

Exhibit E

EVALUATION OF CONSISTENCY WITH THE DC COMPREHENSIVE PLAN AND APPLICABLE SMALL AREA PLANS AND STUDIES

Pursuant to 11-X DCMR § 500.3, the Zoning Commission shall find that the proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan (“Comp Plan”) and with other adopted public policies and active programs related to the subject site. Through a racial equity lens, this Evaluation of Consistency with the D.C. Comprehensive Plan and Applicable Small Area Plans and Studies (“Evaluation”) provides a thorough analysis of the map amendment’s consistency with the Property’s applicable designations under the Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”), relevant policies of the Mid-City Area Element, and other Citywide elements of the Comp Plan. In addition, this Evaluation includes a summary of community outreach and an analysis of outcomes that advance racial equity. An assessment of potential inconsistencies with the Comp Plan is also included, which offers justifications as to how such inconsistencies are outweighed.

General Highlights:

- When analyzed through a racial equity lens, the map amendment creates favorable outcomes for all District residents, namely by allowing for the underutilized Property to be redeveloped with additional density that may include housing and affordable housing density near neighborhood-serving amenities and extensive public transportation.
- The proposed RA-4 zone is not inconsistent with the Property’s FLUM and GPM designations.
- The proposed map amendment advances numerous policies within the Mid-City Area Element and Citywide Elements, including particularly relevant policies under the Land Use, Transportation, Housing, and Environmental Protection Elements.
- Any potential inconsistencies with the Comp Plan are outweighed by other Comp Plan policies or competing considerations, including those of the Housing Equity Report.
- The outcomes of the map amendment will advance racial equity, as they will allow for greater opportunities for housing and affordable housing in the Columbia Heights neighborhood, which offers neighborhood-serving amenities, and will produce physical improvements that will enhance accessibility and the environment.
- The Applicant has actively engaged with and facilitated discussions with the ANC regarding the proposed Zoning Map amendment through outreach efforts designed to foster dialogue, gather feedback, and address concerns. This ongoing engagement reflects the Applicant’s commitment to ensuring that the development benefits both current residents and future occupants while minimizing any potential negative impacts.

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I. Introduction

Emory United Methodist Church (the “Applicant”) submits this Evaluation of the Comp Plan through a Racial Equity Lens in support of a proposed Zoning Map amendment for the property identified as Lot 718 in Square 2672, (the “Property”) from the RA-2 zone to the RA-4 zone (the “Application”). As set forth below, the proposed map amendment is not inconsistent with the Comp Plan as adopted by the D.C. Council pursuant to D.C. Law L23-0217 (Comprehensive Plan Amendment Act of 2017) and D.C. Law 24-0020 (Comprehensive Plan Amendment Act of 2020), including the GPM and FLUM (D.C. Resolution R24-0292), collectively referred to herein as the “Comp Plan”.¹

The Comp Plan guides the District’s development, both broadly and in detail, through maps and policies that address the physical development of the District. *See* 10-A DCMR § 103.2. The Comp Plan also addresses social and economic issues that affect and are linked to the physical development of the city and the well-being of its citizens. The Comp Plan provides the “big picture” of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. *See* 10-A DCMR § 103.5.

Pursuant to the Home Rule Charter, zoning shall not be inconsistent with the Comp Plan. D.C. Code §6-641.02. As stated in the Framework Element, “[i]n its decision-making, the [Commission] must make a finding of not inconsistent with the [Comp Plan]. To do so, the [Commission] must consider the many competing, and sometimes conflicting, policies of the [Comp Plan], along with the various uses, development standards and requirements of the zone districts. It is the responsibility of the [Commission] to consider and balance those policies relevant and material to the individual case... and clearly explain its decision-making rationale.” *See* 10-A DCMR § 224.8. To approve the map amendment, the Commission must consider and balance potential Comp Plan consistencies and inconsistencies to make an overall determination regarding whether the request is “not inconsistent” with the Comp Plan when read as a whole.

As detailed herein, **the proposed Zoning Map amendment is not inconsistent with the policies and goals of the Comp Plan when read as a whole**. The following sections of this Evaluation reflect the Applicant’s thorough evaluation of the map amendment’s overall consistency with the Comp Plan. Given the broad range of overlapping policy topics addressed in the Comp Plan, certain Citywide Elements may have little to no applicability to a zoning proposal. Such is the case for the proposed map amendment. Nevertheless, in conducting its Comp Plan evaluation, the Applicant has thoroughly reviewed the goals and policies of each and every Comp Plan Element. For those Citywide Elements that are more directly applicable to the Applicant’s request, a narrative is provided below explaining the basis for the Applicant’s determination that the map amendment is not inconsistent with that particular element. Finally, in accordance with the guidance provided by the D.C. Court of Appeals (the “Court”), the Applicant’s evaluation also includes a specific assessment of potential Comp Plan inconsistencies.

¹ D.C. Law L23-0217 took effect on August 27, 2020, and included amendments to the Comprehensive Plan Framework Element. D.C. Law L24-0020 took effect on August 21, 2021, and included amendments to the Comprehensive Plan general, citywide, and area elements, and the Generalized Policy Map and Future Land Use Map. The Generalized Policy Map and Future Land Use Map were formally approved on November 16, 2021, pursuant to Resolution No. R24-0292.

As described in Section IV, to the extent that the map amendment is inconsistent with, or potentially inconsistent with, an individual Comp Plan policy, such inconsistencies are far outweighed by other Citywide and Mid-City Area Element policies relating to, among others, land use, housing, transportation, environmental protection, economic development, and urban design.

II. Racial Equity and the Comprehensive Plan

A primary focus of the Comp Plan, as reflected throughout its various policies, is achieving racial equity. The Framework Element of the Comp Plan defines racial equity as the moment when “race can no longer be used to predict life outcomes and outcomes for all groups are improved.” *See* 10-A DCMR § 213.7. Indeed, the importance of equity to District residents was made abundantly clear when the D.C. Office of Planning (“OP”) conducted its D.C. Values survey in Spring 2019. In addition to equity, city residents also expressed concerns about rising costs and inequitable access to opportunities for housing, businesses, employment, and other necessities. Overall, livability, equity, and safety were considered the most critical values. *See* 10-A DCMR §§ 107.17–107.22.

As stated in the Framework Element and as further discussed below, equity is both an outcome and a process. *See* 10-A DCMR § 213.6. Equity exists where all people share equal rights, access, choice, opportunities, and outcomes, regardless of characteristics such as race, class, or gender. Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. An important factor to advancing racial equity is to acknowledge that equity is not the same as equality. *Id.* “As an outcome, the District achieves racial equity when race no longer determines one’s socioeconomic outcomes, when everyone has what they need to thrive, no matter where they live or their socioeconomic status; and when racial divides no longer exist between people of color and their white counterparts. As a process, we apply a racial equity lens when those most impacted by structural racism are meaningfully involved in the creation and implementation of the institutional policies and practices that impact their lives, particularly people of color.” *See* 10-A DCMR § 213.9.

Equity is conveyed through the Comp Plan, particularly in the context of zoning, where certain priorities stand out, including affordable housing, displacement, and access to opportunity. To help guide the Commission in applying a racial equity lens to its decision making, the Implementation Element reads, in relevant part, “[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 in the District.” *See* 10-A DCMR § 2501.6.

As related to zoning actions, racial equity is not a separate consideration from the normal legal standard of review. Rather, the Commission properly considers equity as an integral part of its analysis as to whether a proposed zoning action is “not inconsistent” with the Comp Plan. The scope of the racial equity review and the extent to which Comp Plan policies apply depend upon the nature of the proposed zoning action. In this case, the Commission shall evaluate the requested Zoning Map amendment through a racial equity lens to make its determination as to whether the requested rezoning is not inconsistent with the Comp Plan as a whole.

A. Racial Equity as a Process

The Framework Element states that racial equity is a process, and that as the District grows and changes, it must do so in a way that builds the capacity of vulnerable, marginalized, and low-income communities to fully and substantively participate in decision-making processes. *See* 10-A DCMR § 213.7. The Applicant believes in inclusive, community engagement. To this end, the Applicant has and will continue to work closely with the community and the affected Advisory Neighborhood Commission throughout the map amendment process.

B. Racial Equity as an Outcome

The Framework Element states that “equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality.” *See* 10-A DCMR § 213.6. As stated above, under the Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens. The table in Section VII correlates the proposed map amendment with a number of equitable development indicators in general terms. As the table shows, the map amendment has the potential to address a number of equity issues experienced by residents in the Columbia Heights neighborhood.

The following evaluation follows the Zoning Commission’s Racial Equity Tool,² organized in four parts.

