

934 Eastern Ave N.E.
APPLICATION TO THE
ZONING COMMISSION FOR THE
DISTRICT OF COLUMBIA
FOR AN
AMENDMENT TO THE ZONING MAP
at Square 5203, Lot 0851

Application Date: 2/2/2026

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Applicants' Team

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I. INTRODUCTION

Michael W. Williams (the “Applicant”) submits this Statement in Support of an amendment to the Zoning Map of the District of Columbia (the “Zoning Map”) pursuant to 11-X DCMR § 501.1 and to 11-Z DCMR §§ 201.2(e) and 304 of the Zoning Regulations of the District of Columbia (the “Zoning Regulations”). The Applicant seeks to rezone the Applicant-owned property located at 934 Eastern Avenue, N.E. (more particularly known as Square 5203, Lot 0851 and referred to herein as the “Property”), from the R-3 zone to the RA-1 zone (the “Application”).

A summary of this Application is included as Exhibit A, a plat of the Property from the Office of the Surveyor is included as Exhibit B-1, an excerpt of the Zoning Map as Exhibit B-2, and a detailed analysis of the Application’s consistency with the Comprehensive Plan (the “Comp Plan”) and other adopted public policies applicable to the Property as Exhibit C.

As required pursuant to 11-X DCMR § 500.3, the proposed Zoning Map amendment is not inconsistent with the Comp Plan, including the Property’s designation on the Comp Plan’s Future Land Use Map (“FLUM”) and Generalized Policy Map (“GPM”). The Applicant will demonstrate that the proposed RA-1 zoning is consistent with the FLUM’s Moderate Density Residential designation and aligns with the GPM’s policies for Neighborhood Conservation Areas. The Application advances the objectives and recommendations of the Far Northeast and Southeast Area Element and other adopted public policies and programs related to the Property. The proposed Map amendment is also consistent with the purposes of the Zoning Act in that it will create conditions that are favorable to public health, safety, and welfare.

II. DESCRIPTION OF THE PROPERTY, THE SURROUNDING AREA, AND PLANNING GUIDANCE

The Property is located at 934 Eastern Avenue NE (Square 5203, Lot 0851) in Washington, DC. It is within Ward 7 and Advisory Neighborhood Commission (“ANC”) 7C, Single-Member District (“SMD”) 7C06. The site lies within Neighborhood Cluster 31, Police District 6 (PSA 608), and Voting Precinct 95. The Property is currently zoned R-3 and is improved with a single-family detached residential dwelling. The lot comprises approximately 17,550 square feet of land area, making it one of the largest lots in the square—five to ten times larger than many of the other R-3 zoned properties in the immediate vicinity.

Square 5203 is characterized by a mix of low-density and low- to moderate-density residential zoning. The square includes properties zoned RA-1, a low- to moderate-density apartment zone, and R-3, a low-density rowhouse zone. The presence of both R-3 and RA-1 zoning within the same square underscores the area’s transitional character and evolving residential needs. However, the current R-3 zoning on the subject Property does not reflect its size, potential, or the surrounding zoning context. The R-3 designation significantly limits the

development potential of this unusually large lot. In contrast, the RA-1 zone is more appropriate given the size of the Property and the presence of other low- to moderate-density zoning nearby.

The proposed rezoning to RA-1 would allow for low- to moderate-density multifamily development that is consistent with both the existing RA-1 zoning in the square and the Future Land Use Map (FLUM) designation for Moderate Density Residential. The site is well-suited for additional residential density, given its large land area, access to transit, and compatibility with nearby multifamily development patterns.

Planning guidance for the area is provided by the Far Northeast and Southeast Area Element of the District of Columbia Comprehensive Plan. Relevant policies in support of this Application include Policy FNS-1.1.2: Development of New Housing, which encourages new housing opportunities on underutilized land; Policy FNS-1.1.4: Infill Development, which supports compatible residential infill; and Policy FNS-1.1.3: Transit-Oriented Development, which promotes density near transit corridors. Additionally, Policy FNS-1.1.1: Neighborhood Conservation calls for new development to respect the scale and character of existing neighborhoods while allowing for reinvestment and context-sensitive growth.

As further analyzed in Exhibit C, the proposed rezoning is not inconsistent with the Comprehensive Plan when read as a whole and supports the District's goals for equitable housing access, neighborhood vitality, and efficient land use.

III. MAP AMENDMENT APPROACH VERSUS PUD

The Applicant is seeking a standalone Zoning Map amendment from the R-3 zone to the RA-1 zone rather than pursuing a Planned Unit Development ("PUD") with a related map amendment. This strategic choice reflects both the unique characteristics of the Property and the current status of development planning.

At present, the Applicant has not determined a specific redevelopment program for the Property. However, the Applicant recognizes that the Property's size—approximately 17,550 square feet—is substantially larger than typical R-3 zoned lots in the area, many of which are five to ten times smaller. Given its scale and location within a square that already includes both R-3 and RA-1 zoning, the Property is uniquely positioned to accommodate low- to moderate-density residential infill consistent with the RA-1 zone.

A Zoning Map amendment is therefore the more appropriate and efficient vehicle to align the zoning designation with the Property's physical characteristics and long-term planning vision. The RA-1 zone will provide the necessary flexibility for future development while ensuring compatibility with surrounding residential uses and the District's land use policy objectives.

In contrast, pursuing a PUD at this time would require speculative design and programming decisions that may not reflect the ultimate best use of the Property. Rather than prematurely committing to a specific project or seeking customized zoning relief, the Applicant is first seeking to establish the appropriate base zone that reflects the Property's context and potential. This allows for a more organic planning process and ensures that any future development is grounded in a zoning framework that supports flexibility, predictability, and alignment with District goals.

