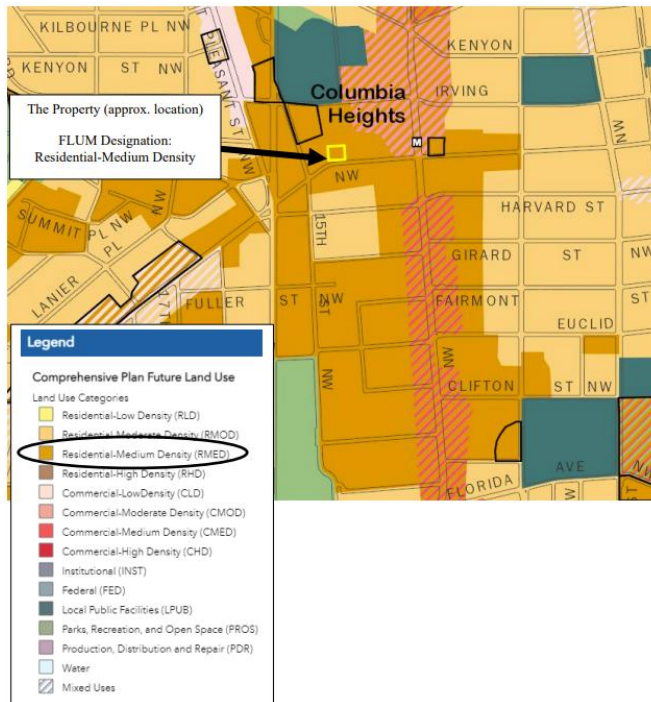
The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan.

The Commission’s 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 has proposed a zoning map change from the RA-2 zone to the RA-4 zone. Please refer to the applicant filings at [Exhibit 3E](#) as well as the OP Setdown Report at [Exhibit 11](#), for a full review of the proposed map amendment against the policy direction of the Comprehensive Plan, including through a Racial Equity Lens.

A. Comprehensive Plan Guidance

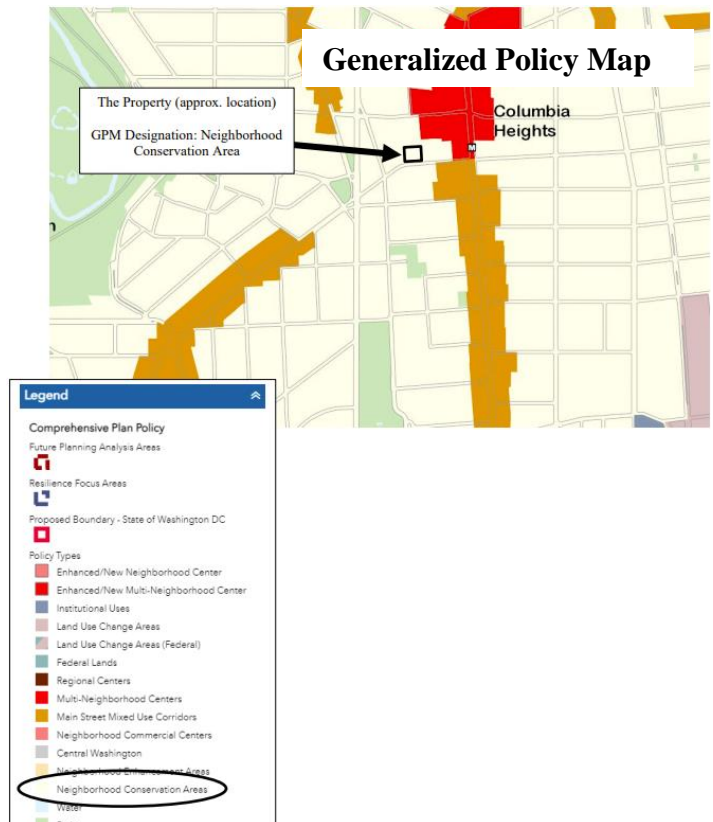
The proposed map amendment would not be inconsistent with the Comprehensive Plan Future Land Use Map and Generalized Policy Map.