III. Part One: Racial Equity Analysis Submissions (Guidance Regarding the Comprehensive Plan)

As required by Part One of the Racial Equity Tool, the Applicant conducted a thorough evaluation of the proposed map amendment’s consistency with the Comp Plan, including the FLUM, GPM, the policies of all applicable Citywide and Area Elements, and all other applicable adopted public policies and active programs.

A. Comprehensive Plan Overview and Application

Because the Comp Plan is the one plan that guides the District's development, it carries special importance in that it provides an overall direction and shapes all other physical plans the District may adopt. 10-A DCMR § 103.2. The Comp Plan includes detailed maps and policies for the physical development of the District, and addresses social and economic issues that affect the District and its citizens. The Comp Plan allows the District to ensure its resources are used wisely and efficiently and that public investment is focused in areas where it is most needed. *See* 10-A DCMR § 100.13. Subsection 228.1(d) of the Comp Plan reads, in relevant part, the “zoning of any given area should be guided by the [FLUM] interpreted in conjunction with the text of the Comp Plan, including Citywide Elements and the Area Elements, as well as approved Small Area Plans.”

² Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

B. Future Land Use Map

The FLUM shows the general character and distribution of recommended and planned uses across the city, and, along with the GPM, is intended to provide generalized guidance on whether areas are designated for conservation, enhancement, or change. *See* 10-A DCMR §§ 200.5, 224.4. The land use category descriptions on the FLUM describe the general character of development in each area, citing typical Floor Area Ratios as appropriate. However, the granting of density bonuses may result in densities that exceed those typical ranges stated in the land use category descriptions. *See* 10-A DCMR § 228.1(c). By definition, the FLUM is to be interpreted broadly and the land use categories identify desired objectives. *See* 10-A DCMR § 228.1(a). Decisions on requests for rezoning shall be guided by the FLUM read in conjunction with the text of the Comp Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning. *See* 10-A DCMR § 2504.5.

As shown below, the FLUM designates the Property as **Medium Density Residential**.

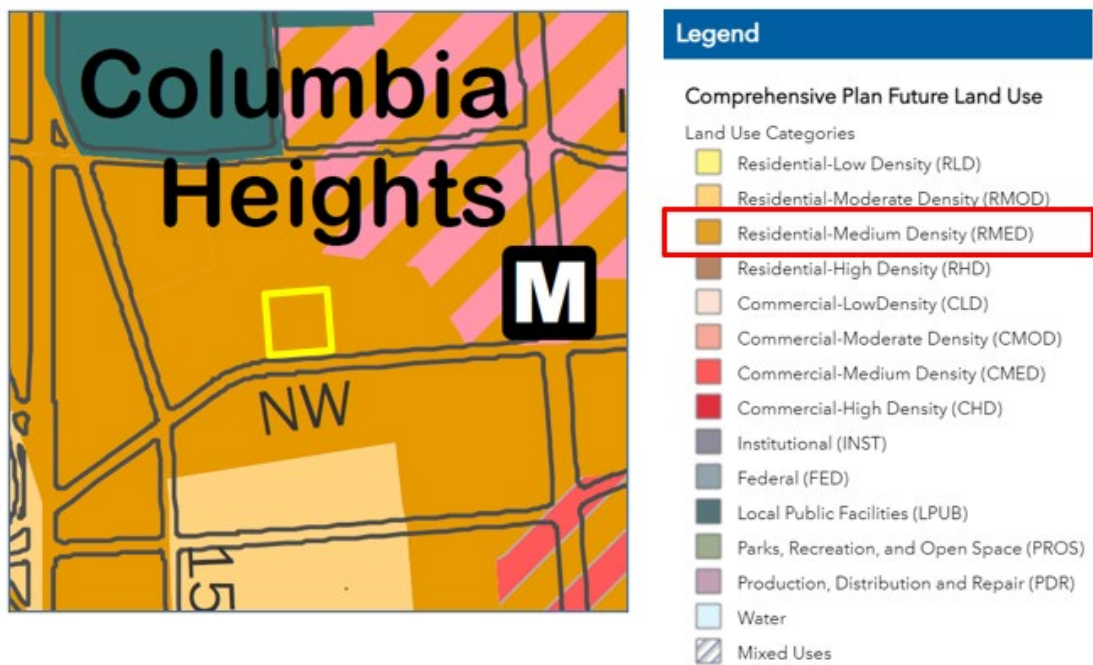


Figure 1: Future Land Use Map

The Framework Element describes these designations as follows:

- **Medium Density Residential:** This designation is used to define neighborhoods or areas generally, but not exclusively, suited for mid-rise apartment buildings. The Medium Density Residential designation also may apply to taller residential buildings surrounded by large areas of permanent open space. Pockets of low and moderate density housing may exist within these areas. Density typically ranges from 1.8 to 4.0 FAR, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-3 Zone District is consistent with the Medium Density Residential

category, and other zones may also apply. *See* 10-A DCMR § 227.7 (emphasis added).

Although the RA-4 zone is indicated as being consistent with High Density Residential in the Comprehensive Plan's Framework, its maximum allowable density of 4.2 FAR with IZ is consistent with the allowable density in the Medium Density Residential land use designation. *See* 10-A DCMR § 227.7. According to 10-A DCMR § 227.8, Medium Density Residential areas may include mid-rise apartment buildings, and the RA-4 zone, with its height and density allowances, fits within this category. Additionally, the RA-4 zone is defined in the zoning regulations as medium- to high-density residential, and is therefore appropriate in the medium-density land use designation. The RA-4 zone enables a balanced approach to residential development by permitting increased density while maintaining compatibility with the surrounding neighborhood context, especially in areas where additional housing is needed near transit and services.

Furthermore, the adaptive reuse of the existing church on the Property, which will be converted into residential units, likely means that the maximum height of 90 feet allowed under the RA-4 zone will not be fully utilized, resulting in redevelopment and adaptive reuse that is compatible with the neighborhood. This is due to potential structural limitations of the historic building, which may restrict extensive vertical expansion. As such, the development aligns with the Medium Density Residential designation's emphasis on the existence of pockets of varying densities within this designation. *See* 10-A DCMR § 227.7. The focus on adaptive reuse also helps preserve the character of the area while contributing to the city's broader goals of providing housing, including affordable units, in areas that are well-connected to public transportation and neighborhood amenities. This approach strikes a balance between promoting residential development and respecting the existing character and constraints of the site.

The Guidelines for Using the Generalized Policy Map and Future Land Use Map provide flexibility in interpreting the appropriate zoning for areas, allowing districts like RA-4 to be considered suitable under the Medium Density Residential designation. *See* 10-A DCMR § 228.1. FLUM is not a strict zoning map but rather a generalized depiction of desired land uses. *Id.* It is intended to be interpreted broadly, with "soft edges" that do not follow parcel-specific boundaries or specify exact development standards such as height or use. *Id.* Instead, the FLUM reflects long-term land use objectives, providing flexibility for developments that may exceed typical densities or heights when appropriate, such as through Planned Unit Developments or Inclusionary Zoning bonuses. *Id.* This broad interpretation supports the consideration of RA-4 in areas where medium-density residential uses are intended, allowing for higher density to meet the city's housing goals while maintaining overall consistency with the land use designation.

Additionally, the FLUM allows for a range of densities and intensities within each category, acknowledging that individual buildings or zones may vary in size and character. *See* 10-A DCMR § 228.1. The zoning of a given area, such as the RA-4 zone, should be guided by the FLUM but also interpreted in conjunction with the Comprehensive Plan's text, including citywide and area-specific elements. *Id.* This flexibility recognizes that although the RA-4 is not specifically listed in the Medium Density Residential description, it is nonetheless compatible with Medium Density Residential designations in certain contexts, especially when the site conditions, adjacent uses, and the need for housing justify greater density. This ensures that the RA-4 zoning can

reinforce the goals of the Medium Density designation by contributing to increased housing supply while respecting the broader intent of the land use category.

Therefore, the proposed RA-4 zone, which allows for a density of 3.5 FAR, or 4.2 FAR with Inclusionary Zoning (“IZ”), is not inconsistent with the Medium Density Residential designation.

C. Generalized Policy Map

The purpose of the GPM is to categorize how different parts of the District may change between 2005 and 2025. It highlights areas where more detailed policies are necessary, both within the Comp Plan and in follow-up plans, to manage this change. *See* 10-A DCMR § 225.1. The GPM is intended to “guide land use decision-making in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps. Boundaries on the map are to be interpreted in concert with these other sources as well as the context of each location.” *See* 10-A DCMR § 225.2.

As shown below, the Property is designated within a **Neighborhood Conservation Area**.

