

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Joshua Mitchum, Development Review Specialist

JL for Jennifer Steingasser, Deputy Director, Development Review & Historic Preservation

DATE: April 28, 2025

SUBJECT: ZC 25-01 – OP Setdown Report for a Map Amendment to rezone the properties located at 227 42nd Street NE (Square 5087; Lot 0074) and 241 42nd Street NE (Square 5088; Lots 0147 and 0852) from RA-1 to RA-2

I. PROPOSAL AND RECOMMENDATION

Ward Memorial AME Church (the “Applicant”) requests an amendment to rezone 227 42nd Street NE (Square 5087, Lot 0074) and 241 42nd Street NE (Square 5088, Lots 0147 & 0852) from the RA-1 Zone, to the RA-2 Zone. This proposed map amendment should implement changes made to the Future Land Use Map in the 2021 Comprehensive Plan.

The Office of Planning (OP) recommends that the Zoning Commission **set down for public hearing** the proposed map amendment to rezone 227 & 241 42nd Street NE from RA-1 to RA-2. On balance, the proposal would not be inconsistent with the Comprehensive Plan.

OP does not recommend IZ Plus in this case. At this time, the Far Northeast/Southeast Planning Area has a considerable number of dedicated affordable units and far exceeds the target for the production of affordable housing.

II. APPLICATION-IN-BRIEF

Applicant:	Ward Memorial AME Church c/o Eric DeBear
Proposed Map Amendment:	RA-1 to RA-2
Address:	227 & 241 42 nd Street NE
Ward and ANC:	Ward 7; ANC 7F
Legal Description:	<ul style="list-style-type: none"> 227 42nd Street NE: Square 5087, Lot 0074 241 42nd Street NE: Square 5088, Lots 0147 & 0852
Property Size:	31,502 sq. ft. total <ul style="list-style-type: none"> 227 42nd Street NE: 5,988 sq. ft. 241 42nd Street NE: 19,641 + 5,873 sq. ft.
Existing Development	<ul style="list-style-type: none"> 227 42nd Street NE: vacant child development center 241 42nd Street NE: church and support space

Future Land Use Map Designation:	Moderate-Density Residential
Generalized Policy Map Designation:	Neighborhood Enhancement Area
Historic District:	N/A

III. SITE AND AREA DESCRIPTION



The property is located north of Benning Road NE and east of Fort Mahan Park, and is comprised of three lots with frontage on 42nd Street NE. On Square 5088, north of Brooks St. NE, Lot 0147 is currently improved with a church building used by the Applicant. Lot 0852 is currently improved with a two-story building used by the Applicant as a fellowship hall. The church and fellowship hall are both separated from the homes to the east of the property by a 15-foot-wide public alley that runs between Brooks Street NE and Clay Street NE. On Square 5087, south of Brooks Street NE, Lot 74 is developed with a two-story building that was previously used by the Applicant as a child development center, but it remains vacant at present.

The 31,502 square foot subject site is irregularly shaped and is bounded to the north by Clay Street NE and single-family detached homes in the R-2 Zone. Brooks Street NE runs between the parcels, and to the south are two-family attached homes. To the west are 42nd Street and Fort Mahan Park, and to the east are single-family detached homes in the R-2 Zone. The property is located approximately a half mile away from the Minnesota Avenue and Benning Road Metrorail stations.

IV. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The Applicant is requesting a map amendment to rezone the subject property from RA-1 to RA-2.

The purpose and intent of the existing RA-1 Zone (Subtitle F § 101) is as follows:

[RA-1] provides for areas predominantly developed with low to moderate-density development, including detached houses, row houses, and low-rise apartments.

The purpose and intent of the proposed RA-2 Zone (Subtitle F § 101) is as follows:

- (a) *Permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts; and*
- (b) *Permit the construction of those institutional and semi-public buildings that be compatible with adjoining residential uses and that are excluded from the more restrictive residential zones*
- (c) *[RA-2] provides for areas developed with predominantly moderate-density residential.*

The following table summarizes the proposed RA-2 Zone in comparison to the existing RA-1 Zone:

	Existing Zone: RA-1	Proposed Zone: RA-2
Permitted Uses:	Residential apartment, as well as any use permitted in the RF Zones under Subtitle U § 301	Residential apartment, as well as any use permitted in the RF Zones under Subtitle U § 301
Height:	40 feet max. 3 stories max.	50 feet max. No story limit
FAR:	0.9 max. 1.8 (IZ) max.	1.8 max. 2.16 (IZ) max.
Penthouse Height:	12 feet max. 1 story	12 feet max. 15 feet mechanical max. 1 story max. (2-story permitted for mechanical space)
Lot Occupancy:	40% max.	60% max.
Rear Yard:	20 feet min.	15 feet min.
Side Yard:	8 feet min. (detached or semi-detached)	0 feet min. (4 feet min if provided)
GAR:	0.4 min.	0.4 min.

As shown in the table above, the RA-2 Zone allows for 1.8 max FAR for projects that include housing, and up to 2.16 max FAR with Inclusionary Zoning (IZ); more than the maximum FAR of 0.9 and 1.08 (IZ) for the RA-1 Zone.