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



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. The applicant has agreed to meet Inclusionary Zoning requirements and the RA-4 zone allows a maximum FAR of 3.5, or 4.2 with IZ, which generally falls within the typical FAR range for Medium Density Residential.

The **Generalized Policy Map (GPM)** shows the site within the Neighborhood Conservation Area. The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address city-wide housing needs. Neighborhood Conservation Areas include areas that are primarily residential in character, where existing land uses and community character are maintained. New development, redevelopment, alterations and reuse opportunities should be compatible with the existing scale, natural features, and character of each area, where densities are guided by Comprehensive Plan policies and the Future Land Use Map. The proposed map amendment and potential residential use would not be inconsistent with this designation.



The proposed zoning map amendment would also further policy objectives of the Comprehensive Plan Citywide Elements, particularly the Land Use, Housing, Economic Development, Transportation, and Urban Design Citywide Elements, as well as the Upper Northeast Area Element.

Chapter 3 Land Use

The proposed zoning increases the possibility for additional housing on the site in a manner compatible with the surrounding medium- to high-density scale of the Columbia Avenue corridor. The request supports growth and affordable housing opportunities in proximity to Metrorail and Metrobus options. Land Use policies also encourage the rehabilitation before demolition, which the applicant intends to do.

Chapter 4 Transportation

The Transportation Element supports transit-oriented development and equitable access to transportation options and opportunities. This site is proximate to the Columbia Heights metro station, Metrobus routes, and opportunities for employment, retail, and services, all of which support residential development on the site.

Chapter 5 Housing

Although no proposed development is associated with this petition, the requested RA-4 zone would permit housing consistent with the Comp Plan direction. OP is recommending that IZ-Plus be applied, which the applicant has committed to. When compared to the RA-2 zone, the RA-4 would accommodate additional housing units, including providing opportunities for mixed-income and affordable housing units. The request avoids any direct displacement of existing residents, as there are currently none on the site.

Chapter 9 Urban Design

The Urban Design Element encourages redevelopment and renovations to existing buildings that respond to and complement the defining visual and spatial qualities of the surrounding neighborhood, particularly regarding building roof lines, setbacks, and landscaping. As the applicant proposes to reuse the existing building, the requested zoning could allow redevelopment that would complement and be consistent with the scale, massing, design, and character along the corridor and in the immediate area.

Chapter 20 Mid-City Area Element

The Mid-City Area Element encourages retention and reinforcement of historic characteristics and although this site is not within a historic district, the applicant intends to keep the existing building, which is historic in appearance. The requested RA-4 allows for a level of density that should encourage higher-density residential development without disturbing the character of the surrounding single-family neighborhood while providing additional opportunity for affordable housing.

B. Other Plans

Columbia Heights Public Realm (CHPR) Framework Plan (2004)

This plan was developed to define, protect, and strengthen public places and integrate them with private and public development, principally along 14th Street close to the metro station, but also for the surrounding Columbia Heights neighborhood. The subject property is also identified as a part of

Focus Area which also identifies this portion of Columbia Road NW as a green space opportunity. The Framework Plan did not include land use direction for this area, so OP does not anticipate that the map amendment would be impacted by this public realm plan.

Columbia Heights Neighborhood Investment Fund Plan (2008)

This Plan for Columbia Heights was approved in 2008, and included eight major investment goals, which included increasing the number of available affordable housing units. The subject property is located in the investment target area. Although the Plan has been deemed completed, the approval of the map amendment could continue to advance affordable housing goals for this area.

C. Racial Equity Analysis

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 Zoning Commission’s 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’s Racial Equity Analysis is provided as part of [Exhibit 3I](#). OP analysis is provided in the OP Setdown Report at [Exhibit 11](#), and summarized below in relation to the proposed zoning change from the RA-2 zone to the RA-4 zone. While it can be difficult to assess the actual impact resulting from a proposed zoning map amendment, the potential general impacts – positive or negative - can be assessed on the assumption of development consistent with permissions of the new zone.