Moreover, the Map amendment is consistent with the Comprehensive Plan's FLUM designation for Moderate Density Residential and with multiple policies in the Far Northeast and Southeast Area Element that promote transit-accessible infill, new housing opportunities, and context-sensitive growth. As such, this Application lays the groundwork for a thoughtful and impactful future development without the constraints or commitments associated with a PUD at this preliminary stage.

IV. EXISTING AND PROPOSED ZONING

The Applicant proposes to rezone the Property from the existing R-3 zone to the RA-1 zone.

The R-3 zone is a low-density residential zone intended to permit attached rowhouses on moderately sized lots and, in limited cases, detached dwellings.

While appropriate for small and moderately scaled parcels, the R-3 zone does not accommodate multifamily development and limits the efficient use of larger residential parcels such as the subject Property.

In contrast, the RA-1 zone is a low- to moderate-density residential zone intended to permit low- to moderate-height apartment buildings in areas generally identified for such development on the Comprehensive Plan's Future Land Use Map.

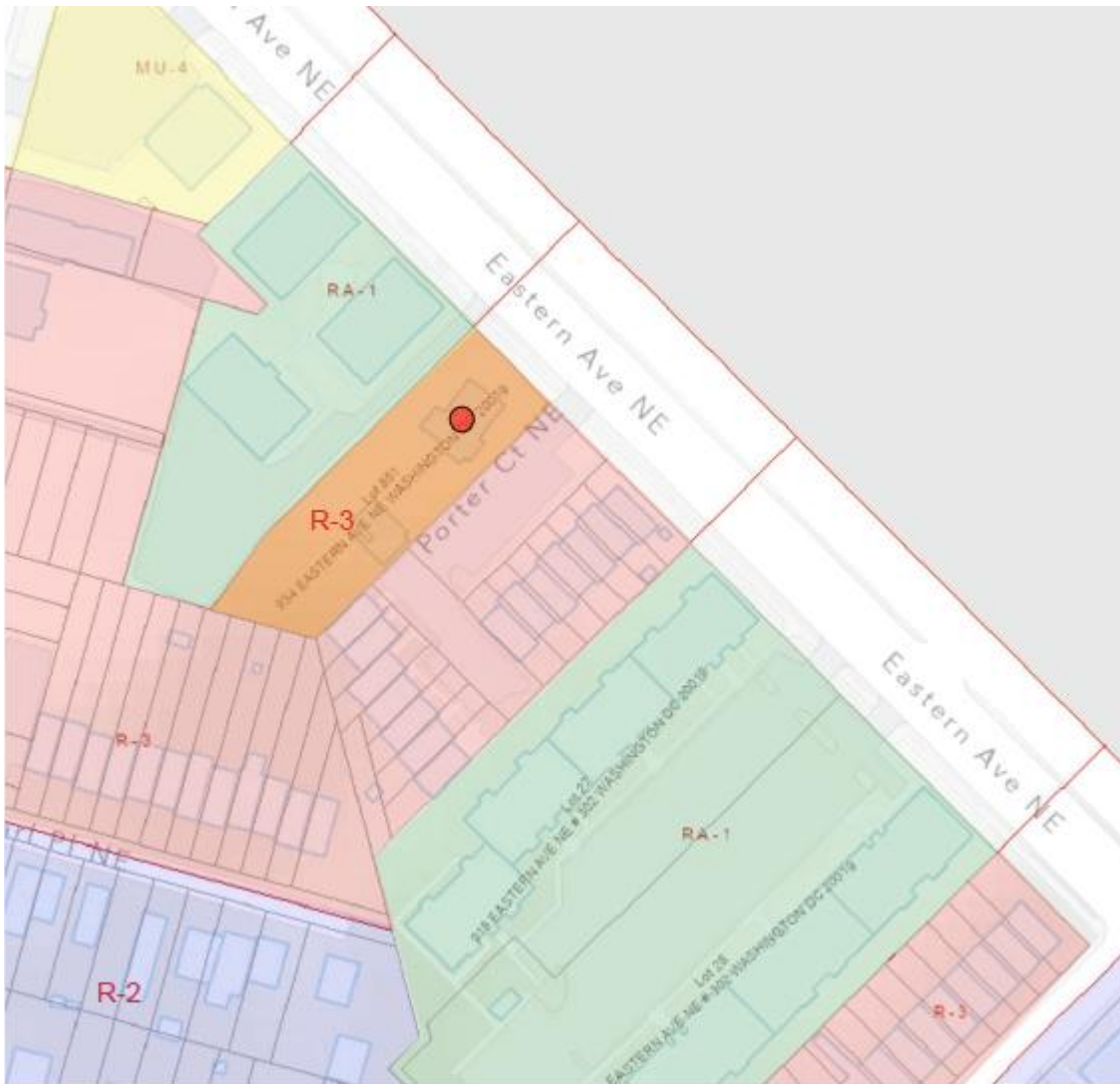
According to 11-F DCMR § 300.1, the purposes of the RA zones include: (i) recognizing the importance of providing a range of housing types for households of varying sizes and income levels; (ii) preserving the stability of residential areas while allowing for compatible infill development; and (iii) promoting low- to moderate density residential neighborhoods with appropriate height and bulk standards.

The RA-1 zone allows for greater development flexibility than R-3 while maintaining compatibility with the residential character of the surrounding area. The Property's unusually large lot size, approximately 17,550 square feet, makes it especially well-suited to support the types of low- to moderate-density multifamily development envisioned in the RA-1 zone. Additionally, as Square 5203 already includes both R-3 and RA-1 zoning, the proposed RA-1 designation

further reinforces the zoning diversity within the square and reflects an appropriate transition in building type and scale.