V. IZ PLUS EVALUATION

Subtitle X § 502 presumes that IZ Plus will apply to map amendments except as provided for in X § 502.2:

502.1 Except as provided in Subtitle X § 502.2, the requirements of this section shall apply to:

- (a) A map amendment that rezones a property:*
 - (1) From a PDR zone to an ARTS, CG, D, MU, R, RA, or RF zone;*
 - (2) From any zone other than a PDR zone to a D zone without a prescribed residential FAR; or*
 - (3) From unzoned to an ARTS, CG, D, MU, R, RA or RF zone; or*
- (b) A map amendment not described on paragraph (a) of this subsection 502.1, which rezones a property from any zone to a zone that allows a higher maximum FAR, both exclusive of the twenty percent (20%) IZ bonus density, if applicable.*

502.2 The requirements of this section shall not apply to a map amendment that:

- (a) Is related to a PUD application;*
- (b) Is to [rezone to] a BF, HE, NHR, SEFC, StE, USN, or WR zone;*
- (c) The Zoning Commission determines is not appropriate for IZ Plus due to the mitigating circumstances identified by the Office of Planning in its report recommending that the map amendment not be subject to IZ Plus; or*
- (d) Was filed as an application that was accepted by the Office of Zoning prior to November 16, 2020.*

IZ Plus has a greater affordable housing requirement than the standard provisions of Inclusionary Zoning (IZ) found in the Zoning Regulations. The proposed map amendment would rezone the property to RA-2, which allows for a higher maximum FAR than its existing RA-1 zoning. However, the Far Northeast/Southeast Planning Area, where the subject property is currently located, already contains a disproportionately high number of the District's affordable housing. Within this Planning Area, 1,267 new affordable units have been added since 2019, which exceeds the planning area's new affordable housing production target of 490 units.

Therefore, OP is not recommending this map amendment be subject to IZ Plus due to the amount of affordable housing already available. As the intent of IZ Plus is to produce more affordable housing, particularly in areas with relatively few affordable units, OP recommends that the subject application be subject to the standard IZ requirements.

VI. PLANNING CONTEXT

Brief History of the Site

According to the applicant's website, the Christian fellowship of the African Methodist Episcopal (AME) denomination began in May of 1877 in Philadelphia, Pennsylvania. In 1879, a group of worshippers organized into a permanent religious body and obtained ownership of land in the Manning Division of the District in order to establish and operate a church. Ward Memorial AME

Church was initially named Grace Chapel and was founded in May 1877. In 1883, the first church was located at 42nd Street NE, adjacent to the existing site, and led by its first pastor, Rev. Johnson.

The church continued to grow under Reverend Bowen. Grace Chapel was renamed in 1921 to Ward Memorial AME Church after the late Bishop Thomas M.D. Ward, who was the 10th Bishop of the AME Church. In 1923, Reverend A.D. Holder and congregation moved the frame structure across the street to its present site. In 1953, The Reverend J. Haskell Mayo continued the plans for building the present structure started by Reverend S.A. Thompson. In 1957, he led the membership in the \$118,000 edifice that seats 450 persons. The cornerstone was laid by the Prince Hall Affiliated, F. & A.M., and its corps of officers. Bishop Frank M. Reid, Sr., led them in the dedicatory rites¹.

COMPREHENSIVE PLAN

As described in the Introduction (Chapter 1 Introduction, Section 103, Attachment I), the Comprehensive Plan is the centerpiece of a “Family of Plans” that guide public policy in the District. The Introduction goes on to note three “Tiers” of Planning (Chapter 1 Introduction, Section 104, Attachment II), including:

- a. Citywide policies
- b. Ward-level policies
- c. Small area policies

A. COMPREHENSIVE PLAN MAPS

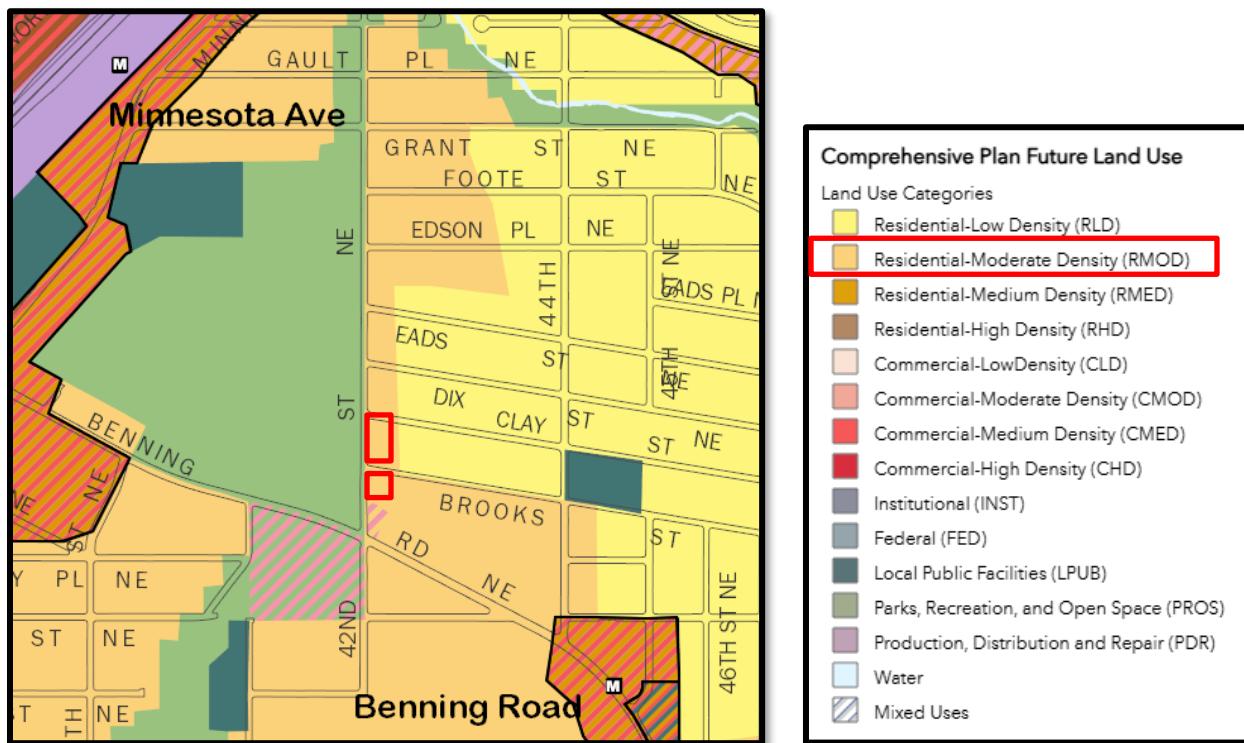
As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226, Attachment III), the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development’s physical characteristics, including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

