

RACIAL EQUITY ANALYSIS

Pursuant to Subtitle Z § 304.7(f)

Proposed Zoning Map Amendment from RA-2 to MU-10

Property	611 L Street NW, Washington, DC 20001
Square / Lot	Square 0449, Lot 0052
Applicant	611 L Street, LLC
Existing Zone	RA-2
Proposed Zone	MU-10
Future Land Use Map	CMED / RMED – Commercial Medium Density / Residential Medium Density

I. Introduction

The Applicant, 611 L Street, LLC, submits this Racial Equity Analysis in support of its application for a Zoning Map amendment to rezone the property located at 611 L Street NW, Washington, DC 20001, from RA-2 to MU-10.

This analysis is submitted pursuant to Subtitle Z § 304.7(f) and the District of Columbia Zoning Commission's Racial Equity Tool. The Tool explains that racial equity is considered as part of the Zoning Commission's Comprehensive Plan consistency analysis, including whether a zoning action is not inconsistent with the Comprehensive Plan.

This application is a map amendment only. It does not approve a specific building, tenant, demolition plan, construction plan, redevelopment program, public space plan, or final use of the property. Accordingly, this analysis focuses on the racial equity implications of changing the zoning framework from RA-2 to MU-10.

II. Proposed Zoning Action

The subject property is currently zoned RA-2, a residential apartment zone. The Applicant requests MU-10 zoning.

The property's Future Land Use Map designation is CMED/RMED, meaning Commercial Medium Density and Residential Medium Density. This is a dual designation contemplating both commercial and residential land use. The MU-10 zone is intended to permit mixed-use development with a balance of uses. 11-G DCMR § 400.9(a). It is therefore more consistent with that mixed commercial and residential policy direction than RA-2, which implements only the residential component.

The proposed zoning action would not, by itself, displace any resident, approve any development plan, or authorize construction. Any future project would remain subject to applicable zoning, permitting, building code, public space, environmental, accessibility, historic preservation, and other District requirements.

III. Racial Equity Framework

The Zoning Commission's Racial Equity Tool identifies several key themes relevant to zoning actions, including affordable housing, avoiding displacement, access to opportunity, community outreach, housing impacts, physical improvements, economic opportunity, and potential positive and negative outcomes.

The Tool also recognizes that not every question applies equally to every zoning action. That is important here because the application is for a map amendment only, not approval of a specific redevelopment project.

IV. Impacted Community

The impacted community includes nearby residents, nearby property owners, nearby businesses, the affected Advisory Neighborhood Commission, the affected Single Member District Commissioner, workers and visitors in the surrounding Central Washington area, and future residents, tenants, employees, customers, or users of the property.

The impacted community is not limited to owners within 200 feet. Because the property is in a central urban area, the zoning action may also affect broader policy goals related to housing, land use, transit access, jobs, services, and neighborhood vitality.

V. Existing Conditions and Equity Context

The subject property is located in a highly urbanized area near downtown Washington, DC. The surrounding area includes residential, commercial, institutional, hospitality, retail, service, and employment-generating uses.

The area has experienced reinvestment, new development, increased housing demand, rising land values, and continued pressure for mixed-use growth near downtown and transit. These conditions make it important to evaluate the proposed zoning action through the lens of displacement risk, housing opportunity, economic opportunity, access to services, and community input.

VI. Potential Benefits

- Reservation of at least half of the permitted density for residential use under the MU-10 zone's 3.0 FAR non-residential limit. 11-G DCMR § 402.1.

- Greater capacity for future housing or mixed-use development than the existing RA-2 zone permits.
- Potential for neighborhood-serving retail, services, or business activity.
- Better use of land near downtown, transit, and existing infrastructure.
- Potential support for jobs, small business activity, and access to services.
- Potential future improvements to the physical condition and public-facing character of the property.
- Concentrating potential growth in an area already served by infrastructure and transit.

VII. Direct Displacement

The proposed zoning action is not expected to cause direct displacement of residents. The map amendment does not approve demolition, construction, redevelopment, or removal of any residential tenant. To the Applicant's knowledge, the subject property is not currently occupied by residential tenants who would be displaced by the rezoning itself. The property is currently occupied by a commercial tenant.

