

ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 24-14
Z.C. CASE NO. 24-14
Emory United Methodist Church
(Map Amendment @ Square 2672, Lot 718
1459 Columbia Road, N.W.
[INSERT DATE]

Pursuant to notice, at its public hearing on June 5, 2025, the Zoning Commission for the District of Columbia (the “Commission”) considered an application by Emory United Methodist Church LLP (the “Applicant”) pursuant to Subtitle X § 500.1 of the Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations (“DCMR”), Zoning Regulations of 2016, to which all references are made unless otherwise specified) for an amendment to the Zoning Map from the RA-2 zone to the RA-4 zone (the “Map Amendment” or “Application”) for the property located at 1459 Columbia Road, N.W. (Square 2672, Lot 718) (the “Property”).

The Commission determined that the Property is appropriate for Inclusionary Zoning (“IZ”) Plus pursuant to Subtitle X § 502.1(b). The Property shall be indicated with an “IZ+” symbol on the Zoning Map.

The Commission considered the Application as a contested case pursuant to Subtitle A § 210 and Subtitle Z, Chapter 4. For the reasons stated below, the Commission hereby **APPROVES** the Application.

FINDINGS OF FACT

I. BACKGROUND

PARTIES

1. In addition to the Applicant, Advisory Neighborhood Commissions (“ANC”) 1A was an automatic party to the Application. (Subtitle Z § 403.5.)
2. The Commission did not receive requests for party status.

NOTICE

3. On September 23, 2024, the Applicant mailed a Notice of Intent to file the Application to all property owners within 200 feet of the Property as well as ANC 1A, as required by Subtitle Z §§ 304.5. (Exhibit (“Ex.”) 3J.)
4. On November 18, 2024, the Office of Zoning (“OZ”) sent notice of the Application’s filing to:
 - Applicant;
 - DC Register
 - ANC 1A;
 - ANC Single Member District (“SMD”) 1A03;
 - ANC SMD 1A01;
 - Office of ANCs;

- The Ward 1 Councilmember;
 - At-Large Councilmembers;
 - Office of Planning (“OP”);
 - Department of Buildings (“DOB”)
 - Department of Energy & Environment (“DOEE”);
 - District Department of Transportation (“DDOT”);
 - Department of Buildings (“DOB”) General Counsel;
 - Lead Attorney- ZC
- (Ex. 4-9.)

5. OZ published notice of the filing of the Application in the November 19, 2024, *District of Columbia Register* (71 DCR 48). (Ex. 8.)
6. On April 14, 2025 and April 17, 2025, the Office of Zoning (“OZ”) sent notice of the Applicant’s public hearing to:
 - Applicant;
 - DC Register
 - ANC 1A;
 - ANC Single Member District (“SMD”) 1A03;
 - ANC SMD 1A01;
 - Office of ANCs;
 - The Ward 1 Councilmember;
 - At-Large Councilmembers;
 - Office of Planning (“OP”);
 - Department of Buildings (“DOB”)
 - Department of Energy & Environment (“DOEE”);
 - District Department of Transportation (“DDOT”);
 - Department of Buildings (“DOB”) General Counsel;
 - Lead Attorney- ZC
 - Property owners within 200 feet of the Property.
7. The Applicant submitted evidence that the Applicant had posted notice of the public hearing as required by Subtitle Z § 402.3 (Ex. 21) and maintained said notice in accordance with Subtitle Z § 402.10. (Ex. 41.)

THE PROPERTY

8. The Property is located in the northwest quadrant of the District and consists of approximately 19,460 square feet of land area (0.44 acres), and is located within the Columbia Heights neighborhood in northwest Washington, DC. (Ex. 5.)
9. The Property is located within Square 2672, which is bounded to the north by Irving Street, NW, to the south by Columbia Road, NW, to the east by 14th Street, NW, and to the west by 15th Street, NW. The Property is more particularly bounded by a public alley to the north, Columbia Road, NW, to the south, and multifamily housing developments to the

east and to the west. The Property is situated within the Columbia Heights neighborhood. (Ex. 5.)

10. The Property is located less than 1,000 feet from the Columbia Heights Metrorail Station and is within 0.25 miles of several WMATA bus routes, specifically the 52, 54, 59, D32, H2, and H4 routes. (Ex. 5.)
11. The area surrounding the Property is comprised of multifamily residential uses, neighborhood-serving retail uses, and commercial uses. Specifically, the area northeast of the Property, and south of Irving Street, NW, and west of 14th Street, NW, consists of the Highland Park Apartments, retail uses, and commercial uses, whereas the area south and west of the Property consists of moderate-density and medium-density residential uses. Further, the DC USA retail development is located less than 1,000 feet from the Property, and includes multiple retail and commercial uses such as a Petco, DSW Designer Shoe Warehouse, IHOP, Chick-fil-A, Marshalls, Best Buy, Target, Lidl, Chase Bank, and Bank of America. (Ex. 5.)
12. The Property is located less than 1,000 feet from the Columbia Heights Metrorail Station and is within 0.25 miles of several WMATA bus routes, specifically the 52, 54, 59, D32, H2, and H4 routes.

CURRENT ZONING

13. The Property is in the RA-2 zone. The purpose of the RA zones “is to permit flexibility of design by permitting all types of urban residential development if it conforms to the height, density, and area requirements of the zone and to 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.” 11-F DCMR §§ 101.3(a)–(b). More specifically, the RA-2 zone provides for areas developed with predominantly moderate-density residential uses. 11-F DCMR § 101.4.
14. As a matter of right, the RA-2 zone requires/permits:
 - Building Height: 50 feet (Subtitle F § 203.2.)
 - Penthouse Height: 12 feet and 1 story; except 15 feet and a second story is permitted for penthouse mechanical space (Subtitle F § 205.1.)
 - Floor Area Ratio (“FAR”): 1.8(2.16 w/ IZ); (Subtitle F § 201.1.)
 - Rear Yard: A distance equal to 4 in. per 1 ft. of principal building height, but not less than 15 ft. min. (Subtitle F § 207.1.)
 - Side Yard: None required, but if a side yard is provided, it shall be a minimum of four feet (4 ft.). (Subtitle F § 208.3(b))
 - Lot Occupancy: 60% for residential use (Subtitle F § 210.1.)
 - Green Area Ratio: 0.40 (Subtitle F § 211.1.)

COMPREHENSIVE PLAN (TITLE 10A OF THE DCMR, THE “CP”)

15. Pursuant to Subtitle X § 500.3, the Commission shall find that the Map Amendment is not inconsistent with the CP and with other adopted public policies and active programs related to the Property.

Equity and the Comprehensive Plan

16. In applying the standard of review applicable to the Map Amendment, the CP requires the Commission to do so through a racial equity lens. (CP §§ 2501.4–2501.6, 2501.8.) Consideration of equity is intended to be based on the policies of the CP, and part of the Commission’s considerations of whether the Map Amendment is “not consistent” with the CP, rather than a separate determination about a zoning action’s equitable impact.
17. The CP Framework Element states that equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities, but is not the same as equality. (CP § 213.6.) Further, “[e]quitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices [and] holistically considers land use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, healthcare, technology, workforce development, and employment opportunities.” (CP § 213.7.) The District applies a racial equity lens by targeting support to communities of color through policies and programs focusing on their needs and eliminating barriers to participate and make informed decisions. (CP § 213.9.)
18. The CP Implementation Element provides guidance to help the Commission in applying a racial equity lens to its decision making. Specifically, the Implementation Element states “[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the Citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas of the District.” (CP § 2501.6.) In addition, the CP Implementation Element suggests to prepare and implement tools to use as a part of the Commission’s evaluation process. Consistent with Comprehensive Plan guidance, the Commission utilizes a Racial Equity Tool in evaluating zoning actions through a racial equity lens. The Tool requires submissions from applicants and the Office of Planning analyzing the zoning action’s consistency with the Citywide and Area Elements of the Comprehensive Plan, and Small Area Plans, if applicable; a submission from applicants including information about their community outreach and engagement efforts regarding the zoning action; and a submission from the Office of Planning including disaggregated race and ethnicity data for the Planning Area affected by the zoning action.

