

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jonathan Kirschenbaum, AICP, Development Review Specialist
JLS
 Jennifer Steingasser, AICP
 Deputy Director, Development Review & Historic Preservation

DATE: February 27, 2023

SUBJECT: ZC Case 22-34 – Set down report for an application to rezone 14,000 square feet from RF-1 (residential flat zone) to RA-2 (apartment house zone).

I. RECOMMENDATION

The Office of Planning (“OP”) recommends that the Zoning Commission (“Commission”) **set down** this application to rezone Lot 77 in Square 2991. The proposal **would be appropriate** for Inclusionary Zoning (“IZ”) Plus.

The Comprehensive Plan analysis through a racial equity lens indicates that the map amendment proposal, on balance, would not be inconsistent with Comprehensive Plan. The analysis of demographic data and the policies of the Comprehensive Plan, work together to support increasing density to permit more housing, including affordable housing, in proximity to transit and services along Georgia Avenue, NW.

II. APPLICATION-IN-BRIEF

Applicant:	Berean Baptist Church
Proposed Rezoning:	From RF-1 to RA-2
Address:	924 Madison Street, NW
Ward and ANC:	4/4D (previously 4B)
Legal Description:	Square 2991, Lot 77
Property size:	14,000 square feet (.32 acres)
Future Land Use Map Designation:	Moderate Density Residential
Generalized Policy Map Designation:	Neighborhood Conservation Areas
Planning Area:	Rock Creek East

III. SITE AND AREA DESCRIPTION



The property (shown in green) is a regularly shaped interior lot that is bounded by Madison Street, NW to the north, a residential flat to the west, an apartment house to the east, and 20-foot public alley to the south. One block to the west is the Georgia Avenue, NW commercial corridor. The subject blockfront is improved with a range of residential uses. Across the street is the Emery Heights Park and Community Center. The property is currently improved with Berean Baptist Church.

IV. BACKGROUND

Faith-based institutions represent a significant opportunity for the development of affordable housing which is often within their charitable mission. Faith-based institutions own nearly 6 million square feet of vacant land in the District and an estimated 4 million square feet of land with improvements. Much of the land owned by these institutions is in residential neighborhoods and have some type of residential zoning, such as the RF-1 zone at the subject property, that limits additional development to low-density single-family homes or flats.

The updated Comprehensive Plan prescribes policies and actions supporting the development of affordable housing on properties owned by faith-based institutions. As part of the District’s faith-based housing initiative OP is committed to removing zoning barriers that prevent the development of new housing, particularly affordable housing, on land owned by faith-based organizations. Though map amendment applications only consider broad consistency with the Comprehensive Plan and not a specific development proposal, Berean Baptist Church has indicated that the rezoning would likely provide additional affordable housing for seniors. However, OP’s analysis and recommendation is based on the development potential of the requested RA-2 zone only and not a specific development plan or use of the subject property.

V. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The applicant proposes to rezone approximately 14,000 square feet from RF-1 to RA-2. The general purpose and intent of the existing RF-1 zone and the proposed RA-2 zone is described below:

Existing RF-1 Zone:

The purpose of the RF-1 zone is to provide for areas predominantly developed with row houses on small lots within which no more than two (2) dwelling units are permitted (Subtitle E § 300.1).

Proposed RA-2 Zone:

- The purposes of the RA-1, RA-2, RA-3, RA-4, RA-5 zones are to:
 - (a) Permit flexibility of design by permitting all types of urban residential development if they conform to the height, density, and area requirements established for these districts;

(b) Permit the construction of those institutional and semi-public buildings that would be compatible with adjoining residential uses and that are excluded from the more restrictive zones (Subtitle F § 300.1).

- The RA-2 zone provides for areas developed with predominately moderate-density residential (Subtitle F § 300.3).

The following table compares the existing RF-1 zone to the proposed RA-2 zone:

	Existing Zone: RF-1	Proposed Zone: RA-2
Permitted Uses:	Single household dwellings, flats, and limited apartment house conversions ¹	Single household dwellings, flats, and apartment houses ²
Lot Area:	4,000 sq. ft. min. (all other structures) 3,000 sq. ft. min. (semi-detached) 1,800 sq. ft. min. (row) 1,500 sq. ft. min. (IZ)	None prescribed
Lot Width:	40 ft. min. (all other structures) 30 ft. min. (semi-detached) 18 ft. min. (row) 16 ft. min. (IZ by sp. ex.)	None prescribed
Height:	35 ft./3 stories max.	50 ft. max./No story limit
Density:	2 dwelling units per lot max. or 900 sq. ft. of land area per dwelling unit for apartment house conversion.	None prescribed
FAR (floor-area-ratio):	None prescribed 0.9 equivalent for determining IZ Plus set-aside requirement	1.8 max. 2.16 max. with IZ
Penthouse Height:	9 ft./1 story max.	12 ft. max./1 story max. 15 ft. mechanical max./2 story max.
Lot Occupancy:	60% max. (single household dwellings, flat, conversions, and places of worship) 40% max. (all other structures)	60% max.
Rear Yard:	20 ft min.	4 in. per 1 ft. of principal building height but not less than 15 ft.
Side Yard:	5 ft min. for detached or semi-detached buildings with one or two dwelling units	8 ft. min. for detached or semi-detached buildings with one or two dwelling units
Vehicle Parking:	1 space per single household dwelling or 1 space per 2 units in a flat or apartment house	1 space per single household dwelling 1 space per 2 dwelling units (flat) 1 space per 3 dwelling units in excess of 4 dwelling units (apartment house)

¹ These are general residential uses permitted in the RF-1 zone. For a complete list of permitted uses please refer to [Subtitle U § 300](#).

