

## **Exhibit D**

### **EVALUATION OF CONSISTENCY WITH THE DC COMPREHENSIVE PLAN**

Pursuant to 11-X DCMR § 500.3, the Zoning Commission shall find that the proposed 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 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 Far Northeast and Southeast Planning Area and other Citywide elements, and the Nannie Helen Burroughs Corridor Small Area Plan. In addition, this Evaluation includes a summary of community outreach, and an analysis of outcomes that advance racial equity.

#### **General Highlights:**

- When analyzed through a racial equity lens, the map amendment creates favorable outcomes for all District residents, namely by allowing for the Property to be redeveloped with housing and affordable housing and neighborhood-serving amenities.
- The proposed MU-7A zone is not inconsistent with the Property’s FLUM and the GPM designations.
- The proposed map amendment advances numerous policies within the Far Northeast and Southeast Area Element and Citywide Elements, including particularly relevant policies under the Land Use, Transportation, Housing, Economic and Environmental Protection Elements.
- The outcomes of the map amendment will advance racial equity, as they will result in housing and affordable housing, as well as new neighborhood-serving amenities that could result in physical improvements that will enhance accessibility and the environment.

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## I. INTRODUCTION

4347 Hunt Place Holdings LLC (the “**Applicant**”) submit 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 103 in Square 5094 with the address of 4347 Hunt Place, NE (the “**Property**”) from the MU-3A Zone to the MU-7A zone (the “**Application**”). As set forth below, the proposed map amendment is not inconsistent with the Comp Plan 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**”. 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. 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. 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.” 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 as to 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 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.

## **II. RACIAL EQUITY AND THE COMPREHENSIVE PLAN**

### **A. Overview.**

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." 10-A DCMR § 213.7. Indeed, the importance of equity to District residents was made abundantly clear when the DC Office of Planning ("OP") conducted its DC 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. 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. 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 in 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." 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.” 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.

#### **B. 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. 10-A DCMR § 213.7. The Applicant believes in inclusive, community engagement, and will work closely with the community and the affected Advisory Neighborhood Commission throughout the map amendment process.

#### **C. 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.” 10-A DCMR § 213.6. As stated above, under the recently adopted Comp Plan, the Commission shall carry out its Comp Plan evaluation for the Application through a racial equity lens. The table in Section VIII 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 Skyland neighborhood.

The following evaluation follows the Zoning Commission's Racial Equity Tool,<sup>1</sup> 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 has conducted a thorough evaluation of the proposed Application's consistency with the Comp Plan, including the FLUM and GPM, the policies of all applicable Citywide and Area Elements, and all other applicable adopted public policies and active programs, such as Small Area Plans.<sup>2</sup>

#### **A. Comprehensive Plan Overview and Application**

As discussed below, the proposed Zoning 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 FLUM and the GPM (D.C. Resolution R24-0292), collectively referred to herein as the Comp Plan.

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. 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 District and the well-being of its citizens. The Comp Plan provides a general overview of how change will be managed in the years ahead and, thus, is intended to be interpreted broadly. 10-A DCMR § 103.5.

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. 10-A DCMR

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<sup>1</sup> Available at: <https://dcoz.dc.gov/release/zc-racial-equity-analysis-tool-new>.

<sup>2</sup> Policies also found in the Office of Planning's Equity Crosswalk, available: [https://planning.dc.gov/sites/default/files/dc/sites/op/page\\_content/attachments/Comprehensive%20Plan%20Equity%20Crosswalk\\_10-2022.pdf](https://planning.dc.gov/sites/default/files/dc/sites/op/page_content/attachments/Comprehensive%20Plan%20Equity%20Crosswalk_10-2022.pdf) are **bolded and underlined** within each element.

§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.”

## **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. 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. 10-A DCMR § 228.1(c). By definition, the FLUM is to be interpreted broadly, and the land use categories identify desired objectives. 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. 10-A DCMR § 2504.5.

As shown in Exhibit B and below, the FLUM designates the Property as **Medium Density Residential and Medium Density Commercial**.

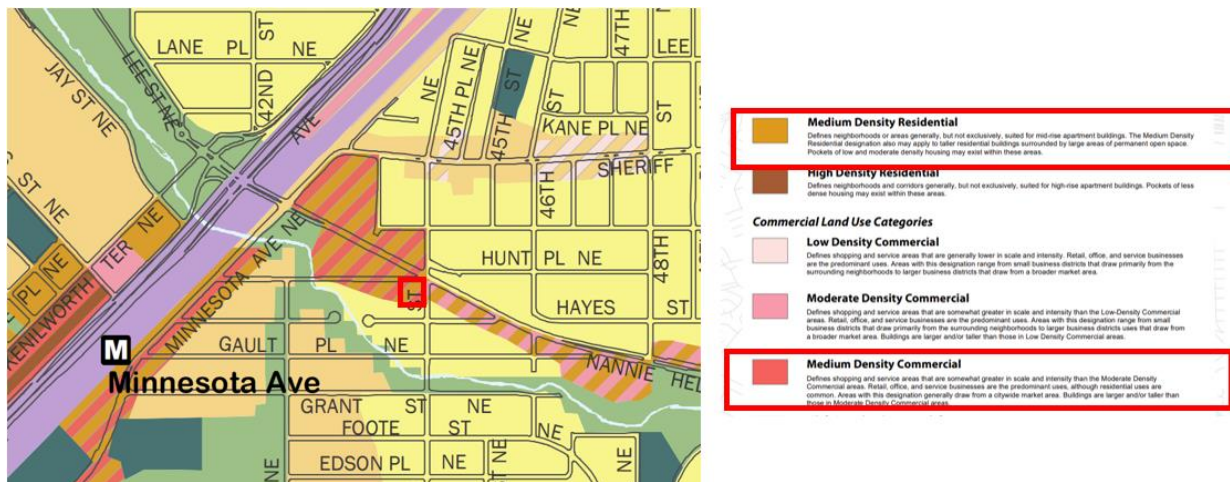


Figure 1: Future Land Use Map

**The Framework Element describes these designations as follows:**

The general density and intensity of development within a given Mixed-Use area is determined by the specific mix of uses shown.

