

**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:** May 18, 2023

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

**I. BACKGROUND**

At its March 9, 2023 public meeting, the Zoning Commission (“Commission”) set down for a public hearing zoning map amendment case 22-34 to rezone Lot 77 in Square 2991 (“property”). The applicant has not modified the proposal since the time of set down.

**II. RECOMMENDATION**

The Office of Planning (“OP”) recommends that the Commission **approve** this application. The petition would **not be inconsistent** with the Comprehensive Plan and **would be appropriate** for Inclusionary Zoning (“IZ”) Plus.

Should the Commission approve this application, the final order should state that the existing RF-1 zone shall have a floor-area-ratio (“FAR”) **equivalent to 0.9** pursuant to Subtitle X § 502.4. The property shall be indicated with a “IZ+” symbol on the Zoning Map pursuant to Subtitle X § 502.5.

**III. APPLICATION-IN-BRIEF**

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

#### IV. SITE AND AREA DESCRIPTION



The property (outlined in blue) 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 a 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 improved with Berean Baptist Church.

As discussed in further detail in Section IV of OP’s set down report in [Exhibit 12](#), faith-based institutions represent a significant opportunity for the development of affordable housing, which is often within their charitable missions. 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 both the existing RF-1 zone and the proposed RA-2 zone are 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
<b>Permitted Uses:</b>	Single household dwellings, flats, and limited apartment house conversions <sup>1</sup>	Single household dwellings, flats, and apartment houses <sup>2</sup>
<b>Lot Area:</b>	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
<b>Lot Width:</b>	40 ft. min. (all other structures) 30 ft. min. (semi-detached) 18 ft. min. (row) 16 ft. min. (IZ by sp. ex.)	None prescribed
<b>Height:</b>	35 ft./3 stories max.	50 ft. max./No story limit
<b>Density:</b>	2 dwelling units per lot max. or 900 sq. ft. of land area per dwelling unit for apartment house conversion.	None prescribed
<b>FAR (floor-area-ratio):</b>	None prescribed 0.9 equivalent for determining IZ Plus set-aside requirement	1.8 max. 2.16 max. with IZ
<b>Penthouse Height:</b>	9 ft./1 story max.	12 ft. max./1 story max. 15 ft. mechanical max./2 story max.
<b>Lot Occupancy:</b>	60% max. (single household dwellings, flat, conversions, and places of worship) 40% max. (all other structures)	60% max.
<b>Rear Yard:</b>	20 ft min.	4 in. per 1 ft. of principal building height but not less than 15 ft.
<b>Side Yard:</b>	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
<b>Vehicle Parking:</b>	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)
<b>Bike Parking:</b>	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)	
<b>Pervious Surface:</b>	20% min.	None prescribed
<b>GAR:</b>	None prescribed	0.3 min.

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

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

## VI. IZ PLUS EVALUATION

IZ Plus requires a higher affordable housing set-requirement than Regular IZ. As discussed in further detail in Section VI of OP’s set down report in [Exhibit 12](#), 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. The 2019 Housing Equity Report<sup>3</sup> prepared by the Office of Planning and the Department of Housing and Community Development set a goal for the Rock Creek East Planning Area to produce 1,500 affordable units by 2025 (Figure 1); and
3. As of January 2023, the Rock Creek East Planning Area had achieved 57.9 percent of its 2025 affordable housing production goal (approximately 869 units) and is estimated to only reach 84.4 percent of its 2025 affordable housing goal<sup>4</sup>.

The map amendment, with an IZ Plus set-aside requirement, could help advance the affordable housing production goal set for the Rock Creek East Planning Area, which is not currently on track to fully meet its goal by 2025.

OP estimates that approximately **six IZ units** could be provided through a **20 percent IZ Plus set-aside requirement** if the property were to be redeveloped for residential use.

**Figure 1: Housing Equity Report 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
<b>Total</b>	<b>12,000</b>	<b>7,970</b>	<b>5,220</b>	<b>36,000</b>