² These are general residential uses permitted in the RA-2 zone. For a complete list of permitted uses please refer to [Subtitle U § 400](#).

	Existing Zone: RF-1	Proposed Zone: RA-2
Bike Parking:	None prescribed for single family houses or flats 1 space per 3 dwelling units for long-term parking (apartment house) 1 space per 20 dwelling units for short-term parking (apartment house)	
Pervious Surface:	20% min.	None prescribed
GAR:	None prescribed	0.3 min.

VI. IZ PLUS

An **IZ Plus set-aside requirement would be appropriate** pursuant to Subtitle X § 502 because:

1. The map amendment would rezone the property to RA-2, which allows a higher maximum permitted FAR than the existing RF-1 zone;
2. ANC 4B, within which the subject property had been located prior to 2023, only had 0.9 percent of the District’s total number of affordable housing units, and ANC 4D, within which the subject property is now located in, only had 0.7 percent of the District’s total number of affordable housing units as of November 2022;
3. 5.2 percent of total housing units in ANC 4B were affordable housing units and 7.3 percent of total housing units in ANC 4D were affordable housing units as of November 2022, whereas the District-wide average for ANCs was 16.3 percent, with the range between 0 and 62.6 percent³;
4. The Rock Creek East Planning Area only contained 5 percent of the District’s total number of affordable housing units as of November 2022, whereas the District-wide planning area average was 16.5 percent, with the range between 1.1 percent 51.3 percent⁴; and
5. The 2019 Housing Equity Report⁵ prepared by the Office of Planning and the Department of Housing and Community Affairs reports that the Rock Creek East Planning Area was short meeting its affordable housing production goals by 340 affordable units (figure 4).

IZ Plus requires a higher affordable housing set-requirement than Regular IZ and prescribes a set-aside requirement based on either:

- a sliding-scale that is correlated to the total floor area built, or
- the amount of IZ bonus density built.

OP has provided two examples below to demonstrate the possible IZ Plus set-aside requirements pursuant to Subtitle C § 1003.3 if a new residential development was built under the RA-2 zone at the subject property⁶. The examples are based on an apartment house that is stick-built (non-Type I construction) on the subject property (14,000 square feet).

³[District of Columbia, Income-Restricted Affordable Housing by ANC](#)

⁴[District of Columbia, Income-Restricted Affordable Housing by Comprehensive Plan Planning Area](#)

⁵[Housing-Equity-Report](#)

⁶ Map amendments only consider consistency with the Comprehensive Plan and not a specific development proposal.

Example 1 – Utilizes IZ Bonus Density

FAR Built:	2.16 IZ FAR
Regular IZ Set-Aside Requirement:	12.5% or 3,780 sq. ft.
Regular IZ Dwelling Units ⁷ :	4 units
Percent Increase in Total FAR Built ⁸ :	140%
IZ Plus Set-Aside Requirement:	20% or 6,048 sq. ft.
IZ Plus Dwelling units:	6 units

Example 2 – Does Not Utilize IZ Bonus Density

FAR Built:	1.8 FAR
Regular IZ Set-Aside Requirement:	10% or 2,520 sq. ft.
Regular IZ Dwelling Units:	3 units
Percent Increase in Total FAR Built:	100%
IZ Plus Set-Aside Requirement:	20% or 5,040 sq. ft.
IZ Plus Dwelling units:	5 units

In both examples above, the set-aside requirement would be 20 percent, which is the maximum IZ Plus set-aside requirement. The amount of residential floor area built in any future development under the RA-2 zone would determine the actual IZ Plus set-aside requirement. However, given the large increase in maximum FAR permitted by the zone change, it is likely that under most development scenarios that the set-side requirement could be (or close) to 20 percent.

VII. PLANNING CONTEXT

A. COMPREHENSIVE PLAN MAPS

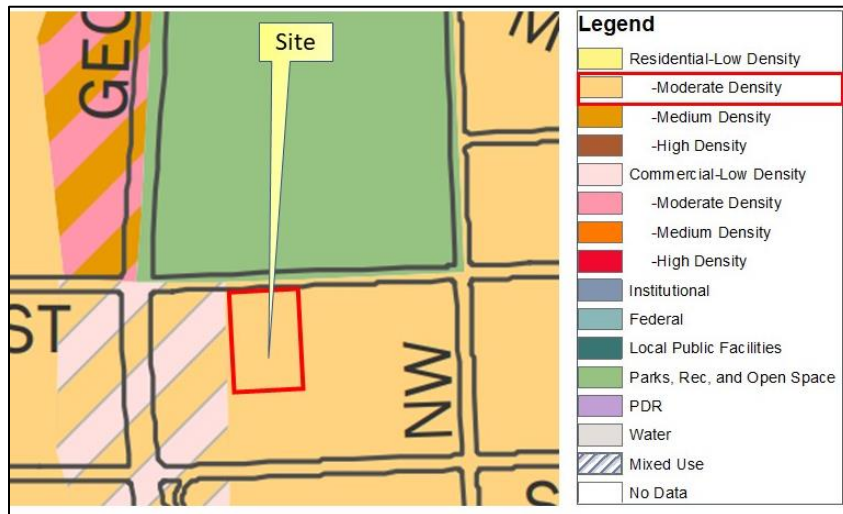
As described in the *Guidelines for using the Generalized Policy Map and the Future Land Use Map* (Chapter 2 Framework Element, Section 228), the maps are intended to:

- Provide generalized guidelines for development decisions;
- Be interpreted broadly and are not parcel-specific like zoning maps; i.e. they do not establish detailed requirements or permissions for a development’s physical characteristics, including building massing or density; uses; or support systems such as parking and loading;
- Be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text; and
- Be balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

⁷ OP typically uses a density factor 1,000 sq. ft. to estimate number of dwelling units.