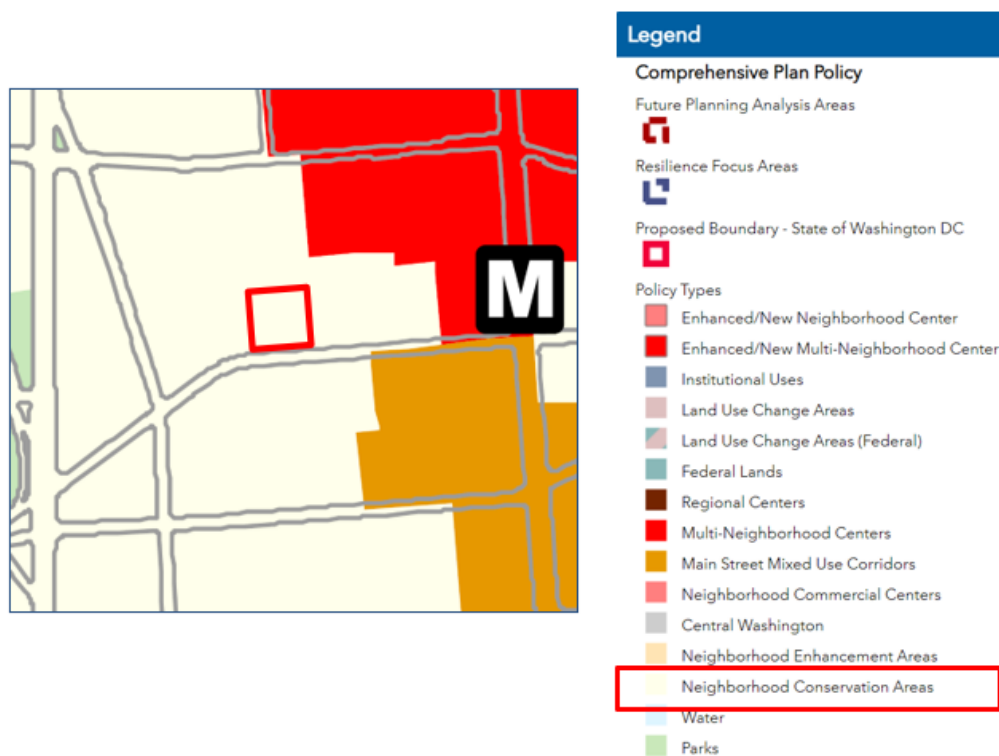


Figure 2: Generalized Policy Map

- **Neighborhood Conservation Area:** 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. *See* 10-A DCMR § 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. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. *See* 10-A DCMR § 225.5.

The proposed map amendment to the RA-4 zone is consistent with the policies of the Neighborhood Conservation Area designation as outlined in the Comp Plan. While these areas are primarily residential with limited vacant land, modest infill development is expected, and the RA-4 zone would support infill housing and redevelopment opportunities that are compatible with the established community while providing a responsible approach to managing growth. This aligns with the designation's vision for modest growth, focusing on supporting housing needs and providing opportunities for new residential development that respects the existing community.

The Neighborhood Conservation designation also emphasizes the importance of addressing citywide housing needs, including the provision of affordable housing, especially in areas with access to services and amenities. The proposed RA-4 zone would enable more housing options, particularly in a Metro-accessible location, by increasing the site's potential to provide both market-rate and affordable housing. This type of development aligns with the goal of ensuring neighborhood growth while maintaining its overall character and accommodating housing affordability within context-sensitive development.

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

D. Mid-City Area Element

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

The Mid-City Planning Area, though one of the smallest of Washington, DC's ten planning areas by size, is among the most diverse. *See* 10-A DCMR § 2000.2. It is also the most densely populated, characterized by a rich urban history that began developing in the late 19th century. *Id.* The area features a mix of row houses, large apartment complexes, and is home to several prominent institutions. *Id.*

The Mid-City Planning Area is a vibrant cultural hub with a strong international influence, serving as the center of Washington, DC's Latino business community and home to a historic Black business corridor. *See* 10-A DCMR § 2000.3. Known for its lively nightlife, ethnic restaurants, and walkable neighborhoods like 18th and U Streets NW, the area embodies the best of urban living. *Id.* Well-connected by public transportation, including the Metro Green and Yellow Lines, bus routes, and bike trails, the area also features the Metropolitan Branch Trail, offering recreational and park space. *Id.* Mid-City neighborhoods, such as U Street, Mount Pleasant, and LeDroit Park, have a strong sense of identity, with notable historic landmarks and community events like Adams Morgan Day and the DC Funk Parade celebrating local culture. *See* 10-A DCMR § 2000.4.

The Mid-City Planning Area has seen significant development, including new housing and retail. *See* 10-A DCMR § 2007.3. However, rising property values and costs have raised concerns about affordability for moderate- and lower-income residents, particularly in Columbia Heights, where many affordable units are at risk of expiring. *See* 10-A DCMR § 2000.6. As a result, many residents are being priced out, highlighting the need for diverse housing options, especially affordable and family-sized units. *See* 10-A DCMR § 2007.3. Increased development has also brought traffic congestion, particularly near the Columbia Heights Metro 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.*

Area Element Evaluation

The proposed rezoning of the Property to the RA-4 zone, along with the potential adaptive reuse of an existing church for residential and affordable housing, directly advances several key policies from the Mid-City Area Element of the Comprehensive Plan. Policy MC-1.1.1: Neighborhood Conservation emphasizes the importance of retaining and enhancing the area's historic character, including its apartment houses and walkability. The potential adaptive reuse of the church will incorporate historically significant portions of the building into the future development, thus contributing to the neighborhood's architectural heritage. Additionally, the Property's proximity to neighborhood services and transportation reinforces the area's mixed-use, pedestrian-oriented environment, ensuring the development complements the existing community fabric.

Policies MC-1.1.2: Directing Growth and MC-1.1.3: Infill and Rehabilitation are advanced by the Property's transformation into transit-oriented housing and affordable housing. The proposal supports the policy of stimulating growth near transit corridors, particularly in Columbia Heights,

by creating mixed-income housing, which includes affordable units. Redevelopment of this Property and the introduction of housing opportunities also contribute to the community's growth, filling a gap in housing needs and enhancing the character of the area. Moreover, the integration of Policy MC-1.1.12: Green Development Practices through enhanced landscape and stormwater features that would be required in future redevelopment of the Property furthers Mid-City's goals of sustainable development by employing bioretention and other methods to manage surface runoff.

The proposal also addresses Policies MC-1.2.1: Cultural Diversity and MC-1.1.7: Preservation of Affordable Housing by ensuring the inclusion of affordable housing units upon redevelopment of the Property. This helps maintain Mid-City's diversity, making housing accessible to residents of varying income levels, and contributing to the mixed-income character of the neighborhood. Furthermore, the greening efforts, in line with Policy MC-1.2.6: Neighborhood Greening, will enhance the aesthetic and environmental quality of the area through additional green spaces, street plantings, and sustainable practices. This combination of historic preservation, adaptive reuse, and new housing in a transit-rich, culturally diverse area reflects a comprehensive approach to neighborhood growth, conservation, and sustainability.

The proposed rezoning to RA-4 will not be inconsistent with the Mid-City Area Element overall, and specifically with the policies listed below.

MC-1.1 Guiding Growth and Neighborhood Conservation

- MC-1.1.1: Neighborhood Conservation
- MC-1.1.2: Directing Growth
- MC-1.1.3: Infill and Rehabilitation
- MC-1.1.7: Preservation of Affordable Housing
- MC-1.1.12: Green Development Practices

MC-1.2 Conserving and Enhancing Community Resilience

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

E. Land Use Element

The Land Use Element is the cornerstone of the Comp Plan. It establishes the basic policies guiding the physical form of the District, and provides direction on a range of development, preservation, and land use computability issues. The element describes the range of considerations involved in accommodating an array of land uses within Washington, D.C. *See* 10-A DCMR § 300.1. Through its policies and actions, the Land Use Element addresses the numerous, challenging land use issues that are present in the District, including, among others:

- Providing adequate housing, particularly affordable housing;
- Enhancing neighborhood commercial districts and centers;
- Balancing competing demands for finite land resources;
- Directing growth and new development to achieve economic vitality and creating jobs while minimizing adverse impacts on residential areas and open spaces;

- Promoting transit-accessible, sustainable development; and
- Siting challenging land uses. 10-A DCMR § 300.2.

More than any other part of the Comp Plan, the Land Use Element lays out the policies through which growth and change occur. The Land Use Element integrates and balances competing policies of all the other District Elements. *See* 10-A DCMR § 300.3. The Implementation Element further recognizes the “overlapping nature” of the Comp Plan elements, stating that “an element may be tempered by one or more of the other elements,” and further states, “because the Land Use Element integrates the policies of all other District Elements, it should be given greater weight than the other elements.” *See* 10-A DCMR § 2504.6.