Racial Equity Tool Part 1 – Racial Equity Analysis (Comprehensive Plan)

In the context of zoning, certain priorities of equity are explicit throughout the Comprehensive Plan, including affordable housing, potential displacement, and access to opportunity. As noted above, the proposal would not be inconsistent with both Comprehensive Plan Generalized Policy and Future Land Use Maps. The proposed development, on balance, would not be inconsistent with the Citywide Elements of the Comprehensive Plan and would particularly further the policies of the Land Use,

Transportation, Housing, and Economic Development Elements. It would also further many of the policies in the Mid-City Area Element.

Racial Equity Tool Part 2 – Community Outreach and Engagement

The applicant has not yet updated the record with a description of additional community outreach conducted since setdown. However, the applicant has stated they’ve conducted outreach to the affected Advisory Neighborhood Commission (1A) and notified property owners within 200 feet of the property. ANC 1A has filed a letter of support for the map amendment to the record at Exhibit 10.

Racial Equity Tool Part 3 – Disaggregated Data Regarding Race and Ethnicity

The site is located within the Mid-City Plan Area as mapped in Chapter 20 of the Comprehensive Plan. Below is disaggregated data for the District and for the Mid-City area, including data trend comparisons over time from 2016 to 2023. The information is from the DC State Data Center, and highlights population; racial and ethnic composition; median income, including by race; age, including by race; vulnerable populations, including by race; owner/renter, including by race; and whether the planning area is on track to meet the Mayor’s 2025 affordable housing goals.

OP’s Set down report previously included data from 2018 to 2022 time period, which has since been updated to the 2019-2023 time period. While the changes are relatively minor, additional analysis is provided below.

Data Trends Over Time

Analysis of census data over time can yield insights into trends in the planning area. At the time of the OP set-down report, the State Data Center had not yet processed and formatted the most recent American Community Survey (ACS) data; this data is now available and used in this report. As such, the following tables compare the 2019-2023 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 Upper Northeast planning area, in which the subject site is located, with District-wide data.

Population by Race/Ethnicity Districtwide and in the Mid-City Planning Area

The Black and white populations of the Mid-City planning area and Districtwide decreased between the two time periods, however, the planning area has seen a larger decline. Populations identifying as Asian and two or more races saw both an increase in the planning area and in the District. American Indian or Native Alaskan, Hispanic or Latinx, some other race and Native Hawaiian or Pacific Islander alone experienced contrasting shifts in the planning area when compared to the District.

Table 1: Population/Race or Ethnicity Districtwide and in the Planning Area

Race or Ethnicity	District 2012-2016	District% 2012-2016	District 2019-2023	District% 2019-2023	Mid-City 2012-2016	Mid-City% 2012-2016	Mid-City 2019-2023	Mid-City% 2019-2023
Total Population	659,009	100%	672,079	100%	94,786	100%	92,368	100%
White	266,035	40%	262,549	39%	49,277	60%	46,053	50%

Race or Ethnicity	District 2012-2016	District% 2012-2016	District 2019-2023	District% 2019-2023	Mid-City 2012-2016	Mid-City% 2012-2016	Mid-City 2019-2023	Mid-City% 2019-2023
Black	318,598	48%	290,772	43%	30,940	32.6%	22,624	24%
American Indian and Alaskan Native	2,174	0%	2,044	0%	101	0.11%	290	0%
Asian	24,036	4%	27,465	4%	4,183	4.4%	5,257	6%
Native Hawaiian and Other Pacific Islander	271	0%	378	0%	116	0.12%	83	0%
Some other race	29,650	4%	32,338	5%	7,184	7.6%	6,953	8%
Two or more races	18,245	3%	56,533	8%	2,986	3.1%	11,108	12%
Hispanic	69,106	10%	77,760	12%	17,148	18.1%	16,703	18%

Age & Vulnerable Population

The Mid-City Planning Area had a lower percentage of older adults in both time periods when compared to the District as a whole. However, the percentage of seniors increased for both the District and the planning area. The planning area's percentage of persons under 18 is also lower compared to the District, however, both the District and the planning area saw an increase between the two five-year periods. The overall disability rates decreased for both the planning area and the District.