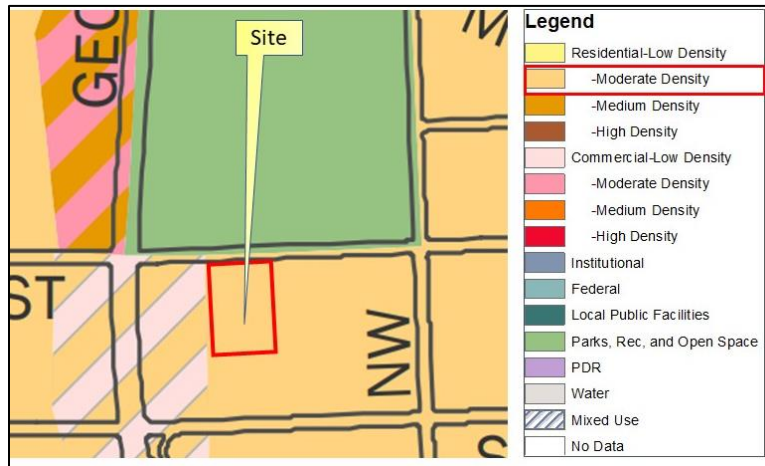
## VII. PLANNING CONTEXT

Subtitle X § 500.3 of Title 11 requires that the Zoning Commission determine that a proposed zoning map amendment “*is not inconsistent with the Comprehensive Plan and other adopted policies and active programs related to the subject site.*” A full and detailed analysis is fully discussed in Section VIII of the OP set down report in [Exhibit 12](#) and is summarized below.

<sup>3</sup> [Housing-Equity-Report](#)

<sup>4</sup> [DC's Comeback Plan, January 2023](#)

### **Generalized Future Land Use Map (“FLUM”)**



The FLUM indicates that the site is appropriate for Moderate Density Residential. According to the Framework Element of the Comprehensive Plan, the RA-2 zone is not inconsistent with this designation.

### **Generalized Policy Map**



The Generalized Policy Map indicates that the site is designated Neighborhood Conservation Areas. According to the Framework Element, the RA-2 zone is not inconsistent with this designation.

Densities for the Neighborhood Conservation Areas are guided by the property’s FLUM designation. As previously discussed, the RA-2 zone would not be inconsistent with the FLUM.

### **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 and its impacts under the proposed zone compared to the existing zone.

Demographics: 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 using 2012-2016 and 2017-2021 American Community Survey data from the [OP Demographic Data Hub](#).

**Table 1: Total Population and Median Age**

RACE AND ETHNICITY	VARIABLE	DISTRICT	DISTRICT %	DISTRICT	DISTRICT %	RCE	RCE %	RCE	RCE %
		2012-2016		2017-2021		2012-2016		2017-2021	
Total Population	Total	659,009	100%	683,154	100%	76,476	100%	78,816	100%
	Median age	37.7		34.3		39.4		39.0	
White alone	Total	266,035	39%	276,373	40%	16,228	21%	19,169	24%
	Median age	40.4		34.1		37.1		38.9	
Black or African American alone	Total	318,598	47%	305,109	45%	45,999	58%	41,543	53%
	Median age	33.4		36.5		45.5		46.4	
American Indian and Alaska Native alone	Total	2,174	0%	1,984	0%	574	1%	243	0%
	Median age	32.2		48.2		33.5		46.5	
Asian alone	Total	24,036	4%	27,988	4%	1,561	2%	1,424	2%
	Median age	36.5		34.1		34.4		36.2	
Native Hawaiian and Other Pacific Islander	Total	271	0%	359	0%	32	0%	0	0%
	Median age	30.8		35.5		N/A		NA	
Some Other Race alone	Total	29,650	4%	32,484	5%	10,008	13%	10,875	14%
	Median age	28		29.8		31.6		27.5	
Two or More Races	Total	18,245	3%	38,857	6%	2,074	3%	5,562	7%
	Median age	19.8		29.9		28.1		35.2	
Hispanic or Latino	Total	69,106	10%	76,982	11%	16,631	21%	17,549	22%
	Median age	28.4		31.1		33.6		31.1	

Table 1 shows that the planning area as of 2021 is predominately Black and has more residents who are either Black, some other race, or two or more races compared to the District. The number of residents who also identify as Hispanic or Latino in the planning area is also higher compared to the District. The planning area has fewer residents who are either white or Asian compared to the Districtwide average. The median age is higher than the District.

A comparison of the 2016 and 2021 ACS data for the planning area shows that over a five-year period white, some other race, two or more races, and Hispanic or Latino residents slightly increased while Black or African American residents slightly decreased. The Comprehensive Plan notes that while the planning area’s percentage of Black residents is higher compared to the District, the population has been decreasing since 2000 when the Black or African American 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 District population (§ 2203.2).