The policies and actions of the Land Use Element all aim to utilize land resources efficiently to achieve the following goals:

- Protect the health, safety, and welfare of District residents, institutions, and businesses;
- Address past and current inequalities disproportionately impacting communities of color;
- Provide for additional . . . employment opportunities; and
- Effectively balance the competing demands for land. *See* 10-A DCMR § 302.1.

Land Use Element Evaluation

The proposed rezoning of the Property to the RA-4 zone, advances multiple policies from the Land Use Element. Policies LU-1.4.2: Development Around Metrorail Stations and LU-1.4.3: Housing Around Metrorail Stations are directly supported by the proposed map amendment, as it emphasizes the development of housing adjacent to public transportation. The Property is located 0.2 miles from the Columbia Heights Metro station and from several bus lines on 14th Street, including the 54, 52, 59, and D32 lines. By reducing reliance on automobiles and maximizing transit use, the proposal ensures a sustainable, transit-oriented development. The inclusion of affordable housing in future redevelopment further aligns with these policies, leveraging the proximity to transit to enhance housing affordability, particularly for moderate- and low-income households. Future redevelopment of the Property will respect the existing character of the neighborhood while addressing the city's broader housing needs.

The potential adaptive reuse of the historically significant portions of the existing church also aligns with Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods, which emphasizes balancing the need for additional housing with historic preservation and environmental goals. Additionally, Policy LU-1.5.1: Infill Development is advanced by redeveloping the Property in a manner that complements the existing urban fabric without creating sharp contrasts in design or scale, further enhancing the neighborhood's character.

Moreover, the landscape enhancements and stormwater management features resulting from future redevelopment of the Property will contribute to Policy LU-2.2.4: Neighborhood Beautification. By improving the visual quality of the area with landscaping and green infrastructure, the proposed rezoning fosters a more pedestrian-friendly and aesthetically pleasing

environment. The combination of adaptive reuse, sustainable practices, and affordable housing development fulfills key policy objectives, resulting in a holistic approach to addressing urban growth, sustainability, and community revitalization.

Upon evaluation of the Land Use Element policies and actions, the Applicant finds that the proposed rezoning to RA-4 is not inconsistent with the Land Use Element overall and actively supports racial equity by increasing access to affordable housing in a high-cost neighborhood, fostering inclusive growth near public transit, and promoting a diverse range of housing options. The proposal directly addresses disparities in housing affordability, particularly for low- and moderate-income households, by ensuring that new residential units serve a mix of incomes, household types, and demographic groups. Additionally, future redevelopment of the Property will help to create opportunities for long-term residents to remain in the community while benefitting from enhanced neighborhood services, transit accessibility, and environmental improvements. This approach helps to address historical inequities in housing access and affordability, promoting a more inclusive and equitable future for the area.

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

LU-1.4: Transit-Oriented and Corridor Development

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

LU-1.5: Neighborhood Infill Development

- LU-1.5.1: Infill Development

LU-2.1: A District of Neighborhoods

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

LU-2.2 Maintaining Community Standards

- LU-2.2.4: Neighborhood Beautification

F. Transportation Element

The Transportation Element provides policies and actions that are devoted to maintaining and improving the District's transportation system and enhancing the travel choices available to District residents, visitors, and workers. These transportation-related policies are integrally related to other Comp Plan policies that address land use, urban design, and environmental protection. The close interplay between these policy areas is necessary to improving safety, mobility, and accessibility in the District. *See* 10-A DCMR § 400.1.

The overarching goal for transportation in the District is to “[c]reate a safe, sustainable, equitable, efficient, and multimodal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhance the quality of life for District residents.” *See* 10-A DCMR § 401.1.

Transportation Element Evaluation

The proposed rezoning of the Property to the RA-4 zone aligns with key transportation policies in the Comp Plan. Policy T-1.1.4: Transit-Oriented Development is supported by the Property’s proximity to public transportation and its potential to create a pedestrian-friendly environment. By redeveloping the Property near the prominent 14th Street corridor with access to neighborhood services and public transit, future redevelopment of the Property may encourage pedestrian improvements. Enhancements to last-mile connections, such as sidewalks and safe pedestrian crossings, will help prioritize pedestrian safety and improve access to transit, which aligns with the goals of transit-oriented development.

Additionally, the future redevelopment of the Property will advance Policy T-1.1.7: Equitable Transportation Access by providing accessible, affordable housing options in close proximity to public transportation. This will enhance transportation equity by ensuring that residents, including those of diverse incomes, races, and physical abilities, have reliable and safe access to transit, reducing transportation barriers to economic and educational opportunities. The proposal also supports Policy T-1.3.1: Transit-Accessible Employment by increasing housing density near transit, which can improve access to jobs, particularly for low-income residents. In doing so, it leverages transit infrastructure to promote equitable economic mobility within the region.

Furthermore, the future redevelopment of the Property will contribute to Policy T-2.4.1: Pedestrian Network and Policy T-2.4.2: Pedestrian Safety by potentially improving pedestrian facilities around the Property. Future redevelopment may require infrastructure upgrades that enhance pedestrian safety through well-marked crosswalks, signal timing adjustments, or accessible pathways, ensuring a safe and secure pedestrian environment. These improvements will create a cohesive, accessible network that enhances walkability, reinforcing the neighborhood’s connection to public transit and services.

The proposed map amendment advances racial equity by enabling the development of affordable housing adjacent to public transportation, addressing historic barriers to transportation access faced by communities of color. By supporting equitable transportation access and transit-oriented development, future redevelopment of the Property with affordable housing ensures that low-income residents, often disproportionately people of color, benefit from reliable, affordable transit, reducing commuting costs and enhancing access to jobs, education, and services. Additionally, improvements to pedestrian infrastructure will enhance safety and accessibility, particularly for vulnerable populations such as older adults and individuals with disabilities. The proposed map amendment promotes equitable growth, economic mobility, and inclusivity due to its proximity to transit-accessible housing and infrastructure.

Accordingly, the map amendment is not inconsistent with the Transportation Element and advances the specific policies listed below:

T-1.1 Land Use: Transportation Coordination

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

T-1.3 Regional Smart Growth Solutions

- T-1.3.1: Transit-Accessible Employment

T-2.4 Pedestrian Access, Facilities, and Safety

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

G. Housing Element

The Housing Element describes the importance of housing to neighborhood quality in the District, and the importance of providing housing opportunities for all segments of the population throughout the District. *See* 10-A DCMR § 500.1. The District continues to face significant demand for more housing, and – in particular – affordable housing across a range of income levels. Other critical housing issues that the District is facing include furthering fair housing opportunities, especially in high-cost areas; fostering housing production to improve affordability; promoting more housing near transit; maintaining healthy homes for residents; and providing housing integrated with supportive services for older adults, vulnerable populations, and residents with disabilities. *See* 10-A DCMR § 500.2.

The overarching goal of the Housing Element is to develop and maintain new residential units to achieve a total of 36,000 new units by 2025, 12,000 of which are dedicated affordable, that provide a safe, decent, accessible, and affordable supply of housing for all current and future residents of the District. *See* 10-A DCMR § 501.1. A multi-pronged strategy is needed to facilitate production, address regulatory and administrative constraints, and deliver a substantial number of the new units that are affordable to District residents, particularly to moderate and lower income residents. *See* 10-A DCMR § 502.5.

Housing Element Evaluation

The proposed rezoning to the RA-4 zone, which allows greater density that will support residential and affordable housing units, advances several key housing policies. Policy H-1.1.1: Private Sector Support and Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority are actively supported by encouraging private sector investment in both market-rate and affordable housing in alignment with the District's land use objectives. The proposed map amendment will enable the creation of much-needed residential units in a Metro-accessible area with access to a variety of neighborhood services, supporting balanced growth and housing supply, particularly in areas where underutilized land can accommodate higher-density housing. The proposed map amendment contributes to addressing the District's long-term housing needs, especially for low- and moderate-income households, helping to mitigate displacement and meet affordability goals.

Assuming that future redevelopment of the Property maximizes the RA-4 density and height, the following IZ+ set aside may be achieved.

