

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission



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.])
July 10, 2025

Pursuant to notice, at its public hearing on June 5, 2025¹, 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. For the purposes of calculating an IZ Plus set-aside requirement pursuant to Subtitle C § 1003, the maximum permitted FAR of the Property’s existing zoning of RA-2 is the equivalent of 1.8 FAR.

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).

¹ The Commission took proposed action at the conclusion of the June 5, 2025, public hearing, and final action at its July 10, 2025, public meeting.

4. On November 18, 2024, the Office of Zoning (“OZ”) sent notice of the Application’s filing to:
 - Applicant;
 - 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”); and
 - Office of Zoning Legal Division (“OZLD”).(Ex. 4-9).
5. OZ published notice of the filing of the Application in the November 29, 2024, *District of Columbia Register* (71 DCR 014914) (Ex. 8).
6. On April 15, 2025, and April 17, 2025, OZ sent notice of the public hearing to:
 - Applicant;
 - ANC 1A;
 - ANC SMD 1A03;
 - ANC SMD 1A01;
 - Office of ANCs;
 - The Ward 1 Councilmember;
 - At-Large Councilmembers;
 - OP;
 - DOB
 - DOEE;
 - DDOT;
 - OZLD; and
 - Property owners within 200 feet of the Property (Ex. 17, 18).
7. OZ published notice of the rescheduled public hearing² in the April 25, 2025, *District of Columbia Register* (72 DCR 004981 *et seq.*) (Ex. 19).
8. 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).

² The public hearing was originally scheduled for June 2, 2025, and was later rescheduled to June 5, 2025 (Ex. 17, 20).

THE PROPERTY

9. 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. 3).
10. The Property is located within Square 2672, which is bounded to the north by Irving Street, N.W., to the south by Columbia Road, N.W., to the east by 14th Street, N.W., and to the west by 15th Street, N.W. The Property is more particularly bounded by a public alley to the north, Columbia Road, N.W., to the south, and multifamily housing developments to the east and to the west. The Property is situated within the Columbia Heights neighborhood (Ex. 3).
11. 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. 3).
12. 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, N.W., and west of 14th Street, N.W., 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. 3).
13. The Property is improved with a church building used by Emory United Methodist Church (Ex. 3E).

CURRENT ZONING

14. 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.” Subtitle F §§ 101.3(a)–(b). More specifically, the RA-2 zone provides for areas developed with predominantly moderate-density residential uses (Subtitle F § 101.5).
15. 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, 201.4);
 - Rear Yard: A distance equal to 4 in. per 1 ft. of principal building height, but not less than 15 ft. minimum (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 all other structures; 20% for public recreation and community center (Subtitle F § 210.1); and
- Green Area Ratio: 0.40 (Subtitle F § 211.1).

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

16. 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

17. 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.
18. 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).
19. 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”)

20. 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).
21. 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).
22. 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).

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. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area . . . (CP § 225.5).

Future Land Use Map (the “FLUM”)

23. The FLUM shows the general character and distribution of recommended and planned uses across the District and provides generalized guidance on anticipated future land uses (CP §§ 200.5, 224.4).
24. The CP’s FLUM designates the Property as Medium Density Residential.
25. 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 Area Element

26. The Property falls within Mid-City Area Element of the Comprehensive Plan, which encompasses 3.1 square miles in the geographic center of Washington, DC (See CP § 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, N.W. and U Street, N.W., and its northern edge is formed by Spring Road NW and Rock Creek Church Road, N.W. (*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* CP § 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* CP § 2000.3). Known for its lively nightlife, ethnic restaurants, and walkable neighborhoods like 18th and U Streets, N.W., 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* CP § 2000.4).
 - The Mid-City Planning Area has seen significant development, including new housing and retail (*See* CP § 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* CP § 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* CP § 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