**Table 2: Median Household Income**

<b>RACE AND ETHNICITY</b>	<b>DISTRICT 2012-2016</b>	<b>DISTRICT 2017-2021</b>	<b>RCE 2012-2016</b>	<b>RCE 2017-2021</b>
<b>Total households</b>	\$72,935	\$93,547	\$69,939	\$95,572
<b>White alone</b>	\$119,564	\$150,563	\$133,437	\$171,546
<b>Black or African American alone</b>	\$40,560	\$51,562	\$60,361	\$77,440
<b>American Indian and Alaska Native</b>	\$51,306	\$58,164	\$42,906	\$61,154
<b>Asian alone</b>	\$91,453	\$112,776	\$96,068	\$169,521
<b>Native Hawaiian and Other Pacific</b>	NA	\$132,054	\$9,499	N/A
<b>Some Other Race alone</b>	\$48,047	\$65,202	\$50,165	\$64,902
<b>Two or More Races</b>	\$83,243	\$96,003	\$79,495	\$104,811
<b>Hispanic or Latino</b>	\$60,848	\$89,480	\$53,088	\$72,894

Table 2 shows that as of 2021, the total median household income in the planning area is higher for all households when compared to the District. When broken down by race, the household median income in the planning area is higher for all races when compared to the District, with the median household income highest for white residents and lowest for American Indian and Alaska Native and some other race residents. With regards to ethnicity, the median household income for Hispanics or Latinos is lower in the planning area when compared to the District.

A comparison of the 2016 and 2021 ACS data for the planning area shows that the medium household income increased by \$25,633 for the total population. During this time period, the median household income increased for all races and ethnicities.

**Table 3: Owner Occupied Households**

<b>RACE AND ETHNICITY</b>	<b>VARIABLE</b>	<b>DISTRICT 2012-2016</b>	<b>DISTRICT 2017-2021</b>	<b>RCE 2012-2016</b>	<b>RCE 2017-2021</b>
<b>Total householder</b>	<b>Total</b>	<b>276,546</b>	<b>310,104</b>	<b>28,188</b>	<b>31,096</b>
	Owner occupied	112,672	128,720	15,718	17,477
	% owner occupied	40.70%	41.51%	55.80%	56.2%
<b>White alone</b>	<b>Total</b>	<b>125,101</b>	<b>138,443</b>	<b>6,327</b>	<b>8,183</b>
	Owner occupied	59,819	66,450	4,123	5,413
	% owner occupied	47.80%	48.00%	65.20%	66.1%
<b>Black or African American alone</b>	<b>Total</b>	<b>124,542</b>	<b>132,384</b>	<b>17,731</b>	<b>17,629</b>
	Owner occupied	44,762	47,665	10,291	9,703
	% owner occupied	35.90%	36.01%	58.00%	55.0%
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>889</b>	<b>1,198</b>	<b>128</b>	<b>96</b>
	Owner occupied	292	356	72	19
	% owner occupied	32.80%	29.72%	56.30%	19.8%
<b>Asian alone</b>	<b>Total</b>	<b>10,428</b>	<b>13,048</b>	<b>573</b>	<b>469</b>
	Owner occupied	4,110	5,373	412	300
	% owner occupied	39.40%	41.18%	71.90%	63.9%
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>99</b>	<b>33</b>	<b>19</b>	<b>0</b>
	Owner occupied	9	32	9	0
	% owner occupied	9.10%	96.97%	47.40%	0.0%
<b>Some Other Race alone</b>	<b>Total</b>	<b>9,095</b>	<b>9,978</b>	<b>2,701</b>	<b>2,845</b>
	Owner occupied	1,589	2,416	470	623
	% owner occupied	17.50%	24.21%	17.40%	21.9%
<b>Two or More Races</b>	<b>Total</b>	<b>6,392</b>	<b>15,020</b>	<b>709</b>	<b>1,873</b>
	Owner occupied	2,091	6,428	341	1,418
	% owner occupied	32.70%	42.80%	48.20%	75.7%
<b>Hispanic or Latino</b>	<b>Total</b>	<b>23,885</b>	<b>27,098</b>	<b>4,382</b>	<b>4,750</b>
	Owner occupied	7,381	9,440	1,255	1,777
	% owner occupied	30.90%	34.84%	28.60%	37.4%

Table 3 shows that as of 2021, the percentage of all owner-occupied households in the planning area is higher than compared to the District. Relatedly, households in the planning area are also predominately owner-occupied. When broken down by race, the percentage of owner-occupied households in the planning area is higher for all races when compared to the District with the exception of residents who identify as some other race, which is slightly lower than the District percentage. With regards to ethnicity, the percentage of owner-occupied households in the planning area is also higher for Hispanic or Latino residents than compared to the District.

A comparison of the 2016 and 2021 ACS data for the planning area shows that the total number of owner-occupied households generally remained the same. However, during this time period, the percentage of owner-occupied households decreased for Black or African American and Asian residents.