Property

- Land Area: 19,460 sq. ft.
- Maximum RA-2 FAR, residential: 1.8; 2.6 with IZ
- Maximum RA-2 Height: 50 ft. (Non-Type I Construction)
- Maximum RA-4 FAR, residential: 3.5; 4.2 with IZ
- Maximum RA-4 Height: 90 ft. (Type I Construction)

Existing RA-2 Zone (Non-Type I Construction)

Total matter of right (“MOR”) GFA	35,028 sq. ft.
Total GFA with IZ	50,596 sq. ft.
10% of Residential GFA	5,060 sq. ft.
75% of Bonus Density	$15,568 \times 0.75 = 11,676$ sq. ft.
IZ Set-Aside Requirement:	11,676 sq. ft. (75% of bonus density utilized)

IZ Plus for Rezoning from RA-2 to RA-4 (Type I Construction)

Total GFA with IZ for RA-2 (exclusive of bonus IZ sq. ft., pursuant to 11-X DCMR § 502.4)	35,028 sq. ft.
Total GFA with IZ for RA-4	81,732 sq. ft.
Percent Increase in Total FAR Utilized	133%
18% of Residential GFA	14,712 sq. ft.
70% of Utilized Bonus Density	$46,704 \times 0.7 = 32,693$ sq. ft.
IZ Set-Aside Requirement	32,692 sq. ft. (70% of bonus density utilized)

Additionally, the inclusion of affordable housing in future redevelopment of the Property meets Policy H-1.2.3: Affordable and Mixed-Income Housing by fostering mixed-income communities in high-cost neighborhoods like Columbia Heights. This approach will help distribute affordable housing more equitably across the District and avoid further concentrations of poverty, promoting demographic diversity and fulfilling fair housing requirements.

Furthermore, the proposed map amendment embodies the goals of Policy H-1.2.6: Build Nonprofit Sector Capacity by leveraging the church’s faith-based mission to provide affordable housing. With the involvement of a nonprofit institution for the adaptive reuse of the church, future redevelopment of the Property will maximize opportunities for affordable housing and ensure long-term affordability, which aligns with Policy H-1.2.11: Inclusive Mixed-Income Neighborhoods. This will not only maintain the neighborhood's character but also contribute to the racial and economic diversity of the area, creating sustainable, inclusive growth that benefits all residents.

The proposed rezoning and future redevelopment of the Property advances racial equity by increasing access to affordable housing in a well-resourced neighborhood. By distributing

affordable housing more equitably across the District and creating mixed-income communities, the proposed map amendment helps address racial income disparities and mitigates displacement in a rapidly developing area. Additionally, the involvement of a nonprofit faith-based institution in providing long-term affordable housing supports inclusive growth and enhances access to economic and educational opportunities for low- and moderate-income households, particularly communities of color. This approach fosters a more equitable and diverse housing landscape across the District.

Accordingly, the proposed map amendment serves a multitude of the District's housing goals and advances many policies of the Housing Element, particularly those enumerated below:

H-1.1 Expanding Housing Supply

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

H-1.2 Ensuring Housing Affordability

- H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- H-1.2.2: Production Targets
- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.6: Build Nonprofit Sector Capacity
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- H-1.2.11: Inclusive Mixed-Income Neighborhoods

H. Environmental Protection Element

The Environmental Protection Element addresses the protection, conservation, and management of Washington, D.C.'s land, air, water, energy, and biological resources. This Element provides policies and actions for addressing important issues such as climate change, drinking water safety, the restoration of the tree canopy, energy conservation, air quality, watershed protection, pollution prevention, waste management, the remediation of contaminated sites, and environmental justice. The biological, chemical, and hydrologic integrity of the environment are key indicators of the quality of life in the District. Furthermore, environmental sustainability is linked to resilience, population health, and community prosperity. Good environmental management and pollution prevention are essential to sustain all living things and to safeguard the welfare of future generations. *See* 10-A DCMR § 600.1.

The overarching goal for the Environmental Protection Element is to protect, restore, and enhance the natural and human-made environment in Washington, D.C., taking steps to improve environmental quality and resilience, adapt to and mitigate climate change, prevent and reduce pollution, improve human health, increase access to clean and renewable energy, conserve the value and functions of the District's natural resources and ecosystem, and educate the public on ways to secure a sustainable future. *See* 10-A DCMR § 601.1.

Environmental Protection Evaluation

The proposal to rezone the Property to the RA-4 zone, allowing for the future redevelopment of the Property, will advance several environmental policies from the Comp Plan. Policy E-1.1.2: Urban Heat Island Mitigation and Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff are supported by the incorporation of green roofs, tree planting, and enhanced landscaping features. By potentially including these sustainable design elements, the proposed map amendment will mitigate the urban heat island effect, particularly in a dense, urban setting where heat-vulnerable residents are more likely to be affected. The use of green roofs and permeable materials also aligns with Policy E-4.1.1: Maximizing Permeable Surfaces by reducing stormwater runoff and increasing absorption, enhancing the site's overall environmental performance.

Furthermore, the proposal promotes Policy E-2.1.3: Sustainable Landscaping Practices by implementing sustainable landscaping, such as planting native trees and creating vegetated spaces that not only beautify the area but also reduce stormwater runoff, which will be a consideration upon redevelopment of the Property. Future redevelopment of the Property also supports Policy E-3.2.7: Energy-Efficient Building and Site Planning by exceeding minimum energy code requirements through energy-efficient building practices, reducing long-term operational costs, and contributing to the District's clean energy goals. By focusing on energy efficiency, sustainable site planning, and green building methods, the proposed map amendment will enhance the environmental resilience of the area while providing residents with affordable and energy-efficient homes.

Additionally, the proposed map amendment aligns with Policy E-4.2.1: Support for Green Building, as future redevelopment would likely incorporate green building standards into redevelopment of the Property. The proposed future redevelopment of the Property may be designed to reduce energy consumption and support long-term environmental sustainability through the use of energy-efficient systems, in line with Policy E-3.2.5: Reducing Home Heating and Cooling Costs. This not only conserves natural resources but also helps lower utility costs for residents, especially benefiting those with limited financial resources. By integrating environmental best practices, the proposed map amendment contributes to a more sustainable, resilient, and equitable urban landscape.

These environmental policies advance racial equity by promoting sustainable and energy-efficient housing in an apartment zone, which benefits low- and moderate-income residents, often disproportionately people of color. By mitigating the urban heat island effect, reducing stormwater runoff, and incorporating green roofs and energy-efficient systems, the proposed map amendment supports healthier living environments for vulnerable communities. Additionally, the use of green building practices and the reduction of heating and cooling costs help lower utility expenses for residents, enhancing affordability and improving long-term financial stability. These measures ensure that historically disadvantaged groups benefit from environmentally sustainable and cost-efficient housing, contributing to more equitable living conditions.

Accordingly, the proposed map amendment is not inconsistent with the Environmental Protection Element and advances the specific policies listed below:

E-1.1 Preparing for and Responding to Natural Hazards

- E-1.1.2: Urban Heat Island Mitigation

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

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

E-3.2 Conserving Energy and Reducing GHG Emissions

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

E-4.1 Green Infrastructure GI

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

E-4.2 Promoting Green Building

- E-4.2.1: Support for Green Building

IV. Analysis of Potential Inconsistencies with the Comprehensive Plan

Notwithstanding the numerous policies across the Comp Plan's various elements that the proposed Zoning Map amendment would advance, an analysis of potential inconsistencies with the Comp Plan is also necessary to demonstrate that the RA-4 zone is "not inconsistent with the Comp Plan[.]" See 11-X DCMR § 500.3. As established by the Court, it is not sufficient to simply identify the policies that would be advanced when evaluating a proposal for consistency with the Comp Plan. Rather, because of the overlap within and between the elements, the evaluation must also recognize where there may be potential inconsistencies.³

In the event there are inconsistencies, an explanation must be provided as to why said inconsistencies are outweighed by the advancement of other policies and considerations. A "roadmap" of sorts for evaluating a proposal's consistency with the Comp Plan can be found in the Court's initial review of the McMillan Planned Unit Development ("PUD"):

The Comprehensive Plan is a "broad framework intended to guide the future land use planning decisions for the District." *Wisconsin-Newark Neighborhood Coal. v. District of Columbia Zoning Comm'n*, 33 A.3d 382, 394 (D.C. 2011) (internal quotation marks omitted). "[E]ven if a proposal conflicts with one or more individual policies associated with the Comprehensive Plan, this does not,

³ Since first being adopted by the D.C. Council, the Comprehensive Plan has always recognized that there is intentional overlap between its individual components (elements), and that it is intended to be a policy framework that is to be interpreted broadly and provide guidance to all executive and legislative decision making. Indeed, the first Comprehensive Plan adopted in 1984 stated "[t]he primary dynamic of the District elements of the Plan are the overlapping of its elements' goals. This overlapping is intentional." See Section 102, District of Columbia Comprehensive Plan Act of 1984. The current Implementation Element reflects the same language: "[r]ecognize the overlapping nature of the Comprehensive Plan elements as they are interpreted and applied. An element may be tempered by one or more of the other elements." 10-A DCMR § 2504.6.

in and of itself, preclude the Commission from concluding that the action would be consistent with the Comprehensive Plan as a whole.” *Durant v. District of Columbia Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013). The Comprehensive Plan reflects numerous “occasionally competing policies and goals,” and “[e]xcept where specifically provided, the Plan is not binding.” *Id.* at 1167, 1168 (internal quotation marks omitted). Thus “the Commission may balance competing priorities in determining whether a PUD is consistent with the Comprehensive Plan as a whole.” *D.C. Library Renaissance Project/West End Library Advisory Grp. v. District of Columbia Zoning Comm’n*, 73 A.3d 107, 126 (D.C. 2013). “[I]f the Commission approves a PUD that is inconsistent with one or more policies reflected in the Comprehensive Plan, the Commission must recognize these policies and explain [why] they are outweighed by other, competing considerations.” *Friends of McMillan Park v. District of Columbia Zoning Comm’n*, 149 A.3d 1027, 1035 (D.C. 2016) (brackets and internal quotation marks omitted).