⁸ The percent increase between the max. permitted FAR of the existing/prior zone (RF-1), not including IZ bonus density, and the total FAR built in the IZ Plus Development. IZ Plus prescribes the RF-1 zones with a FAR of 0.9.

Generalized Future Land Use Map (“FLUM”)



The FLUM indicates that the site is generally appropriate for Moderate Density Residential.

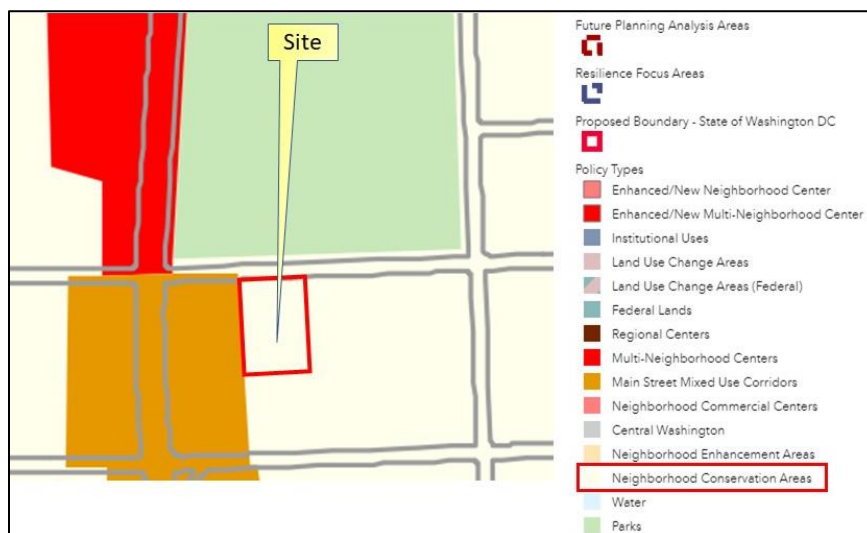
The Framework Element of the Comprehensive Plan describes Moderate Density Residential as follows:

Moderate Density Residential: *This designation is used to define neighborhoods generally, but not exclusively, suited for row houses as well as low-rise garden apartment complexes.*

The designation also applies to areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings. In some neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). Density in Moderate Density Residential areas is typically calculated either as the number of dwelling units per minimum lot area, or as a FAR up to 1.8, although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The R-3, RF, and RA-2 Zone Districts are consistent with the Moderate Density Residential category [emphasis added], and other zones may also apply. 227.6

The proposed rezoning from the RF-1 zone to the RA-2 zone would not be inconsistent with the Comprehensive Plan’s FLUM. The RA-2 zone would permit moderate-density residential development with a maximum FAR of 1.8 and up to 2.16 for the provision of IZ units. The proposed zone would allow for a range of residential uses, including single-family homes, flats, and multi-story apartment houses.

Generalized Policy Map



The Generalized Policy Map indicates that the site is designated Neighborhood Conservation Areas.

The Framework Element of the Comprehensive Plan describes Neighborhood Conservation Areas as follows:

Neighborhood Conservation areas have little vacant or underutilized land. They

are generally residential in character [emphasis added]. Maintenance of existing land uses and

community character is anticipated over the next 20 years. Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, public facilities, and institutional uses. Major changes in density over current (2017) conditions are not expected but some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character where guided by Comprehensive Plan policies and the Future Land Use Map. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided. 225.4

*The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods, **but not preclude development, particularly to address city-wide housing needs** [emphasis added]. Limited development and redevelopment opportunities do exist within these areas. The diversity of land uses and building types in these areas should be maintained and new development, redevelopment, and alterations should be compatible with the existing scale, natural features, and character of each area. **Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map and Comprehensive Plan policies** [emphasis added]. Approaches to managing context-sensitive growth in Neighborhood Conservation Areas may vary based on neighborhood socio-economic and development characteristics. In areas with access to opportunities, services, and amenities, more levels of housing affordability should be accommodated. Areas facing housing insecurity (see Section 206.4) and displacement should emphasize preserving affordable housing and enhancing neighborhood services, amenities, and access to opportunities. 225.5*

Densities for the Neighborhood Conservation Areas are guided by the property’s FLUM designation. The proposed rezoning from the RF-1 zone to the RA-2 zone would not be inconsistent with the Policy Map because the proposed RA-2 zone would be consistent with the property’s FLUM designation. Further, the Framework Element states that Neighborhood Conservation Areas are generally residential in character and that the designation is not intended to preclude development, especially for development of more housing. The RA-2 zone primarily allows residential uses (though some community facilities are allowed) and would permit larger residential uses compared to the RF-1 zone, which could help address the District’s city-wide housing needs.

B. COMPREHENSIVE PLAN WRITTEN ELEMENTS

Comprehensive Plan Analysis Through a Racial Equity Lens

The direction to consider equity “as part of its Comprehensive Plan consistency analysis” indicates that the equity analysis is intended to be based on the policies of the Comprehensive Plan and part of the Commission’s consideration of whether a proposed zoning action is “not inconsistent” with the Comprehensive Plan. In the case of a map amendment, the Commission does not know whether or when the subject site will be redeveloped, or whether the site would still be redeveloped if the proposed rezoning were to be denied. Thus, a racial equity evaluation will only be able to analyze the potential development, uses, and impacts under the proposed zone compared to the existing zone.