The discussion below details and compares the specific purposes and development standards of the existing and proposed zones as they apply to the Property.

Existing Zoning Map



A. Existing R-3 Zone

As shown in Exhibit B-2, the Property is currently located in the R-3 zone. The Zoning Regulations describe the R-3 zone as intended to permit low-density development, including detached and semi-detached dwellings, as well as rowhouses on moderately sized lots. The zone is designed to preserve the character of established residential neighborhoods while allowing limited infill consistent with existing patterns. (11-D DCMR § 300.1)

The maximum permitted height in the R-3 zone is 40 feet (not including penthouse), and the maximum floor area ratio (FAR) is 0.9, or 1.08 with Inclusionary Zoning (IZ). The maximum lot occupancy is 60%, and the minimum rear yard depth is 20 feet.

Although the R-3 zone may be appropriate for smaller lots within the square, it is not well-suited to a property of this size. At approximately 17,550 square feet, the subject Property is five to ten times larger than typical R-3-zoned lots in the area. This significant disparity in scale renders the R-3 development standards inefficient and overly restrictive for the Property. The result is a zoning mismatch that limits the site's potential for residential development that could otherwise contribute meaningfully to the District's housing goals.

B. Proposed RA-1 Zone

As shown in Exhibit B-2, the Applicant requests a Zoning Map amendment to rezone the Property to the RA-1 zone. The RA zones are intended to permit a range of residential building types at varying densities, with the RA-1 zone specifically intended to allow for low- to moderate-density, multi-family residential development. The RA-1 zone is typically mapped in areas identified in the Comprehensive Plan as appropriate for Moderate Density Residential uses. 11-F DCMR § 300.3.

The maximum permitted density in the RA-1 zone is 0.9 FAR, or 1.08 FAR with Inclusionary Zoning ("IZ"). 11-F DCMR § 302.1. The maximum permitted building height, not including a penthouse, is 40 feet. 11-F DCMR § 303.1. The maximum lot occupancy for residential use is 60%, and the required minimum rear yard depth is 15 feet.

The RA-1 zone is well-suited for the subject Property due to its large lot size (approximately 17,550 square feet), which exceeds the scale of typical R-3-zoned lots within the same square. Rezoning to RA-1 would allow for a more appropriate level of density and flexibility while maintaining compatibility with the existing residential character and zoning context of the surrounding neighborhood, including the RA-1 properties located within the same square.

C. Comparison of Development Standards and Permitted Uses

The following table compares the matter-of-right development standards of the Property’s existing zone against those of the proposed zone:

Table 1: Zoning Comparison Table – R-3 vs. RA-1

Standard	R-3 (Existing)	RA-1 (Proposed)
Zone Type	Residential – Low Density	Residential – Moderate Density
Use Group	Low-density residential (rowhouses, detached)	Multifamily residential (apartment houses)
Minimum Lot Area	2,000 sq. ft. (rowhouse)	None
Minimum Lot Width	20 ft. (rowhouse)	None
Maximum Height	40 ft. / 3 stories	40 ft. / 4 stories
Maximum FAR	0.9 (rowhouse); 1.08 (with IZ)	0.9; 1.08 (with IZ)
Lot Occupancy (max.)	60%	60%
Rear Yard (min.)	20 ft.	15 ft.
Side Yard (min., if provided)	8 ft.	None required (unless provided)
Green Area Ratio (GAR)	0.4	0.4
IZ Requirements	Applies to new construction of 10+ units	Applies to new construction of 10+ units

V. STANDARD OF REVIEW FOR A ZONING MAP AMENDMENT

This Application is being submitted as a rulemaking case pursuant to Subtitle Z of the Zoning Regulations.

When considering a Zoning Map amendment, the Zoning Commission applies two principal standards.

First, in accordance with 11-X DCMR § 500.3, the Commission must find that the proposed amendment is not inconsistent with the District of Columbia Comprehensive Plan when read as a whole. This includes consistency with the Future Land Use Map (FLUM), Generalized Policy Map (GPM), and the policies set forth in the Far Northeast and Southeast Area Element, as well as other adopted public policies and planning guidance.

Second, the Commission must determine that the proposed map amendment will further the purposes of the Zoning Act (D.C. Official Code § 6-641.01),

including promoting the health, safety, morals, convenience, order, prosperity, and general welfare of the District and the orderly development of land in the nation's capital.

As detailed in Exhibit C and the sections that follow, the proposed RA-1 zoning for the Property satisfies both of these standards.

VI. EVALUATION OF THE PROPOSED ZONING MAP AMENDMENT UNDER THE STANDARD OF REVIEW

Evaluation of the Comprehensive Plan “As a Whole” Through a Racial Equity Lens

The Application is not inconsistent with the Comprehensive Plan when evaluated both “as a whole” and through a racial equity lens, in accordance with the standards established by the D.C. Council, the Court of Appeals, and the Zoning Commission.

The D.C. Court of Appeals and the D.C. Council have each outlined a two-part framework for evaluating zoning actions under the Comprehensive Plan:

- First, the Zoning Commission is required to assess the overall consistency of the Application with the Comprehensive Plan, balancing individual policies that may support the proposal against any that may be inconsistent. A zoning action need not align with every policy; instead, the Commission must determine whether the action is consistent with the Comprehensive Plan when read as a whole. Where inconsistencies exist, the Commission must recognize them and explain why they are outweighed by other, more compelling considerations.
- Second, under 10-A DCMR § 2501.8, the Commission must evaluate zoning actions through a racial equity lens. This does not constitute a separate test but is integrated into the “not inconsistent” analysis.