**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 Low Density Residential 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. 10-A DCMR 227.7

**Medium Density Commercial:** This designation is used to define shopping and service areas that are somewhat greater in scale and intensity than the Moderate Density Commercial areas. Retail, office, and service businesses are the predominant uses, although residential uses are common. Areas with this designation generally draw from a citywide market area. Buildings are larger and/or taller than those in Moderate Density Commercial areas. Density typically ranges between a FAR of 4.0 and 6.0, with greater density possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The MU-8 and MU-10 Zone Districts are consistent with the Medium Density category, and **other zones may also apply.** 10-A DCMR 227.12

In this case, the MU-7A zone is consistent with the mix of commercial and residential density described above, having an overall permitted FAR of 4.0, or 4.8, with IZ—up to 1.0 of which can be designated for non-residential uses.

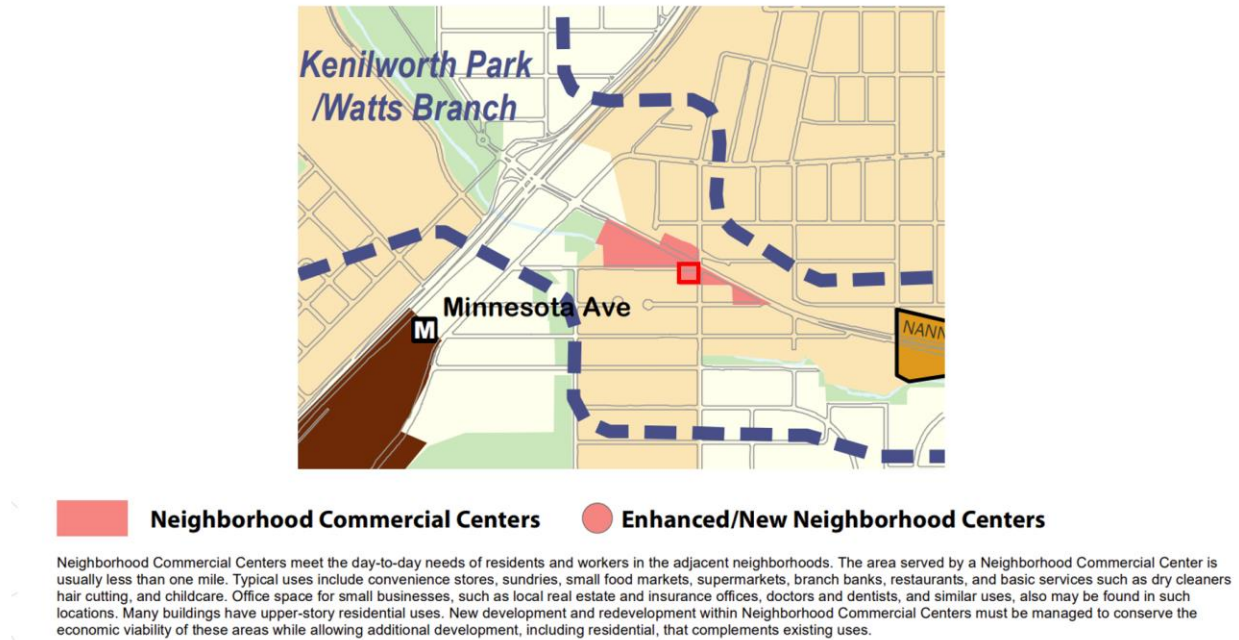
### **C. Generalized Policy Map**

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. 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.” 10-A DCMR § 225.2.

As shown in Exhibit B and below, the Property is designated as **Neighborhood Commercial Center**.



*Figure 2: Generalized Policy Map*

Per 10-A DCMR § 225:

- Neighborhood Commercial Centers meet the day-to-day needs of residents and workers in the adjacent neighborhoods. The area served by a Neighborhood Commercial Center is usually less than one mile. Typical uses include convenience stores, sundries, small food markets, supermarkets, branch banks, restaurants, and basic services such as dry cleaners, hair cutting, and childcare. Office space for small businesses, such as local real estate and insurance offices, doctors and dentists, and similar uses, also may be found in such locations. Many buildings have upper-story residential uses. 10-A DCMR § 225.15.
- Unlike Main Street Mixed Use Corridors, the Neighborhood Commercial Centers include both auto-oriented centers and pedestrian-oriented shopping areas. Examples include Penn Branch Shopping Center on Pennsylvania Avenue, S.E. and the Spring Valley Shopping Center on Massachusetts Avenue, N.W. New development and redevelopment within Neighborhood Commercial Centers must be managed to conserve the economic viability of these areas while allowing additional development, including residential, that complements existing uses. 10-A DCMR § 225.16

The proposed map amendment is not inconsistent with the Property's designation as a Neighborhood Commercial Center. This designation is intended to encourage mixed-use development with a focus on services to better serve the needs of existing and future residents of the area, as well as residential stories above. The proposal to MU-7A would do just this by providing opportunities for both retail and residential where the existing MU-3A zoning can only sustain one type of use.

**D. Small Area Plan: Nannie Helen Burroughs Corridor**

The Property is located within the Nannie Helen Burroughs Corridor Small Area Plan. The proposed Map amendment is not inconsistent with the vision and goals of the Nannie Helen Burroughs Corridor Small Area Plan (NHBC-SAP). While the property is not specifically called out by address, the plan encourages mixed-use, infill development that supports housing diversity, neighborhood-serving retail, and vibrant, walkable communities—particularly along key segments of the corridor and near significant intersections. The proposed map amendment aligns with the plan's strategy to revitalize underutilized parcels through context-sensitive development that enhances the public realm and supports access to transit. Therefore, the proposal reflects the intent of the NHBC-SAP and contributes to its long-term vision for a more connected and economically vibrant corridor.

**E. Other Plans of Note-- New Communities Initiative:**

The proposed Map Amendment is consistent with the goals of the District's New Communities Initiative (NCI), which aims to revitalize low-income communities in Wards 7 and 8 into mixed-income neighborhoods without displacing existing residents. NCI emphasizes one-for-one replacement of public housing, "build first" strategies to avoid resident displacement, and the creation of mixed-income housing supported by community engagement.

While the subject property is not a public housing site, the amendment aligns with NCI's broader goals by enabling future development that supports housing diversity, economic integration, and neighborhood revitalization. The upzoning from MU-3A to MU-7A will trigger Inclusionary Zoning Plus (IZ+), increasing the likelihood of mixed-income market rate and affordable housing. The amendment also opens the door for redevelopment of a non-contributing use—a liquor store that has since gone out of business—into a site that could provide new housing, community-serving retail, or other neighborhood amenities. In this way, the amendment supports

the long-term transformation goals of the NCI while respecting the neighborhood's identity and housing needs.