Demographics⁹: The subject property is in the Rock Creek East Planning Area (“planning area”) as mapped in Chapter 22 of the Comprehensive Plan. The following section provides disaggregated demographic data comparing the planning area to the District as a whole.

⁹ The data provided in this section is from the OP Demographic Data Hub (opdatahub.dc.gov) and is based on the American Community Survey (ACS) 2016 to 2020 5 Year Estimates. At the time this report was prepared, OP did not

Table 1: General Characteristics of the Planning Area and District

Characteristic	Planning Area	Districtwide
Population	82,862	671,803
Median Household Income	\$87,593	\$90,842
Median Age	38.9	34.3
Unemployment Rate	7%	7.1%
Foreign Born	23.3%	13.4%
Average Household Size	2.9	2.3

Table 1 provides general characteristics of the planning area, which has a total population of 82,862 residents. The median household income in the planning area is slightly lower than the Districtwide median household income while the unemployment rate is about the same as the Districtwide rate. The median age in the planning area is higher compared to the Districtwide median age and the foreign-born population is also higher in the planning area compared to the District.

Table 2: Race or Ethnicity in the Planning Area and Districtwide

Race or Ethnicity	Planning Area Estimate	Planning Area Percent	Districtwide Estimate	Districtwide Percent
White alone	20,181	24.4%	288,306	41.1%
Black alone	44,207	53.4%	318,631	45.4%
American Indian and Alaskan Native alone	342	0.4%	2,438	0.3%
Asian alone	1,596	1.9%	28,762	4.1%
Native Hawaiian and Other Pacific Islander alone	0	0.0%	328	0.0%
Some other race alone	12,198	14.7%	33,764	4.8%
Two or more races	4,339	5.2%	29,745	4.2%
Hispanic	19,141	23.1%	77,981	11.1%

Table 2 shows that the planning area is predominately Black and has more residents who are either Black, some other race, or two or more races compared to the Districtwide average. The number of residents who also identify as Hispanic in the planning area is higher compared to the Districtwide average. The planning area has fewer residents who are either white or Asian compared to the Districtwide average.

The Comprehensive Plan notes that while the planning area’s percentage of Black residents is higher compared to the Districtwide total percentage, the population has been decreasing since 2000 when the Black population was 77.5 percent of the total planning area population. Further, the Comprehensive Plan notes that the white population between 2000 and 2017 more than doubled while the Hispanic population also grew significantly and is more than double the Districtwide average (§ 2203.2).

have access to all available demographic data from the same data set to use for accurate comparison. If this application is set down, OP will provide additional demographic data analysis disaggregated by race and ethnicity in the public hearing report.

Table 3: Owner and Renter Occupied Households in the Planning Area and Districtwide

Tenancy	Planning Area Estimate	Planning Area Percent	Districtwide Estimate	Districtwide Percent
Owner Households	16,225	57%	122,530	42.5%
Renter Households	12,395	43%	165,777	57.5%
Total Households	28,620	100%	288,307	100%

Table 3 shows that the percent of owner households in the planning area is higher than the percent of renter households in the planning area. This is in contrast to Districtwide, where the percent of owner households is lower than the percent of renter households Districtwide.

Table 4: Median Home Value and Median Rent in the Planning Area and Districtwide

Tenancy	Planning Area Median	Districtwide Median
Home Value	\$582,582	\$618,100
Rent	\$1,331	\$1,607

Table 4 shows that both the median home value and rent in the planning area is lower than the Districtwide median.

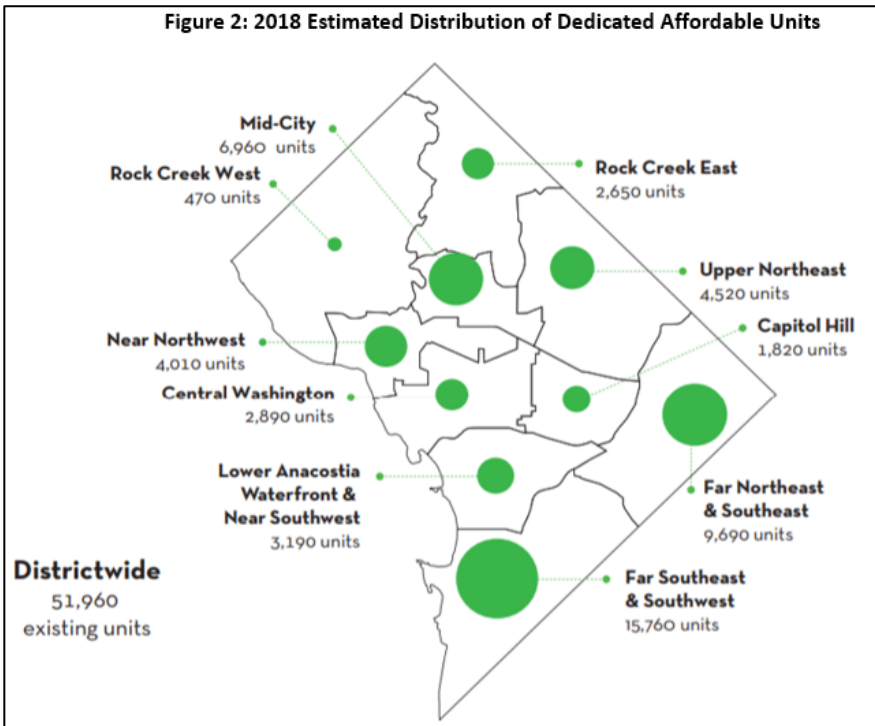
Table 5: Vulnerable or Special Populations in the Planning Area and District

Characteristic	Planning Area	Districtwide
Persons 65 or Older	13.5%	12.2%
Persons Under 18 Years	20.7%	18%
Disability Rate	11.5%	11.4%