With regards to median age, the planning area's median age range narrowed in in 2023 with most residents being in their 30s, with Black/African American and American Indian/Alaskan Native populations decreasing in median age. There appears to be no significant correlation for the planning area and District's median ages per racial group between the two five-year periods. However, for the 2019-2023 period, the planning area median age per group is closely reflective of that of the District as a whole.

Table 2 & 3: Age/Special Populations in the District and the Planning Area

	Districtwide (2012-2016)	Mid-City Planning Area (2012-2016)	Districtwide (2019-2023)	Mid-City Planning Area (2019-2023)
Persons 65 or Older	11.4%	7.5%	12.6%	7.9%
Persons Under 18 Years	17.4%	12.3%	18.5%	14%
Disability Rate	11.3%	8%	10.9%	7.7%

Median Age	District 2012-2016	District 2019-2023	Mid-City 2012-2016	Mid-City 2019-2023
Total Population	37.7	34.9	32.1	33.5
White	40.4	35.3	30.6	33.6
Black	33.4	37.3	42.3	37.5
American Indian and Alaskan Native	32.2	34.9	41.5	37.6

Median Age	District 2012-2016	District 2019-2023	Mid-City 2012-2016	Mid-City 2019-2023
Asian alone	36.5	35.2	33.5	33.4
Native Hawaiian and Other Pacific Islander	30.8	20.9	N/A	N/A
Some other race	28	28.7	29.2	30.5
Two or more races	19.8	31	28.8	32.1
Hispanic	28.4	32.5	31.5	32.8

Median Household Income Districtwide and in the Mid-City Planning Area

The median household income in the planning area was generally higher than or similar to the Districtwide median household income, and generally rose between the two time periods except for American Indian/Native Alaskan. Median income for Black residents rose, but remains significantly lower than that of White, Asian or Hispanic residents of the planning area.

Table 4: Median Income Districtwide and in the Planning Area

Median Household Income	District 2012-2016	District 2019-2023	Mid-City (2012-2016)	Mid-City (2019-2023)
Total Median	\$72,935	\$106,287	\$55,341	\$131,704
White	\$119,564	\$166,774	\$105,214	\$169,741
Black	\$40,560	\$60,446	\$47,630	\$63,175
American Indian and Alaskan Native	\$51,306	\$63,617	\$82,770	\$37,782
Asian	\$91,453	\$121,619	\$69,206	\$120,032
Native Hawaiian and Other Pacific Islander	N/A	N/A	N/A	N/A
Some other race	\$48,047	\$74,754	\$38,992	\$63,396
Two or more	\$83,243	\$116,869	\$77,520	\$143,213
Hispanic	\$60,848	\$106,435	\$47,585	\$95,249

Homeownership Districtwide and in the Mid-City Planning Area

Both the District and the planning area experienced an increase in the number of households between the two periods. The data indicates that during both periods the planning area had a slightly lower homeownership rate than the District as a whole, but the percentage of owner-occupied households increased between the two time periods. Black/African-American, American Indian/Alaska Native, and some other race had the lowest homeownership rates in the planning area, under 30%, and the homeownership rates for Black and Asian residents of the planning area decreased between the two time periods.

Table 5: Owner Occupied Households Districtwide and in the Planning Area

RACE and ETHNICITY	VARIABLE	Districtwide 2012-2016	Districtwide 2019-2023	Mid-City 2012-2016	Mid-City 2019-2023
Total Households	Owner occupied	112,672	132,288	14,783	17,888
	% owner occupied	40.7%	41.1%	36.9%	38.3%
	Renter occupied	163,874	189,268	25,273	28,848