The applicant has provided analysis of the proposal against the Comprehensive Plan, including through a racial equity lens, as part of Exhibit 3. As described below, the proposed zoning map amendment would not be inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

This site is designated for Residential Moderate Density (RMOD) uses on the FLUM. In the 2021 Comprehensive Plan update, the designation for the subject property did not change.

¹ “Our History”, Ward Memorial AME Church website (<https://www.wardame.org/church-history>)



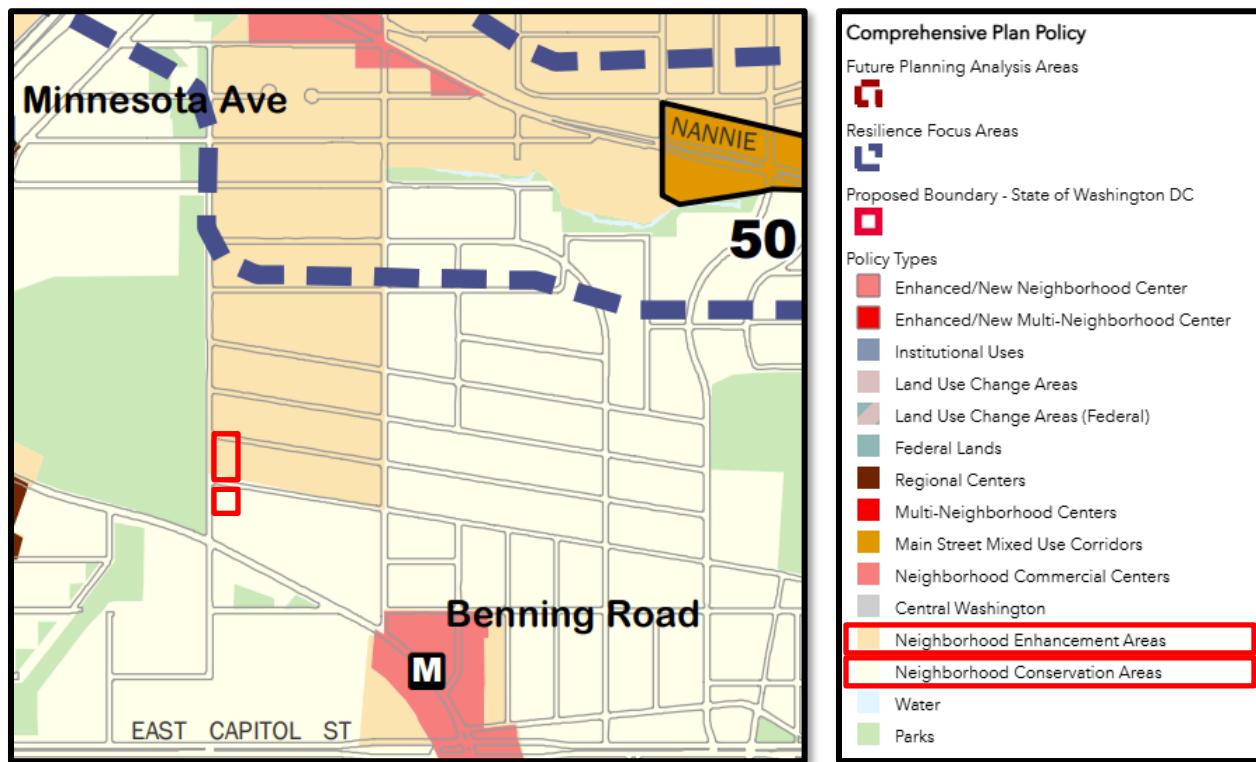
Moderate-Density Residential:

Defines neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single-family homes, two-to-four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate-Density areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate-Density Residential category, and other zones may also apply. 227.6.

The proposed rezoning to RA-2 would not be inconsistent with the FLUM designation for the subject property; RA-2 is specially noted as being consistent with this category. The RA-2 Zone allows for more density and, subsequently, potential for the production of more affordable housing units, consistent with the planning and development strategy of the surrounding area.

Generalized Policy Map (GPM)

This site is designated for both Neighborhood Enhancement Area and Neighborhood Conservation Area on the GPM.