27. 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:
 - The Office of Zoning's Application form for a Map Amendment;
 - A cover letter; and
 - A statement in support of the Application, attaching:
 - A surveyor's plat;
 - A portion of the Comprehensive Plan's Future Land Use Map;
 - A portion of the Zoning Map;
 - The Applicant's Comprehensive Plan analysis;
 - The names and mailing address of the owner(s) of the property to be rezoned;
 - Signature Page;
 - Authorization Letter;
 - Certificate of Proficiency;
 - Certificate of Notice and NOI; and
 - List of Property Owners within 200 Feet.
 - On March 28, 2025, the Applicant submitted its pre-hearing statement, which included:
 - Cover letter; and
 - Pre-hearing Statement, attaching:
 - Outline of witness testimony
 - Brandice Elliot's resume
 - List of public documents the Applicant would rely on
 - A map showing a 200-foot radius from the Property; and
 - The Office of Zoning Hearing Fee form.

PROPOSED ZONING

28. 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.
29. The purpose of the RA-4 zone is to provide for areas developed with predominantly medium- to high-density residential. Subtitle F § 101.7.
30. 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, 201.4);
 - Rear Yard: A distance equal to 4 in. per 1 ft. of principal building height, but not less than 15 ft. minimum (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% all other structures, 20% for public recreation and community center (Subtitle F § 210.1); and
- Green Area Ratio: 0.30 (Subtitle F § 211.1).

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 recommendations of Citywide Elements and the Mid-City Area Element 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 Application 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;
- 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; and
- 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 Application asserted that the Map Amendment is not inconsistent with the Property’s FLUM designation as Medium Density Residential because:

- Although the RA-4 zone is cited as being consistent with the High Density Residential FLUM category in the Comprehensive Plan’s Framework Element, its maximum allowable density of 3.5 or 4.2 FAR with Inclusionary Zoning is consistent with the anticipated density range of 1.8 to 4.0 FAR stated in the Medium Density Residential FLUM category. Further, the Medium Density Residential FLUM category states that greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development (*See* CP §§ 227.7, 227.8);
- 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*

CP § 228.1). The zoning of a given area, such as the proposed 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 cited as consistent in the Medium Density Residential FLUM category, it is nonetheless compatible with Medium Density Residential designation in certain contexts, especially in these circumstances where the Property site conditions, adjacent uses, and the need for housing, including the provision of more affordable housing through Inclusionary Zoning, justify greater density on the Property.

Mid-City Area Element

34. The Property is located within the Mid-City Area Element of the Comprehensive Plan (*See* CP § 2000.1). The Application asserted that 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 the following 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 could incorporate historically significant portions of the building into the future development, thus contributing to the neighborhood's architectural heritage;
 - Policies MC-1.1.2: Directing Growth and MC-1.1.3: Infill and Rehabilitation are advanced by the Map Amendment's provision of housing development, including affordable housing, in a transit-rich area. The proposal supports the policy of stimulating growth near transit corridors, particularly in Columbia Heights; and
 - Policy MC-1.1.12: Green Development Practices would be advanced through enhanced landscape and stormwater features that would be required in future redevelopment of the Property and could further Mid-City's goals of sustainable development through employing bioretention and other methods to manage surface runoff.
35. The Application stated that 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; and
 - MC-1.1.12: Green Development Practices.
- MC-1.2 Conserving and Enhancing Community Resilience
- MC-1.2.1: Cultural Diversity; and
 - MC-1.2.6: Neighborhood Greening.

Land Use Element

36. The Application asserted that the proposed rezoning of the Property to the RA-4 zone, advances the following policies of 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 will facilitate the development of more housing than the current zoning 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;
- 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; and
- Policy LU-2.2.4: Neighborhood Beautification is advanced by the potential landscape enhancements and stormwater management features resulting from future redevelopment of the Property.

37. The Application stated that 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; and
- 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; and
- LU-2.1.10: Multi-Family Neighborhoods.

LU-2.2 Maintaining Community Standards

- LU-2.2.4: Neighborhood Beautification.