## **F. Rock Creek East Area Element**

The Property is located within the Far Northeast and Southeast Area Element of the Comprehensive Plan. See 10-A DCMR § 1700.1. The Planning Area encompasses approximately 8.3 square miles of largely residential neighborhoods and is known for its rich cultural history, generous open space, and distinctive neighborhood identities. Communities such as Deanwood, where the Property is located, are defined by modest single-family homes, a unique architectural character, and a long-standing tradition of African-American homeownership. See 10-A DCMR §§ 1700.1, 1702.3.

Although the area retains a semi-suburban character, it faces challenges including disinvestment in commercial corridors, limited retail options, and aging housing stock. 10-A DCMR §§ 1712.3. Recognizing this, the Comprehensive Plan calls for strategic revitalization efforts in several "Policy Focus Areas," including Deanwood, with targeted policies that promote equitable development, enhance neighborhood-serving retail, and leverage proximity to transit. See 10-A DCMR § 1712.6 and Map 17.1.

## **Area Element Evaluation**

The proposed map amendment advances several major planning objectives outlined in the Far Northeast and Southeast Area Element. The proposed rezoning to MU-7A will increase development potential and support revitalization along Hunt Place NE and nearby corridors, consistent with the following policies and goals of the Comprehensive Plan:

### **FNS-1.1 Guiding Growth and Neighborhood Conservation**

- **FNS-1.1.2: Development of New Housing.** Encourage new mixed-use, mixed-income development for area residents on vacant lots and around Metro stations and on underused commercial sites along the area's major avenues. Strongly encourage the rehabilitation and renovation of existing housing in Far Northeast and Southeast and seek to ensure that the housing remains affordable for current and future residents.
- **FNS-1.1.3: Directing Growth.** Concentrate employment growth in Far Northeast and Southeast, including office and retail development around the Deanwood, Minnesota

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

- **FNS-1.1.4: Retail Development** . Support the revitalization of the neighborhood commercial areas listed in Policy FNS-1.1.3 encouraging a vibrant and diverse mix of new businesses and activities that provide needed retail services to the adjacent neighborhoods and that are compatible with surrounding land uses.
- **FNS-1.1.1A:** Encourage urban design and façade improvements in the established commercial districts along Naylor Road, Minnesota Avenue, Benning Road, Branch Avenue, Alabama Avenue, Nannie Helen Burroughs Avenue, Division Avenue, Sheriff Road, and Pennsylvania Avenue SE. These improvements should respect and enhance historic structures and landmarks in these areas.

## **FNS-2.2 Focus Area: Deanwood**

- **FNS-2.2.1: Strengthening Deanwood’s Core.** Strongly encourage infill development on vacant lots in the Deanwood community. Where designated on the Future Land Use Map, development should respect and perpetuate the low-density, single-family character of the neighborhood, with new one-, two-, three-, and four-bedroom family homes that complement existing architectural traditions and community character.
- **FNS-2.2.2: Nannie Helen Burroughs Avenue.** Focus on neighborhood-serving commercial development, such as the comprehensively planned Deanwood Town Center in Deanwood along the Nannie Helen Burroughs Corridor, with the intersection of Division and Nannie Helen Burroughs Avenues restored as a community hub. Convert low-density mixed-use zones into higher density zones.
- **FNS-2.2.5: Neighborhood-Serving Commercial Uses:** Encourage the development of a variety of neighborhood-serving commercial uses along Nannie Helen Burroughs Avenue, Sherriff Road, and Minnesota Avenue to create and invest into community-owned small businesses, adding and creating jobs for District residents and establish retail and service uses that support the surrounding residential community. Commercial uses in these locations should provide infrastructure that is attractive to drivers, pedestrians, and cyclists; supply adequate on-site parking and access to public transit, and especially buses; and create an active street environment that helps to reinvigorate the commercial corridors. Medium-density development is appropriate, particularly near the intersection of Nannie Helen Burroughs and Minnesota Avenues.

In light of the foregoing, the proposed map amendment supports the specific policies listed within the Far Northeast and Southeast Area Element, particularly the goals outlined in the Deanwood Focus Area:

### **FNS-1.1 Guiding Growth and Neighborhood Conservation**

- FNS-1.1.2: Development of New Housing
- FNS-1.1.3: Directing Growth
- FNS-1.1.4: Revitalizing Commercial Centers
- FNS-1.1.1A: Façade Improvements

### **FNS-2.2 Deanwood Focus Area**

- FNS-2.2.1: Strengthening Deanwood's Core
- FNS-2.2.2: Nannie Helen Burroughs Avenue
- FNS-2.2.5: Neighborhood-Serving Commercial Uses

The proposed MU-7A zone will allow for the redevelopment of the site in a manner that is consistent with the Comprehensive Plan's goals for equitable growth, economic development, and neighborhood revitalization within Deanwood and the broader Far Northeast and Southeast Planning Area.

### **G. 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. 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. 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.” 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.

[10-A DCMR § 302.1]

#### *Land Use Element Evaluation*

The proposed Application will help achieve the above-described goals through its consistency with several Land Use Element policies. The proposed rezoning to MU-7A will facilitate redevelopment of land with new residential units for a mix of incomes, as well as neighborhood serving commercial uses while respecting the surrounding low-density neighborhoods, supporting different neighborhood types, revitalizing the neighborhood, and located adjacent to public transportation. (LU-1.4.6, LU-2.1.1, LU-2.1.2, LU-2.1.3, LU 2.1.10, 2.2.4, LU-2.4.1)

Upon evaluation of the Land Use Element policies and actions, the Applicant finds that the proposed rezoning to MU-7A will not be inconsistent with the Land Use Element overall, and specifically with the policies listed below:

#### LU-1.4: Transit-Oriented and Corridor Development

- LU-1.4.6: Development Along Corridors

#### 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-2.1.10: Multi-Family Neighborhoods

#### LU-2.2: Maintaining Community Standards

- LU-2.2.4: Neighborhood Beautification

#### LU-2.4: Neighborhood Commercial Districts and Centers

- LU-2.4.1: Promotion of Commercial Centers

### **H. 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 improve safety, mobility, and accessibility in the District. 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.” 10-A DCMR § 401.1.