Neighborhood Enhancement Areas:

Neighborhood Enhancement Areas are neighborhoods with substantial amounts of vacant and underutilized land. They include areas that are primarily residential in character, as well as mixed-use and industrial areas. Many of these areas are characterized by a patchwork of existing homes and individual vacant lots, some privately owned, and others owned by the public sector or nonprofit developers. These areas present opportunities for compatible infill development, including new single-family homes, townhomes, other density housing types, mixed-use buildings, and, where appropriate, light industrial facilities. Land uses that reflect the historical mixture and diversity of each community and promote inclusivity should be encouraged. 225.6.

Neighborhood Conservation Areas:

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 the 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. 225.4.

This proposed map amendment would not be inconsistent with the GPM designations for the subject property. The proposed RA-2 zoning is consistent with the policy of promoting modest infill housing while also strengthening the Applicant's existing institutional use as a church. Furthermore, the proposed RA-2 zoning represents a modest increase in density that still maintains an overall residential neighborhood character.

B. ANALYSIS THROUGH A RACIAL EQUITY LENS USING THE ZONING COMMISSION'S RACIAL EQUITY TOOL

The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan. The Comprehensive Plan recognizes that advancing equity requires a multifaceted policy approach and that many areas of policy must be brought to bear on the challenge:

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

The Commission’s four-part Racial Equity Tool outlines information to be provided to assist in the evaluation of zoning actions through a racial equity lens. The Applicant’s Racial Equity Analysis is provided at Exhibit 3. OP’s analysis is provided below.

Equity is conveyed through the Comprehensive Plan. The rezoning could allow for the subject property to provide more housing and services to the surrounding community.

RACIAL EQUITY TOOL PART 1 – COMPREHENSIVE PLAN GUIDANCE

In the context of zoning, certain priorities of equity are explicit throughout the Comprehensive Plan, including affordable housing, displacement, and access to opportunity. Below is an outline of Comprehensive Plan policies related to this proposal which, when viewed through a racial equity lens, provides the Commission with a framework for evaluating the map amendment. Please refer to Attachment I to this report for the full text of each policy statement, or refer to the Comprehensive Plan that is available on the Office of Planning website at www.planning.dc.gov.

As noted above, the proposal would not be inconsistent with both the Comprehensive Plan Generalized Policy Map and the Future Land Use Map. The proposed development, on balance, would be not inconsistent with the Citywide Elements of the Comprehensive Plan. Although it can be difficult to assess the exact impact of development in a map amendment case, the proposed map amendment would provide additional opportunity to further the policies of the Land Use, Transportation, Housing, and Economic Development Elements. Furthermore, it would also advance a number of development policies for the Far Northeast/Southeast Area Element.

Citywide Elements:

Land Use Element

- *Policy LU-1.4.3: Housing Around Metrorail Stations*
- *Policy LU-1.4.4: Affordable Rental and For-Sale Multifamily Housing Near Metrorail Stations*

- *Policy LU-1.4.6: Development Along Corridor*
- *Policy LU-2.1.1: Variety of Neighborhood Types*
- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods*
- *Policy LU-2.1.8: Explore Approaches to Additional Density in Low and Moderate-Density Neighborhoods*
- *Policy LU-2.3.6: Places of Worship and Other Religious Facilities*

The proposed map amendment would not be inconsistent with the Land Use Element of the Comprehensive Plan. The site is about ¼ mile from the Benning Road Metro Station, and ½ mile from the Minnesota Avenue Metro Station. It is also well served by buses on Benning Road, and will be adjacent to the pending Benning Road streetcar line. Through the amendment, the property would be upzoned to allow it to provide a citywide need of more affordable housing units. The proposed RA-2 rezoning would ensure that future development for the property will remain compatible with the surrounding neighborhood.

Transportation Element

- *Policy T-1.1.7: Equitable Transportation Access*

The proposed map amendment would not be inconsistent with the Transportation Element of the Comprehensive Plan. The subject property is currently transit-oriented due to its close proximity to the Benning Road and Minnesota Avenue Metrorail stations. Benning Road NE is a major corridor in the District, and the proposed RA-2 rezoning would allow additional housing that would have access to local transit options for residents of a wider income variety. This access to more transit options furthers the Plan's goals by reducing transportation barriers to economic and educational opportunities.

Housing Element

- *Policy H-1.1.3: Balanced Growth*
- *Policy H-1.1.9: Housing for Families*
- *Policy H-1.2.1: Low and Moderate-Income Housing Production as a Civic Priority*
- *Policy H-1.2.3: Affordable and Mixed-Income Housing*
- *Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas*
- *Policy H-1.3.1: Housing for Larger Households*
- *Policy H-2.1.9: Redevelopment of Affordable Housing*

The proposed map amendment would not be inconsistent with the Housing Element of the Comprehensive Plan, and furthers the policies noted above. As stated above, the proposed upzoning to the RA-2 Zone would allow for more affordable housing units. The Applicant has stated that they intend to focus on providing family and senior housing, thus diversifying the neighborhood's housing stock.

Economic Development Element

- *Policy ED-1.1.1: Neighborhood Commercial Vitality*

The proposed zoning would not permit new commercial development, consistent with FLUM and GPM direction, but the new residents of any potential development facilitated by the proposed zoning would support existing close by retail nodes.

Far Northeast/Southeast Area Elements:

- *Policy FNS-1.1.1: Conservation of Low-Density Neighborhoods*

- *Policy FNS-1.1.2: Development of New Housing*
- *Policy FNS-1.1.3: Directing Growth*

The proposed map amendment would not be inconsistent with the Far Northeast/Southeast Area Elements of the Comprehensive Plan. The RA-2 upzoning would further the above policies by increasing the amount of affordable housing units available to better utilize the land while still conserving the overall low-to-moderate-density characteristic of the surrounding neighborhood. The subject site is not located within a Policy Focus Area.