RACE and ETHNICITY	VARIABLE	Districtwide 2012-2016	Districtwide 2019-2023	Mid-City 2012-2016	Mid-City 2019-2023
	% renter occupied	59.3%	58.9%	63.1%	61.7%
White alone	Owner occupied	59,819	67,735	9,302	11,086
	% owner occupied	47.8%	48%	39.3%	42.7%
	Renter occupied	65,282	73,379	14,344	14,867
	% renter occupied	52.2%	52.0%	60.7%	57.3%
Black or AF AM alone	Owner occupied	44,472	46,179	4,139	2,977
	% owner occupied	35.9%	34.9%	37%	28%
	Renter occupied	79,780	86,093	7,037	7,653
	% renter occupied	64.1%	65.1%	63%	72%
American Indian and Alaska Native alone	Owner occupied	292	235	0	59
	% owner occupied	32.8%	19.6%	0	27.7%
	Renter occupied	597	964	64	154
	% renter occupied	67.2%	80.3%	100%	72.3%
Asian	Owner occupied	4,110	5,843	742	1,057
	% owner occupied	39.4%	41.4%	43.7%	36.3%
	Renter occupied	6,318	8,278	955	2,035
	% renter occupied	60.6%	58.6%	56.3%	63.7%
Native Hawaiian and other Pacific Islander	Owner occupied	9	41	0	28
	% owner occupied	9.1%	31.8%	0%	100%
	Renter occupied	90	88	0	0
	% renter occupied	90.9%	68.2%	0%	0%
Some other Race alone	Owner Occupied	1,589	2,878	200	550
	% owner occupied	17.5%	28.7%	8.6%	23.7%
	Renter occupied	7,506	7,142	2,128	1,772
	% renter occupied	82.5%	71.3%	91.4%	76.4%
Two or More Races	Owner Occupied	2,091	9,377	400	2,131
	% owner occupied	32.7%	41.3%	35%	47.4%
	Renter occupied	4,301	13,323	745	2,367

RACE and ETHNICITY	VARIABLE	Districtwide 2012-2016	Districtwide 2019-2023	Mid-City 2012-2016	Mid-City 2019-2023
	% renter occupied	67.3%	58.7%	65.1%	52.6%
Hispanic or Latino	Owner Occupied	7,381	10,529	1,430	2,040
	% owner occupied	30.9%	36.4%	23.6%	31.8%
	Renter occupied	16,504	18,407	4,625	4,379
	% renter occupied	69.1%	65.1%	76.4%	68.2%

General Characteristics

The unemployment rate for both the planning area and the District decreased between the two time periods, with both remaining under 10% and the planning area remaining lower than the District.

The rate of households in the planning area that are housing cost burdened (spending more than 30% of their income on housing) dropped between the two time periods and remained less than the District, which also saw a decrease. These statistics are also reflected in the poverty rate.

Table 6: Cost Burdened Households in the District and in the Planning Area

Characteristic	Districtwide 2012-2016	Mid-City 2012-2016	Districtwide 2019-2023	Mid-City 2019-2023
Unemployment Rate	8.7%	6%	6.5%	3.6%
Cost-Burdened Households	38.6%	35.8%	34%	30%
Poverty Rate	17.9%	13.5%	14.5%	11.2%

Is the area on track to meet the Mayor's 2025 affordable housing goal?

According to the Mayor's 2025 DC Comeback plan, the Mid-City planning area has achieved 154% of the Mayor's goal as of December 2024, exceeding the target goal. However, the housing equity goals are designed to achieve a minimum of 15% in a planning area, and they are minimums only. This proposed map amendment would provide the opportunity for more market rate and affordable units in the planning area, which would contribute to meeting both housing and affordable housing goals for the District.

Planning Area	Affordable Unit Goal	% of Progress Towards Goal (December 2024)
Far Southeast and Southwest	1,120	234.9%
Far Northeast and Southeast	490	258.6%
Lower Anacostia Waterfront & Near Southwest	850	109.3%
Mid-city	1,010	154.2 %
Upper Northeast	1,350	66%
Central Washington	1,040	88.7%
Rock Creek East	1,500	79.6%
Near Northwest	1,250	33.4%
Capitol Hill	1,400	34 %
Rock Creek West	1,990	11.6%
Total	12,000	88%

Table 1: 2025 Dedicated Affordable Housing Production Goals and Percentage

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 available data indicates the population in the Mid-City planning area is generally higher income and majority white with 50% in 2023. Between the two time periods, the planning area experienced a slight decrease in population. The white population maintained majority of the population, followed by African-Americans, with both populations declining. Black/African American residents in this planning area tended to be older than most of the other groups in the area by a slight margin, as it is for the District. For most racial demographics in the planning area, there are more renters than homeowners.