Any future displacement analysis would depend on a specific future development proposal. No such proposal is being approved through this application.

VIII. Indirect Displacement

The Applicant recognizes that land use changes can contribute to broader market pressures in some circumstances. However, the potential for indirect displacement from this application is limited because the zoning action applies to a single property of approximately 1,620 square feet in an already urbanized, mixed-use, central location.

The proposed rezoning does not remove existing affordable housing, does not eliminate existing residential units, and does not approve luxury redevelopment or any specific high-impact development program.

Any future project would remain subject to applicable District requirements, including any applicable affordable housing, Inclusionary Zoning, permitting, environmental, public space, historic preservation, and public review requirements.

IX. Housing and Affordable Housing

The proposed MU-10 zoning supports future housing opportunity in a manner the existing RA-2 zone does not, and in a manner more reliable than a zone that permits a predominantly non-residential building. The MU-10 zone limits non-residential use to 3.0 FAR of a permitted 6.0 FAR, so at least 3.0

FAR of permitted density is reserved for residential use. 11-G DCMR § 402.1. On this lot that is approximately 4,860 square feet of residential capacity.

The application does not approve a specific housing project or establish a specific number of units. If future residential development occurs, applicable District housing and affordable housing requirements, including Inclusionary Zoning where applicable, would be evaluated at that time. Because the MU-10 zone's Inclusionary Zoning density and height bonuses are available only in connection with residential development, the zone's structure supports the production of affordable housing in a high-opportunity, transit-accessible location.

The proposed action does not remove existing residential units and is not expected to directly displace residential tenants.

X. Access to Opportunity

The proposed rezoning may improve access to opportunity by allowing the property to better support productive uses in a central location near employment centers, transit, commercial corridors, public services, and urban amenities. Relevant considerations include:

- Housing opportunity in a location with a Transit Score of 100 and a Walk Score of 94.
- Job creation and employment-generating uses.
- Small business and neighborhood-serving activity.
- Walkability and transit access.
- Improved use of existing infrastructure.
- Potential access to new services for residents, workers, and visitors.

XI. Economic Development

The proposed MU-10 zoning may support economic development by allowing future commercial, service, office, retail, residential, or mixed-use activity within the zone's balanced framework. This flexibility is appropriate in a central location where land use needs may change over time, while the zone's non-residential limit ensures that commercial activity does not displace the residential component the Comprehensive Plan contemplates for this site.

XII. Physical Environment and Historic Context

Although no specific building or site plan is being approved, MU-10 zoning may allow future investment, adaptive reuse, redevelopment, or property improvements that could improve the site's physical condition and relationship to the surrounding neighborhood.

Because the property is located within the Mount Vernon Square Historic District, future physical changes would remain subject to applicable historic preservation review and requirements. The proposed map amendment does not waive or alter those requirements. The MU-10 zone also applies a residential lot occupancy limit of 75 percent (80 percent with IZ) and requires a rear yard for residential use. 11-G DCMR §§ 404.1, 405.7.

XIII. Community Outreach and Engagement

The Applicant understands that community outreach is an important part of the racial equity analysis. The Applicant has served or will serve the application and accompanying documents on the District of Columbia Office of Planning, the affected Advisory Neighborhood Commission, the affected Single Member District Commissioner, and nearby property owners as required by the Zoning Regulations.

The Applicant provided written Notice of Intent to all property owners within 200 feet by certified mail on July 9, 2026. The Applicant held telephone conferences with Commissioner Rachelle P. Nigro (SMD 2G06) and with Robert Goldberg, Chair of the ANC 2G Zoning, Planning, and Historic Preservation Committee, on July 31, 2026; presented to the ANC 2G Zoning, Planning, and Historic Preservation Committee on September 2, 2026; and presented to the full ANC 2G at its September public meeting on September 10, 2026. The Applicant intends to continue engaging with OP, the affected ANC, the affected SMD Commissioner, nearby property owners, and other stakeholders as the application proceeds. Because the application is a map amendment only, there are no architectural plans, building plans, tenant plans, construction plans, or final development program to modify at this time. The Applicant remains open to community discussion regarding the zoning action and the appropriate future use of the property.