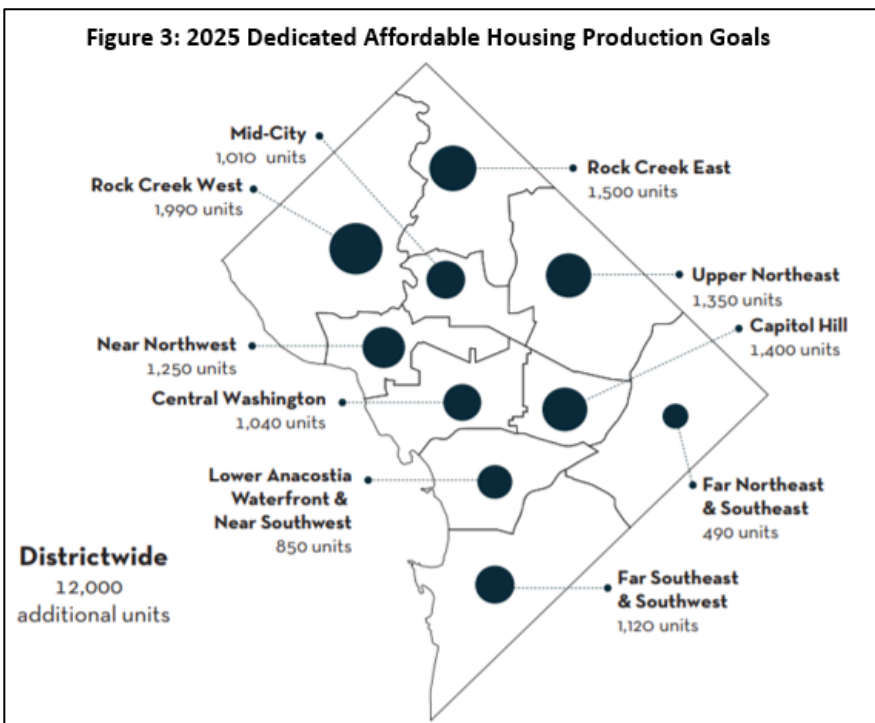
Table 5 shows that the percentage of persons 65 years or older in the planning area is slightly higher than the Districtwide percentage while persons under 18 years in the planning area is also slightly higher than the Districtwide percentage. The disability rate in the planning area is about the same as the Districtwide rate.

Housing: The rising cost of housing in the District limits the ability to provide housing for a variety of household types, including family and senior housing, rental and ownership housing, and housing for all income levels. Given the land use characteristics of the District, only a small amount of the total land area (28.1 percent) is dedicated to residential use (Framework Element § 205.3). The scarcity of land increases the cost of building new housing, limits the availability of housing, and intensifies housing cost burdens, particularly for lower- and middle-income households.

The Comprehensive Plan states that residents of color are a majority of lower-income households in the District and, therefore, face a disproportionate share of the problems caused by housing insecurity and displacement” (Framework Element § 206.4).



The OP 2019 Housing Equity Report identified the Rock Creek East planning area as containing 2,650 dedicated affordable units, which was the third lowest for any planning area (Figure 2).



The report also identified the planning area as having an affordable housing production goal of 1,500 units by 2025, the second highest production goal of any planning area (Figure 3).

At the time the report was written, the planning area had 1,160 units in the affordable housing pipeline and was short by 340 affordable housing units (Figure 4) from meeting its 2025 housing production goals.

The prevailing low-density residential zoning in the planning area limits a significant portion of land to only single-family housing. The Comprehensive Plan states that 58 percent of

Figure 4: Current Affordable Housing Pipeline & 2025 Production Goals

Planning Area	Affordable Housing Production Goals	Affordable Housing Pipeline	Shortage of Affordable Housing	2025 Total Housing Production Goals*
Rock Creek West	1,990	80	1,910	1,260
Capitol Hill	1,400	280	1,120	3,270
Near Northwest	1,250	270	980	1,850
Mid-City	1,010	620	390	4,210
Rock Creek East	1,500	1,160	340	1,580
Central Washington	1,040	750	290	3,940
Upper Northeast	1,350	1,160	190	6,900
Lower Anacostia Waterfront & Near Southwest	850	910	on track	7,960
Far Southeast & Southwest	1,120	1,450	on track	2,040
Far Northeast & Southeast	490	1,290	on track	2,990
Total	12,000	7,970	5,220	36,000

total residential acreage in the planning area is developed with single-family homes compared to 37 percent Districtwide, while only 21.6 percent of total residential acreage is developed with apartment houses of 20 units or more compared to 35.4 percent Districtwide (§ 2204.1). This makes the development of land for apartment house development and the inclusion of appropriate levels of affordable housing units, even more critical.

The current RF-1 zone generally only permits low-density single-family housing or two-family housing (“flats”) per lot. This limits the potential to provide a greater number of housing units available to all income levels, but particularly to lower-income households. The proposed RA-2 zone would permit a greater variety of permitted housing types, including apartment houses that can provide substantially more housing units per acre than single-family houses or flats. The proposed map amendment has the potential to increase the total supply of housing units in the planning area, which could help alleviate the pressure on housing costs overall. It also has the potential to create a greater range of housing types and sizes, which increases the ability to provide housing for a variety of household sizes and income levels.

The Comprehensive Plan defines affordable housing as housing available to households earning 80 percent or less of the median family income (“MFI”) (§ 304.3). As of 2018, the planning area only had five percent (5%) of the District’s total number of affordable housing units. A key piece of this map amendment is the potential to create additional affordable housing through an IZ Plus set-aside requirement. It is likely that the RA-2 zone could require a 20 percent set-aside requirement resulting in approximately 5 to 6 affordable housing units.