#### *Transportation Element Evaluation*

The proposed map amendment advances the overarching goal of the Transportation Element by providing the opportunity for mixed-use development that does not currently exist; thereby encouraging upgraded pedestrian and bicycle infrastructure near a major bus corridor. (T-1.1.4). There is also existing parking on the lot for the which could be potentially better utilized or shared between any new uses; or alternatively adapted into other uses, which would reduce off-street parking (T-1.1.8, T-3.2.F)

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-1.1.8: Minimize Off-Street Parking

#### T-3.2 Curbside Management and Parking

- T-3.2.F: Encourage Shared-Use Parking

### **I. 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. 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. 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. 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. 10-A DCMR § 502.5.

#### *Housing Element Evaluation*

The proposed Application will help meet the housing needs of present and future District residents at a desirable location near neighborhood services that is consistent with District land use and housing policies and objectives. The map amendment will provide for an increase in permitted density for residential use, thereby expanding the District's housing and, if deemed appropriate, affordable housing supply. New housing is desirable at this location given its underutilized status (H-1.1.1, H-1.1.3, H-1.2.1).

Additionally, any future redevelopment of the Property that consists of affordable housing will be designed and constructed according to the same high-quality architectural design standards



used for market rate units. (H-1.1.5, H-1.3.2). Moreover, the inclusion of additional housing has the potential to diversify the neighborhood by introducing various housing types such as family-sized housing and for-sale housing (H-1.1.9, H-1.3.1, H-1.2.9, H-1.2.1, H-1.4.2). These additions will complement the area's existing neighborhood services and employment opportunities.

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

#### H-1.1 Expanding Housing Supply

- Policy H-1.1.1: Private Sector Support
- Policy H-1.1.3: Balanced Growth
- Policy H-1.1.5: Housing Quality
- Policy H-1.1.9: Housing for Families

#### H-1.2 Ensuring Housing Affordability

- Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority
- Policy H-1.2.2: Production Targets**
- Policy H-1.2.3: Affordable and Mixed-Income Housing**
- Policy H-1.2.5: Moderate-Income Housing
- Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas**
- Policy H-1.2.1: Inclusive Mixed-Income Neighborhoods

#### H-1.3 Diversity of Housing Types

- Policy H-1.3.1: Housing for Larger Households
- Policy H-1.3.2: Tenure Diversity

#### H-1.4: Housing and Neighborhood Revitalization

- Policy H-1.4.2: Opportunities for Upward Mobility

### **J. Environmental Protection Element**

The Environmental Protection Element addresses the protection, conservation, and management of Washington, DC'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. 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, DC, 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. 10-A DCMR § 601.1.

### *Environmental Protection Evaluation*

In accordance with the overarching goal for the Environmental Protection Element, future redevelopment of the Property, enabled by the Application, could incorporate energy efficient systems to reduce energy use – certainly more so than what is currently there—and potentially provide alternative energy sources to contribute to the District’s energy efficiency goals (E-3.2.3, E-3.2.7, E-4.2.1). Redevelopment of the Property could also yield new landscaping and environmentally friendly enhancements to the abutting streetscape (E-1.1.2, E-2.1.2, E-2.1.3, E-4.1.1, E-4.1.2). Moreover, any future development will be required to comply with the Green Building Act and the District’s storm water management regulations and will be consistent with the Sustainable DC Plan (E-4.1.2, E-4.2.1). This is especially important considering the Property is located within the 100-year floodplain, and new construction would have to undergo evaluation for adaptive design consistent with its location in the floodplain (E-1-1.B).

Accordingly, the proposed Zoning 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

- Policy E-1.1.2: Urban Heat Island Mitigation
- Policy E-1.1.B: Development in Floodplains

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

Policy E-2.1.2: Tree Requirements in New Development

Policy E-2.1.3: Sustainable Landscaping Practices

#### E-3.2 Conserving Energy and Reducing GHG Emissions

- Policy E-3.2.3: Renewable Energy
- Policy E-3.2.7: Energy-Efficient Building and Site Planning

#### E-4 Promoting Environmental Sustainability

- Policy E-4.1.1: Maximizing Permeable Surfaces
- Policy E-4.1.2: Using Landscaping and Green Roofs to Reduce Runoff
- Policy E-4.2.1: Support for Green Building

### **K. Economic Development Element**

The Economic Development Element addresses the future of Washington, DC's economy, and the creation of economic opportunity for current and future District residents. It includes strategies to sustain the District's major industries, diversify the economy, accommodate job growth, maintain small businesses and neighborhood commercial districts, and increase access to employment for District residents. 10-A DCMR 700.1

The overarching goal for economic development in the District is to drive inclusive economic expansion and resilience by growing the economy and reducing employment disparities across race, geography, and educational attainment status. 10-A DCMR 701.1

#### *Economic Development Analysis*

In accordance with the overarching goal for the Economic Development Element, the Map Amendment has the potential to drive inclusive economic expansion. Overall, the proposal to rezone the Property to MU-7A will not be inconsistent with the policies and actions of the Economic Development Element, and particularly those listed below.

Specifically, the additional business opportunities would promote local entrepreneurship and potentially minority-owned and women-owned businesses (ED 1.1.4, 1.1.5, 2.2.4, 3.2.8). It would increase the mix of potential businesses in the neighborhood, including grocery stores or supermarkets, or offices (E.D. 2.2.3, 2.2.5, 2.2.6). Finally, bringing additional business to the area would link more residents to jobs, including entry-level opportunities and local hiring. (E.D. 4.2.1, 4.2.3, 4.2.6, and 4.2.12).

#### ED-1.1: Diversifying the Economic Base

##### **ED-1.1.4: Promote Local Entrepreneurship**

ED-1.1.5: Build Capacity and Opportunities

#### ED-2.2: The Retail Economy

ED-2.2.3: Neighborhood Shopping

ED-2.2.4: Support Local Entrepreneurs

ED-2.2.5: Business Mix

ED-2.2.6: Grocery Stores and Supermarkets

ED-3.2: Small and Locally Owned Businesses

**ED-3.2.8: Certified Business Enterprise Programs**

ED-4.2: Increasing Workforce Development Skills

ED-4.2.1: Linking Residents to Jobs

**ED-4.2.3: Focus on Economically Disadvantaged Populations**

ED-4.2.6: Entry-Level Opportunities

ED-4.2.12: Local Hiring Incentives

#### **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 MU-7A zone is “not inconsistent with the Comp Plan[.]” 11-X DCMR § 500.3. As established by DCCA, 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.<sup>3</sup>

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 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, 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*

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<sup>3</sup> 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.” (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.