Equity as a Central Planning Principle

The Framework Element of the Comprehensive Plan defines equity as both a process and an outcome (10-A DCMR § 213.6). Equity exists where all people have equal access, rights, choices, and outcomes, regardless of race, class, or gender. The Comprehensive Plan explicitly calls on the Zoning Commission to consider equity—and particularly racial equity—as part of its evaluation and implementation of zoning actions.

Policy Guidance Documents Used in This Evaluation

This Application considers two primary racial equity frameworks endorsed by the Zoning Commission and the Office of Planning:

1. Zoning Commission’s Racial Equity Tool (2023) This tool directs applicants to:
 - o Identify existing racial and socio-economic inequities in the area
 - o Assess whether the proposed action helps correct or perpetuate those inequities
 - o Engage community stakeholders when possible
 - o Evaluate impacts on access to housing, jobs, transit, education, and health

The tool requires a complete analysis of FLUM, GPM, and all relevant Citywide and Area Elements. This Application fulfills that requirement and demonstrates how rezoning the subject property to RA-1 supports more equitable development in Ward 7.

2. Office of Planning’s Equity Crosswalk (2021)
 This planning tool highlights Comprehensive Plan policies that explicitly advance racial equity. The proposed amendment supports policies identified in the Crosswalk, including:
 - o Expansion of affordable housing in high-need areas
 - o Infill development that prevents displacement
 - o Equitable access to transportation and services

Planning Guidance Considered

Table 2 outlines the primary planning documents, maps, and policies reviewed in evaluating the proposed zoning map amendment “as a whole” and through a racial equity lens:

Table 2 – Planning Guidance Used in Evaluation

Source	Policy or Map	Relevance to Project
Comprehensive Plan	Future Land Use Map (FLUM) – Moderate Density Residential	RA-1 zoning is expressly consistent with this designation
Comprehensive Plan	Generalized Policy Map (GPM) – Neighborhood Conservation Area	Supports compatible infill in stable residential areas
Framework Element (213.6–213.9)	Equity as an outcome and process	Requires integrated racial equity analysis
Far Northeast &	FNS-1.1.1, 1.1.2, 1.1.3, 1.1.4	Encourages infill, TOD, and

Source	Policy or Map	Relevance to Project
Southeast Element		new housing while maintaining character
Housing Element	H-1.1.1, H-1.2.2, H-2.1.1	Supports diverse housing types and affordable housing tools
Land Use Element	LU-1.4.1 (Infill Development), LU-2.1.5 (Conservation of Single Family Neighborhoods)	Encourages redevelopment of large underutilized lots in residential areas
Transportation Element	T-1.2.3 (Transit-Oriented Development)	Supports residential growth near transit access
Equity Crosswalk (OP, 2021)	Housing Equity, Anti-Displacement, Access to Opportunity	Aligns with goals to expand housing options in underserved areas
Mayor's Housing Equity Report	Ward 7 Equity Targets	Helps Ward 7 meet its housing production and affordability benchmarks
DDOT's MoveDC Plan	Future Transit and Corridor Investment	Reinforces need for housing near multimodal transportation corridors

Evaluation of Consistency with the Comprehensive Plan's Maps and Citywide Elements

When evaluated through a racial equity lens, the Applicant finds that the proposed map amendment is not inconsistent with the Comprehensive Plan's Future Land Use Map and Generalized Policy Map, and is not inconsistent with the Citywide Elements when considered as a whole.

Comprehensive Plan Maps

The proposal to rezone the Property from the R-3 zone to the RA-1 zone is not inconsistent with either the Future Land Use Map (FLUM) or the Generalized Policy Map (GPM) when evaluated as part of the Comprehensive Plan as a whole.

As shown in Figure 1, the FLUM designates the Property as Moderate Density Residential, which supports zoning districts such as RA-1, RA-2 and RF-1. The proposed RA-1 zoning aligns directly with this designation by permitting low- to moderate-density multifamily housing, consistent with the density and form envisioned by the Plan.

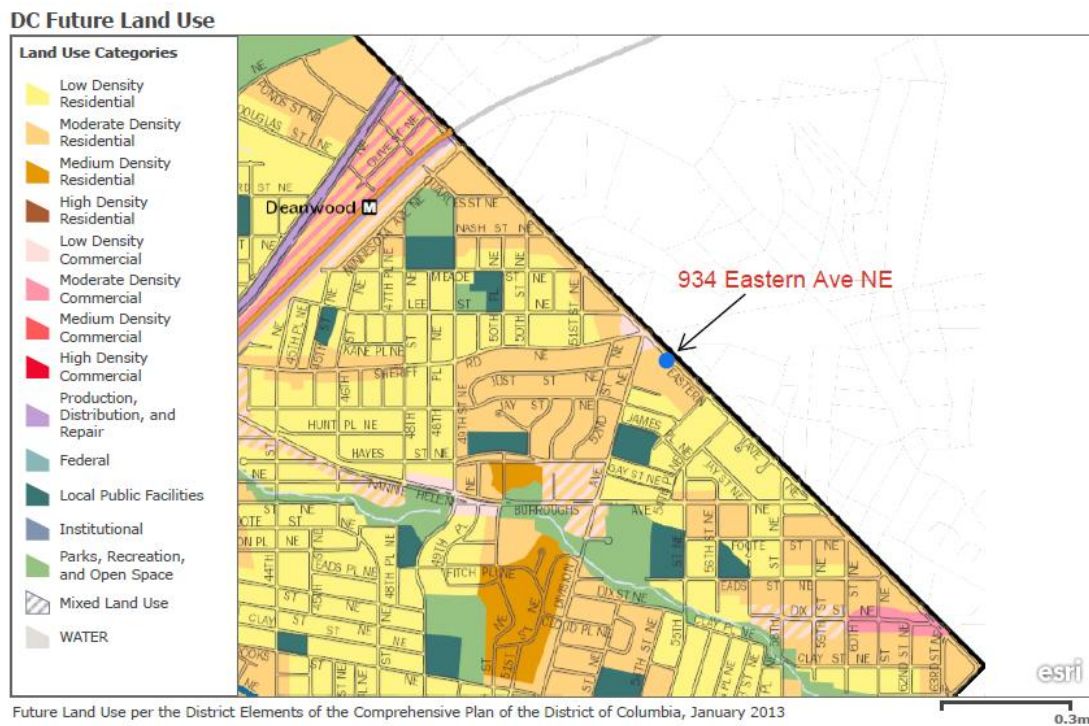
As shown in Figure 2, the GPM designates the Property as part of a Neighborhood Conservation Area, which supports infill development that