Generalized Policy Map (the “GPM”)

19. The GPM highlights areas where more detailed policies are necessary, both within the CP and in follow-up plans, to most effectively chart the District’s envisioned growth. (CP § 225.1.)
20. The GPM is intended to “guide land use decision-making in conjunction with the text of the CP, the Future Land Use Map, and other CP maps. Boundaries on the map are to be

interpreted in concert with these other sources as well as the context of each location.” (CP § 225.2.)

21. The CP’s GPM designates the Property as being within a Neighborhood Conservation Area. The CP defines Neighborhood Conservation Areas as:

Neighborhood Conservation Areas have little vacant or underutilized land. They are generally residential in character. Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. (CP § 225.4.)

Future Land Use Map (the “FLUM”)

22. The FLUM shows the general character and distribution of recommended and planned uses across the District, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change and guidance on anticipated future land uses. (CP §§ 200.5, 224.4.)
23. The CP’s FLUM designates the Property as Medium Density Residential.
24. The CP defines Medium Density Residential as:

*“[The Medium Density Residential] . . . 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.” (See CP § 227.7; emphasis added.)*

Mid-City Planning Area

25. The Property falls within Mid-City Planning Area Element of the Comprehensive Plan, which encompasses 3.1 square miles in the geographic center of Washington, DC. See 10-A DCMR § 2000.1.
- The Mid-City Planning Area extends from Rock Creek Park on the west to the CSX rail corridor on the east. Its southern edge is formed by Florida Avenue NW and U

Street NW, and its northern edge is formed by Spring Road NW and Rock Creek Church Road NW. *Id.*

- The Mid-City Planning Area, though one of the smallest of Washington, DC's ten planning areas by size, is among the most diverse. *See* 10-A DCMR § 2000.2. It is also the most densely populated, characterized by a rich urban history that began developing in the late 19th century. *Id.* The area features a mix of row houses, large apartment complexes, and is home to several prominent institutions. *Id.*
- The Mid-City Planning Area is a vibrant cultural hub with a strong international influence, serving as the center of Washington, DC's Latino business community and home to a historic Black business corridor. *See* 10-A DCMR § 2000.3. Known for its lively nightlife, ethnic restaurants, and walkable neighborhoods like 18th and U Streets NW, the area embodies the best of urban living. *Id.* Well-connected by public transportation, including the Metrorail Green and Yellow Lines, bus routes, and bike trails, the area also features the Metropolitan Branch Trail, offering recreational and park space. *Id.*
- Mid-City neighborhoods, such as U Street, Mount Pleasant, and LeDroit Park, have a strong sense of identity, with notable historic landmarks and community events like Adams Morgan Day and the DC Funk Parade celebrating local culture. *See* 10-A DCMR § 2000.4.
- The Mid-City Planning Area has seen significant development, including new housing and retail. *See* 10-A DCMR § 2007.3. However, rising property values and costs have raised concerns about affordability for moderate- and lower-income residents, particularly in Columbia Heights, where many affordable units are at risk of expiring. *See* 10-A DCMR § 2000.6. As a result, many residents are being priced out, highlighting the need for diverse housing options, especially affordable and family-sized units. *See* 10-A DCMR § 2007.3.
- Increased development has also brought traffic congestion, particularly near the Columbia Heights Metrorail station, where parking demand exceeds supply and pedestrian safety, as well as the efficient movement of vehicles, buses, and bicycles, are concerns. *Id.* Additionally, rapid population growth has strained public facilities, such as schools, parks, and libraries, creating a need for more public spaces, recreational facilities, and improved infrastructure. *Id.*

II. THE APPLICATION

26. The Applicant made the following submissions to the record in support of the Application proposing to rezone the Property from the RA-2 zone to the RA-4 zone:

- On November 7, 2024, the Applicant submitted the Application, which included:
 - i. The Office of Zoning's Application form for a Map Amendment

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- ii. A cover letter
- iii. A statement in support of the Application, attaching:
 1. A surveyor's plat
 2. A portion of the Comprehensive Plan's Future Land Use Map
 3. A portion of the Zoning Map
 4. The Applicant's Comprehensive Plan analysis
 5. The names and mailing address of the owner(s) of the property to be rezoned
 6. Signature Page
 7. Authorization Letter
 8. Certificate of Proficiency
 9. Certificate of Notice and NOI; and
 10. List of Property Owners within 200 Feet.
- On March 28, 2025, the Applicant submitted its pre-hearing statement, which included:
 - i. Cover letter
 - ii. Pre-hearing Statement, attaching:
 1. Outline of witness testimony
 2. Brandice Elliot's resume
 3. List of public documents the Applicant would rely on
 4. A map showing a 200-foot radius from the Property; and
 5. The Office of Zoning Hearing Fee form.

PROPOSED ZONING

- 27. The Application proposes to rezone the Property from the RA-2 zone to the RA-4 zone. The Application asserts that the Property's existing RA-2 zone is inconsistent with the CP, and the proposed RA-4 zone, given the site constraints, is more consistent with the Property's Medium Density Residential FLUM designation.
- 28. The purpose of the RA zones "is to permit flexibility of design by permitting all types of urban residential development if it conforms to the height, density, and area requirements of the zone and to 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." 11-F DCMR §§ 101.3(a)–(b). More specifically, the RA-4 zone provides for areas developed with predominantly medium- to high-density residential. 11-F DCMR § 101.7.
- 29. As a matter of right, the RA-4 zone permits/requires:
 - Building Height: 90 feet (Subtitle F § 203.2.)
 - Penthouse Height: 20 feet, one-story plus mezzanine; second story permitted for penthouse mechanical space (Subtitle F § 205.1.)
 - FAR: 3.5 (4.2 w/ IZ); (Subtitle F § 201.1.)
 - Rear Yard: A distance equal to 4 in. per 1 ft. of principal building height, but not less than 15 ft. min. (Subtitle F § 207.1.)

- Side Yard: None required, but if a side yard is provided, it shall be a minimum of four feet (4 ft.). (Subtitle F § 208.3(b))
 - Lot Occupancy: 75% (Subtitle F § 210.1.)
 - Green Area Ratio: 0.30 (Subtitle F § 211.1.)
30. The Comprehensive Plan Framework Element states density ranging from 1.8 to 4.0 FAR is consistent with the Medium Density Residential category. 10-A DCMR § 227.7. The Comprehensive Plan Framework Element also states that the Medium Density Residential category may yield a density greater than 1.8 to 4.0 FAR when complying with Inclusionary Zoning. 10-A DCMR § 227.7. The RA-4 zone permits 3.5 FAR as a matter of right and 4.2 FAR with Inclusionary Zoning. *See* 11-F DCMR § 201.1; *see also* 11-F DCMR § 201.4. Therefore, the density permitted by the RA-4 zone is consistent with the density range contemplated by the Comprehensive Plan Framework Element.

APPLICANT'S JUSTIFICATION FOR REZONING

Not Inconsistent with the CP

31. The Applicant asserted that the Map Amendment is not inconsistent with the CP—including the Property's designations on the GPM and the FLUM—advances the objectives and the recommendations of the Mid-City Planning Area, and furthers racial equity goals. The Applicant also asserted that the Map Amendment is consistent with the purposes of the Zoning Act in that it will create conditions that are favorable to public health, safety, welfare, and convenience; and that the Map Amendment is consistent with other adopted public policies and active programs applicable to the Property, as detailed below. (Ex. 3.)

GPM

32. The Applicant asserted that the Map Amendment is not inconsistent with the GPM because:
- While these areas are primarily residential with limited vacant land, modest infill development is expected, and the RA-4 zone would support infill housing and redevelopment opportunities that are compatible with the established community while providing a responsible approach to managing growth.
 - This aligns with the designation's vision for modest growth, focusing on supporting housing needs and providing opportunities for new residential development that respects the existing community.
 - The Neighborhood Conservation designation also emphasizes the importance of addressing citywide housing needs, including the provision of affordable housing, especially in areas with access to services and amenities.
 - The proposed RA-4 zone would enable more housing options, particularly in a Metro-accessible location, by increasing the site's potential to provide both market-rate and affordable housing.
 - This type of development aligns with the goal of ensuring neighborhood growth while maintaining its overall character and accommodating housing affordability within context-sensitive development.