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

A. E-3.2.2: Net-Zero Buildings

Policy E-3.2.2 aims to encourage incentives that enable buildings to achieve net-zero energy design standards, a crucial aspect of D.C.'s broader objective to eliminate all carbon emissions by 2050. However, it is currently unknown if future redevelopment of the Property will include net-zero buildings due to the financial impact it could have on the number of potential dwelling units and affordable dwelling units that could be accommodated on the Property, or due to the historic nature of the church and its ability to accommodate net-zero energy design standards. However, future development will comply with the Green Building Act and the District's storm water management regulations, and will be consistent with the Sustainable D.C. Plan.

B. E-3.2.3: Renewable Energy

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

V. Part Two: Applicant's Community Outreach and Engagement

As required by Part Two of the Racial Equity Tool, the Applicant has conducted outreach to the affected Advisory Neighborhood Commission ("ANC").

In addition to proactive engagement, Part Two of the Racial Equity Tool also requires the Applicant to consider the affected community and address various questions as they pertain to the proposed zoning action, to the extent possible. The Applicant's responses are provided below.

A. Community(ies)

The Congress for the New Urbanism ("CNU") defines a "community" as "a group of people living in the same place or having a particular characteristic in common." Many places have different communities inhabiting them, such as an elderly, or arts, or ethnic community living and/or working in close proximity to one another. Even the internet can be considered a place inhabited by many diverse communities. The scale, parameters, and character of a community-scaled planning effort can be difficult to define. See CNU.org, Public Square.

What community is impacted by the zoning action?

The community that would be most impacted by the proposed map amendment is the Columbia Heights neighborhood. Columbia Heights is a diverse, densely populated, and transit-accessible area. The neighborhood is known for its mix of residents, including long-time DC natives, recent transplants, and a large immigrant community, particularly of Latino descent. The area includes a variety of housing types, from historic rowhouses to newer apartment buildings, as well as affordable housing developments. It is a vibrant, mixed-use area with easy access to public transportation, including the Columbia Heights Metro station, and is home to retail, restaurants, schools, and community services.

Rezoning the Property to the RA-4 zone would likely impact this diverse population by potentially altering the housing landscape. New residential units, including affordable housing, could provide opportunities for existing residents and newcomers, but there could also be concerns related to changes in neighborhood character or affordability for current residents in the event that redevelopment of the Property increases the tax obligations of adjacent properties.

What specific factors define the impacted community?

The Comp Plan identifies several factors that define the Columbia Heights neighborhood:

- **Diversity and Demographics**: Columbia Heights is known for its diverse population, with no single racial or ethnic group constituting a majority. The neighborhood includes White, Asian, Black, and Hispanic/Latino residents, each making up at least 10 percent of the population. 10-A DCMR § 2001.12.
- **Housing and Development**: The area features a mix of housing types, including high-priced condominiums, townhouses, public housing, and middle-income housing. There are also multimillion-dollar homes. The neighborhood has seen significant development,

particularly around the Columbia Heights Metro station, which has spurred the construction of new housing and commercial spaces. 10-A DCMR § 2001.12.

- **Commercial and Cultural Hub:** Columbia Heights is a vibrant commercial and cultural hub with numerous new restaurants, shops, and nightlife options. The opening of the Columbia Heights Metro station and the development of the DC USA commercial center have been pivotal in the neighborhood's revitalization. 10-A DCMR §§ 2001.11-12.
- **Public and Institutional Facilities:** The neighborhood includes several public schools, including nine public charter schools. It also has a variety of public facilities and institutions that contribute to the community's character. 10-A DCMR § 2001.12.
- **Community and Activism:** Columbia Heights has a strong sense of community and a tradition of neighborhood activism. Nonprofits like the Latino Economic Development Corporation and the Columbia Heights Development Corporation are active in community affairs. 10-A DCMR § 2000.5.
- **Transportation and Accessibility:** The area is well-served by the District's transportation system, including the Metro Green and Yellow Lines, numerous bus lines, and several cross-town arterials. The neighborhood's accessibility has been a key factor in its development and appeal. 10-A DCMR § 2000.3.

These factors collectively define Columbia Heights as a diverse, vibrant, and dynamic neighborhood with a rich mix of housing, commercial activities, cultural institutions, and strong community engagement.

Who would potentially be burdened as a result of the zoning action?

Those who may be burdened in the short term as a result of the map amendment include residents living in residential buildings located adjacent to the Property, which could be impacted by construction and associated nuisances, such as truck traffic and noise. Future development of the Property could result in additional residential density, resulting in increased traffic that may be considered a burden on residential or nonresidential neighbors.

New development also has the potential to increase the assessed value of properties adjacent to the Property, which may result in increased property taxes. However, the Office of Tax and Revenue offers tax relief and credit programs to assist eligible homeowners with increased property taxes, including the Assessment Cap Credit, Senior Assessment Cap Credit, First-Time Homebuyer Individual Income Tax Credit, Homestead Deduction, Individual Income Property Tax Credit, Lower Income Home Ownership Tax Abatement, Lower Income, Long-Term Homeowners Tax Credit, and Low-Income Senior Citizen Property Tax Deferral. See [DC Office of Tax and Revenue](#).

The Comp Plan verifies the success of these programs, providing that “[t]he District has taken enormous strides toward strengthening its affordable housing infrastructure. The city has some of the strongest tenant protection provisions in the country; the highest level, per capita, for affordable housing investment; the lowest residential real property tax rate in the region; and

provides additional discounts for seniors and renters. It has innovative programs such as tax abatements to stimulate the development of workforce housing. From 2015 to 2018, the District of Columbia has successfully delivered, through subsidy or inclusionary zoning, 5,352 new or preserved affordable housing units.” *See* 10-A DCMR § 206.11.

Within the community, who would potentially benefit as a result of the zoning action?

Future redevelopment of the Property enabled by the map amendment would result in many benefits to the community, potentially including streetscape improvements consistent with DDOT standards, such as wider sidewalks, the installation of street trees, and enhanced lighting, thereby increasing pedestrian safety and comfort while simultaneously expanding equity by making the area more accessible. In addition, the community would benefit from a redevelopment that potentially increases residential density and affordable housing. Future redevelopment of the Property would further enhance the neighborhood, as it would offer housing and affordable housing in a transit-accessible area.

Therefore, those who would potentially benefit from future development of the Property include current and future residents who will enjoy upgraded, safer, and modern homes, and residents seeking a different housing unit within the neighborhood.

B. Past and Present Racial Discrimination / Harm to Community

Are there negative conditions in the community that are the result of past or present discrimination?

The [Ward 1 Heritage Guide](#) (“Guide”) is intended to identify historic or culturally important places in Ward 1 and to provide a framework for developing strategies necessary to capitalize on, and if necessary, protect these historic resources. The Guide’s historical perspective presents several negative conditions in the Ward 1 communities that are the result of past or present discrimination:

- **Racial Segregation and Restrictive Covenants**: In the 1920s, restrictive racial covenants confined African American residents primarily to areas east of 13th Street in Columbia Heights. *See* Guide, p. 21.
- **Economic Decline Post-1948**: 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. *See* Guide, p. 21.
- **1968 Riots and Slow Reinvestment**: 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 Metro construction delays. *See* Guide, p. 22.

The historical discrimination faced by the Columbia Heights community has left a lasting impact, shaping the neighborhood's development and socio-economic landscape. Restrictive racial covenants in the 1920s confined African American residents to certain areas, creating divisions that affected housing access and community cohesion. The economic decline that followed the lifting of these covenants in 1948 saw many affluent residents relocate, which, in turn, led to overcrowding and deterioration in remaining housing stock. Additionally, the devastation from the 1968 riots and subsequent delays in community reinvestment compounded these challenges, leaving Columbia Heights with economic and infrastructural setbacks. These events underscore how past discriminatory practices and slow recovery efforts have contributed to enduring inequities in the community.