preserves neighborhood character while addressing citywide housing needs. The proposed rezoning fulfills these goals by enabling context-sensitive multifamily development on a large lot, within a square that already includes RA-1 zoning.

Future Land Use Map (FLUM) Analysis of the Comprehensive Plan:

The FLUM designates the subject property as Moderate Density Residential (see Figure 2). This designation supports zoning districts such as RA-1, RA-2, and RF zones. The FLUM is intended to guide general land use patterns and ensure that zoning decisions reflect the anticipated scale and character of development in a given area.

Figure 1: FLUM



Existing Zoning Misalignment

The current zoning of the Property—R-3—is a low-density residential zone that primarily permits single-family detached and attached row dwellings. It does not permit multifamily development, nor does it allow for the density needed to meet the intent of the Moderate Density Residential designation.

Given the Property's size (17,550 square feet) and its location in a square already containing RA-1 zoned parcels, the R-3 zoning unnecessarily restricts housing potential on one of the largest lots in the immediate area. In contrast, the RA-1 zone permits low- to moderate-density multifamily housing—precisely the development pattern envisioned under this FLUM designation.

FLUM Definition: Moderate Density Residential

According to the Comprehensive Plan Framework Element (§ 227.6), Moderate Density Residential areas are defined as:

“Areas with a mix of housing types, including row houses, low-rise garden apartments, and small apartment buildings. The associated zoning districts typically include RA-1, RA-2, and RF zones.”

The proposed RA-1 zoning allows for:

- Multifamily apartment buildings up to 40 feet in height
- FAR of 0.9 (1.08 with Inclusionary Zoning)
- Inclusionary Zoning (IZ) requirements, ensuring a mix of market-rate and affordable units

This aligns directly with the FLUM's stated development intent and density range. Planning Context and Compatibility

The site is situated within a square that includes a mix of R-3 and RA-1 zoning, and is located in a broader Ward 7 context where housing access, affordability, and racial equity are critical planning concerns. The RA-1 zone provides an ideal framework for new development that:

- Fits within the height and scale of nearby RA-1 buildings
- Respects the existing residential fabric
- Encourages housing production without disrupting neighborhood character