- In summary, the proposed RA-4 zone upholds the principles of the Neighborhood Conservation Area by supporting modest, compatible growth, while addressing housing needs and maintaining the community's residential character.

FLUM

33. The Map Amendment is not inconsistent with the Property's FLUM designation as Medium Density Residential. Although the RA-4 zone is indicated as being consistent with High Density Residential in the Comprehensive Plan's Framework, its maximum allowable density of 4.2 FAR with IZ is consistent with the allowable density in the Medium Density Residential land use designation. *See* 10-A DCMR § 227.7. According to 10-A DCMR § 227.8, Medium Density Residential areas may include mid-rise apartment buildings, and the RA-4 zone, with its height and density allowances, fits within this category. Additionally, the Commission acknowledges that the RA-4 zone is defined in the zoning regulations as medium- to high-density residential, and is therefore appropriate in the medium-density land use designation. Although a Map Amendment is not tied to a specific development, the Commission notes that historically significant portions of the existing building on the property would have to be incorporated into any future development on the Property, thus enabling a balanced approach to residential development by permitting increased density while maintaining compatibility with the surrounding neighborhood context. As such, future development of the Property will align with the Medium Density Residential designation's emphasis on the existence of pockets of varying densities within this designation. *See* 10-A DCMR § 227.7.
34. The Guidelines for Using the Generalized Policy Map and Future Land Use Map provide flexibility in interpreting the appropriate zoning for areas, allowing districts like RA-4 to be considered suitable under the Medium Density Residential designation. *See* 10-A DCMR § 228.1. Moreover, the FLUM is not a strict zoning map but rather a generalized depiction of desired land uses. *Id.* It is intended to be interpreted broadly, with "soft edges" that do not follow parcel-specific boundaries or specify exact development standards such as height or use. *Id.* Instead, the FLUM reflects long-term land use objectives, providing flexibility for developments that may exceed typical densities or heights when appropriate, such as through Planned Unit Developments or Inclusionary Zoning bonuses. *Id.* This interpretation supports the consideration of RA-4 in areas where medium-density residential uses are intended, allowing for higher density to meet the city's housing goals while maintaining overall consistency with the land use designation. Additionally, the FLUM allows for a range of densities and intensities within each category, acknowledging that individual buildings or zones may vary in size and character. *See* 10-A DCMR § 228.1. The zoning of a given area, such as the RA-4 zone, should be guided by the FLUM but also interpreted in conjunction with the Comprehensive Plan's text, including citywide and area-specific elements. *Id.* This flexibility recognizes that although the RA-4 is not specifically listed in the Medium Density Residential description, it is nonetheless compatible with Medium Density Residential designations in certain contexts, especially when the site conditions, adjacent uses, and the need for housing justify greater density.

Mid-City Planning Area

35. The Property is located within the Mid-City Area Element of the Comprehensive Plan. See 10-A DCMR § 2000.1. The proposed rezoning of the Property to the RA-4 zone, along with the potential adaptive reuse of an existing church for residential and affordable housing, directly advances several key policies from the Mid-City Area Element of the Comprehensive Plan. Policy MC-1.1.1: Neighborhood Conservation emphasizes the importance of retaining and enhancing the area's historic character, including its apartment houses and walkability. The potential adaptive reuse of the church will incorporate historically significant portions of the building into the future development, thus contributing to the neighborhood's architectural heritage. Additionally, the Property's proximity to neighborhood services and transportation reinforces the area's mixed-use, pedestrian-oriented environment, ensuring the development complements the existing community fabric.
36. Policies MC-1.1.2: Directing Growth and MC-1.1.3: Infill and Rehabilitation are advanced by the Property's transformation into transit-oriented housing and affordable housing. The proposal supports the policy of stimulating growth near transit corridors, particularly in Columbia Heights, by creating mixed-income housing, which includes affordable units. Redevelopment of this Property and the introduction of housing opportunities also contribute to the community's growth, filling a gap in housing needs and enhancing the character of the area. Moreover, the integration of Policy MC-1.1.12: Green Development Practices through enhanced landscape and stormwater features that would be required in future redevelopment of the Property furthers Mid-City's goals of sustainable development by employing bioretention and other methods to manage surface runoff.
37. The proposal also addresses Policies MC-1.2.1: Cultural Diversity and MC-1.1.7: Preservation of Affordable Housing by ensuring the inclusion of affordable housing units upon redevelopment of the Property. This helps maintain Mid-City's diversity, making housing accessible to residents of varying income levels, and contributing to the mixed-income character of the neighborhood. Furthermore, the greening efforts, in line with Policy MC-1.2.6: Neighborhood Greening, will enhance the aesthetic and environmental quality of the area through additional green spaces, street plantings, and sustainable practices. This combination of historic preservation, adaptive reuse, and new housing in a transit-rich, culturally diverse area reflects a comprehensive approach to neighborhood growth, conservation, and sustainability.
38. The proposed rezoning to RA-4 will not be inconsistent with the Mid-City Area Element overall, and specifically with the policies listed below.

MC-1.1 Guiding Growth and Neighborhood Conservation

- MC-1.1.1: Neighborhood Conservation
- MC-1.1.2: Directing Growth
- MC-1.1.3: Infill and Rehabilitation
- MC-1.1.7: Preservation of Affordable Housing

- MC-1.1.12: Green Development Practices

MC-1.2 Conserving and Enhancing Community Resilience

- MC-1.2.1: Cultural Diversity
- MC-1.2.6: Neighborhood Greening

Land Use Element

39. The proposed rezoning of the Property to the RA-4 zone, advances multiple policies from the Land Use Element. Policies LU-1.4.2: Development Around Metrorail Stations and LU-1.4.3: Housing Around Metrorail Stations are directly supported by the proposed Map Amendment, as it emphasizes the development of housing adjacent to public transportation. The Property is located 0.2 miles from the Columbia Heights Metrorail station and from several bus lines on 14th Street, including the 54, 52, 59, and D32 lines. By reducing reliance on automobiles and maximizing transit use, the proposal ensures a sustainable, transit-oriented development. The inclusion of affordable housing in future redevelopment further aligns with these policies, leveraging the proximity to transit to enhance housing affordability, particularly for moderate- and low-income households. Future redevelopment of the Property will respect the existing character of the neighborhood while addressing the city's broader housing needs.
40. The potential adaptive reuse of the historically significant portions of the existing church also aligns with Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods, which emphasizes balancing the need for additional housing with historic preservation and environmental goals. Additionally, Policy LU-1.5.1: Infill Development is advanced by redeveloping the Property in a manner that complements the existing urban fabric without creating sharp contrasts in design or scale, further enhancing the neighborhood's character.
41. Moreover, the potential landscape enhancements and stormwater management features resulting from future redevelopment of the Property will contribute to Policy LU-2.2.4: Neighborhood Beautification. By improving the visual quality of the area with landscaping and green infrastructure, the proposed rezoning fosters a more pedestrian-friendly and aesthetically pleasing environment. The combination of adaptive reuse, sustainable practices, and affordable housing development fulfills key policy objectives, resulting in a holistic approach to addressing urban growth, sustainability, and community revitalization.
42. Upon evaluation of the Land Use Element policies and actions, the proposed rezoning to RA-4 is not inconsistent with the Land Use Element overall and actively supports racial equity by increasing access to affordable housing in a high-cost neighborhood, fostering inclusive growth near public transit, and promoting a diverse range of housing options. The proposal directly addresses disparities in housing affordability, particularly for low- and moderate-income households, by ensuring that new residential units serve a mix of incomes, household types, and demographic groups. Additionally,

future redevelopment of the Property will help to create opportunities for long-term residents to remain in the community while benefitting from enhanced neighborhood services, transit accessibility, and environmental improvements. This approach helps to address historical inequities in housing access and affordability, promoting a more inclusive and equitable future for the area.

43. The proposed rezoning to RA-4 is not inconsistent with the Land Use Element overall, and specifically with the policies listed below.