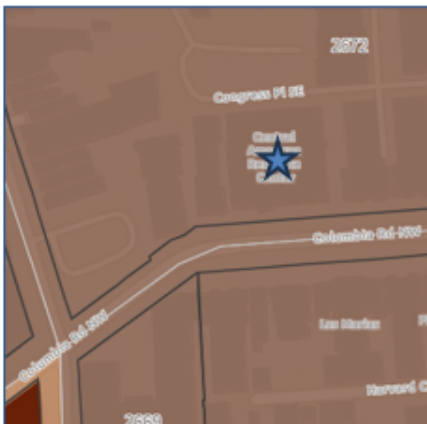
Restricted Housing and Racial Change, 1950



Restricted Housing and Racial Change, 1960



Restricted Housing and Racial Change, 1970



Legend

Square Boundaries



Restricted by Petition



Restricted by Deed



Waterbodies (1999)



Nonwhite Households: 1970

% Nonwhite Persons

80-100

60-80

40-60

20-40

1-20

Source 1: Mapping Segregation in DC

The racial covenant maps above illustrate the significant demographic change in the neighborhood surrounding the Property between 1950 and 1970. This area was predominantly

white between 1950 and 1960 before shifting to predominantly non-white by 1970. *See Mapping Segregation in DC.*

This demographic transition is linked to the 1968 riots in Washington, DC, following the assassination of Dr. Martin Luther King Jr., which had a profound and lasting impact on the city. The unrest led to widespread destruction, including in the Columbia Heights neighborhood. Many businesses, homes, and community centers were burned or looted, leaving behind a landscape of devastation. The riots caused significant displacement of residents, as many were forced to leave their homes due to the destruction and the unsafe conditions that followed. This period of turmoil also accelerated the phenomenon known as "white flight," where many white residents moved to the suburbs, further exacerbating the economic and social challenges faced by the city. The exodus of businesses and residents left behind a weakened tax base, contributing to a decline in public services and infrastructure. The scars of the 1968 riots are still visible in some parts of the city today, serving as a reminder of the deep-seated issues of racial inequality and injustice that sparked the unrest.

Are there current efforts or ongoing efforts in the community that are addressing past discrimination described above?

The District government has established programs intended to address past discrimination perpetuated by redlining. The Black Homeownership Strike Force ("BHSF") acknowledges that D.C.'s history of redlining and racist real estate practices blocked Black households from attaining the "American Dream." [Black Homeownership Strike Force](#), p.5. The patterns established by redlining decades ago are visible today, as Black households are concentrated in the eastern wards of the city, particularly to the east of the Anacostia River. *Id.* at 7. The BHSF establishes a goal of gaining 20,000 net new Black homeowners by 2030 by implementing the following recommendations:

- Provide estate planning resources and legal services to assist with the transfer of ownership to homeowners and their heirs.
- Pass legislation to protect homeowners from unwanted solicitation regarding the sale or potential purchase of their homes.
- Establish a Homeowner Assistance Fund to aid Black homeowners at risk of foreclosure due to their inability to pay their mortgage and related housing fees.
- Provide homeownership units to Black owner occupant homebuyers with a mixed income requirement with an average income restriction of 80 percent MFI.
- Leverage the \$10 million Black Homeownership Fund to create a public-private fund where 1/3 of the units are affordable, 1/3 of the units are market rate and sold to Black owner-occupant homebuyers.
- Broaden awareness of programs to support homeownership.
- Increase the effectiveness of all homeownership programs to increase the ability of Black homebuyers using District programs to compete for homes in the current market.

The District's [Upward Mobility Action Plan](#) ("UMAP") also addresses disparities long entrenched through discriminatory policies, such as redlining and segregation and exacerbated by the COVID 19 pandemic. The UMAP introduces an approach to boosting mobility from poverty

in the District by aligning systems and programs for housing, financial wellbeing, and workforce development / adult education. *See Id.* at IV. In particular, community-based organizations that partnered with the District in this effort noted that homeownership remains the strongest pathway to prosperity. *See Id.* at II. The UMAP recommends a systemic approach to boost upward mobility by 1) improving residents experience of District programs; 2) aligning programs that help residents achieve stability and then mobility toward prosperity; 3) measuring progress for upward mobility; and 4) evaluating program effectiveness to improve resident outcomes. *See Id.* at 19–21.

These efforts work in combination with other existing programs within the District that provide resources for housing, including the IZ Affordable Housing Lottery, Home Purchase Assistance Program, Housing Choice Voucher Program, Foreclosure Prevention Resources, Employer Assisted Housing Program, Tenant Opportunity to Purchase Act, District Opportunity to Purchase Act, Public Housing, and Housing Assistance Payment Program, among others available through [Housing DC](#).

More specific to the Columbia Heights neighborhood, there are efforts underway to revitalize the community.

- **Affordable Housing Initiatives:** The DC government has prioritized affordable housing in Columbia Heights through various programs and investments. The IZ program and affordable housing trust funds aim to ensure that new developments include affordable units for low- and moderate-income residents. Additionally, specific projects like the redevelopment of public housing complexes, such as Park Morton, focus on preserving and expanding affordable housing options to prevent displacement.
- **Community Engagement and Legal Support:** Grassroots organizations and community groups in Columbia Heights, such as the Latino Economic Development Center (LEDC), advocate for residents' rights, ensuring that they have a voice in development decisions and providing legal support to fight against displacement. These organizations often work with residents on issues like eviction prevention, tenant rights, and access to affordable housing programs.

The Applicant will continue to work with the community to identify any additional ongoing efforts in the community intended to address past discrimination or current challenges due to past discrimination.

C. Community Participation / Outreach Efforts

The planning and development policies for the Mid-City Area Element derive from large Comp Plan workshops that took place in the Planning Area during the 2006 Comp Plan revision. These meetings provided an opportunity for residents to discuss neighborhood planning issues, as well as District-wide issues. Additional meetings were held on planning topics not directly connected to the Comp Plan, including the public realm and transportation improvements in Columbia Heights. *See* 10A DCMR § 2007.2

The community identified the following priorities during these meetings:

- The unique character that defines Mid-City neighborhoods should be preserved as infill development takes place.
- Housing opportunities should be increased for people at all income levels so that Mid-City can remain a diverse neighborhood. The District-wide rise in housing prices has particularly impacted Mid-City, as costs have soared beyond what many local residents can afford. Moderate-income families and lower-income residents are being priced out of the area, and there are concerns that the community is becoming affordable only to persons with high incomes.
- New condominiums, apartments, and commercial development should be directed to the areas that are best able to handle increased density, namely areas immediately adjacent to Metrorail stations or along high-volume transit corridors.
- The row house fabric that defines neighborhoods like Adams Morgan, Columbia Heights, Pleasant Plains, Eckington, and Bloomingdale should be conserved.
- Pedestrian safety, improved traffic operations, and parking management are all high priorities. Increased density within this already dense Planning Area creates busier streets—both for cars and for people. Despite its proximity to a Metro station, Columbia Heights will become more congested as 700 new housing units and 500,000 square feet of new retail space are opened.

10A DCMR § 1707.3

The proposed map amendment would address the above-mentioned community priorities by allowing for higher density housing and affordable housing and improvements to the public realm that would enhance the streetscape.

What unique factors about the affected community and/or communities influenced your outreach plan / efforts?

Columbia Heights is home to a racially, ethnically, and economically diverse community, with significant Latino, African American, and immigrant populations. Additionally, the neighborhood has a wide range of income levels, from low-income residents in affordable housing to wealthier newcomers. These socioeconomic differences create varying priorities and concerns, such as housing affordability and displacement for lower-income residents versus property value and amenities for higher-income individuals.

The Applicant has responded to these factors by engaging with the ANC early in the process, including its Housing Justice and Zoning Committee to discuss community priorities, which include the development of additional housing and affordable housing in the neighborhood.

How were your outreach efforts proactive in terms of meeting community needs and circumstances?

The Applicant sent the Notice of Intent to property owners located within 200 feet of the Property and the ANC on September 23, 2024. The Applicant then 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 on Monday, October 14, 2024. The Applicant described the map amendment application to the Commissioners, who expressed support for the proposed rezoning. The Applicant also presented to ANC 1A's Housing Justice and Zoning Committee on November 4, 2024, where the Committee voted unanimously to recommend that the full ANC support the proposed map amendment. The Applicant anticipates formally presenting the proposed map amendment to the full Housing Justice and Zoning Committee in November or December of 2024, and to the full ANC in December 2024.

The Applicant will continue to engage with the ANC to coordinate meetings with the Housing and Justice and Zoning Committee and the full ANC.

What was the overall timeframe and frequency of your outreach?

