

EXHIBIT 4

COMPREHENSIVE PLAN EVALUATION

Table of Contents

1. Evaluation of the Comprehensive Plan Consistency	1
2. Climate Resilience and Racial Equity	2
3. Racial Equity Lens	3
4. Community Outreach and Engagement	6
5. Conclusion	6

1. Evaluation of the Comprehensive Plan Consistency

One of Washington, DC's key housing goals is to increase the supply of housing, especially affordable units, in response to the housing demand in the nation's capital. The population of DC currently sits at ~680,000 and is expected to increase to ~845,000 by the year 2050. The Far Northeast and Southeast Planning Area, which is where the site in question is located, is expecting population growth to 112,611 by 2045 from 83,906 in 2017. By rezoning the property located at 5045 Hanna Place SE to a MU-4 zone, the city can further their efforts in the creation of affordable housing units. The property is currently improved with a four-unit multifamily property. By rezoning the lot to MU-4, the city would allow for the development of a small affordable apartment building containing ~20 units.

The proposed map amendment to rezone the Property to the MU-4 zone is not inconsistent with the FLUM, and in fact will implement the 2021 FLUM amendments adopted by the Council for the Property. Additionally, the range of uses permitted in the proposed MU-4 zone can also support new commercial uses on the Property.

The proposed Zoning Map amendment is also not inconsistent with the FLUM. The FLUM designates the Property for moderate density residential/commercial development, which is exactly the type and intensity of development permitted in the proposed MU-4 zone. Specifically, the Zoning Regulations describe the MU-4 zone as being intended to "permit moderate-density mixed-use development." 11-G DCMR § 101.13. Additionally, The Framework Element expressly identifies the MU-4 zone as being consistent with both the Low Density Commercial and Moderate Density Commercial FLUM designation. Upon evaluation of the matter-of-right height and density permitted in this zone, the Applicant concluded that the proposed MU-4 zone is a more appropriate zone to pursue as part of a standalone map amendment for Property. The proposed MU-4 zone permits a maximum residential density of 2.5 FAR (3.0 FAR with Inclusionary Zoning), of which no more than 1.5 FAR may be devoted to non-residential uses, which is consistent with the Framework Element guidance on the typical density range in areas with a moderate-density residential/commercial FLUM designation.

Ultimately, the proposed MU-4 zone would result in positive outcomes for the Property and the District at-large. Establishing this zoning on the property will increase DC's affordable housing stock while also ensuring that zoning on the property is not inconsistent with the Comprehensive Plan, as required under the Home Rule Charter.

2. Climate Resilience and Racial Equity

As building owners consider “green” retrofitting and building developers consider building to certain green building standards I’ve noticed that many individuals in these groups are primarily focused on the initial costs of undertaking climate resilience efforts while overlooking the value. Not only can climate resilience efforts improve the overall aesthetics of properties, they can also increase the value and health of properties. Instead of focusing on the initial costs associated with climate resilience efforts, I believe that building professionals should analyze both the qualitative and quantitative benefits of undertaking these efforts.

Climate hazards in the North East region of the United States have led to increased maintenance costs, increased insurance costs, infrastructure damage, and infrastructure strain. The Property under consideration has been affected by all of the aforementioned. Warmer summer months have led to strained cooling systems that require increased maintenance and more frequent storms have caused soil erosion.

A new development allowed under the MU-4 zone will incorporate the following resilient building features:

- Extended downspouts to reduce the severity of water pressure
- Incorporation of sump pumps and gutter guards
- Utilization of permeable pavers in driveways to allow rainwater to seep into the ground
- Incorporation of a green roof and/or solar panels to generate renewable energy
- Increased vegetation as the Property is faced with a landslide risk hazard

The Far Northeast & Southeast Area Element states “More steps should be taken to improve environmental quality, especially along Watts Branch. Far Northeast and Southeast was impacted for years by the now defunct Benning Road incinerator and continues to face noise, air pollution, and truck traffic from I-295 and other thoroughfares.” The resilience features that would be incorporated would most certainly advance this goal while reducing greenhouse gas (GHG) emissions.

Poorer and marginalized communities often face the brunt of climate impacts as infrastructure and community health investments are made more regularly in affluent areas. These areas are usually devoid of climate resilience efforts that are more prevalent in affluent areas. The redevelopment of this site under a MU-4 zone will result in community health investments, in the realm of sustainable development, that will further the goal of climate justice/equity.

3. Racial Equity Lens

A primary focus of the Comprehensive Plan, as reflected throughout its various policies, is achieving racial equity. As stated in the Framework Element and as further discussed below, “equity is both an outcome and a process.” 10A DCMR § 213.6. To assist the Commission in applying a racial equity lens to its Comp Plan determinations, the Commission has developed a Racial Equity Tool that applicants are expected to utilize throughout the process of a proposed zoning action. The Racial Equity Tool emphasizes community outreach, and is intended to facilitate proactive and meaningful engagement with the community most likely to be affected by a proposed zoning action in order to gain insight on negative conditions that may exist in the community, develop an understanding of community priorities, and solicit input on potential positive and negative outcomes of the proposed zoning action.