The IZ program requires affordable housing units to be available to households earning either no more than 60 percent MFI for rental housing or 80 percent MFI for ownership housing. The potential affordable housing units that could be created under the requested RA-2 zone is higher than if the property was not rezoned. Making room for affordable housing has the potential to benefit non-white populations who on average have lower incomes than white residents.

Direct Displacement: The proposed map amendment would not result in direct displacement of any tenants or residents because there is currently no housing at the subject property and the map amendment is being brought forward by the church who owns the property.

Indirect Displacement: Allowing for new residential development is a way to limit indirect displacement and the Comprehensive Plan recognizes that without increased housing, the imbalance between supply and demand will drive up housing prices in a way that creates challenges for many residents, particularly low-income residents. If the property were not rezoned there would likely not be an IZ requirement for any new residential development built under the current RF-1 zone and any new residential development built would be limited to a maximum of two market-rate units.

If the property is rezoned, any newly constructed residential development will likely have an IZ Plus affordable housing requirement that is higher than what is required by the Regular IZ program. Thus, a residential development would likely add to the total number of affordable units in the planning area.

The District’s Local Rent Supplement Program (“LSRP”) is another tool that could be used in conjunction with any new market-rate housing units to provide rents that are affordable to households earning no more than 30 percent of the median family income (“MFI”). The rezoning provides the best way for the District to increase its housing supply, increase its IZ unit production, and increase the market-rate units available that could be used in conjunction with the LRSP while limiting indirect displacement of existing low-income residents.

Physical: It is not likely that the proposed rezoning would result in negative impacts to the physical environment as the primary uses allowed by the requested RA-2 zone are residential and community facility uses. Any impact is balanced by the fact that the Comprehensive Plan recognizes that “. . .at the most basic level, it is the availability of safe, decent, affordable housing across all neighborhoods that will determine whether the District’s vision for an inclusive District will be realized” (Housing Element § 500.6a). The map amendment will provide a greater opportunity for the District to achieve this goal than if the existing zoning were to be remain in place.

Access to Opportunity: There are many opportunities within walking distance of this site to which new residents would have access. The Emery Heights Community Center and Emery Heights Park are directly across Madison Street, NW, there is a large retailer with grocery two blocks north of this site on Georgia Avenue, NW along with the Brightwood Education Center several blocks to the northwest, and Georgia Avenue, NW has many places to eat and shop as well as easy access to major bus lines.

Citywide Elements

The map amendment proposal is not inconsistent with the Citywide Element of the Comprehensive Plan and would further the policies of the Land Use, Transportation, and Housing Elements. A compilation of relevant policies can be found in Appendix II.

Land Use

The proposed map amendment would permit moderate density residential uses, such as low- to mid-rise apartment houses, both which are not permitted by the existing RF-1 zone in proximity to the Georgia Avenue, NW bus priority transit route. The RA-2 zone would allow for substantially more housing to be built overall, both affordable and market-rate, and would allow for a greater variety of different housing sizes and types. Any residential development that would result from

the rezoning would be subject to IZ Plus, which would require more IZ units to be built than the Regular IZ set-aside requirements. The ability for the map amendment to provide new opportunities for housing variety with a substantial affordable housing requirement can help advance racial equity and opportunity.

Transportation

The subject property is located approximately 388 feet from the 70 Metrobus line and approximately 1,000 feet from the 79 Metrobus line, which provides faster limited-stop service. The map amendment could also support the District’s goals of providing more housing, including affordable housing, in proximity to safe, affordable, and reliable transportation regardless of a person’s age, race, income, geography, or physical ability.

Housing

The map amendment would require IZ Plus for any future residential development, which could help the District towards its goals of ensuring that one-third of the new housing built from 2018 to 2030 be affordable to persons earning 80 percent or less of the MFI. The application of an IZ Plus set-aside requirement would also support mixed-income housing by encouraging affordable housing.

The IZ Plus regulations also provide an incentive for property owners to provide larger family-sized units that are three-bedrooms or larger and an incentive for property owners to provide units for households earning 50 percent MFI or less.

The map amendment would also help the District achieve its goal of achieving a minimum 15 percent affordable housing units in each planning area by 2050. The total percent of housing units that were affordable in the Rock Creek East Planning Area as of 2018 was only 8 percent¹⁰. The rezoning can provide new ways to increase this affordable housing percentage, while ensuring that affordable housing is fairly and equitably dispersed throughout the District.

Area Element

The subject property is in the Rock Creek East Area Element. A compilation of relevant policies can be found in Appendix II.

The Rock Creek East Area Element calls for directing growth, including housing and affordable housing along Georgia Avenue, NW, which the subject property is in proximity to. The area element also calls for the development of new housing along Georgia Avenue, NW with particular emphasis for affordable housing for older adults and families. As discussed earlier, the planning area’s senior and youth populations are both slightly higher than the Districtwide averages.

C. SUMMARY OF PLANNING CONTEXT ANALYSIS

The Comprehensive Plan analysis through a racial equity lens indicates that the map amendment proposal from RF-1 to RA-2, on balance, would not be inconsistent with Comprehensive Plan. The analysis of demographic data and the policies of the Comprehensive Plan, work together to support increasing density to permit more housing, including affordable housing, in proximity to transit and services along Georgia Avenue, NW.