Transportation Element

38. The Application asserted that the proposed rezoning of the Property to the RA-4 zone aligns with the following key policies of the Transportation Element:

- Policy T-1.1.4: Transit-Oriented Development is supported as future redevelopment of this Property near the prominent 14th Street corridor with access to neighborhood services and public transit may encourage pedestrian improvements. The potential for 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;
- Policy T-1.1.7: Equitable Transportation Access will be advanced through the Map Amendment's 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; and
- 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.

39. Accordingly, the Application stated that 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; and
- 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; and
- T-2.4.2: Pedestrian Safety.

Housing Element

40. The Application asserted that the proposed rezoning to the RA-4 zone, which allows greater density that will support residential and affordable housing units, advances the following key Housing Element 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 because the development facilitated by the Map Amendment will encourage 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;
- Policy H-1.2.3: Affordable and Mixed-Income Housing will be advanced because the inclusion of affordable housing in future development on the Property fosters mixed-income communities in a high-cost neighborhood 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; and
- 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.

41. Accordingly, the Application stated that the proposed Map Amendment is not inconsistent with the Housing Element, and advances the specific policies listed below:

H-1.1 Expanding Housing Supply

- H-1.1.1: Private Sector Support; and
- 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; and
- H-1.2.11: Inclusive Mixed-Income Neighborhoods.

Environmental Protection Element

42. The Application asserted that the proposal to rezone the Property to the RA-4 zone, allowing for the future redevelopment of the Property, will advance the following policies of the Environmental Protection Element:

- 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 potential for future development on the Property to incorporate green roofs, tree planting, and enhanced landscaping features;
- The proposal promotes Policy E-2.1.3: Sustainable Landscaping Practices because of the potential for future development on the Property to implement sustainable landscaping, such as planting native trees and creating vegetated spaces that not only beautify the area but also reduce stormwater runoff; and
- The proposed Map Amendment aligns with Policy E-4.2.1: Support for Green Building, as future redevelopment will 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.

43. Accordingly, the Application stated that 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; and
- 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; and
- E-3.2.7: Energy-Efficient Building and Site Planning.

E-4.1 Green Infrastructure GI

- E-4.1.1: Maximizing Permeable Surfaces; and
- 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

44. 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 provided a racial equity analysis, as required by the Commission's Racial Equity Tool (Ex. 3E).

Community Outreach and Engagement

45. The Applicant provided the following information about the community affected by the Application and the Applicant's outreach efforts:

- The Applicant identified the following as key historical attributes which helped shape and define the community impacted by the Map Amendment (Ex. 3E):
 - The Property is located within the Columbia Heights neighborhood, a diverse, densely populated, and transit-accessible area;
 - 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;
 - The area features a mix of housing types as it has experienced significant development, particularly around the Columbia Heights Metrorail station;
 - The neighborhood has a vibrant commercial and cultural hub with numerous new restaurants, shops, and nightlife options;
 - 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;
 - 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;
 - 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; and
 - 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 efforts to understand the community's priorities.
 - 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;

- 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;
- On November 4, 2024, the Applicant presented the Map Amendment to ANC 1A at its regularly scheduled meeting; and
- On December 11, 2024, ANC 1A issued a letter unanimously supporting the Map Amendment with the condition that the Applicant provide a plan displaying the impacts the development will have on the surrounding traffic (See Ex. 10).
- Applying the racial equity themes of the Commission’s Tool, 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 as there are no existing residents on the Property.
 - ii. Result in positive changes with respect to housing because the Map Amendment would:
 - 1. Increase the Property’s potential residential density and therefore 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, 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.

46. Based on the foregoing, and based on the Applicant’s filings, the Applicant asserted that the proposed Map Amendment would result in positive outcomes, and therefore, the Application is not inconsistent with the CP when evaluated through a racial equity lens.

Potential Inconsistencies with the CP

47. 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 CP. After a full review of the elements, the Applicant has identified the following two CP policies that are potentially inconsistent with the Map Amendment:

- 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; and
- 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.