The Applicant is a true testament to the sentiments published in the Framework Element. “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.” 10A DCMR § 213.9. The Applicant is a DC native whose first residence after birth was in SW DC at 4660 MLK Ave (currently the Vista Apartments) and he is now providing/developing quality affordable housing for the residents in his community.

The table below provides responses to the Commission’s Racial Equity Tool that is used to carry out the evaluation of this proposal. As indicated in the table, the proposed amendment will result in an overall positive outcome when considered through several racial equity themes.

Evaluation of Equitable Development Indicators		
Theme	Measure / Indicator	Outcome / Applicable Public Benefit
Displacement		
Physical	• Displacement due to redevelopment	• Temporary displacement of residents who will be permitted to return upon delivery of new units

Economic	<ul style="list-style-type: none"> • Displacement due to housing cost increases 	<ul style="list-style-type: none"> • Increase in amount of housing on property • Proximity to public transportation (Metrorail, pedestrian and bicycle infrastructure) decreases living costs, as residents will not have to own a car
Cultural	<ul style="list-style-type: none"> • Loss of sense of belonging or shared identity in neighborhood 	<ul style="list-style-type: none"> • Density gained for residential use will help existing residents remain in neighborhood
Housing		
Availability of Housing		<ul style="list-style-type: none"> • Significant increase in the amount of new housing that can be constructed on the Property compared to existing zoning • Potential affordable senior housing
Housing Burden	<ul style="list-style-type: none"> • Households that pay more than 30% or more than 50% of their income on housing 	<ul style="list-style-type: none"> • Increase in amount of housing that will be capped at 60% AMI • Newly constructed units will be more energy efficient and will reduce utility costs
Family Sized Units	<ul style="list-style-type: none"> • Housing units with three or more bedrooms 	<ul style="list-style-type: none"> • Increased potential for family sized units due to increase in allowed density

Employment		
Access to Employment	<ul style="list-style-type: none"> • Proximity to public transit • Proximity to employment centers 	<ul style="list-style-type: none"> • Resident proximity to public transit allows access to employment opportunities throughout the region
Transportation		
Access and Proximity to Transit	<ul style="list-style-type: none"> • One mile to Metrorail • .1 miles to Metrobus 	<ul style="list-style-type: none"> • Located one mile from Benning Road Metrorail station • Located less than .1 miles from Metrobus stop on Benning Road
Education / Health / Wellness		
Access to Public and Private Schools / Access to safe, clean public gathering spaces, open spaces, and recreation	<ul style="list-style-type: none"> • Proximity to public transit • Schools within surrounding neighborhood • Public parks, recreation centers, libraries, etc. within surround neighborhood 	<ul style="list-style-type: none"> • .4 miles from Kipp DC Leap Academy • .8 miles from CW Harries Elementary School • .3 mils from Woody Ward Community Center • .9 miles from Capitol View Neighborhood Library
Environmental		
Health Benefits	<ul style="list-style-type: none"> • Sustainable design • Resilient design 	<ul style="list-style-type: none"> • Renewable energy generation via solar panels • Access to community solar • New development will incorporate resilient building features aimed at mitigating impacts of extreme heat, flooding, soil erosion, etc.

4. Community Outreach and Engagement

The property lies within the boundaries of Advisory Neighborhood Commission (ANC) 7E, and lies specifically with the jurisdiction of ANC 7E03.

Efforts to redevelop the property have been ongoing since before February of 2024. February 2024 is when the Applicant initially reached out to the Office of Planning for their input on a potential redevelopment for the site. Since then, the Applicant has coordinated with residents in the immediate vicinity of the site and the ANC 7E.

The Applicant presented the proposed map amendment, in-person, at the ANC 7E Monthly Meeting on October 8, 2024. No specific development was proposed at that time but the Applicant did provide a rendering of what a new development could potentially resemble. The comments received at that time were primarily centered on the Applicants abilities as a landlord/developer. The applicant provided information/details on his experience as he has owned and operated the site since the year 2018.

After officially notifying all property owners within 200ft of the subject property the applicant has had numerous meetings with community members and residents near the subject property. The applicant has had in person conversations with neighborhood residents in person over the past few years but multiple in-depth conversations have taken place since notifying all property owners within 200ft.

No changes have resulted from community input but a concern was expressed by the community on whether the applicant intends on incorporating retail on the site should a map amendment be granted. The applicant has no intentions of incorporating retail on the site and agrees that retail should not be allowed on the subject site and/or on any other site in 7E03 upon receipt of a map amendment to an MU-4 designation.

5. Conclusion

The Applicant submits that the proposed rezoning of the Property to the MU-4 zone meets all of the requirements for an amendment to the official Zoning Map of the District of Columbia. The proposed Zoning Map amendment is consistent with the District's plans and policies for the Property and the surrounding area. Furthermore, the proposed rezoning is not inconsistent with the Comprehensive Plan and will further each of the specific objectives set forth in the Zoning Act. The Applicant respectfully requests that the Commission schedule a public hearing on this application and grant the requested Zoning Map amendment.