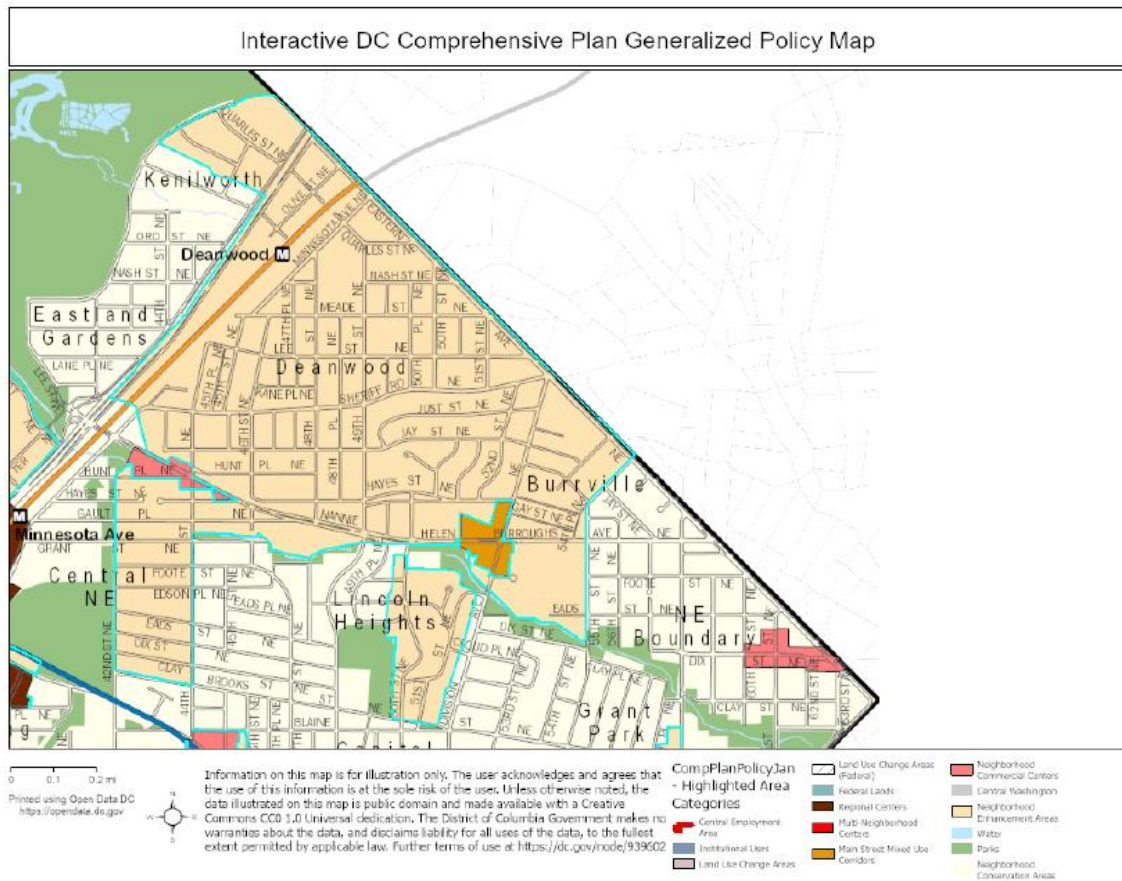
Infill Development and Equity Alignment

The underutilization of a 17,550 sq. ft. lot in a Moderate Density Residential area presents a missed opportunity for context-sensitive infill housing. By enabling multifamily development with affordability requirements, the RA-1 zone not only meets the technical FLUM designation but also furthers racial equity, housing choice, and District-wide housing production goals.

GPM: Generalized Policy Map Analysis

The Generalized Policy Map (GPM) designates the subject property as part of a Neighborhood Conservation Area (see Figure 3). This designation applies to areas across the District that are primarily residential in character, where the overarching goals are to preserve neighborhood character, support neighborhood stability, and allow infill development that fits the existing context.

Figure 2: Generalized Policy Map



According to the Comprehensive Plan:

"Development and redevelopment is expected to occur, but at a scale and design that preserves the existing neighborhood character. The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, but not preclude development, particularly to address citywide housing needs."
(10-A DCMR § 223.5)

The proposed rezoning from R-3 to RA-1 is not inconsistent with this designation. While the R-3 zone allows only single-family and rowhouse dwellings, the RA-1 zone allows low- to moderate-density multifamily housing, which is:

- Already present in the square via RA-1 zoning
- Scaled to be compatible with adjacent development
- Well-suited to a larger lot (17,550 sq. ft.) that can support new housing without overburdening infrastructure or disrupting neighborhood character

The RA-1 zone supports context-sensitive infill development—one of the GPM's key planning objectives for Neighborhood Conservation Areas. The proposed rezoning would enable low- to moderate-density housing in a neighborhood that has traditionally lacked diverse housing options, especially in a manner that respects the surrounding form and scale.

Additionally, by incorporating Inclusionary Zoning (IZ) requirements, as required, future development under RA-1 would include affordable units, advancing the GPM's citywide housing and equity objectives while supporting long-term neighborhood stability.

Comp Plan Citywide Elements

The proposed Zoning Map amendment to rezone the Property from R-3 to RA-1 is not inconsistent with the Comprehensive Plan's Citywide Elements when considered as a whole. The amendment advances numerous policies related to land use, housing, transportation, equity, urban design, and neighborhood reinvestment. Several of these policies are also identified in the Office of Planning's Equity Crosswalk as having particular relevance to advancing racial equity in land use decisions.

Land Use Element:

The Application balances the sometimes competing objectives of the Land Use Element, which is given “great weight” under District land use law. The proposal promotes the efficient use of a large underutilized parcel in an established residential area and supports infill development that respects neighborhood character. The RA-1 zone is consistent with the Moderate Density Residential FLUM designation and provides a transition from R-3 to existing RA-1 zoning within the square within the same square. This Application does not displace any existing residents, and future development would provide needed housing opportunities on a lot currently restricted to low-density use.

Housing Element:

The proposed RA-1 zoning will allow the construction of multifamily residential buildings, subject to the Inclusionary Zoning (IZ) program. Under current IZ+ provisions, any residential development on the site would be required to

dedicate at least 20% of its residential GFA to income-restricted affordable housing. This supports the District's goals of increasing the supply of affordable housing in high-need planning areas like Ward 7 and advances key housing policies, including H-1.1.1 (Increasing Supply) and H-1.2.2 (Production of Affordable Housing).

Transportation Element:

The Property is located near major arterials and Metrobus service routes, supporting transit-oriented development (TOD). Future development enabled by the RA-1 zoning will facilitate walkable, pedestrian-scaled housing options, consistent with T-1.2.3 (TOD and Land Use Connection) and T-2.3.3 (Ensuring Mobility for All Residents). While no companion BZA case is currently proposed, any future project would incorporate transportation demand management (TDM) measures as required.

Environmental Protection Element:

Although this Application does not propose a specific development, the rezoning supports green infrastructure, stormwater management, and energy efficiency goals by enabling new residential construction that will be subject to current environmental and building code requirements, consistent with E-3.1 (Sustainable Neighborhoods) and E-4.1 (Green Building Requirements).

Urban Design Element:

The RA-1 zone permits development that can complement the existing architectural form of the neighborhood while promoting better use of a deep lot. Design controls such as height limitations (40 feet) and rear yard requirements ensure compatibility with adjacent properties. New construction would offer an opportunity for thoughtful site planning, streetscape integration, and pedestrian-friendly facades, consistent with UD-2.2.1 (Neighborhood Character and Identity).

Equity and Implementation:

The Application directly supports the District's equity goals, including the Mayor's Housing Equity Report and the Framework Element's racial equity provisions (10-A DCMR §§ 213.6–213.9). The Equity Crosswalk flags this type of zoning action—expanding housing options through low- to moderate-density residential infill in underserved areas—as a key strategy to address systemic inequities in access to housing and opportunity. The Application also supports Implementation Element policies calling for zoning actions to reflect Comprehensive Plan priorities, especially those tied to housing and equity.