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).

### **Potential Inconsistencies?**

While the Comprehensive Plan’s Framework Element identifies MU-8 and MU-10 as representative zones for the medium-density mixed-use designation, it also acknowledges that other zones may be appropriate depending on the surrounding context, infrastructure, and design intent. In this case, MU-7A offers a scale and intensity of development that appropriately balances the policy objectives of the FLUM with the character of the immediately surrounding neighborhood.

Compared to MU-8A, which permits a maximum FAR of 6.0 and a height of up to 70 feet, MU-7A is slightly less intense, allowing a maximum FAR of 4.8 (with Inclusionary Zoning) and a height of up to 65 feet. This modest step down in density and height makes MU-7A more compatible with the general area, which consists largely of single-family homes, small apartment buildings, and low-rise commercial properties. The MU-7A zone is well-suited to serve as a transitional zone between lower-density residential uses and higher-density corridors or nodes of commercial activity, especially given the adjacent property has already been rezoned to MU-4.

Preserving the neighborhood scale is a key consideration, where longstanding patterns of lower-density residential development and a tight-knit community character are central to the Comprehensive Plan’s Area Element vision. Rezoning to MU-7A enables infill and revitalization in a form that is consistent with Comprehensive Plan guidance, while mitigating more intense density that might occur under a higher-density designation like MU-8A or MU-10.

In conclusion, although MU-8 and MU-10 are identified as representative zones for Medium Density Mixed Use designations, MU-7A is consistent with this FLUM designation and better reflects the site’s immediate context. It facilitates appropriately scaled transit-oriented

growth, encourages new housing and retail, and furthers the Comprehensive Plan’s goals for equitable development, neighborhood compatibility, and targeted reinvestment—particularly in areas like this that are designated for enhancement and revitalization.

## **V. PART TWO: APPLICANT’S COMMUNITY OUTREACH AND ENGAGEMENT**

As required by Part Two the Racial Equity Tool, the Applicant will conduct outreach to the affected Advisory Neighborhood Commission (“ANC”), community groups, and individuals in the neighborhood. The Applicant’s team reached out to the ANC Chair and SMD on June 2, 2025, prior to sending out the Notice of Intent. The Notice of Intent was mailed on June 3, 2025. Counsel for the Applicant emailed Chairman Holmes and Single Member District Commissioner Brown on again on June 30, 2025. As of the date of this filing, the ANC has not yet responded directly. However, the Applicant understands the importance of ANC input and remains committed to maintaining an open line of communication. Given the nature of a map amendment—where no specific development is yet proposed—and the extended timeline before a Zoning Commission hearing, the Applicant is confident that it will be able to fully present the request to the affected community with ample time for dialogue, feedback, and refinement.

The Applicant’s outreach is intentionally early and designed to align with the Comprehensive Plan’s racial equity and engagement goals, particularly for areas like Deanwood that have historically been excluded from planning decisions. Future outreach will be responsive to ANC guidance and community interest, and the Applicant welcomes opportunities to collaborate with civic associations and other stakeholders in advance of the public hearing.

In addition to discussing outreach, 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 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?***

While the Property is located in the Deanwood Area, the specific neighborhood is called the Central Northeast/Mahaning Heights area. Defined as an area within Northeast Washington, DC and is generally bounded by Nannie Helen Burroughs Avenue to the north, Benning Road to the south, the tracks of the Washington Metro and Minnesota Ave station to the west, and 44th Street NE to the east.

***What specific factors define the impacted community?***

Site Characteristics: This area is located in the northeastern quadrant of Washington, DC, and is defined by a mix of low- to moderate-density residential housing, public housing developments, and community institutions. The residential fabric includes single-family detached homes, small apartment buildings, and legacy public housing such as Lincoln Heights and Richardson Dwellings. Streets are generally quiet and tree-lined, with relatively low commercial activity, especially compared to other parts of the city. Prominent community anchors include Kelly Miller Middle School, Smothers Elementary, Marvin Gaye Park, and the Deanwood Recreation Center. The Deanwood and Minnesota Avenue Metro stations provide limited but important transit access.

Demographic Information: According to data from the US Census Bureau and platforms such as NeighborhoodScout and Niche.com, the population in this area is predominantly Black (approximately 90%), with smaller percentages of Hispanic, white, and other racial groups. The median age is about 30 years old, indicating a relatively young and family-oriented population. A significant portion of households have children, and the average household size is above the DC average.

Most residents rent their homes, and a considerable number reside in public or subsidized housing. Educational attainment in the area is lower than in many other parts of the city, with many adults having completed high school or some college, and fewer holding bachelor's degrees.

Median household incomes are below the DC average, and many families face economic hardship, qualifying for public assistance programs.

Despite socioeconomic challenges, the area has a strong sense of community, with engagement through schools, churches, and neighborhood associations playing a vital role in residents' daily lives. Community resilience, long-standing family networks, and a commitment to improving local conditions are commonly reported themes in both formal planning studies and community-led discussions.

This has been noted in numerous planning efforts and community engagement initiatives, including the District's New Communities Initiative (NCI) for Lincoln Heights and Richardson Dwellings, and the Far Northeast and Southeast Area Element of the DC Comprehensive Plan. These documents consistently highlight the area's strong sense of community, emphasizing the critical role of neighborhood schools, churches, recreation centers, and civic associations in supporting residents' daily lives. Planning workshops and stakeholder interviews repeatedly cite long-standing family networks, active resident participation in redevelopment planning, and a shared commitment to improving neighborhood conditions without displacement.

Additionally, local organizations such as the Deanwood Citizens Association, Friends of Deanwood Library, and the East River Family Strengthening Collaborative have sustained long-term engagement in youth development, cultural programming, and housing advocacy. These efforts, combined with grassroots leadership and high levels of public meeting participation, reflect a deep-rooted resilience and civic pride that continue to shape this area's response to planning and zoning changes

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

While a zoning action in this area has the potential to bring investment and new opportunities, it is important to recognize the unique characteristics of the community to ensure that the benefits are equitably shared. This area is home to many long-term residents, including families, renters, and individuals living in public or subsidized housing. These residents contribute to a strong, resilient community and have deep ties to local schools, churches, and neighborhood institutions. To ensure that they are not disproportionately impacted by changes, careful attention should be given to preserving housing affordability, expanding access to community resources, and supporting infrastructure improvements. With thoughtful planning, the zoning action can serve



as a catalyst for inclusive development—strengthening the existing neighborhood fabric while welcoming new investment in a way that benefits all residents.