RACIAL EQUITY TOOL PART 2 – APPLICANT/PETITIONER COMMUNITY OUTREACH AND ENGAGEMENT

The Applicant has provided a timeline of events detailing their outreach and community engagement efforts, as part of [Exhibit 3](#). Notable events from the provided timeline include a virtual presentation to ANC 7F on October 15, 2024, and an in-person community meeting and information session held at the Ward Memorial AME Church on November 23, 2024.

RACIAL EQUITY TOOL PART 3 – FAR NORTHEAST/SOUTHEAST PLANNING AREA DISAGGREGATED DATA

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. The data is sourced from the 2012-2016 and 2019-2023 American Community Survey 5-Year Estimates by Planning Area via the OP State Data Center (ACS DATA). Part 3 also asks if the Planning Area is on track to meet affordable housing goals.

The subject property is in the Far Northeast/Southeast Planning Area (“planning area”). Each table below compares data for this planning area with District-wide data.

Population by Race or Ethnicity

Between 2012 and 2016, the largest portion of the Far Northeast/Southeast (FNFS) planning area were Black residents, which amounted to 93.8% of the area’s population (Table 1). The second largest group was Hispanic/Latino residents at 3.47%. In the 2019-2023 period, Black residents saw a slight decrease in the total percentage of the planning area’s population, however, Black residents still make up the largest portion of FNFS at 88.4%. With the exceptions of American Indian and Alaskan Native, and Native Hawaiian and Other Pacific Islander groups, all other races and/or ethnicity groups saw slight increases in population between the two time periods. The “Two or more races” group, while still remaining a relatively small portion of the area’s population, saw the greatest increase among the groups – increasing from 1.15% in 2012-2016 to 4.20% in 2019-2023.

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

Race or Ethnicity	Districtwide 2012-2016	FNFS 2012-2016	FNFS % 2012-2016	Districtwide 2019-2023	FNFS 2019-2023	FNFS % 2019-2023
Population	659,009	79,912	100%	672,079	85,659	100%
White alone	266,035	1,666	2.1%	262,549	2,513	2.9%
Black alone	318,598	74,997	93.8%	290,772	75,684	88.4%
American Indian and Alaskan Native alone	2,174	238	0.30%	2,044	144	0.20%

Race or Ethnicity	Districtwide 2012-2016	FNFS 2012-2016	FNFS % 2012-2016	Districtwide 2019-2023	FNFS 2019-2023	FNFS % 2019-2023
Asian alone	24,036	352	0.44%	27,465	408	0.50%
Native Hawaiian and Other Pacific Islander alone	271	30	0.04%	378	31	0.03%
Some other race alone	29,650	1,706	2.13%	32,338	3,293	3.80%
Two or more races	18,245	923	1.15%	56,533	3,587	4.20%
Hispanic or Latino	69,106	2,774	3.47%	77,760	5,260	6.10%

Median Income

The median income of the planning area was much lower than Districtwide in both the 2012-2016 and 2019-2023 periods (Table 2). Between the two periods, FNFS saw a median income increase of approximately \$24,565. Despite this increase, it is still lower than the Districtwide increase of approximately \$35,275.

Black and African American populations had the lowest median income of all groups with available income information during the two periods (\$36,614 and \$58,784), as well as the lowest increase of \$22,170 (up from \$36,614 in 2012-2016). The White and Some Other Races groups had higher median incomes in the FNFS area, with the Some Other Races group having a substantial increase of \$75,875 (up from \$38,723 in 2012-2016).

The planning area's overall lower median income is reflected in its 2019-2023 poverty rate of 22.4%, compared to the 2019-2023 Districtwide rate of 14.5% (Table 4).

Table 2: Median Income Districtwide and in the Planning Area

Median Income (disaggregated by race and ethnicity)	Districtwide 2012-2016	FNFS 2012-2016	Districtwide 2019-2023	FNFS 2019-2023
Median Household Income	\$72,935	\$37,510	\$108,210	\$62,075
White alone	\$119,564	\$84,460	\$166,774	\$153,121
Black or African American alone	\$40,560	\$36,614	\$60,446	\$58,784
American Indian and Alaskan Native alone	\$51,306	Unavailable	\$63,617	Unavailable
Asian alone	\$91,453	Unavailable	\$121,619	\$73,637
Native Hawaiian and Other Pacific Islander alone	Unavailable	Unavailable	Unavailable	N/A
Some other races	\$41,927	\$38,723	\$74,754	\$114,598
Two or more races	\$83,243	\$40,956	\$116,869	\$84,662
Hispanic or Latino	\$60,848	\$42,302	\$106,435	\$103,347

Housing Tenure

The rising cost of housing in the District limits the ability to provide housing for a variety of household types, which include family and senior housing, renter and owner-occupied housing, and mixed income housing.

Between 2012-2016 and 2019-2023, the percentage of Districtwide owner occupancy saw a very slight increase from 40.7% to 41.1% (Table 3). Between the same period, FNFS saw a higher increase from 35% to 41.2%. In the 2019-2023 period, White and Hispanic/Latino households had the highest percentage of owner occupancy at 81.5% and 54.6% respectively, while Native Hawaiian and Other Pacific Islander and American Indian and Alaskan Native households had the lowest owner occupancy. The Black and African American and Two or More Races groups were also on the lower end of owner occupancy for the planning area.