The Applicant noted that it is currently unknown whether future redevelopment of the Property will include net-zero buildings or renewable energy; therefore, it is unknown at this time whether the Map Amendment will ultimately be inconsistent with the referenced CP policies.

Public Hearing Testimony

48. 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; and
 - Pastor Joseph Daniels, Jr., representative of the Applicant.

III. RESPONSES TO THE APPLICATION

OP REPORTS AND TESTIMONY

49. 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 not be inconsistent with the CP, including when viewed through a racial equity lens, and would be appropriate for IZ Plus. 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, N.W.;
 - **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 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 buildings. The RA-4 zone 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. The RA-4 zone FAR is consistent with this, as it allows a maximum FAR of 3.5, or 4.2 with IZ;

- **Mid-City Area Element** – The proposed Map Amendment would not be inconsistent with the Mid-City Area Element. The RA-4 zone 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; and
- **Racial Equity** – The OP Setdown Report provides a racial equity analysis³, as required by the Commission’s Racial Equity Tool. OP’s analysis concluded that the proposed Map Amendment would further racial equity goals of the CP and result in positive outcomes because it could result in an increase in the amount of housing in the District, including the amount of affordable housing for low-income households, all within

³ The OP Setdown Report’s racial equity analysis included disaggregated race and ethnicity data for the Mid-City Planning Area, as required by the Commission’s Racial Equity Tool; however, the data is less current than the data provided in the OP Hearing Report. Accordingly, the more current disaggregated race and ethnicity data from the OP Hearing Report is discussed below in Finding of Fact No. 53.

walking distance of retail, service, and employment opportunities, as well as a Metrorail station and other transit options. OP noted:

- 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; and
- 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.

50. IZ Plus applies to the proposed Map Amendment because the RA-4 zone allows a higher maximum FAR than the existing RA-2 zone (See Subtitle X § 502.1(b); see also Finding of Fact (“FF”) No. 15, 30). Thus, the OP Setdown Report recommends that the Map Amendment be subject to IZ Plus. OP notes that the Mid City Planning Area has a considerable number of dedicated affordable units and exceeds the Mayor’s target for the provision of affordable housing. Nonetheless, the increased density allowed under the proposed RA-4 zone coupled with IZ Plus will result in more housing in a high-opportunity area close to transit, retail, and employment. In addition, the Applicant has stated that future development on the site will exceed IZ Plus requirements.
51. 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). The OP Hearing Report provided more recent disaggregated race and ethnicity data for the Mid City Planning Area, in which the Property is located. Specifically, the data is the 2012-2016 and 2019-2023 American Community Survey 5 Year Estimates while the OP Setdown Report utilized less recent 2018-2022 data. The more recent data noted the following trends:

Disaggregated Race and Ethnicity Data

- Population - The Black and white populations of the Mid-City planning area and Districtwide decreased between the 2012-2016 and 2019-2023 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 Alaskan Native, 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;
- Median Age - 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;

- Median Income - 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/Alaskan Native. Median income for Black residents rose, but remains significantly lower than that of White, Asian or Hispanic residents of the planning area; and
- Housing Tenure - 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/Alaskan 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 (Ex. 27).

52. At the public hearing, OP reiterated its support for the Application as detailed in its reports.

DDOT REPORT

53. 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).

54. DDOT did not provide testimony at the public hearing.

ANC REPORTS AND TESTIMONY

55. 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, with the condition that the Applicant provide a plan displaying the impacts the development will have on the surrounding traffic (Ex.10).

PERSONS AND ORGANIZATIONS IN SUPPORT

56. 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 Unlocking Revenue for Social Innovation (Ex. 38);
- The Festival Center (Ex. 39);

- Faith and Money Network (Ex. 40);
- LAYC (Ex. 45); and
- The District Church (Ex. 46).

57. At the public hearing, no persons or organizations appeared to testify in support, in opposition, or undeclared regarding the Application.