The Applicant engaged with the community as provided in the following table:

Engagement	Date	Result
Notice of Intent sent to property owners within 200 feet of the Property and the ANC	September 23, 2024	--
Meeting with Commissioners Morales, Perri and Ewart to introduce and discuss the proposed map amendment.	October 14, 2024	The Commissioners expressed support for the proposed rezoning.
Applicant presented the proposed map amendment to ANC 1A's Housing Justice and Zoning Committee	November 4, 2024	The Committee voted unanimously (6-0) to recommend that the full ANC support the requested rezoning of the property from the RA-2 to RA-4 zone. The Applicant anticipates attending ANC 1A's November or December meeting for the full Commission to vote on the application.

D. Community Priorities and Impact on Zoning Action

Has the community identified negative outcomes that could result from the zoning action, i.e. specific things the community doesn't want to change/happen as a result of the zoning action?

The ANC has indicated that the proposed redevelopment could result in increased traffic and has requested a traffic study during the permitting process for the future proposed development. The Applicant agreed to submit a traffic study or TDM plan as part of the building permitting process.

The Applicant will continue to work with the community and address concerns as they arise, including impact mitigation.

Has the community identified positive outcomes that could result from the zoning action, i.e. specific things the community wants to change as a result of the zoning action?

The ANC has indicated its support for housing and affordable housing, which will be advanced by the proposed map amendment.

Will members of the community be displaced (either directly or indirectly) as a result of the zoning action?

There will be no permanent displacement of any residents as a result of the zoning action. The existing church currently uses the building and it will relocate to a different location upon redevelopment of the Property.

Did community outreach inform/change your zoning action? If so, how does it incorporate or respond directly to the community input received?

Community outreach has not impacted the proposal because no plans will be submitted as part of the rezoning application. The criteria of 11-X DCMR § 500.3 does not require the Zoning Commission to assess the merits of a potential design, only the map amendment's consistency with the Comp Plan.

If the zoning action could potentially create negative outcomes, how will they be mitigated?

In the event that rezoning the Property to the RA-4 zone leads to potential negative outcomes, the Applicant will actively work to mitigate them through careful planning and community engagement. Some potential concerns, such as increased density and changes in land use, can be addressed through strategies like thoughtful building design and ensuring compatibility with the surrounding neighborhood character.

Traffic and parking concerns can also be managed by incorporating transportation demand management ("TDM") measures, promoting alternative transportation options, and working closely with DDOT to enhance pedestrian and transit infrastructure. Additionally, any concerns related to affordability can be mitigated by providing a mix of residential unit types, including affordable housing options, to support diverse household incomes and prevent displacement of residents within the Columbia Heights neighborhood.

The Applicant is committed to collaborating with the community, city agencies, and stakeholders to ensure that future redevelopment enabled by the map amendment contributes positively to the neighborhood while minimizing adverse impacts.

What input from the community was shared but not incorporated into the zoning action? Why?

The community has not provided input to incorporate into the zoning action, as the Application does not require architectural plans.

VI. Part Three: Disaggregated Data Regarding Race and Ethnicity

The Zoning Commission expects disaggregated race and ethnicity data from the **Office of Planning** in every racial equity analysis submission that analyzes a zoning action through a racial equity lens. The Applicant will provide any additional information as requested by the Zoning Commission.

VII. Part Four: Zoning Commission Evaluation

Part Four of the Zoning Commission's Racial Equity Tool provides the criteria with which the Zoning Commission shall evaluate a proposed action through a racial equity lens. This evaluation is guided by the following questions:

- *What Comprehensive Plan policies related to racial equity will potentially be advanced by approval of the zoning action?*
- *What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?*
- *When considering the following themes/questions based on Comprehensive Plan policies related to racial equity, what are the anticipated positive and negative impacts and/or outcomes of the zoning action?*

The table below indicates how the proposed map amendment will generally result in positive outcomes when considered through several racial equity themes, as it has the potential to address a number of equity issues that residents in the Mid-City Planning Area are experiencing. Throughout the processing of this Application, the Applicant will continue engaging with the affected ANC and community.

Evaluation of Equitable Development Indicators		
Indicator	Measure	Outcome / Applicable Public Benefit
Displacement		
Physical	<ul style="list-style-type: none">• Displacement due to redevelopment.	<ul style="list-style-type: none">• Displacement will not occur on the Property. The building is currently used by the church for church uses. These uses will be relocated upon redevelopment of the Property.• There are no residential residents currently residing on the Property.
Economic	<ul style="list-style-type: none">• Displacement due to housing cost increases.	<ul style="list-style-type: none">• Potential increase in permitted residential density can increase the supply of housing units, therefore contributing to a

		<p>decrease in the cost of housing overall.</p> <ul style="list-style-type: none"> · Potential increase in residential density will result in the provision of IZ+, providing units affordable at various MFI levels.
Cultural	<ul style="list-style-type: none"> · Loss of sense of belonging or shared identity in neighborhood. 	<ul style="list-style-type: none"> · Increased residential density provides an opportunity for residents to have open or amenity spaces within the development to meet and gather. · Redevelopment of the Property with increased residential units would allow more residents access to cultural amenities in Columbia Heights.
Housing	<ul style="list-style-type: none"> · Number of new market rate and dedicated affordable units (per 2019 Housing Equity Report). 	<ul style="list-style-type: none"> · Increase in amount of housing permitted on Property. · Increased IZ set aside through applicability of IZ+.
Housing Burden	<ul style="list-style-type: none"> · Households that pay more than 30% of income (burdened), or 50% of income (severely burdened) on housing. 	<ul style="list-style-type: none"> · Increase in amount of housing that can be provided to households earning no more than 60% (rental) or 80% (ownership) MFI. · 50% MFI units for any IZ set aside generated by penthouse habitable space.
Family-sized Units	<ul style="list-style-type: none"> · Dwelling units with 3 or more bedrooms. 	<ul style="list-style-type: none"> · Increased potential for larger units due to gain in overall permitted density.
Transportation		
Access to Transit	<ul style="list-style-type: none"> · 0.5 miles to Metrorail. · 0.25 miles to priority bus corridors and other modes of public transportation. 	<ul style="list-style-type: none"> · Located 0.2 miles from the Columbia Heights Metrorail station, which serves the Green Line and provides access to Metrobus routes 52, 54, 59, and H8.
Transportation Improvements / Pedestrian Safety	<ul style="list-style-type: none"> · Gaps in pedestrian network. · Lack of pedestrian facilities (crosswalks, lighting, seating, etc.). 	<ul style="list-style-type: none"> · Redevelopment is likely to include improvement of pedestrian connectivity with

		streetscape enhancements as required by DDOT.
Employment		
New Jobs	<ul style="list-style-type: none"> Establishment of new businesses Mixed use developments that include offices, restaurants, retail, or other uses. Construction of new development. 	<ul style="list-style-type: none"> Increased residential density can result in jobs related to office management and maintenance. Location of housing near public transit provides access to jobs. Increased employment during construction of new development.
Access to Jobs	<ul style="list-style-type: none"> Proximity to public transit. Reduced commute times. Walkability and bikeability. Affordable housing near Employment Centers. Internet Access Access to childcare 	<ul style="list-style-type: none"> The Property is in close proximity to public transit, including Metro stations and multiple bus lines, providing access to employment areas throughout the region.
Community		
Education / Health / Wellness	<ul style="list-style-type: none"> Access to quality public services. Access to safe, clean public gathering spaces, open spaces, and recreation. Healthy natural environment. 	<ul style="list-style-type: none"> Proximity to public schools, including H.D. Cooke Elementary School, Columbia Heights Education Campus, and Cardozo Education Campus. Proximity to Mt. Pleasant Neighborhood Library. Near Columbia Heights Community Center.
Environmental	<ul style="list-style-type: none"> LEED rating. Use of renewable energy sources. Storm water management. Placement of unwanted / high-impact land uses 	<ul style="list-style-type: none"> Improved storm water infrastructure as required for redevelopment of the Property. Incorporate resiliency features into redevelopment. Future redevelopment and adaptive reuse of the building will adhere to applicable Building Code requirements and energy-efficient building systems and technologies.
Access to Amenities	<ul style="list-style-type: none"> Availability of building amenities. Proximity/availability of uses that meet day-to-day needs (grocery, 	<ul style="list-style-type: none"> Map amendment will permit the development of increased residential density near the

	retail, service, eating and drinking).	<p>prominent 14th Street corridor, therefore granting future residents more access to day-to-day needs and public transportation.</p> <ul style="list-style-type: none"> · Proximity to parks, open space, and recreation.
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VIII. Conclusion

In light of the foregoing analysis, the Applicant submits that the proposed map amendment will advance many Comp Plan policies related to racial equity. Overall, rezoning the Property to the RA-4 zone will allow for future redevelopment of the Property with increased residential density, consistent with the Comp Plan designations for the Property.