Table 3: Owner Occupied Households Districtwide and in the Planning Area

Owner Occupancy (disaggregated by race and ethnicity)	Districtwide 2012-2016	FNFS 2012-2016	Districtwide 2019-2023	FNFS 2019-2023
Total Owner Occupied	40.7%	35%	41.1%	41.2%
White alone	47.8%	62.4%	48.0%	81.5%
Black or African American alone	35.9%	34.7%	34.9%	39.7%
American Indian and Alaskan Native alone	32.9%	20.0%	19.6%	12.2%
Asian alone	39.4%	29.1%	41.4%	42.1%
Native Hawaiian and Other Pacific Islander alone	9.1%	0.0%	31.8%	0.0%
Some other races	17.5%	30.2%	28.7%	53.5%
Two or more races	32.7%	23.4%	41.3%	37.8%
Hispanic or Latino	30.9%	44.5%	36.4%	54.6%

Unemployment/Poverty/Cost Burden

In the 2012-2026 period, the unemployment rate in the planning area was 18.2%, which was more than double the Districtwide rate of 8.7% (Table 4). Although the planning area's unemployment rate fell to 13.5% in the 2019-2023 period, it remains more than double the Districtwide rate of 6.5% (of the same period).

The cost burden for housing in FNFS was greater than that of the District across both periods. The FNFS unemployment and cost burden rates may be reflected in the area's overall poverty rate. In both periods, the poverty rate of FNFS was substantially higher than the Districtwide average.

Table 4: General Characteristics of the District and the Planning Area

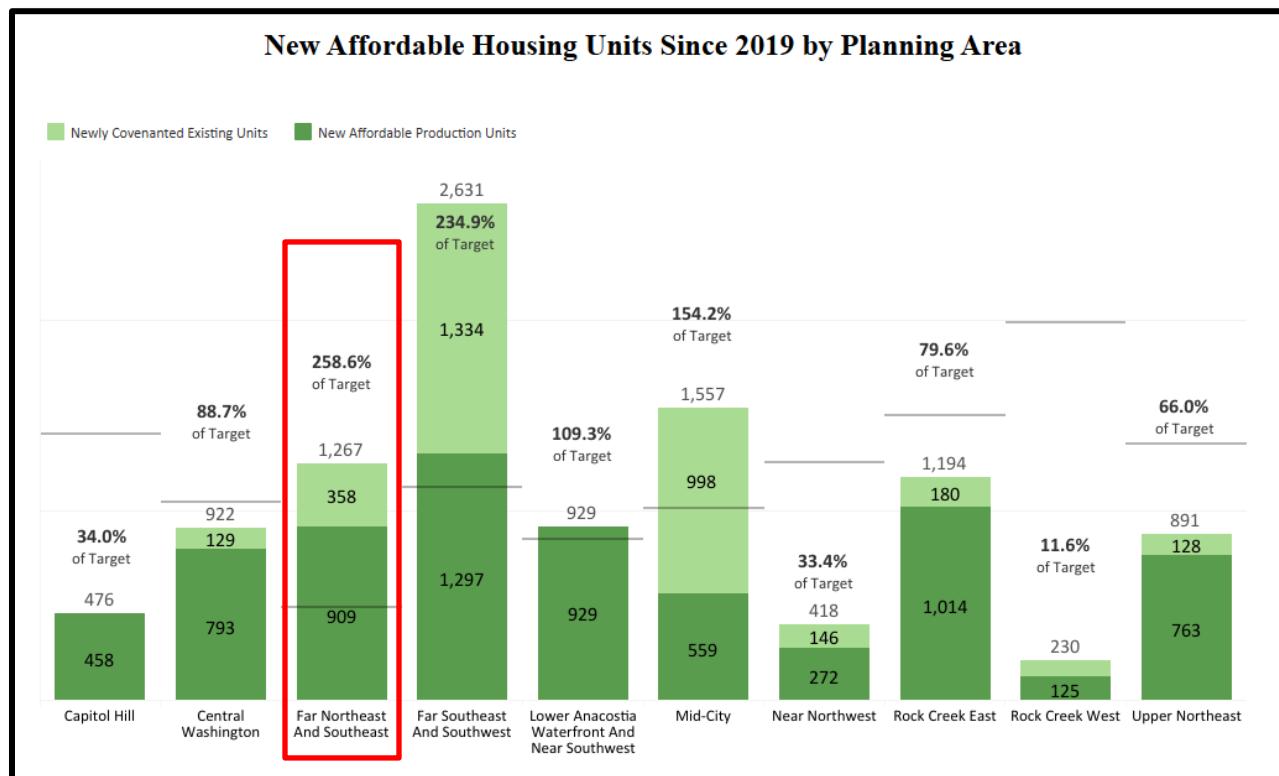
Characteristic	Districtwide 2012-2016	FNFS 2012-2016	Districtwide 2019-2023	FNFS 2019-2023
Unemployment Rate	8.7%	18.2%	6.5%	13.5%
Cost Burdened Households²	38.6%	47.1%	34.0%	41.7%
Poverty Rate	17.9%	27.6%	14.5%	22.4%

Progress Towards Meeting the Mayor's 2025 Housing Equity Goals

The Mayor's housing goals include the production of 12,000 new affordable units citywide for households earning below 80% of Median Family Income (MFI). The District expects to meet the Mayor's affordable housing goal by the end of 2025.