NATIONAL CAPITAL PLANNING COMMISSION (“NCPC”)

58. The Commission referred the Application to the National Capital Planning Commission (“NCPC”) on June 6, 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. 44).

59. On July 2, 2025, NCPC staff filed a letter stating that the proposal falls under an exception listed in NCPC’s submission guidelines and is therefore exempt from NCPC review (Ex. 49).

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 and is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the Property for the reasons discussed below.

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)). For the reasons stated herein and below, the Commission finds that the Map Amendment is not inconsistent with the CP, on the whole, and to the extent it is potentially inconsistent with any CP policies, the Commission finds such inconsistencies to be outweighed by the numerous CP policies of the Citywide Elements and the Mid-City Area Element that would be advanced by the Map Amendment (FF 32-45, 49, 51).

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, inclusive of disaggregated race and ethnicity data for the Mid-City Planning Area (FF 44-46, 49, 51). The Commission finds that the racial equity analyses provided addressed 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 to provide increased density to facilitate development of more housing, including affordable housing, in a high opportunity, transit accessible, and amenity rich location (*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 45, 49);
 - 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 sixteen (16) letters of support and therefore finds the Applicant’s community outreach and engagement regarding the Application adequate (FF 45, 56); and

- Disaggregated Race and Ethnicity Data – OP’s racial equity analysis for the Mid-City Planning Area, where the Property is located, provided disaggregated race and ethnicity data reflecting demographic shifts and socioeconomic trends for the 2012-2016 and 2019-2023 time periods (FF 51). The Planning Area’s Black and White populations decreased over the two time periods. Compared to Districtwide data over both time periods, the Planning Area data indicates higher median income but lower homeownership than Districtwide. The Planning Area demonstrates racial disparities, particularly for American Indian/Alaskan Native and Black or African American residents (*Id.*). Accordingly, the Commission concluded that allowing increased residential density on the Property would positively impact the Mid-City Planning Area, primarily because the Map Amendment will facilitate increased housing opportunities, including more affordable housing through the provision of IZ Plus, in a transit and amenity rich location. 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 49, 51).

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 (FF 22, 32, 49, 51). 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 facilitate additional housing opportunities, including affordable housing, on the Property (*Id.*).

FLUM

10. The Commission concludes that the Map Amendment is not inconsistent with the Property’s FLUM designation as Medium Density Residential. Though the Framework Element cites the RA-3 zone as a consistent zone with the Property’s Medium Density Residential FLUM designation, it also states that other zones may apply and higher density than the anticipated range of 1.8 to 4.0 FAR may be possible when complying with Inclusionary Zoning (CP § 227.7). The Framework Element also describes the Medium Density Residential category as suited for mid-rise apartment buildings, but not exclusively, noting that it also may apply to taller residential buildings; and states that the FLUM allows for a range of densities and intensities within each category and zoning in any given area should be guided by the FLUM, interpreted in conjunction with the CP text, including the Citywide and Area Elements (CP §§ 227.7, 228.1). The RA-4 zone will allow more residential density in this Property’s transit and amenity rich location than the existing RA-2 zone or the RA-3 zone would, facilitating development of more housing on the Property and the provision of IZ Plus will require a higher affordable housing set aside than regular IZ. The Commission finds the RA-4 zone appropriate for the Property’s FLUM designation in these circumstances where medium-density residential uses are intended, and allowing for higher density facilitates meeting the city’s housing goals while maintaining overall consistency with the land use designation. The RA-4 zone allows a

maximum density of 3.5 FAR or 4.2 FAR with IZ, which is within the range contemplated by the Medium Density Residential category; however, it will allow more intense density, height, and lot occupancy on the Property than the existing RA-2 zone, and Inclusionary Zoning Plus will apply to any future residential development on the Property. Given the Property location and site conditions, the surrounding uses, and the need for more housing, the Commission finds the additional density allowed under the RA-4 zone compatible with the Property's Medium Density Residential FLUM designation (FF 12, 13, 15, 30, 25, 33, 49, 51).