LU-1.4: Transit-Oriented and Corridor Development

- LU-1.4.2: Development Around Metrorail Stations
- LU-1.4.3: Housing Around Metrorail Stations
- LU-1.4.6: Development Along Corridors

LU-1.5: Neighborhood Infill Development

- LU-1.5.1: Infill Development

LU-2.1: A District of Neighborhoods

- LU-2.1.1: Variety of Neighborhood Types
- LU-2.1.2: Neighborhood Revitalization
- LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods
- LU-2.1.5: Support Low-Density Neighborhoods
- LU-2.1.10: Multi-Family Neighborhoods

LU-2.2 Maintaining Community Standards

- LU-2.2.4: Neighborhood Beautification

Transportation Element

44. The proposed rezoning of the Property to the RA-4 zone aligns with key transportation policies in the Comp Plan. Policy T-1.1.4: Transit-Oriented Development is supported by the Property's proximity to public transportation and its potential to create a pedestrian-friendly environment. By redeveloping the Property near the prominent 14th Street corridor with access to neighborhood services and public transit, future redevelopment of the Property may encourage pedestrian improvements. Enhancements to last-mile connections, such as sidewalks and safe pedestrian crossings, will help prioritize pedestrian safety and improve access to transit, which aligns with the goals of transit-oriented development.
45. Additionally, the future redevelopment of the Property will advance Policy T-1.1.7: Equitable Transportation Access by providing accessible, affordable housing options in close proximity to public transportation. This will enhance transportation equity by ensuring that residents, including those of diverse incomes, races, and physical abilities, have reliable and safe access to transit, reducing transportation barriers to economic and educational opportunities. The proposal also supports Policy T-1.3.1: Transit-Accessible Employment by increasing housing density near transit, which can improve

access to jobs, particularly for low-income residents. In doing so, it leverages transit infrastructure to promote equitable economic mobility within the region.

46. Furthermore, the future redevelopment of the Property will contribute to Policy T-2.4.1: Pedestrian Network and Policy T-2.4.2: Pedestrian Safety by potentially improving pedestrian facilities around the Property. Future redevelopment may require infrastructure upgrades that enhance pedestrian safety through well-marked crosswalks, signal timing adjustments, or accessible pathways, ensuring a safe and secure pedestrian environment. These improvements will create a cohesive, accessible network that enhances walkability, reinforcing the neighborhood's connection to public transit and services.
47. The proposed Map Amendment advances racial equity by enabling the development of affordable housing adjacent to public transportation, addressing historic barriers to transportation access faced by communities of color. By supporting equitable transportation access and transit-oriented development, future redevelopment of the Property with affordable housing ensures that low-income residents, often disproportionately people of color, benefit from reliable, affordable transit, reducing commuting costs and enhancing access to jobs, education, and services. Additionally, improvements to pedestrian infrastructure will enhance safety and accessibility, particularly for vulnerable populations such as older adults and individuals with disabilities. The proposed Map Amendment promotes equitable growth, economic mobility, and inclusivity due to its proximity to transit-accessible housing and infrastructure.
48. Accordingly, the Map Amendment is not inconsistent with the Transportation Element and advances the specific policies listed below:

T-1.1 Land Use: Transportation Coordination

- T-1.1.4: Transit-Oriented Development
- T-1.1.7: Equitable Transportation Access

T-1.3 Regional Smart Growth Solutions

- T-1.3.1: Transit-Accessible Employment

T-2.4 Pedestrian Access, Facilities, and Safety

- T-2.4.1: Pedestrian Network
- T-2.4.2: Pedestrian Safety

Housing Element

49. The proposed rezoning to the RA-4 zone, which allows greater density that will support residential and affordable housing units, advances several key housing policies. Policy H-1.1.1: Private Sector Support and Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority are actively supported by encouraging private sector investment in both market-rate and affordable housing in alignment with the

District's land use objectives. The proposed Map Amendment will enable the creation of much-needed residential units in a Metro-accessible area with access to a variety of neighborhood services, supporting balanced growth and housing supply, particularly in areas where underutilized land can accommodate higher-density housing. The proposed Map Amendment contributes to addressing the District's long-term housing needs, especially for low- and moderate-income households, helping to mitigate displacement and meet affordability goals.

50. Additionally, the inclusion of affordable housing in future redevelopment of the Property meets Policy H-1.2.3: Affordable and Mixed-Income Housing by fostering mixed-income communities in high-cost neighborhoods like Columbia Heights. This approach will help distribute affordable housing more equitably across the District and avoid further concentrations of poverty, promoting demographic diversity and fulfilling fair housing requirements.
51. Furthermore, the proposed Map Amendment embodies the goals of Policy H-1.2.6: Build Nonprofit Sector Capacity by leveraging the church's faith-based mission to provide affordable housing. With the involvement of a nonprofit institution for the adaptive reuse of the church, future redevelopment of the Property will maximize opportunities for affordable housing and ensure long-term affordability, which aligns with Policy H-1.2.11: Inclusive Mixed-Income Neighborhoods. This will not only maintain the neighborhood's character but also contribute to the racial and economic diversity of the area, creating sustainable, inclusive growth that benefits all residents.
52. The proposed rezoning and future redevelopment of the Property advances racial equity by increasing access to affordable housing in a well-resourced neighborhood. By distributing affordable housing more equitably across the District and creating mixed-income communities, the proposed Map Amendment helps address racial income disparities and mitigates displacement in a rapidly developing area. Additionally, the involvement of a nonprofit faith-based institution in providing long-term affordable housing supports inclusive growth and enhances access to economic and educational opportunities for low- and moderate-income households, particularly communities of color. This approach fosters a more equitable and diverse housing landscape across the District.
53. Accordingly, the proposed Map Amendment serves a multitude of the District's housing goals and advances many policies of the Housing Element, particularly those enumerated below:

H-1.1 Expanding Housing Supply

- H-1.1.1: Private Sector Support
- H-1.1.3: Balanced Growth

H-1.2 Ensuring Housing Affordability

- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- H-1.2.2: Production Targets

- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.6: Build Nonprofit Sector Capacity
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- H-1.2.11: Inclusive Mixed-Income Neighborhoods

Environmental Protection Element

54. The proposal to rezone the Property to the RA-4 zone, allowing for the future redevelopment of the Property, will advance several environmental policies from the Comp Plan. Policy E-1.1.2: Urban Heat Island Mitigation and Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff are supported by the incorporation of green roofs, tree planting, and enhanced landscaping features. By potentially including these sustainable design elements, the proposed Map Amendment will mitigate the urban heat island effect, particularly in a dense, urban setting where heat-vulnerable residents are more likely to be affected. The use of green roofs and permeable materials also aligns with Policy E-4.1.1: Maximizing Permeable Surfaces by reducing stormwater runoff and increasing absorption, enhancing the site's overall environmental performance.
55. Furthermore, the proposal promotes Policy E-2.1.3: Sustainable Landscaping Practices by implementing sustainable landscaping, such as planting native trees and creating vegetated spaces that not only beautify the area but also reduce stormwater runoff, which will be a consideration upon redevelopment of the Property. Future redevelopment of the Property also supports Policy E-3.2.7: Energy-Efficient Building and Site Planning by exceeding minimum energy code requirements through energy-efficient building practices, reducing long-term operational costs, and contributing to the District's clean energy goals. By focusing on energy efficiency, sustainable site planning, and green building methods, the proposed Map Amendment will enhance the environmental resilience of the area while providing residents with affordable and energy-efficient homes.
56. Additionally, the proposed Map Amendment aligns with Policy E-4.2.1: Support for Green Building, as future redevelopment would likely incorporate green building standards into redevelopment of the Property. The proposed future redevelopment of the Property may be designed to reduce energy consumption and support long-term environmental sustainability through the use of energy-efficient systems, in line with Policy E-3.2.5: Reducing Home Heating and Cooling Costs. This not only conserves natural resources but also helps lower utility costs for residents, especially benefiting those with limited financial resources. By integrating environmental best practices, the proposed Map Amendment contributes to a more sustainable, resilient, and equitable urban landscape.
57. These environmental policies advance racial equity by promoting sustainable and energy-efficient housing in an apartment zone, which benefits low- and moderate-income residents, often disproportionately people of color. By mitigating the urban heat island effect, reducing stormwater runoff, and incorporating green roofs and energy-

efficient systems, the proposed Map Amendment supports healthier living environments for vulnerable communities. Additionally, the use of green building practices and the reduction of heating and cooling costs help lower utility expenses for residents, enhancing affordability and improving long-term financial stability. These measures ensure that historically disadvantaged groups benefit from environmentally sustainable and cost-efficient housing, contributing to more equitable living conditions.