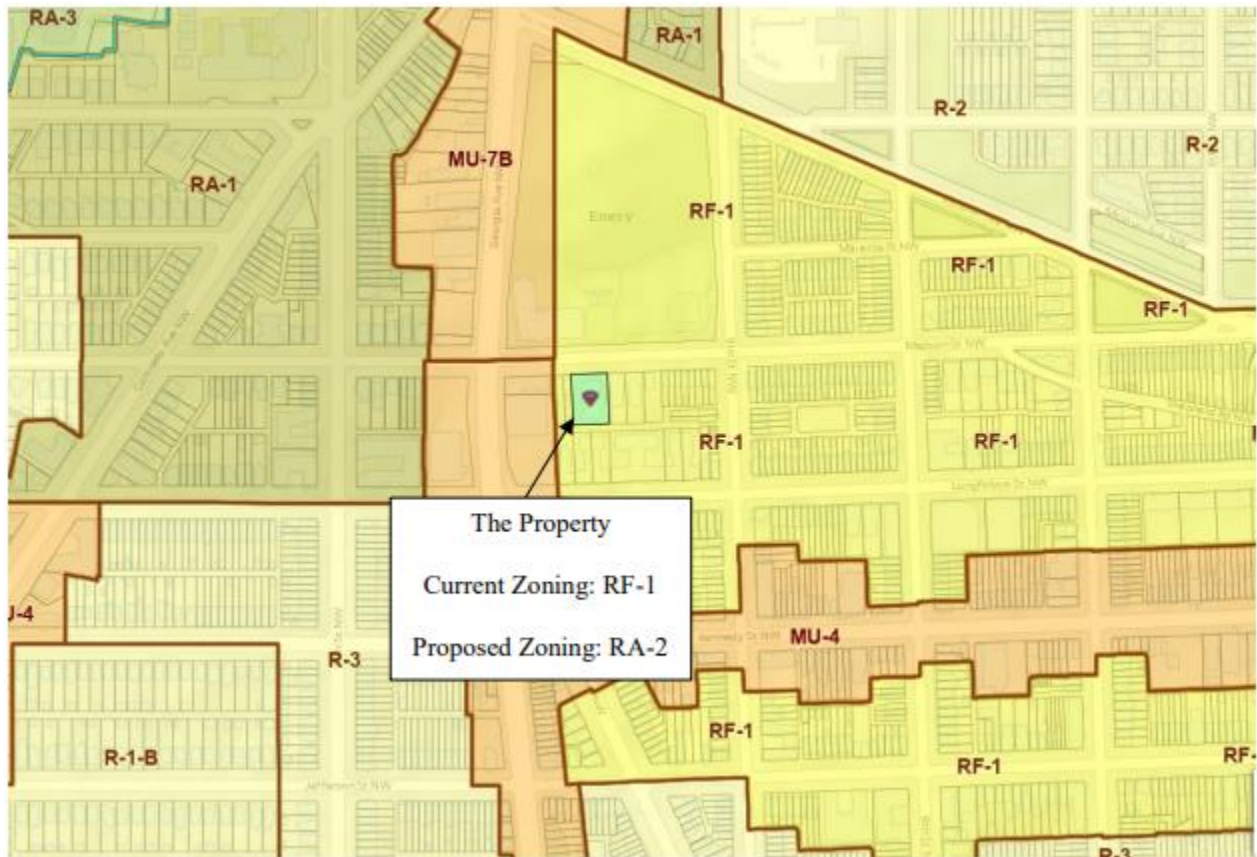
¹⁰ [District of Columbia, Income-Restricted Affordable Housing by Comprehensive Plan Planning Area](#)

It is not anticipated that there would be negative impacts or outcomes associated with the zoning action given the potential the RA-2 zone provides for the development of more housing and affordable housing at the subject property. While the Black population is still the predominate race in the planning area, the population has declined by almost 25 percent between 2000 and 2020 while the overall population of the planning area has increased by just under 25 percent. It is anticipated that the RA-2 zone will provide positive impacts on overall housing options in terms of unit sizes and affordability, which in turn can help provide additional housing options for low-income households who are majority residents of color.

Finally, it is important to note the Mayor's vision for the creation of 36,000 new housing units by 2025, including 12,000 affordable units. The map amendment would help the District towards attaining its affordable housing pipeline goals as identified in the Housing Equity Report and could help the Planning Area achieve a minimum of 15 percent of affordable units by 2050.

Appendix I

Proposed Zoning Map



Appendix II

Comprehensive Plan Citywide and Area Elements

The following is a compilation of the relevant Citywide and Area Elements that will be advanced by the proposed map amendment.

Chapter 3 Land Use

The Land Use Chapter provides the general policy guidance on land use issues across the District.

Policy LU-1.4.6: Development Along Corridors

Encourage growth and development along major corridors, particularly priority transit and multimodal corridors. Plan and design development adjacent to Metrorail stations and corridors to respect the character, scale, and integrity of adjacent neighborhoods, using approaches such as building design, transitions, or buffers, while balancing against the District's broader need for housing. 307.14

Policy LU-2.1.1: Variety of Neighborhood Types

Maintain a variety of neighborhoods, ranging from low-density to high-density. The positive elements that create the identity and design character of each neighborhood should be preserved and enhanced while encouraging the identification of appropriate sites for new development and/or adaptive reuse to help accommodate population growth and advance affordability, racial equity, and opportunity. 310.7

Policy LU-2.1.8: Explore Approaches to Additional Density in Low and Moderate Density Neighborhoods

Notwithstanding Policy LU-2.1.5, explore approaches, including rezoning, to accommodate a modest increase in density and more diverse housing types in low-density and moderate density neighborhoods where it would result in the appropriate production of additional housing and particularly affordable housing. However, detailed neighborhood planning is a condition predicate to any proposals. Infill and new development shall be compatible with the general design character and scale of existing neighborhoods and minimize demolition of housing in good condition. 310.5