Mid-City Planning Area Element

11. The Commission concludes that the Map Amendment directly advances several key policies from the Mid-City Area Element of the Comprehensive Plan. 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, on a Property in a pedestrian oriented environment in close proximity to neighborhood services and various transportation options. Redevelopment of this Property and the introduction of more housing opportunities could also contribute to the community's growth, filling a gap in housing needs (FF 26, 34-35, 49, 51).

Land Use Element

12. The Commission concludes that the Map Amendment furthers policies of the Land Use Element based on the findings stated above (FF 36-37, 49, 51).

Transportation Element

13. The Commission concludes that the Map Amendment furthers policies of the Transportation Element based on the findings stated above (FF 38-39, 49, 51).

Housing Element

14. The Commission concludes that the Map Amendment furthers policies of the Housing Element based on the findings stated above (FF 40-41, 49, 51).

Environmental Protection Element

15. The Commission concludes that the Map Amendment furthers 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 (FF 42-43).

Potential Inconsistencies with the CP

16. The Commission notes that the Applicant identified two CP policies as potentially inconsistent the Map Amendment, E-3.2.2: Net-Zero Buildings, and E-3.2.3: Renewable Energy (FF 47). The Commission's evaluation standard in a map amendment is limited to whether the matter of right development standards and uses of the proposed zone are not inconsistent with the CP and other adopted public policies and active programs related to the subject site (Subtitle X § 500.3). The Commission is not reviewing a proposed development project in its evaluation of a map amendment case. As noted by the Applicant,

it is unclear whether the future development on the Property will include net-zero buildings or renewable energy; therefore, the Commission does not find the two CP policies identified by the Applicant to be inconsistent with the Map Amendment (*Id.*). However, to the extent other CP policies that were not identified would be potentially inconsistent with the Map Amendment, the Commission finds such inconsistencies to be outweighed by the numerous CP policy objectives and goals that would be advanced by the Map Amendment, as discussed herein (FF 32-43, 49, 51).

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 § 405.9 (*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 (FF 49, 51). The Commission also concurs with OP that the proposed Map Amendment is appropriate for an IZ Plus set-aside requirement, pursuant to Subtitle X § 502.1(b) (FF 50).

“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 (FF 55). The Commission notes that the ANC’s support was conditioned on the Applicant providing a plan displaying the impacts the development will have on the surrounding traffic. The Commission concurs with the ANC’s recommendation of support but finds its proposed condition unpersuasive. The Commission’s evaluation in a map amendment is limited to whether the matter of right development standards and uses of the proposed zoning are not inconsistent with the CP and other adopted public policies and active programs related to the Property (Subtitle X § 500.3). The Commission is not reviewing a proposed development project and its potential impacts in its evaluation of a map amendment case. Accordingly, the ANC’s proposed condition, which relates to potential traffic impacts associated with future development of the Property, is irrelevant

to the Commission’s evaluation of a map amendment. Nonetheless, the Commission strongly encourages the Applicant to work with ANC 1A to identify and address any potential traffic impacts at the time of any future development project on the Property.

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
2672	Lot 718	RA-2 zone to RA-4 zone

For the purposes of calculating an IZ Plus set-aside requirement pursuant to Subtitle C § 1003, the maximum permitted FAR of the Property’s existing zoning of RA-2 is the equivalent of 1.8 FAR.

Proposed Action

Vote (June 5, 2025): 4-0-1

(Robert E. Miller, Gwen Wright, Anthony J. Hood, and Tammy M. Stidham to approve; Joseph Imamura not participating, not voting.)

Final Action

Vote (July 10, 2025): 5-0-0

(Robert E. Miller, Joseph S. Imamura, Anthony J. Hood, Tammy M. Stidham, and Gwen Wright to approve.)

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 *District of Columbia Register*, that is on March 27, 2026.



ANTHONY J. HOOD
CHAIRMAN
ZONING COMMISSION



SARA A. BARDIN
DIRECTOR
OFFICE OF ZONING

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.