58. Accordingly, the proposed Map Amendment is not inconsistent with the Environmental Protection Element and advances the specific policies listed below:

E-1.1 Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation

E-2.1 Conserving and Expanding Washington, DC's Urban Forests

- E-2.1.2: Tree Requirements in New Development
- E-2.1.3: Sustainable Landscaping Practices

E-3.2 Conserving Energy and Reducing GHG Emissions

- E-3.2.5: Reducing Home Heating and Cooling Costs
- E-3.2.7: Energy-Efficient Building and Site Planning

E-4.1 Green Infrastructure GI

- E-4.1.1: Maximizing Permeable Surfaces
- E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff

E-4.2 Promoting Green Building

- E-4.2.1: Support for Green Building

Racial Equity

59. The Application noted that equity is conveyed throughout the CP where priorities of affordable housing, the prevention of displacement, and access to opportunity are discussed. In light of the guidance provided by relevant CP policies, the Applicant asserted that the Map Amendment would not be inconsistent with the CP when evaluated through a racial equity lens. In support of its assertion, the Applicant evaluated the Map Amendment's consistency with the CP through a racial equity lens by applying the Commission's Racial Equity Tool. (Ex. 3E.)
60. The Applicant provided an assessment of how the Map Amendment is not inconsistent with the CP when evaluated through a racial equity lens in its CP Evaluation, in subsequent filings, and through testimony at the public hearing. OP concurred with the Applicant and/or made similar findings in its reports. (Ex. 3E, 11, 14, and 27.)
61. The Applicant provided the following information about the community and the Applicant's outreach:

- The Applicant identified the following as key historical attributes which helped shape and define the community impacted by the Map Amendment: (Ex. 3A.)
 - i. The Property is located within the Columbia Heights neighborhood, a diverse, densely populated, and transit-accessible area;
 - ii. This area is defined by a mix of residents, including long-time D.C. natives, recent transplants, and a large immigrant community, particularly of Latino descent;
 - iii. The area features a mix of housing types as it has experienced significant development, particularly around the Columbia Heights Metrorail station;
 - iv. The neighborhood has a vibrant commercial and cultural hub with numerous new restaurants, shops, and nightlife options;
 - v. Restrictive racial covenants confined African American residents primarily to areas east of 13th Street in Columbia Heights during the 1920s, creating divisions that affected housing access and community cohesion.
 - vi. The economic stability of Columbia Heights declined after the Supreme Court's 1948 decision to overturn restrictive covenants, which accelerated the departure of wealthier, often white, residents to the suburbs, leaving behind fewer economic opportunities and leading to the subdivision of large rowhouses, overcrowding, and deterioration in remaining housing stock.
 - vii. Following Martin Luther King Jr.'s assassination in 1968, riots severely impacted the area around 14th Street, creating lasting damage. Community rebuilding efforts were hampered by delayed reinvestment and slow infrastructure improvements, including Metrorail station construction delays.
 - viii. The exodus of businesses and residents left behind a weakened tax base, contributing to a decline in public services and infrastructure.
- The Property is within the boundaries of ANC 1A. The Applicant made a concerted effort to understand the community's priorities.
 - i. On October 14, 2024, the Applicant met remotely with Chairperson Dieter Lehmann Morales (SMD 1A02), Commissioner Carlo Perri (SMD 1A03), and Max Ewart, Chairperson of the ANC's Housing Justice and Zoning Committee. The Applicant described the Map Amendment application to the Commissioners, who expressed support for the proposed rezoning.
 - ii. On November 4, 2024, the Applicant presented to ANC 1A's Housing Justice and Zoning Committee, where the Committee voted unanimously to recommend that the full ANC support the proposed Map Amendment.
 - iii. On November 4, 2024, the Applicant presented the Map Amendment to ANC 1A at its regularly scheduled meeting.
 - iv. On December 11, 2024, ANC 1A issued a letter unanimously supporting the Map Amendment provided that a traffic impact plan be prepared.

- Applying the Tool’s racial equity themes, the Applicant asserted the Map Amendment would have the following impacts and/or outcomes:
 - i. Not result in negative outcomes with respect to direct displacement because of the following:
 1. No physical displacement of residential tenants; and
 2. Increase in residential density.
 - ii. Result in positive changes with respect to housing because the Map Amendment would:
 1. Increase the Property’s potential housing capabilities; and
 2. Increase the Property’s required IZ+ set-aside requirement because a higher IZ+ set-aside would apply to the Map Amendment.
 - iii. Result in positive changes to the physical environment because the development facilitated by the Map Amendment could potentially:
 1. Improve stormwater infrastructure;
 2. Improve pedestrian connectivity with streetscape enhancements; and
 3. Preserve architectural features of building, which are part of the neighborhood character.
 - iv. Increase access to opportunity because the development facilitated by the Map Amendment could potentially:
 1. Provide access to transit accessibility, including access to Metrorail station and Metrobus routes;
 2. Provide access to regional employment opportunities; and
 3. Provide access to recreation facilities, open space, and neighborhood-serving retail services, public schools, and Mt. Pleasant Neighborhood Library.

62. Based on the foregoing, and based on the Applicant’s filings, the Applicant asserted, and OP concurred, that the proposed Map Amendment would result in positive outcomes for all existing and future District residents, and therefore, the Application is not inconsistent with the CP when evaluated through a racial equity lens.

Potential Inconsistencies with the CP

63. As discussed above, the FLUM designates the Property as Medium Density Residential, and the GPM designates the Property as a Neighborhood Conservation Area. The Applicant has specifically analyzed the proposed zoning for potential inconsistencies with the Comp Plan. After a full review of the elements, the Applicant has found only a few areas of potential inconsistency which are addressed below:

- E-3.2.2: Net-Zero Buildings - Policy E-3.2.2 aims to encourage incentives that enable buildings to achieve net-zero energy design standards, a crucial aspect of D.C.’s broader objective to eliminate all carbon emissions by 2050. However, it is currently unknown if future redevelopment of the Property will include net-zero buildings due to the financial impact it could have on the number of potential dwelling units and affordable dwelling units that could be accommodated on the

Property, or due to the historic nature of the church and its ability to accommodate net-zero energy design standards. However, future development will comply with the Green Building Act and the District's storm water management regulations, and will be consistent with the Sustainable D.C. Plan.

- E-3.2.3: Renewable Energy - Policy E-3.2.3 concerns the promotion of the efficient use of energy that reduces unnecessary energy expenses. Most often, this results in the installation of solar panels on the roof that reduce overall energy consumption for buildings. Future redevelopment of the Property has not yet been designed; therefore, because the infrastructure needed for renewable energy may have financial impacts that could affect the number of residential units provided within future development, the Applicant will collaborate with DOEE to determine if renewable energy is feasible in the future development of the Property. Thus, it is unknown at this time whether the Map Amendment would be inconsistent with this policy.

Public Hearing Testimony

64. At the public hearing on June 5, 2025, the Applicant presented its case, including testimony from:

- Ms. Brandice Elliott, Director of Planning Services, Holland & Knight, LLP, whom the Commission recognized as an expert in land planning and zoning.
- Pastor Joseph Daniels, Jr., representative of the Applicant.