XIV. Community Priorities and Potential Concerns

Potential positive outcomes include better alignment between zoning and the CMED/RMED Future Land Use Map designation, reservation of at least half of permitted density for residential use, potential neighborhood-serving uses, more productive use of land near transit, potential property investment, and potential improvements to the physical condition of the site.

Potential concerns may include future development intensity, building scale, traffic, parking, loading, affordability, indirect displacement, compatibility with nearby residential uses, historic preservation, and public space impacts. The Applicant notes that the MU-10 zone permits a maximum height of 90 feet (100 feet with IZ), greater than the 50 feet permitted under the existing RA-2 zone. The property is a small lot of approximately 1,620 square feet and lies within the Mount Vernon Square Historic District, where any construction is subject to HPRB review regardless of zone. These issues would be more fully evaluated if a specific future development proposal is advanced.

XV. Disaggregated Race and Ethnicity Data

The Racial Equity Tool states that the Zoning Commission expects disaggregated race and ethnicity data from the Office of Planning in racial equity submissions, using sources such as the OP Demographic Data Hub, U.S. Census, Open Data DC, and the OP Upward Mobility Dashboard.

The Applicant understands that OP may provide additional demographic analysis as part of its report to the Zoning Commission. The Applicant will review and respond to any demographic data, racial equity analysis, or community input provided by OP, the ANC, or affected community members during the review process.

XVI. Comprehensive Plan Policies Potentially Advanced

- Housing opportunity and housing production.
- Efficient use of land.
- Mixed-use development with a balance of uses.
- Transit-accessible growth.
- Economic development.
- Neighborhood-serving commercial activity.
- Walkable urban places.
- Access to jobs and services.
- Avoiding direct residential displacement.
- Reinvestment in central areas of the District.

XVII. Comprehensive Plan Policies Potentially Not Advanced

Because this application is a map amendment only, certain Comprehensive Plan goals cannot be fully evaluated until a specific future development proposal is submitted. This zoning action does not itself establish a specific number of housing units, a specific number of affordable units, a specific tenant, a specific building design, a specific public space improvement, or a specific employment program.

However, MU-10 creates a zoning framework that better supports these outcomes than RA-2, and reserves at least half of permitted density for residential use, given the property's CMED/RMED Future Land Use Map designation.

XVIII. Evaluation Through a Racial Equity Lens

Direct displacement: The zoning action is not expected to result in direct displacement of tenants or residents. The property is occupied by a commercial tenant and contains no residential units.

Indirect displacement: The zoning action applies to a single small property in an already urbanized, mixed-use area. No existing residential units are being removed by the rezoning.

Housing: The MU-10 zone reserves at least 3.0 FAR of its permitted 6.0 FAR for residential use, supporting future housing production, subject to applicable District requirements including Inclusionary Zoning.

Physical environment: The zoning action may support future reinvestment, adaptive reuse, redevelopment, streetscape improvement, or better public-facing design, subject to applicable review, including HPRB review within the Mount Vernon Square Historic District.

Access to opportunity: The site's central location may support access to employment, transit, services, housing opportunity, and neighborhood-serving uses.

Community: The Applicant has engaged with the affected ANC and SMD Commissioner and will continue to engage with OP, the ANC, nearby property owners, and other stakeholders as the application proceeds.

XIX. Conclusion

The proposed Zoning Map amendment from RA-2 to MU-10 is not expected to create direct residential displacement and may support racial equity objectives by allowing more flexible, productive, and opportunity-oriented use of land in a central, transit-accessible location, while reserving at least half of permitted density for housing.

The requested MU-10 zoning implements both components of the property's dual CMED/RMED Future Land Use Map designation and supports the Racial Equity Tool's core considerations, including housing opportunity, avoiding displacement, access to opportunity, physical improvements, economic development, and community engagement.

For these reasons, the Applicant submits that the proposed map amendment is not inconsistent with the Comprehensive Plan when viewed through a racial equity lens.

Respectfully submitted,

/s/ Rich Tynes

Rich Tynes
On behalf of 611 L Street, LLC
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