Assessment of Potential Policy Tensions

While the Application is broadly consistent with Citywide Elements, the Applicant recognizes that certain policies emphasize neighborhood preservation and cautious changes to residential zoning. Table 4 below presents a summary of these policies, along with offsetting policies that support the proposed map amendment:

Table 3: Policy Tension Analysis

Potentially Conflicting Policy	Offsetting/Supporting Policy or Consideration
LU-2.1.1: Conservation of Established Areas	LU-1.4.1: Encourages compatible infill development to meet housing needs
H-1.4.5: Minimizing Displacement	H-1.2.2: Expansion of affordable housing through Inclusionary Zoning and context-sensitive density increases
UD-2.2.1: Neighborhood Character	UD-2.2.7: Infill Development that respects context and promotes walkability

As detailed in Exhibit C, the Application's consistency with the FLUM, GPM, and majority of applicable Citywide and Area Element policies outweighs any minor tension with conservation-based objectives. The proposal furthers housing equity, supports moderate growth, and allows for sustainable reinvestment in an area already planned for modest increases in density.

Evaluation of Consistency with the SAP and W5W Study

The proposed Zoning Map amendment is not inconsistent with the Comprehensive Plan when considered in light of other adopted District planning studies. However, it is important to clarify that the subject property is not located within the boundaries of any adopted Small Area Plan (SAP) or the Ward 5 Works Industrial Land Transformation Study (W5W Study).

SAP:

There is no adopted Small Area Plan that applies to Square 5203 or to the property at 934 Eastern Avenue NE. Therefore, no SAP-specific designations, maps, or policy directives are applicable to the evaluation of this Application. Nonetheless, the Application's goals—low- to moderate-density infill, housing opportunity, and equity—are consistent with the type of community-driven planning outcomes advanced in SAPs across the District.

W5W Study:

The Ward 5 Works Study is also not applicable, as the subject site is located in Ward 7, not Ward 5. The study's recommendations concerning the transformation of industrial lands, job access, and creative economy uses in industrial zones are directed toward retaining or adapting PDR-designated areas in Ward 5. The Property is currently zoned R-3 and designated Moderate Density Residential on the FLUM—neither of which are associated with PDR or industrial land use typologies.

Accordingly, the SAP and W5W Study are not relevant guidance tools for the evaluation of this map amendment. The appropriate evaluation framework remains the Comprehensive Plan as a whole, including the Future Land Use Map,

Generalized Policy Map, Far Northeast and Southeast Area Element, and applicable Citywide Elements, which are addressed in detail in this Application and Exhibit C.

Evaluation of Procedural Racial Equity Considerations

The Application affirmatively advances the procedural objectives of the Comprehensive Plan's racial equity framework. The Framework Element emphasizes that as the District grows and evolves, it must do so in a manner that empowers vulnerable, historically marginalized, and low-income communities to fully participate in decisions that shape their neighborhoods. (10-A DCMR § 213.7).

As a process, racial equity involves ensuring that those most impacted by structural racism are substantively included in shaping the policies and practices that affect their lives. The Zoning Commission's Racial Equity Tool places a clear priority on community outreach and expects engagement to begin early in the zoning process.

This Application reflects those values by committing to transparent and accessible communication with ANC 7C, the affected SMD, and nearby neighbors. Table 5 below responds to the questions outlined in Part Two (Community Outreach and Engagement) of the Commission's Racial Equity Tool. These responses are informed by the Applicant's understanding of community context and potential impacts.

Table 4: Racial Equity Tool – Part Two: Community Outreach & Engagement Summary

Community Engagement Question	Applicant's Response
What communities are most likely to be impacted by the zoning action?	Residents of ANC 7C, specifically in SMD 7C06, including long-term homeowners and renters in single-family and multifamily dwellings.
What outreach has occurred or is planned?	The Applicant will present to ANC 7C, communicate directly with SMD 7C06, and offer meetings with nearby residents to explain the proposed map amendment.
How has community feedback been incorporated?	Initial conversations have helped inform a focus on maintaining neighborhood character while expanding housing options. The Applicant will adjust engagement based on additional input.
How will the proposal affect communities of color or low-income communities?	The rezoning enables more diverse housing options, including affordable units via Inclusionary Zoning, in a historically underserved area of Ward 7.

How will transparency be maintained?	The Applicant is committed to ongoing engagement, public presentations, and follow-up with local stakeholders throughout the zoning process.
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Table 5: Evaluation of Equitable Development Indicators

Key: Positive Outcome ● Negative Outcome ● Neutral Outcome ●

Indicator	Aspect(s) of Zoning Action Relating to Racial Equity	Potential Outcome
Displacement – Physical (Direct/Residential)	No direct residential displacement will occur since no residents currently reside on the Property	●
Displacement – Physical (Direct/Non-Residential)	No existing businesses will be displaced; the Property is currently used as a private residence	●
Displacement – Economic (Indirect)	Indirect displacement of nearby residents is not expected due to the scale and nature of the proposed rezoning	●
Displacement – Cultural (Indirect)	The proposed RA-1 zoning allows compatible development that maintains neighborhood character and encourages inclusion	●
Housing – Availability of Housing	Rezoning enables multifamily development with IZ, increasing housing supply and potential affordability	●
Housing – Preservation of Affordable Housing	N/A: The Property currently does not contain affordable housing	●
Housing – Replacement Housing	N/A: No housing is being demolished or replaced	●
Housing – Housing Burden	Future IZ requirements could reduce housing cost burden for income-	●

	restricted households	
Housing – Larger Unit Size	RA-1 zoning allows for a range of unit types, including family-sized apartments	●
Employment – Entrepreneurial Opportunities	The proposed zoning could enable accessory home occupations and ground-floor uses in future development	●
Employment – Job Creation	Construction and operation of new housing can create direct and indirect job opportunities	●
Employment – Job Training	No specific training programs are proposed	●
Employment – Access to Employment	Improved transit-oriented location will increase resident access to job centers via transit	●
Transportation – Public Space / Streetscape Improvements	Redevelopment under RA-1 will trigger updates to sidewalks and public space as required by DDOT	●
Transportation – Infrastructure Improvements	Development will require utility upgrades, stormwater controls, and pedestrian infrastructure	●
Transportation – Access to Transit	Site is well-served by Metrobus routes on Eastern Avenue and surrounding arterials	●
Transportation – Pedestrian Safety	Future improvements will enhance pedestrian access, safety, and circulation	●
Education / Health / Wellness – Education/Schools	The map amendment does not directly impact public schools	●
Education / Health / Wellness – Healthcare	No direct change to healthcare access, though new housing may improve proximity to providers	●