The Deputy Mayor for Planning and Economic Development (DMPED) provides regular updates on how each planning area is progressing in meeting their portion of the affordable housing target. The December 2024 update indicates that the planning area has exceeded its target by providing 1,234 affordable units – or 251.8 percent of the target amount ([DMPED 36,000 by 2025 Dashboard](#)). Therefore, OP is not recommending IZ Plus standards be applied to the subject application at this time.

As stated earlier in this report, the proposed map amendment would further contribute to the planning area's housing equity goals.



² Percentage of households spending 30% or more of their income on housing

RACIAL EQUITY TOOL PART 4 – ZONING COMMISSION EVALUATION FACTORS

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The zoning action would not result in displacement of tenants or residents. The subject property is in part currently used by the Applicant as a church, and the existing residential structure was previously used as a childcare center and is currently vacant.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate any indirect residential displacement, as the proposed rezoning would facilitate development would create new affordable housing units for the neighborhood.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> • Market Rate Housing • Affordable Housing • Replacement Housing 	The map amendment, if granted, would result in more housing opportunities for the area, which would include affordable units, at a minimum, consistent with the IZ program. Furthermore, due to the amount of affordable housing already available in the area, OP is not recommending IZ Plus be applied to the map amendment, as outlined earlier in this report, potentially providing new market-rate home-ownership opportunities for area residents.
Transportation	<ul style="list-style-type: none"> • Access to public transit • Transportation improvements 	The subject property is located less than a ½ mile from the Minnesota Avenue and Benning Road Metrorail stations. The Applicant does not anticipate any transportation-related improvements as a result of the map amendment.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> • Public Space Improvements • Streetscape Improvements 	The map amendment, if granted, could likely result in improvements in adjacent streetscape improvements as part of any new development on the site.
New Jobs/ Access to Jobs	Is there a change in access to job opportunities	While there is no commercial or office component to the map amendment, the RA-2 upzoning would provide more residents with access to the nearby transit stations, thus reducing transportation barriers to employment opportunities. Any new residents would also support existing local neighborhood businesses.
Environmental	<ul style="list-style-type: none"> • LEED Rating • Stormwater management • Etc. 	The map amendment does not propose any environmental changes; however, the Applicant has stated that they will be exploring sustainable design options for development should the zoning action be approved. Any new development would be required to meet DOEE environmental standards at the time of development.

Factor	Question	OP Response
Community	How did community outreach and engagement inform/change the zoning action?	The Applicant's filings indicate the extensive community discussions and outreach measures that took place.

C. OTHER RELEVANT PLANNING DOCUMENTS

Benning Road Corridor Redevelopment Framework Plan

The Benning Road Corridor Redevelopment Framework Plan, approved on July 15, 2008, includes all property fronting Benning Road from Southern Avenue to Bladensburg Road. The subject property is on the edge of the plan's boundary, and the plan recommends *the encouragement of the construction of new, mixed-income housing along the corridor and improving the living conditions for existing residents without causing displacement.* 14.

The proposed map amendment would not be inconsistent with this plan. Through the proposed RA-2 upzoning, the map amendment would further the plan's goal of providing more mixed-income housing for residents along the corridor, doing so without causing displacement of existing residents.

D. SUMMARY OF PLANNING CONTEXT ANALYSIS

As discussed above, the proposed map amendment would rezone the site to a zone that is consistent with the Comprehensive Plan's land use recommendations for the subject property. The proposed RA-2 zoning could potentially guide the site to further realize the Moderate-Density Residential development strategy as recommended by the Future Land Use Map.

ATTACHMENTS

Attachment I – Comprehensive Plan Policies

Note: The full 2019-2023 5-Year ACS Data is still being compiled and formatted, and will be included in the submission of OP's Hearing Report for the subject application.

Attachment I

Comprehensive Plan Citywide Elements

Chapter 3 – Land Use Element

Policy LU-1.4.3: Housing Around Metrorail Stations

Build housing adjacent to Metrorail stations that serves a mix of incomes and household types, including families, older adults, and persons with disabilities, and prioritize affordable and deeply affordable housing production. Leverage the lowered transportation costs offered by proximity to transit to increase affordability for moderate and low-income households. 307.11

Policy LU-1.4.4: Affordable Rental and For-Sale Multi-family Housing Near Metrorail Stations

Explore and implement as appropriate mechanisms, which could include community land trusts, public housing, and shared appreciation models, to encourage permanent affordable rental and for-sale multi-family housing, adjacent to Metrorail stations, given the need for accessible affordable housing and the opportunity for car-free and car-light living in such locations. 307.12

Policy LU-1.4.6: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. 307.14

Policy LU-2.1.1: Variety of Neighborhood Types

Maintain a variety of neighborhoods, ranging from low-density to high density. The positive elements that create the identity and design character of each neighborhood should be preserved and enhanced while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability, racial equity, and opportunity. 310.7

Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods

Recognize the importance of balancing goals to increase the housing supply, including affordable units, and expand neighborhood commerce with parallel goals to preserve historic resources, advance environmental and sustainability goals, and further Fair Housing. The overarching goal to create vibrant neighborhoods in all parts of the District requires an emphasis on conserving units and character in some neighborhoods and revitalization in others, including inclusive and integrated growth and meeting communities and public facility needs. All neighborhoods have a role to play in helping to meet broader District-wide needs, such as affordable housing, public facilities, and more. 310.10

Policy LU-2.1.8: Explore Approaches to Additional Density in Low and Moderate-Density Neighborhoods