III. RESPONSES TO THE APPLICATION

OP REPORTS AND TESTIMONY

65. OP submitted a report, dated March 17, 2025 (the "OP Setdown Report"), recommending the Commission set down for a public hearing the Applicant's Map Amendment and concluded that the Map Amendment would be appropriate for IZ Plus and would not be inconsistent with the CP. The OP Setdown Report's CP analysis concluded the following (Ex. 11):

- **GPM** – The proposed Map Amendment would not be inconsistent with the GPM designation for the Property. Neighborhood Conservation Area policy states that this designation does not preclude development to address city-wide housing needs, so long as the development is context-sensitive to the existing scale and character of the area. The current development on the site is consistent in scale and character of the area and the Applicant has stated there are no plans for future redevelopment to increase the building height. The site is in an area that has access to opportunities, services and amenities, such as the area surrounding the Columbia Heights Metrorail station and along 14th Street NW.
- **FLUM** – The proposed Map Amendment would not be inconsistent with the FLUM designation for the Property. The Medium Density Residential (MDR) FLUM designation generally emphasizes mid-rise apartment buildings, but not

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exclusively. The surrounding area consists of several multifamily buildings that are typically four to five stories in height. The Comprehensive Plan states that RA-3 is consistent with MDR, although other zones may also apply. In this case, the Applicant has stated that they intend to use the existing building and not exceed the current building height, which is consistent with the height of the surrounding mid-rise apartment building. The RA-4 would provide additional lot occupancy and FAR flexibility. Density (FAR) in MDR typically ranges from 1.8 to 4.0 and allows greater density when complying with Inclusionary Zoning. RA-4 FAR is consistent with this, as it allows a maximum FAR of 3.5, or 4.2 with IZ.

- **Columbia Heights Public Realm (CHPR) Framework Plan (2004)** - The Columbia Heights Public Realm Framework Plan resulted from a community planning process in collaboration with community residents, stakeholders, and District agencies that focused on coordinating high-quality civic space and public streetscape improvements, generally. 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 Metrorail station, but also for the surrounding Columbia Heights neighborhood. Columbia Road NW was identified as a Residential Secondary Street and a street desired for additional street trees. The property is also identified as a part of Focus Area #10, which again 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)** - The Columbia Heights Neighborhood Investment Fund (NIF) was intended to provide resources to support investment and revitalization in emerging and distressed neighborhoods. The Plan for Columbia Heights was approved in 2008 and completed over a five-year period. The Plan 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.
- **Mid-City Area Element** – The proposed Map Amendment would not be inconsistent with the Mid-City Area Element. 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. The existing building is intended to be preserved and adaptively repurposed for residential use. The proposed amendment could provide mixed-income and affordable housing opportunities for neighborhood and District residents, within easy walking distance to the Columbia Heights commercial area and the Metrorail Station, providing access to employment, recreation, retail, and services.
- **Land Use Element** - The proposed Map Amendment would not be inconsistent with several Land Use Element policies of the Comprehensive Plan. The proposed

amendment could support additional infill housing in proximity to the Metrorail station and Metrobus routes, and other nearby retail services. The RA-4 zone supports a higher FAR for housing development compared to the current RA-2, which could provide opportunities for more affordable housing units. The RA-4 zone encourages multi-family housing, which is consistent with the multi-family uses in the immediate area.

- **Housing Element** – The proposed Map Amendment would further policies of the Housing Element of the Comprehensive Plan. Currently, the property is a place of worship, however, the Applicant intends to convert the building into housing units. With housing units proposed in redevelopment plans for the site, the additional density permitted by the RA-4 zone could accommodate more housing than currently allowed by the existing RA-2 zoning. Future housing could also target families below the MFI and include affordable or mixed-income housing options, which the Applicant intends to do.
- **Transportation Element** – The proposed Map Amendment would further policies of the Transportation Element. The subject property is transit-oriented by having close access to several bus lines including the D32, H1, H2 and H8 routes. It is also 0.2 miles from the Columbia Heights Metrorail station. These public transit options could support residential development on the property that should not require residents to have cars, or have long walking distances, and could help to keep household expenses more affordable for residents. The proposed Map Amendment would therefore support redevelopment of the site to meet the expectations of equity in transportation accessibility.
- **Racial Equity** – The OP Setdown Report provides a racial equity analysis but notes that it can only analyze the potential development and its potential impacts under the Map Amendment. It is anticipated that the RA-4 zone will generally lead to positive impacts, and that the Map Amendment, when evaluated through a racial equity lens, is not inconsistent with the CP because:
 - Direct Displacement – 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.
 - Indirect Displacement – 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 – The proposed RA-4 zone would allow for more housing opportunity on the site, including affordable units. If approved, this Map Amendment would not preclude the Applicant from preserving the existing building and using it for housing.

- 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 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 - The site is 0.2 miles from the Columbia Heights Metrorail station and close to several Metrobus lines. If the site were to be redeveloped, it would include complying with public space improvement requirements, including pedestrian safety improvements.
- Environmental—If approved, any redevelopment would include compliance with energy efficiency and stormwater regulatory requirements.
- Community –According to the Applicant, community outreach has not impacted the zoning action. 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.
- Disaggregated Race and Ethnicity Data – The OP racial equity analysis provides disaggregated race and ethnicity data for the Mid-City Planning Area, in which the Property is located. Based on the data it compiled, OP made the following observations and conclusions about the area immediately surrounding the Property: (Ex. 11 and 27.)
 - Over the past ten years, the percentage of both Black and white populations declined in the Mid-City Planning Area and Districtwide; however, the rate of decline was more pronounced within the Mid-City Planning Area. During the same period, populations identifying as American Indian or Alaska Native, Asian, and individuals identifying with two or more races increased both Districtwide and within the Planning Area, with the most significant increase observed among those identifying with two or more races. Populations identifying as Hispanic or Latinx and Native Hawaiian or Other Pacific Islander experienced growth at the Districtwide level, but not within the Mid-City Planning Area.
 - The Comprehensive Plan notes that while the Planning Area’s percentage of Black residents was lower compared to the

Districtwide total percentage, the population has been decreasing since 2000 when the Black population was over 50 percent of the total Planning Area population.

- Between the 2012–2016 and 2018–2022 periods, both the District and the Mid-City Planning Area experienced an increase in the total number of households. Throughout both periods, the Planning Area exhibited a slightly lower homeownership rate compared to the District overall; however, the percentage of owner-occupied households in the Planning Area increased over time. Despite this overall increase, homeownership rates among Black or African American, American Indian or Alaska Native, Hispanic or Latino, and individuals identifying as some other race remained the lowest within the Planning Area. Notably, the homeownership rate among Black residents of the Planning Area declined between the two periods.
- The median household income in the Planning Area was generally higher than or similar to the Districtwide median household income and generally rose 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.
- The Mid-City Planning Area had lower percentages of both older adults and individuals under 18 compared to the District overall, though both age groups increased in share over time. Disability rates declined in both the Planning Area and the District. As of the 2019–2023 period, the Planning Area’s median age narrowed, with most residents in their 30s and a decrease in median age among Black or African American and American Indian or Alaska Native populations. Median ages by racial group in the Planning Area now closely reflect those of the District.
- The unemployment rate for both the Planning Area and the District decreased 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.

66. 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. Although the MidCity Planning Area has a considerable number of dedicated affordable units and exceeds the target for the provision of

affordable housing according to DMPED's affordable housing dashboard, the Applicant has stated that future development on the site will exceed IZ+ requirements, and this is a high-opportunity area close to transit, retail, and employment opportunities. Thus, OP recommends that this Map Amendment be subject to IZ Plus.

67. OP submitted a hearing report, dated May 23, 2025 (the "OP Hearing Report"), that largely reiterated the OP Setdown Report's conclusions, and recommended approval of the Map Amendment. (Ex. 27.)
68. At the public hearing, OP reiterated its support for the Application as detailed in its reports.

DDOT REPORT

69. DDOT submitted a report dated May 20, 2025, (the "DDOT Report") stating that "DDOT has no objection to the approval of the requested Map Amendment." (Ex. 26.)
70. DDOT did not provide testimony at the public hearing.