Policy LU-2.3.6: Places of Worship and Other Religious Facilities

Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the District's neighborhoods. Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these facilities' transportation needs, operations, and expansions so that existing and new religious facilities may be sustained as neighborhood anchors and a source of spiritual guidance. Recognize also that places of worship or religious assembly, and some other religious facilities or institutions, are accorded important federal constitutional and statutory protections under the First Amendment (U.S. Const. Amend. I) and the Religious Land Use and Institutionalized Persons Act of 2000, approved September 22, 2000 (114 Stat. 803; 42 U.S.C. 2000cc). The missions of many religious institutions involve service to those in need, and institutions offer important services, such as providing food banks, meals, clothing, counseling services, shelter, and housing. 312.8

Chapter 4 Transportation

The Transportation Element provides policies and actions to maintain and improve the District's transportation system and enhance the travel choices of current and future residents, visitors, and workers.

Policy T-1.1.7: Equitable Transportation Access

Transportation within the District shall be accessible and serve all users. Residents, workers and visitors should have access to safe, affordable and reliable transportation options regardless of age, race, income, geography or physical ability. Transportation should not be a barrier to economic, educational, or health opportunity for District residents. Transportation planning and development should be framed by a racial equity lens, to identify and address historic and current barriers and additional transportation burdens experienced by communities of color. 403.13

Chapter 5 Housing

The Housing Element of the Comprehensive Plan describes the importance of housing to neighborhood quality in Washington, DC and the importance of providing housing opportunities for all segments of the population throughout Washington, DC.

Policy H-1.1.1: Private Sector Support

Encourage or require the private sector to provide both new market rate and affordable housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 503.3

Policy H-1.1.3: Balanced Growth

Strongly encourage the development of new housing, including affordable housing, on surplus, vacant, and underused land in all parts of Washington, DC. Ensure that a sufficient supply of land is planned and zoned to enable the District to meet its long-term housing needs, including the need for low- and moderate density single-family homes, as well as the need for higher-density housing. 503.5

Policy H-1.2.1: Low- and Moderate-Income Housing Production as a Civic Priority

The production and preservation of affordable housing for low- and moderate income households is a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all District neighborhoods. 504.7

Policy H-1.2.2: Production Targets

Consistent with the Comprehensive Housing Strategy, work toward a goal that one-third of the new housing built in Washington, DC from 2018 to 2030, or approximately 20,000 units, should be affordable to persons earning 80 percent or less of the area-wide MFI. Newly produced affordable units shall be targeted toward low-income households in proportions roughly equivalent to the proportions shown in Figure 5.8. 504.8

Policy H-1.2.6: Build Nonprofit Sector Capacity

Actively involve and coordinate with the nonprofit sector, including faith-based institutions, to meet affordable housing needs, including housing construction and housing service delivery. Partner with the nonprofit sector so that public funding can be used to leverage the creation of affordable units and to expand access to housing through counseling, education, tenant rights services, and increased awareness of funding opportunities. Faith-based institutions represent a significant opportunity for the development of affordable housing and community facilities in

Washington, DC and the provision of affordable housing and care of those in need is within their charitable missions. Faith-based institutions own nearly 6 million square feet of vacant land in the District and an estimated 4 million square feet of land with improvements. Much of the land owned by these institutions is in residential neighborhoods, adjacent to commercial corridors and have some type of residential zoning that limits them to low density development. These institutions may need technical support but have expressed their interest and commitment and can be willing partners in providing space for affordable housing. 504.13

Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas

Proactively plan and facilitate affordable housing opportunities and make targeted investments that increase demographic diversity and equity across Washington, DC. Achieve a minimum of 15 percent affordable units within each Planning Area by 2050. Provide protected classes (see H-3.2 Housing Access) with a fair opportunity to live in a choice of homes and neighborhoods, including their current homes and neighborhoods. 504.17

Policy H-1.2.11 Inclusive Mixed-Income Neighborhoods

Support mixed-income housing by encouraging affordable housing in high-cost areas and market rate housing in low-income areas. Identify and implement measures that build in long-term affordability, preferably permanent or for the life of the project, to minimize displacement and achieve a balance of housing opportunities across the District. 504.18

Chapter 22 Rock Creek East

Policy RCE-1.1.1: Strengthening Lower Density Neighborhoods

Maintain and strengthen the neighborhoods of the Rock Creek East Planning Area while providing new housing opportunities for a range of incomes and household sizes. Any new development in the Planning Area should be attractively designed and should contribute to the community's physical characteristics. 2208.2

Policy RCE-1.1.3: Directing Growth

Concentrate economic development activity, employment growth, and new housing, including affordable housing, in Rock Creek East around the Georgia Avenue-Petworth and Takoma Metro station areas, along the Georgia Avenue NW corridor, along Kennedy Street NW, at key nodes along 14th Street NW, at the former WRAMC site, and at the AFRH site. Provide improved pedestrian, transit, and bicycle access to these areas, and improve their visual and urban design qualities to create a unique destination for the local community to enjoy. 2208.4

Policy RCE-1.1.6: Development of New Housing

Encourage the retention of existing public housing units within the Rock Creek East Planning Area, along with other measures to increase housing choices and improve housing affordability for area residents. This should include the production of new housing for a mix of incomes and household sizes along Georgia Avenue NW, and the encouragement of mixed-income housing in the industrially zoned area west of Georgia Avenue between Upshur and Shepherd Streets NW, and on District-owned land along Spring Road near the Georgia Avenue-Petworth Metro station. A particular emphasis should be placed on providing affordable housing for older adults and families. 2208.7