Education / Health / Wellness – Open Space / Recreation	No new recreation space proposed, but redevelopment may enhance public space landscaping	●
Environmental – Environmental Changes	Future development will reduce impervious surface and improve stormwater management	●
Environmental – Sustainable Design	Development must meet Green Building Act and stormwater compliance standards	●
Environmental – Resilient Design	The Property is outside floodplain areas and must meet resiliency codes	●
Environmental – Remediation	No remediation expected; any required cleanup would be completed per DOEE standards	●
Access to Opportunity – Neighborhood Retail/Service Uses	Residential density may support nearby retail nodes and encourage service use growth	●
Access to Opportunity – Residential Amenities	No amenities proposed directly, but future housing could support community cohesion	●
Access to Opportunity – Arts & Culture	While not directly tied to arts, inclusive housing opportunities contribute to cultural retention	●

Zoning Act Health, Safety, General Welfare, and Character Considerations

The proposed Zoning Map amendment from R-3 to RA-1 supports and advances the public purposes of the Zoning Act of 1938, particularly the promotion of health, safety, morals, convenience, order, prosperity, and general welfare of the District and its residents.

Rezoning the Property to RA-1 allows for future low- to moderate-density residential development that aligns with the Comprehensive Plan, including the

Future Land Use Map (FLUM) and Generalized Policy Map (GPM). By enabling appropriately scaled multifamily housing, the amendment supports neighborhood conservation while also helping meet District-wide housing needs, particularly in Ward 7, an area identified as needing expanded housing opportunities under the Mayor's Housing Equity Report.

The RA-1 zone allows for development with controlled height (40 feet) and low-to moderate density (0.9 FAR, or 1.08 with IZ), which promotes access to light and air—a core concern of the Zoning Act. The inclusion of Inclusionary Zoning (IZ) also ensures that future development will enhance affordability and housing diversity, directly furthering health and welfare goals for vulnerable populations.

The proposed map amendment supports orderly growth by allowing the Property—currently underutilized under R-3 zoning—to contribute to the stability of the neighborhood. It avoids overcrowding while unlocking the potential of a 17,550 square foot lot, which is significantly larger than surrounding R-3-zoned properties. A zoning designation of RA-1 brings the property into better alignment with its scale and context, promoting predictable and equitable land use patterns.

Furthermore, the rezoning contributes to the economic vitality and stability of the neighborhood. Increased housing options support population retention, generate local tax revenue, and ensure efficient use of public infrastructure and services such as utilities, emergency response, and transportation networks.

Finally, by facilitating development that respects existing neighborhood character while addressing housing needs, the map amendment supports the stability of land values in the area—an original intent of the Zoning Act. Future development under RA-1 will contribute to the continued reinvestment and resiliency of the community in a way that is equitable, measured, and consistent with District planning goals.

VII. Conclusion

In summary, the proposed Zoning Map amendment to rezone the subject property from R-3 to RA-1 is fully consistent with the District's Comprehensive Plan, when evaluated both as a whole and through a racial equity lens. The Future Land Use Map clearly designates the property for Moderate Density Residential development, and the proposed RA-1 zoning provides a flexible framework that better utilizes the property's large 17,550-square-foot lot. This rezoning enables the development of multifamily housing—including affordable units via Inclusionary Zoning—thus addressing critical housing needs in Ward 7 and advancing equitable outcomes for historically underserved communities.

The analysis further demonstrates that the proposed amendment complies with key Citywide Elements, supporting essential objectives in land use, housing,

transportation, environmental protection, urban design, and overall community stability. By ensuring controlled height and low- to moderate density, the amendment protects the light and air objectives of the Zoning Act, while also fostering orderly growth and preserving neighborhood character. Furthermore, the proposed rezoning promotes economic vitality by enabling future development that is both responsive to local needs and aligned with the District's long-term strategic goals.

Taken together, the substantive and procedural evaluations—including the detailed racial equity analyses and the policy matrices—underscore that the proposed map amendment not only corrects an existing zoning mismatch but also establishes a foundation for sustainable, inclusive, and resilient development. In doing so, the application fully meets the statutory and policy requirements of the Zoning Act, positioning the property to contribute positively to the overall health, safety, and prosperity of the District.

The Applicant proposes to rezone the Property from the R-3 zone to the RA-1 zone. All materials required pursuant to Subtitle Z § 304 have been submitted with this application. The analysis provided herein and in Exhibit C demonstrates that the application is not inconsistent with the Comprehensive Plan when read as a whole.

The proposed RA-1 zone permits low- to moderate-density residential development that is consistent with the Future Land Use Map designation of Moderate Density Residential and reflects the existing context within Square 5203.

As further detailed in Exhibit C, which is incorporated herein by reference, the proposed map amendment is not inconsistent with the Comprehensive Plan when read as a whole.

A standalone Racial Equity Analysis is provided as Exhibit D and is incorporated herein by reference. A summary of community outreach and notice is provided in Exhibit E.