ANC REPORTS AND TESTIMONY

71. ANC 1A submitted a Report in Support of the Application, dated December 11, 2024, (the "ANC 1A Report"), stating at its properly noticed public meeting of December 11, 2024, at which a quorum was present, the ANC voted (8-0-0) to support the Application. (Ex.10)

PERSONS AND ORGANIZATIONS IN SUPPORT

72. The following letters were submitted in support of the Application:
 - Thrive DC (Ex. 24)
 - Community Purchasing Alliance (Ex. 28)
 - Breadcoin Foundation (Ex. 29)
 - DC Jobs with Justice (Ex. 30)
 - All Souls Church Unitarian (Ex. 31)
 - Food Rescue US (Ex. 32)
 - ROC-DC (Ex.33)
 - L'Arche Greater Washington DC (Ex. 34)
 - Little Bird Community Acupuncture (Ex.35)
 - Richael Faithful Folk & Healing Justice Practitioner (Ex.36)
 - First Shift Justice Project (Ex.37)
 - 20 Degrees Unloding Revenue for Social Innovation (Ex.38)
 - The Festival Center (Ex.39)
 - Faith and Money Network (Ex. 40)

NATIONAL CAPITAL PLANNING COMMISSION ("NCPC")

73. The Commission referred the Application to the National Capital Planning Commission ("NCPC") on _____, 2025, for the 30-day review period required by § 492(b)(2)

of the District Charter. (Dec. 24, 1973, Pub. L. 93-198, title IV, § 492(b)(2); D.C. Official Code 6-641.05)). (Ex. ____.)

74. On _____, 2025, NCPC filed a report stating that the Map Amendment was not inconsistent with the federal elements of the Comprehensive Plan and would not adversely impact any identified federal interests. (Ex. ____.)

CONCLUSIONS OF LAW

1. Section 1 of the Zoning Act of 1938 (effective June 20, 1938, as amended, 52 Stat. 797; D.C. Official Code § 6-641.01 et seq. (2012 Repl.)) (the “Zoning Act”) authorizes the Commission to create zones within which the Commission may regulate the construction and use of property in order to “promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital.”
2. Section 2 of the Zoning Act (D.C. Official Code § 6-641.02) further provides that:

Zoning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital and zoning regulations shall be designed to lessen congestion on the street, to secure safety from fire, panic, and other dangers to promote health and general welfare, to provide adequate light and air, to prevent the undue concentration and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection or property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.
3. The Commission must ensure that the Zoning Map, and all amendments to it, are “not inconsistent” with the CP pursuant to § 492(b)(1) of the District of Columbia Home Rule Act. (§ 2 of the Zoning Act; D.C. Official Code § 6-641.02.) Subtitle X § 500.3 incorporates this intent to the Zoning Regulations by requiring that Map Amendments be “not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.”
4. The Commission concludes the Application advances the purposes of the Zoning Act. The Commission found the Applicant’s testimony compelling that the Map

Amendment is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the Property.

NOT INCONSISTENT WITH THE COMPREHENSIVE PLAN (SUBTITLE X § 500.3)

5. Pursuant to Subtitle X § 500.3, the Commission shall find that the Map Amendment is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the Property.
6. The Commission concludes, based on the filings and testimony of the Applicant and OP, that the Zoning Map Amendment from the RA-2 zone to the RA-4 zone is not inconsistent with the CP in its entirety, including all CP maps and elements, and will advance a number of CP Elements as discussed below.
7. Even if the Map Amendment conflicts with one or more individual policies associated with the CP, this does not, in and of itself, preclude the Commission from concluding that the Map Amendment would be consistent with the CP as a whole. (*See Durant v. D.C. Zoning Comm'n*, 65 A.3d 1161, 1168 (D.C. 2013).)

Racial Equity

8. The Commission concludes that the Map Amendment is not inconsistent with the CP when evaluated through a racial equity lens. The Commission reached this conclusion based on the case record and the racial equity analyses provided by the Applicant, inclusive of community outreach and engagement information, and the OP Reports, and inclusive of disaggregated race and ethnicity data for the Mid-City Planning Area. (FF. 59-62, and 65-68.) The Commission finds that the racial equity analysis provided address the components of the Commission's Racial Equity Tool and that the Map Amendment will further CP racial equity goals, primarily because of its potential for new housing and affordable housing development, as discussed in more detail below: (*Id.*)
 - Displacement – The Map Amendment will not result in the direct displacement of residents because there are no existing residential uses on the Property. (FF. 61, 65.)
 - Community Outreach and Engagement – The Applicant's racial equity analysis included evidence that the Applicant conducted outreach with various community stakeholders as detailed in the record, including ANC 1A. Further, the Commission acknowledges the fourteen (14) letters of support and the Applicant's thorough efforts to engage with the community and therefore concludes that the Applicant's community engagement was more than satisfactory. (FF. 61, 65)
 - Disaggregated Race and Ethnicity Data – OP's racial equity analysis for the Mid-City Planning Area, where the Property is located, provides disaggregated data that reflects demographic shifts and socioeconomic trends over the past decade. While the percentage of Black and white residents declined, the Planning Area saw increases in residents identifying as American Indian or Alaska Native, Asian, and individuals of two or more races. Despite a general increase in household income and homeownership, disparities persist, particularly among Black, Hispanic or

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Latino, and American Indian or Alaska Native populations. The Planning Area continues to exhibit a lower percentage of older adults and children compared to the District overall, though both age groups have increased, and median ages have generally declined. Housing cost burdens, unemployment, and poverty rates have improved over time and remain below Districtwide levels. Overall, the data reveal both progress and ongoing inequities that remain relevant to land use and policy decisions affecting the area. Accordingly, the Commission concluded that allowing increased density on the Property would positively impact the Mid-City Planning Area, specifically because the Map Amendment is subject to IZ Plus which will result in increased housing opportunities for low-income households. Therefore, the Commission finds that the Map Amendment will result in positive outcomes with respect to housing, the physical environment, and will increase access to opportunities for all District residents, regardless of background and socioeconomic status. Furthermore, the Commission concludes that increasing overall housing opportunities in the Planning Area could relieve some of the housing costs pressures impacting lower income households. (FF. 65.)

GPM

9. The Commission concludes that the Map Amendment is not inconsistent with the GPM's designation of the Property as a Neighborhood Conservation Area because the Neighborhood Conservation Area designation is intended to conserve and enhance established neighborhoods, but not preclude development, which particularly addresses citywide housing needs and the Framework Element of the CP recognizes that limited redevelopment opportunities exist within Neighborhood Conservation Areas, and that redevelopment should be compatible with the existing scale, natural features, and character of the area. (FF. 29.) Further, the Commission concludes that the proposed RA-4 zone is not inconsistent with the Property's GPM designation because the RA-4 zone will enhance the pedestrian environment, address city-wide priorities, and will enhance the surrounding corridor by enabling additional housing on the Property that has the potential to help the District achieve its housing goals—especially affordable housing.

FLUM

10. The Commission concludes that the Map Amendment is not inconsistent with the Property's FLUM designation as Medium Density Residential. Although the RA-4 zone is indicated as being consistent with High Density Residential in the Comprehensive Plan's Framework, its maximum allowable density of 4.2 FAR with IZ is consistent with the allowable density in the Medium Density Residential land use designation. *See* 10-A DCMR § 227.7. According to 10-A DCMR § 227.8, Medium Density Residential areas may include mid-rise apartment buildings, and the RA-4 zone, with its height and density allowances, fits within this category. Additionally, the Commission acknowledges that the RA-4 zone is defined in the zoning regulations as medium- to high-density residential, and is therefore appropriate in the medium-density land use designation. Although a Map Amendment is not tied to a specific development, the Commission notes that historically significant portions of the existing building on the property would have to be incorporated into any future development on

the Property, thus enabling a balanced approach to residential development by permitting increased density while maintaining compatibility with the surrounding neighborhood context. As such, future development of the Property will align with the Medium Density Residential designation's emphasis on the existence of pockets of varying densities within this designation. *See* 10-A DCMR § 227.7.