Notwithstanding Policy LU-2.1.5, explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types in low-density and moderate-density neighborhoods where it would result in the appropriate production of additional housing and particularly affordable housing. Build upon the guidance of the April 2020 Single Family Housing Report to diversify the cost of housing available in high-opportunity, high-cost low- and moderate-

density neighborhoods, especially near transit. However, neighborhood planning and engagement is a condition predicate to any proposals. Infill and new development shall be compatible with the design character of existing neighborhoods. Minimize demolition of housing in good condition. 310.15

Policy LU-2.3.6: Places of Worship and Other Religious Facilities

Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the District's neighborhoods. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these facilities' transportation needs, operations, and expansions so that existing and new religious facilities may be sustained as neighborhood anchors and a source of spiritual guidance. ... The missions of many religious institutions involve service to those in need, and institutions offer important services, such as providing food banks, meals, clothing, counseling services, shelter, and housing. 312.8

Chapter 4 – Transportation Element

Policy T-1.1.7: Equitable Transportation Access

Transportation within the District shall be accessible and serve all users. Residents, workers, and visitors should have access to safe, affordable and reliable transportation options regardless of age, race, income, geography or physical ability. Transportation should not be a barrier to economic, educational, or health opportunity for District residents. Transportation planning and development should be framed by a racial equity lens, to identify and address historic and current barriers and additional transportation burdens experienced by communities of color. 403.13

Chapter 5 – Housing Element

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District to meet its long-term housing needs, including the need for low- and moderate- density single-family homes, as well as the need for higher-density housing. 503.5.

Policy H-1.1.9: Housing for Families

Encourage and prioritize the development of family-sized units and/or family-sized housing options which generally have three or more bedrooms, in areas proximate to transit, employment centers, schools, public facilities, and recreation to ensure that the District's most well-resourced locations remain accessible to families, particularly in areas that received increased residential density as a result of underlying changes to the Future Land Use Map. Family-sized units and/or family-sized housing options include housing typologies that can accommodate households of three or more persons and may include a variety of housing types including townhomes, fourplexes and multi-family buildings. To address the mismatch between meeting the needs of larger households and the financial feasibility of developing family-sized housing, support family-sized housing options through production incentives and requirements that address market rate challenges for private development that may include zoning, subsidies or tax strategies, or direct subsidy and regulatory requirements for publicly owned sites. 503.11

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

The production and preservation of affordable housing for low- and moderate-income households is a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all District neighborhoods. 504.8

Policy H-1.2.3: Affordable and Mixed-Income Housing

Focus investment strategies and affordable housing programs to distribute mixed-income housing more equitably across the entire District by developing goals and tools for affordable housing and establishing a minimum percent affordable by Planning Area to create housing options in high-cost areas, avoid further concentrations of affordable housing, and meet fair housing requirements.

504.10

Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas

Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods. 504.17

Policy H-1.3.1: Housing for Larger Households

Increase the supply of larger family-sized housing units for both ownership and rental by encouraging new and retaining existing single-family homes, duplexes, row houses, and three- and four-bedroom market rate and affordable apartments across Washington, DC. The effort should focus on both affordability of the units and the unit and building design features that support families, as well as the opportunity to locate near neighborhood amenities, such as parks, transit, schools, and retail. 505.8

Policy H-2.1.9: Redevelopment of Affordable Housing

As dedicated affordable housing reaches the end of its functional life, support maintaining or expanding the quantity of dedicated affordable housing in the redevelopment of the site to the greatest extent feasible, in line with the District's goals as identified in the Framework Element including those for racial equity and equitable development, and with all applicable redevelopment strategies as referenced in Policy H-2.1.1. 510.13

Chapter 7 – Economic Development Element

Policy ED-3.1.1: Neighborhood Commercial Vitality

Promote the vitality and diversity of Washington, DC's neighborhood commercial areas by retaining existing businesses, attracting new businesses, supporting a strong customer base through residential density, and improving the mix of goods and services available to residents. 713.5

Comprehensive Plan Area Element

Far Northeast/Southeast Area Element

Policy FNS-1.1.1: Conservation of Low-Density Neighborhoods

Recognize the value and importance of Far Northeast and Southeast's established single-family neighborhoods to the character of the local community and to the entire District. Comprehensive Plan and zoning designations for these neighborhoods reflect and preserve the existing land use

pattern while allowing for taller and denser infill development that is compatible with neighborhood character. 1708.2

Policy FNS-1.1.2: Development of New Housing

Encourage new mixed-use, mixed-income development for area residents on vacant lots and around Metro stations and on underused commercial sites along the area's major avenues. Strongly encourage the rehabilitation and renovation of existing housing in Far Northeast and Southeast and seek to ensure that the housing remains affordable for current and future residents. 1708.3

Policy FNS-1.1.3: Directing Growth

Concentrate employment growth in Far Northeast and Southeast, including office and retail development around the Deanwood, Minnesota Avenue, and Benning Road Metro station areas; the East Capitol Street Gateway; the Fletcher-Johnson property; the former George Washington Carver Apartments site; the Skyland Shopping Center; and along I-295 adjacent to the Parkside neighborhood, along Nannie Helen Burroughs Avenue NE, Minnesota Avenue NE/SE, Benning Road NE, and Pennsylvania Avenue SE Great Streets corridors, as well as along the 58th Street, Eastern Avenue, and Dix Street corridors. Provide improved pedestrian, bus, and automobile access to these areas, and improve their visual and urban design qualities. These areas should be safe, inviting, pedestrian-oriented places. 1708.4