For example, 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?***

The entire community would benefit from a redevelopment that increases residential density, affordable housing, and additional neighborhood serving uses and potential community gathering spaces.

**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?***

Yes. The conditions in this area—comprising Lincoln Heights, Mahaning Heights, and Deanwood—reflect a legacy of systemic racism embedded in housing, planning, and land use policy. This majority-Black community has long been shaped by the effects of racially discriminatory practices, including redlining, exclusionary zoning, urban renewal displacement, and underinvestment in public infrastructure. The historic redlining maps produced by the Home Owners’ Loan Corporation (HOLC) in the 1930s explicitly marked much of this area as

“hazardous” due to its racial composition, cutting off access to mortgage credit and private investment ([Mapping Inequality Project, University of Richmond](#)).

Public housing developments such as Lincoln Heights and Richardson Dwellings were sited in predominantly Black areas and remained largely segregated by race, reinforcing patterns of concentrated poverty ([Lincoln Heights/Richardson Dwellings Revitalization Plan, 2006](#)). These housing sites were often isolated from economic opportunity, transit, and quality schools—conditions that persist today. The [Far Northeast and Southeast Area Element](#) of the D.C. Comprehensive Plan recognizes these disparities and calls for reinvestment that specifically addresses the needs of long-term residents who have been excluded from equitable growth.

Further, exclusionary zoning has maintained low-density residential zones surrounding higher-density public housing, without zones that would support mixed-income and mixed-use development. This planning pattern has reinforced racial and economic segregation in the built environment ([D.C. Comprehensive Plan, 2021](#), [NCRC: The Roots of Structural Racism](#)).

Today, these past injustices are mirrored in present disparities: lower homeownership rates, higher poverty and unemployment, limited walkability, and aging infrastructure ([NeighborhoodInfo DC](#)). These are not natural market outcomes—they are the result of deliberate policy choices.

As a result, any zoning action in this area must be approached with an explicit racial equity lens, recognizing how past discrimination has shaped current conditions and prioritizing community-led development, anti-displacement protections, and equitable investment moving forward.

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

District-wide efforts include:

**Districtwide Racial Equity Action Plan (REAP):** In February 2025, Mayor Muriel Bowser announced the launch of the Districtwide Racial Equity Action Plan, a three-year roadmap outlining steps the District will take to reduce racial inequities and improve life for all Washingtonians. The plan emphasizes policy decisions and programs evaluated through a racial equity lens, aiming to close racial equity gaps and measure progress toward a more equitable D.C. [mayor.dc.gov](#)

**Office of Racial Equity (ORE):** Established in 2021, the Mayor's Office of Racial Equity focuses on developing an infrastructure to ensure policy decisions and District programs are evaluated through a racial equity lens. ORE collaborates with District agencies, residents, and external stakeholders to make meaningful progress toward a more racially equitable city. [ore.dc.gov](#)

**Mapping Segregation in Washington D.C.:** Prologue DC's "Mapping Segregation" project documents the historic segregation of D.C.'s housing, schools, and public spaces. By making this history accessible, the project educates the public and informs current discussions on racial equity, including in neighborhoods like Petworth. [mappingsegregationdc.org](#)

**Black Homeownership Strike Force (“BHSF”):** [The Black Homeownership Strike Force](#) (“BHSF”) acknowledges that DC’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.

**Upward Mobility Action Plan (“UMAP”):** This program 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 Inclusionary Zoning 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.

**Specific Local Efforts Include:**

**New Communities Initiative (NCI) – Lincoln Heights/Richardson Dwellings:** The District’s New Communities Initiative (NCI) is a long-term redevelopment effort aimed at transforming public housing communities into vibrant, mixed-income neighborhoods. Since 2006, Lincoln Heights and Richardson Dwellings have been part of this initiative, which emphasizes a “build first” approach to minimize displacement and ensure residents can remain in the community. NCI projects such as Deanwood Hills and Strand Residences reflect these goals, incorporating affordable units and community-driven planning. [dcnewcommunities.org](http://dcnewcommunities.org)

**Local Nonprofit and Community-Led Efforts:** Community-based organizations such as the East River Family Strengthening Collaborative and the Deanwood Citizens Association play a vital role in advancing equity on the ground. These groups provide housing counseling, tenant rights advocacy, youth development programs, and economic empowerment services. Their work directly addresses the effects of structural racism by empowering residents to stay rooted in their neighborhoods and participate in shaping their futures. [erfdc.org](http://erfdc.org) | [facebook.com/deanwoodcitizens](https://facebook.com/deanwoodcitizens)

**Community Benefits in New Development Projects:** Recent mixed-income developments, including Deanwood Hills and Providence Place, have been shaped by intentional community engagement. These projects incorporate deeply affordable units, early childhood education facilities, and supportive services. Their aim is to ensure that redevelopment not only avoids displacement but actively invests in the long-term success of existing residents. These projects are examples of how equitable development can be realized through inclusive planning and benefit-sharing agreements. [dcnewcommunities.org](http://dcnewcommunities.org) | [dhcd.dc.gov](http://dhcd.dc.gov)

### **C. Community Participation/ Outreach Efforts**

The planning policies for the Far Northeast and Southeast Area Element stem from extensive community engagement held during the 2021 Comprehensive Plan revision process. Residents identified key priorities, including preserving deeply affordable housing, addressing infrastructure disparities, improving public amenities, and fostering equitable economic development. Long-time residents voiced concerns about disinvestment, cultural displacement, and the need for development that benefits the existing community. Specific goals included expanding access to quality housing, improving the condition of public housing stock, supporting small and minority-

owned businesses, and ensuring public facilities—from schools to parks—meet the needs of a growing and historically underserved population. 10A DCMR § 1710.2–1710.3

The community identified the following priorities during these meetings:

- The preservation of affordability and cultural identity in legacy Black neighborhoods like Deanwood and Lincoln Heights is a top priority. Residents expressed concerns about rising housing costs, market-rate infill, and the threat of cultural displacement. They strongly advocated for policies that retain long-time residents, support multigenerational households, and prevent the erasure of the area's historic character and community institutions. [10A DCMR § 1710.2(a)]
- There is a clear need to expand housing options—especially deeply affordable and family-sized units—while ensuring that new development serves current residents. The community emphasized that any new housing should reflect neighborhood needs, not outside demand, and called for equitable redevelopment of public housing with one-for-one replacement, homeownership opportunities, and anti-displacement safeguards. [10A DCMR § 1710.2(b)]
- The rehabilitation of aging public and privately owned housing stock is essential to preserving community stability. Many residents noted that existing rental buildings and public housing units suffer from decades of disrepair. Upgrades must be made without displacing tenants or converting affordable units into market-rate housing. The preservation of affordability during rehabilitation was repeatedly emphasized. [10A DCMR § 1710.2(c)]
- Access to safe, high-quality parks and green space is critical to health and neighborhood well-being. Although Marvin Gaye Park and Watts Branch are important assets, the community expressed a need for more recreational space, better lighting and maintenance, and programs to improve tree canopy and mitigate urban heat. Environmental justice was a recurring theme, particularly in areas with aging infrastructure and limited shade. [10A DCMR § 1710.2(d)]
- Support for small and minority-owned businesses—particularly legacy Black-owned businesses—was identified as vital for economic resilience. Residents called for targeted technical and financial assistance to help neighborhood entrepreneurs compete and grow in the face of economic pressure and corridor revitalization. Commercial affordability and anti-displacement strategies were considered necessary to preserve neighborhood-serving businesses. [10A DCMR § 1710.2(e)]

The proposed map amendment would address the above-mentioned community priorities by allowing for potential new residential units while preserving affordability and neighborhood character. It would also support small business growth.

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

The outreach plan for the proposed map amendment at 4347 Hunt Street NE was shaped by the unique civic landscape and deeply rooted community networks in this area of Far Northeast DC. This community is characterized by a strong tradition of civic engagement, with longstanding neighborhood associations such as the Deanwood Citizens Association and active ANC representation, including Commissioner Brown who serves the SMD where the subject site is located, and Chairman Holmes.

Recognizing the area's history of disinvestment and mistrust in planning processes—rooted in decades of racially inequitable land use policies—our outreach strategy is designed to build trust by initiating early and transparent communication. Even though this map amendment is not tied to a specific development project, we believe it's critical to begin the dialogue now. We contacted the ANC Chair and SMD commissioner with a clear explanation of the amendment's purpose and process, acknowledging the common concern that map amendments feel abstract without a concrete proposal. We emphasized that this outreach is a first step in establishing a relationship—not just to inform, but to invite participation from the beginning.

Additionally, given the area's historic vulnerability to displacement and redevelopment without community control, we plan to engage local civic associations directly and are reaching out to the Deanwood Citizens Association to request a presentation or discussion ahead of filing. This aligns with the expectations articulated in the Far Northeast and Southeast Area Element of the Comprehensive Plan, which stresses early engagement, racial equity, and building meaningful partnerships with the community as development proceeds. We are committed to respecting that guidance by ensuring that communication is proactive, localized, and inclusive.

***How were your outreach efforts proactive in terms of meeting community needs and circumstances? And what was the overall timeframe and frequency of your outreach?***

Recognizing the importance of early and sustained community engagement—particularly in communities that have historically experienced exclusion from planning decisions—the Applicant initiated outreach well before filing by contacting the Advisory Neighborhood Commission (ANC) Chair and the Single Member District (SMD) Commissioner whose jurisdiction includes the subject property. The Applicant provided a clear explanation of the map amendment process,

noting that it is not tied to a specific project at this time, and framed the outreach as the beginning of a longer-term conversation. This proactive communication acknowledged a common challenge in map amendment cases: community members often feel uncertain or excluded when no physical development is proposed. By reaching out in advance of filing, the Applicant aimed to establish trust, clarify intent, and invite open dialogue from the outset.

Outreach has been structured around the specific needs and civic culture of this area, which includes strong neighborhood institutions and civic associations. The Applicant has already engaged the ANC and plans to meet with the Deanwood Citizens Association prior to filing. These early efforts reflect an intentional strategy to engage with trusted local representatives and tailor communications based on their feedback.

#### **D. Community Input 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?*
- *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?*
- *What input from the community was shared but not incorporated into the zoning action? Why?*

Engagement with the ANC is still in its early stages, but the Applicant will provide an update to this section as it works more closely with the ANC and stakeholders.

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

There will be no direct or indirect displacement as a result of the proposed map amendment. The site houses one single vacant building. The Property was most recently by a commercial use—a liquor store—which is currently out of business. The site does not include any residential units, affordable housing, or community-serving institutions. As such, no existing residents or businesses that provide essential services to the neighborhood will be displaced.

In fact, the amendment presents an opportunity to replace what could be considered a non-contributing use with future development that could better serve the community's needs. While no project is currently proposed, the upzoning could pave the way for new investment that aligns with

community priorities—such as mixed-use development, increased housing supply (including affordable units), and retail that supports neighborhood vitality. This process is being approached with intentional transparency and early outreach to ensure that, should a future project move forward, it reflects the goals of inclusive growth without displacement.

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

As noted above, the Applicant is in its early stages of ANC engagement. It does not have a specific project in mind and the amendment is based on the FLU Map. 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?***

The zoning action should not create negative outcomes, but if any are raised, the Applicant will address these in a subsequent filing outlining community outreach and responses closer to the set down date.

## **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?***

The policies related to racial equity as identified in the Equity Crosswalk have been **bolded** in Part One and include:



- LU-2.1.1: Variety of Neighborhood Types
- LU-2.1.2: Neighborhood Revitalization
- H-1.2.2: Production Targets
- H-1.2.3: Affordable and Mixed-Income Housing
- H-1.2.9: Advancing Diversity and Equity of Planning Areas
- **ED-1.1.4: Promote Local Entrepreneurship**
- **ED-3.2.8: Certified Business Enterprise Programs**
- **ED-4.2.3: Focus on Economically Disadvantaged Populations**

***•What Comprehensive Plan policies related to racial equity will potentially not be advanced by approval of the zoning action?***

The other policies identified on the Equity Crosswalk would be policies related to racial equity that will potentially not be advanced because of the zoning action as they are not applicable or relevant for this particular Map Amendment either given the existing/proposed zoning, or the location.