11. The Commission further concludes that the Guidelines for Using the Generalized Policy Map and Future Land Use Map provide flexibility in interpreting the appropriate zoning for areas, allowing districts like RA-4 to be considered suitable under the Medium Density Residential designation. *See* 10-A DCMR § 228.1. Moreover, the FLUM is not a strict zoning map but rather a generalized depiction of desired land uses. *Id.* It is intended to be interpreted broadly, with "soft edges" that do not follow parcel-specific boundaries or specify exact development standards such as height or use. *Id.* Instead, the FLUM reflects long-term land use objectives, providing flexibility for developments that may exceed typical densities or heights when appropriate, such as through Planned Unit Developments or Inclusionary Zoning bonuses. *Id.* This interpretation supports the consideration of RA-4 in areas where medium-density residential uses are intended, allowing for higher density to meet the city's housing goals while maintaining overall consistency with the land use designation. Additionally, the FLUM allows for a range of densities and intensities within each category, acknowledging that individual buildings or zones may vary in size and character. *See* 10-A DCMR § 228.1. The zoning of a given area, such as the RA-4 zone, should be guided by the FLUM but also interpreted in conjunction with the Comprehensive Plan's text, including citywide and area-specific elements. *Id.* This flexibility recognizes that although the RA-4 is not specifically listed in the Medium Density Residential description, it is nonetheless compatible with Medium Density Residential designations in certain contexts, especially when the site conditions, adjacent uses, and the need for housing justify greater density.

Mid-City Planning Area Element

12. The Commission concludes that the Map Amendment directly advances several key policies from the Mid-City Area Element of the Comprehensive Plan. The Property's proximity to neighborhood services and transportation reinforces the area's mixed-use, pedestrian-oriented environment, ensuring the development complements the existing community fabric. The additional housing that can be produced as a result of the Map Amendment will enable the production of mixed-income housing, which includes affordable units. Redevelopment of this Property and the introduction of housing opportunities also contribute to the community's growth, filling a gap in housing needs and enhancing the character of the area.

Land Use Element

13. The Commission concludes that the Map Amendment furthers the Land Use Element because the Map Amendment will facilitate the redevelopment of the Property with a mix of uses that are well-positioned to enhance the Columbia Heights neighborhood,

and because the Map Amendment will help the District meet its long-term neighborhood and citywide demands for additional housing and affordable housing.

Transportation Element

14. The Commission concludes that the Map Amendment furthers the Transportation Element as it will facilitate redevelopment near the prominent 14th Street corridor with access to neighborhood services and public transit, future redevelopment of the Property may encourage pedestrian improvements. Additionally, the future redevelopment of the Property will enable the provision of accessible, affordable housing options in close proximity to public transportation. This will enhance transportation equity by ensuring that residents, including those of diverse incomes, races, and physical abilities, have reliable and safe access to transit, reducing transportation barriers to economic and educational opportunities.

Housing Element

15. The Commission concludes that the Map Amendment furthers the Housing Element because it will require IZ Plus for any future residential development, which would help the District towards its goals of ensuring that one-third of the new housing built from 2018 to 2030 is affordable. (FF. 37.)

Environmental Protection Element

16. The Commission concludes that the Map Amendment is not inconsistent with the policies of the Environmental Protection Element because the Map Amendment will facilitate the redevelopment of the Property with new development that is required to comply with applicable Building Code requirements and energy-efficient building systems and technologies, therefore furthering the District's energy efficiency goals and complying with the Green Building Act. (FF. 38.)

GREAT WEIGHT TO THE RECOMMENDATIONS OF OP

17. The Commission must give "great weight" to the recommendations of OP pursuant to § 5 of the Office of Zoning Independence Act of 1990, effective September 20, 1990 (D.C. Law 8-163; D.C. Official Code § 6-623.04 (2018 Repl.)) and Subtitle Z § 405.8. (*Metropole Condo. Ass'n v. D.C. Bd. of Zoning Adjustment*, 141 A.3d 1079, 1087 (D.C. 2016)).
18. The Commission concludes that OP's reports, which provided an in-depth analysis of the Map Amendment, are persuasive and the Commission concurs with OP's recommendation that the Property's rezoning would not be inconsistent with the CP Maps, the Citywide Elements and Mid-City Area Element, and, as discussed above, would advance the CP racial equity goals when evaluated through a racial equity lens. The Commission also concurs with OP that the proposed Map Amendment is appropriate for an IZ Plus set-aside requirement.

“GREAT WEIGHT” TO THE ANC REPORT

19. The Commission must give great weight to the issues and concerns raised in the written report of an affected ANC that was approved by the full ANC at a properly noticed public meeting pursuant to § 13(d) of the Advisory Neighborhood Commissions Act of 1975, effective March 26, 1976 (D.C. Law 1-21; D.C. Official Code § 1-309.10(d) (2012 Repl.)) and Subtitle Z § 406.2. To satisfy the great weight requirement, the Commission must articulate with particularity and precision the reasons why an affected ANC does or does not offer persuasive advice under the circumstances. (*Metropole Condo. Ass’n v. D.C. Bd. of Zoning Adjustment*, 141 A.3d 1079, 1087 (D.C. 2016)). The District of Columbia Court of Appeals has interpreted the phrase “issues and concerns” to “encompass only legally relevant issues and concerns.” (*Wheeler v. D.C. Bd. of Zoning Adjustment*, 395 A.2d 85, 91 n.10 (1978) (citation omitted)).
20. The ANC 1A Report expressed the ANC’s recommendation of support for the Map Amendment. The Commission concurs with ANC 1A’s recommendation. (FF. 48.)

DECISION

In consideration of the record for Z.C. Case No. 24-14 and the Findings of Fact and Conclusions of Law contained in this Order, the Zoning Commission concludes that the Applicant has satisfied its burden of proof and, therefore, **APPROVES** the Application to amend the Zoning Map as follows:

SQUARE	LOT(S)	MAP AMENDMENT
Square 2672	Lot 718	RA-2 zone to RA-4 zone

Proposed Action

Vote (_____, 2025): _ _ _ (Robert E. Miller, Tammy M. Stidham, Anthony J. Hood, Gwen Wright to **APPROVE**; Joseph Imamura not participating, not voting)

Final Action

Vote (_____, 2025): _ _ _ (Robert E. Miller, Tammy M. Stidham, Anthony J. Hood, Gwen Wright to **APPROVE**; Joseph Imamura not participating, not voting)

In accordance with the provisions of Subtitle Z § 604.9, this Z.C. Order No. 24-14 shall become final and effective upon publication in the *D.C. Register*, that is on _____, 2025.

ANTHONY J. HOOD
CHAIRMAN
ZONING COMMISSION

SARA A. BARDIN
DIRECTOR
OFFICE OF ZONING

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THE APPLICANT IS REQUIRED TO COMPLY FULLY WITH THE PROVISIONS THE D.C. HUMAN RIGHTS ACT OF 1977, D.C. LAW 2-38, AS AMENDED, D.C. OFFICIAL CODE § 2-1401.01 ET SEQ., (THE "ACT"). THIS ORDER IS CONDITIONED UPON FULL COMPLIANCE WITH THOSE PROVISIONS. IN ACCORDANCE WITH THE ACT, THE DISTRICT OF COLUMBIA DOES NOT DISCRIMINATE ON THE BASIS OF ACTUAL OR PERCEIVED: RACE, COLOR, RELIGION, NATIONAL ORIGIN, SEX, AGE, MARITAL STATUS, PERSONAL APPEARANCE, SEXUAL ORIENTATION, GENDER IDENTITY OR EXPRESSION, FAMILIAL STATUS, FAMILY RESPONSIBILITIES, MATRICULATION, POLITICAL AFFILIATION, GENETIC INFORMATION, DISABILITY, SOURCE OF INCOME, OR PLACE OF RESIDENCE OR BUSINESS. SEXUAL HARASSMENT IS A FORM OF SEX DISCRIMINATION WHICH IS PROHIBITED BY THE ACT. IN ADDITION, HARASSMENT BASED ON ANY OF THE ABOVE PROTECTED CATEGORIES IS PROHIBITED BY THE ACT. DISCRIMINATION IN VIOLATION OF THE ACT WILL NOT BE TOLERATED. VIOLATORS WILL BE SUBJECT TO DISCIPLINARY ACTION. THE FAILURE OR REFUSAL OF THE APPLICANT TO COMPLY SHALL FURNISH GROUNDS FOR DENIAL OR, IF ISSUED, REVOCATION OF ANY BUILDING PERMITS OR CERTIFICATES OF OCCUPANCY ISSUED PURSUANT TO THIS ORDER.

DRAFT