The proposed RA-4 zone could facilitate more housing opportunities, including affordable housing, to the area. Districtwide Black/African Americans, American Indian and Alaska Native, some other race and Hispanic/Latino have a lower median income than the planning area and District medians. Future affordable units could help address the housing needs of minority and housing cost-burdened residents of the area, and attract new minority households to the area to add race/ethnic diversity of Mid-City.

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?

As noted in the OP’s set down report, the requested map amendment would further many policies of the Land Use and Housing Citywide Elements, as well as policies of the Transportation and Environmental Protection Elements, including when viewed through a Racial Equity lens. The proposal would also be consistent with important policies of the Mid-City Area Element of the Comprehensive Plan.

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

OP did not identify a Comprehensive Plan Policy or Action Item that the proposal would hinder, including with respect to racial equity as the map amendment could provide allowance for additional housing options.

Zoning Commission Evaluation Table

Factor		OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The property is currently not used for residential use. There are also no businesses that OP is aware of on this property. Therefore, there are no tenants or residents on the property that would be displaced.

Factor		OP Response
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	The proposed RA-4 zone should not have a significant indirect displacement impact. Immediately surrounding properties are mainly developed with medium density apartment buildings. The proposal would allow for affordable housing to be added to the site.
Housing	<ul style="list-style-type: none"> • Availability • Preservation of housing • Replacement of housing • Housing burden • Homeownership Opportunity • Larger Unit Size 	<p>The proposed RA-4 zone would allow for more housing opportunity on the site, including affordable units.</p> <p>If approved, this map amendment would not preclude the applicant from preserving the existing building and using it for housing.</p>
Employment	Access to Employment	Rezoning the property to RA-4 would increase the amount of housing that can be developed on this high opportunity and transit-oriented site. The housing would be close to varied employment opportunities in the immediate neighborhood, while access to transit allows for easy transportation access to potential employment opportunities.
Transportation	<ul style="list-style-type: none"> • Public Safe/Streetscape • Access to Transit • Pedestrian Safety 	<p>The site is 0.2 miles from the Columbia Heights Metrorail station and close to several Metrobus lines.</p> <p>If the site were to be redeveloped, it would include complying with public space improvement requirements, including pedestrian safety improvements.</p>
Environmental	Environmental Improvements	If approved, any redevelopment would include compliance with energy efficiency and stormwater regulatory requirements.
Community	How did community outreach and engagement inform/change the zoning action?	<p>According to the Applicant, community outreach has not impacted the zoning action.</p> <p>ANC 1A's Housing Justice and Zoning Committee voted in support of the request, however, there were concerns with increased traffic and the ANC requested a traffic study for any future development.</p>

On balance, the proposal would facilitate an increase in the amount of housing in the District, including the amount of affordable housing for low-income households, all within walking distance of retail, service, and employment opportunities, as well as a Metrorail station and other transit options. On balance, the request is not inconsistent with the Comprehensive Plan Citywide and Mid-City Area Elements. The Comprehensive Plan supports Medium Density Residential development in this area and strongly encourages the opportunity for the creation of new housing, especially near public transit areas, and the proposal increases opportunities for this.

Therefore, OP recommends the Commission approve the requested map amendment to the RA-4 zone.

VIII. AGENCY COMMENTS

At Exhibit 26 is a memo from the District Department of Transportation indicating no objection to this map amendment. To date, no comments have been received from any other agencies.

IX. ANC COMMENTS

ANC 1A has filed a memo in support at Exhibit 10.

X. COMMUNITY COMMENTS

A letter of support from ThriveDC, a nonprofit that strives to provide more comprehensive services to a historically underserved and vulnerable population with the mission to end homelessness in the District, is provided at Exhibit 24.

JS/SIB