***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?***

Theme	Question	Anticipated Positive/Negative or Neutral Impacts
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The map amendment does not involve or impact any existing housing or residents. The site is currently vacant so there will be no displacement. The rezoning creates the potential for future mixed-income housing, including affordable units under Inclusionary Zoning Plus (IZ+), which can promote housing stability for long-term residents.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	Positive: The amendment will require Inclusionary Zoning Plus (IZ+), increasing the

		<p>likelihood of affordable housing to help mitigate displacement pressures. The introduction of mixed-use development can create job opportunities for local residents, increasing economic stability and reducing displacement risks.</p> <p>Negative (but mitigable): Rising property values could increase tax burdens on nearby residents, but DC offers tax relief programs to assist with this issue as discussed thoroughly above.</p> <p>Mixed: If redevelopment occurs, the existing business may need to relocate in the future, though this could provide opportunities for modernized retail spaces and this is the anticipated goal of the FLU Map and Comp Plan.</p>
<b>Housing</b>	<p>Will the action result in changes to:</p> <ul style="list-style-type: none"> <li>- Market Rate Housing</li> <li>- Affordable Housing</li> <li>- Replacement Housing</li> </ul>	<p><b>Positive:</b> The site currently has no residential units, so no housing is being lost. The rezoning enables the creation of housing that is not currently possible under existing zoning, including affordable and family-sized units. IZ+ will help ensure long-term affordability. New density may support public investments in schools, transit, and infrastructure.</p> <p>Neutral/No Impact: There is no existing housing on site, so there would be no replacement housing.</p>

Physical	<p>Will the action result in changes to the physical environment such as:</p> <ul style="list-style-type: none"> <li>- Public Space Improvements</li> <li>- Infrastructure Improvements</li> <li>- Arts and Culture</li> <li>- Environmental Changes</li> <li>- Streetscape Improvements</li> </ul>	<p>Positive: Future redevelopment could lead to public space enhancements, improved streetscapes, and better pedestrian infrastructure. The mixed-use designation could encourage arts and culture spaces, fostering a vibrant and inclusive community.</p>
Access to Opportunity	<p>Is there a change in access to opportunity?</p> <ul style="list-style-type: none"> <li>- Job Training/Creation</li> <li>- Healthcare</li> <li>- Addition of Retail/Access to New Services</li> </ul>	<p>Positive: A mixed-use development could support new businesses and services—such as small grocers, health clinics, or childcare—within walking distance. These amenities would expand daily access to essential services in an area that has historically lacked high-quality neighborhood retail. Job creation in construction, operations, or retail could benefit local workers.</p>
Community	<p>How did community outreach and engagement inform/change the zoning action?</p> <p><i>(e.g., did the architectural plans change, or were other substantive changes made to the zoning action in response to community input/priorities etc.)?</i></p>	<p>The Applicant initiated outreach well before filing, engaging the ANC Chair and SMD Commissioner to explain the process and begin a dialogue. The Applicant is following the Commissioner's lead in structuring additional outreach and plans to meet with the Deanwood Citizens Association prior to submission. While no specific design is yet proposed, this early engagement reflects a commitment to transparency and responsive, community-led development. Future</p>

		conversations will allow the community to shape what ultimately gets built, aligning with the Comprehensive Plan's call for equity-driven planning in Far Northeast DC.
Other Themes	See below	

While not listed directly in the Racial Equity tool, the Applicant has identified other themes related to racial equity in which the zoning action would create an overall positive impact:

- **Transportation and Mobility**

- *Question:* How will the zoning action affect transportation infrastructure, transit access, and pedestrian safety?
- *Potential Impact:*
  - The zoning change itself does not directly fund or mandate transit improvements, but it encourages transit-oriented development, improving walkability and access to public transportation. The potential for new streetscape improvements, including better lighting, crosswalks, and bike lanes, can enhance pedestrian and cyclist safety. Increased density could lead to higher ridership and justify additional transit service improvements.

- **Small Business and Commercial Stability**

- *Question:* How will the zoning action impact existing small businesses and access to commercial opportunities?
- *Potential Impact:*
  - More flexible zoning (MU-7A) could allow a broader mix of businesses and increase foot traffic. More flexible zoning could encourage new local businesses, including minority-owned and small-scale enterprises, contributing to neighborhood vibrancy. The increased foot traffic from new residents and visitors could help existing businesses thrive. The zoning change itself does not guarantee small business retention, but community input can help shape policies that support them.

- **Public Services and Infrastructure Capacity**

- *Question:* Will the zoning action affect the demand for public services (schools, emergency services, utilities, etc.)?
- *Potential Impact:*
- Increased density could lead to additional tax revenue, which can support school funding, emergency services, and infrastructure improvements. New development may lead to investments in public amenities like libraries, recreation centers, and public gathering

spaces. The impact on public services will depend on how much development occurs and how the city plans for it, of course, but this opens the door for such development and investment in this area.

- **Environmental Sustainability and Resilience**

- *Question:* How will the zoning action impact environmental factors such as stormwater management, air quality, and green space?
- *Potential Impact:*
  - The rezoning could promote green building practices, energy efficiency, and increased use of renewable energy in new developments. Future projects could incorporate tree planting, green roofs, and stormwater management improvements, enhancing the urban environment. The potential for mixed-use, walkable development can reduce vehicle emissions by encouraging public transit and pedestrian-friendly design.

- **Crime Prevention and Public Safety**

- *Question:* Could the zoning action impact safety, lighting, and perceptions of crime in the neighborhood?
- *Potential Impact:*
  - More active and mixed-use development can create "eyes on the street," increasing natural surveillance and contributing to crime reduction. Potential new commercial and residential activity could lead to better street lighting and pedestrian-friendly infrastructure, improving safety. If new businesses include late-night establishments such as restaurants or grocery stores, they could contribute to a safer nighttime environment. Crime trends depend on multiple factors beyond zoning, but thoughtful development can contribute to a safer public realm.

## 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 MU-7A zone will allow for the development of the Property with increased residential density, consistent with the Comp Plan designations for the Property.

Respectfully Submitted,

*Alexandra Wilson*

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Alexandra Wilson  
Sullivan & Barros, LLP