**Table 4: Renter Occupied Households**

RACE AND ETHNICITY	VARIABLE	DISTRICT	DISTRICT	RCE	RCE
		2012-2016	2017-2021	2012-2016	2017-2021
<b>Total householder</b>	<b>Total</b>	<b>276,546</b>	<b>310,104</b>	<b>28,188</b>	<b>31,096</b>
	Renter occupied	163,874	181,384	12,470	13,619
	% renter occupied	59.30%	58.49%	44.20%	43.8%
<b>White alone</b>	<b>Total</b>	<b>125,101</b>	<b>138,443</b>	<b>6,327</b>	<b>8,183</b>
	Renter occupied	65,282	71,993	2,204	2,770
	% renter occupied	52.20%	52.00%	34.80%	33.9%
<b>Black or African American alone</b>	<b>Total</b>	<b>124,542</b>	<b>132,384</b>	<b>17,731</b>	<b>17,629</b>
	Renter occupied	79,780	84,719	7,440	7,926
	% renter occupied	64.10%	63.99%	42.00%	45.0%
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>889</b>	<b>1,198</b>	<b>128</b>	<b>96</b>
	Renter occupied	597	842	56	77
	% renter occupied	67.20%	70.28%	43.80%	80.2%
<b>Asian alone</b>	<b>Total</b>	<b>10,428</b>	<b>13,048</b>	<b>573</b>	<b>469</b>
	Renter occupied	6,318	7,675	161	169
	% renter occupied	60.60%	58.82%	28.10%	36.1%
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>99</b>	<b>33</b>	<b>19</b>	<b>0</b>
	Renter occupied	90	1	10	0
	% renter occupied	90.90%	3.03%	52.60%	0.0%
<b>Some Other Race alone</b>	<b>Total</b>	<b>9,095</b>	<b>9,978</b>	<b>2,701</b>	<b>2,845</b>
	Renter occupied	7,506	7,562	2,231	2,222
	% renter occupied	82.50%	75.79%	82.60%	78.1%
<b>Two or More Races</b>	<b>Total</b>	<b>6,392</b>	<b>15,020</b>	<b>709</b>	<b>1,873</b>
	Renter occupied	4,301	8,592	367	455
	% renter occupied	67.30%	57.20%	51.80%	24.3%
<b>Hispanic or Latino</b>	<b>Total</b>	<b>23,885</b>	<b>27,098</b>	<b>4,382</b>	<b>4,750</b>
	Renter occupied	16,504	17,658	3,127	2,973
	% renter occupied	69.10%	65.16%	71.40%	62.6%

Table 4 shows that as of 2021, the percentage of all renter-occupied households in the planning area is lower than compared to the District. When broken down by race and ethnicity, most households are majority owner-occupied, except for some other race, and Hispanic or Latino households.

A comparison of the 2016 and 2021 ACS data for the planning area shows that the total number of renter-occupied households generally remained the same. However, the percentage of renter-occupied households increased for Black or African American, American Indian and Alaska Native and Asian households.

**Table 5: Housing Cost Burden**

VARIABLE	DISTRICT 2012-2016	DISTRICT 2017-2021	RCE 2012-2016	RCE 2017-2021
Total Households	276,546	310,104	28,188	31,096
Cost Burdened Households	102,855	108,129	10,450	10,060
Not Computed	10,259	10,882	643	927
Percent of households spending 30% or more of their income on housing	38.6	36.1	37.9	33.3

A household is considered housing cost burdened if 30 percent or more of their income is spent on housing. Table 5 shows that as of 2021, the percentage of people who are housing cost burdened in the planning area is lower than compared to the District. A comparison of the 2016 and 2021 ACS data for the planning area shows that the number of households who were housing cost burdened decreased by just over four percent.

**Table 6: Population with a Disability 2012-2016**

RACE AND ETHNICITY	VARIABLE	DISTRICT	DISTRICT %	RCE	RCE %
<b>Total</b>	<b>Total</b>	<b>648,263</b>		<b>75,967</b>	
	Population with a disability	73,230	11%	8,145	11%
<b>White alone</b>	<b>Total</b>	<b>262,215</b>		<b>15,925</b>	
	Population with a disability	13,440	5%	1,054	7%
<b>Black or African American alone</b>	<b>Total</b>	<b>312,180</b>		<b>45,843</b>	
	Population with a disability	55,538	18%	6,542	14%
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>2,156</b>		<b>574</b>	
	Population with a disability	303	14%	40	7%
<b>Asian alone</b>	<b>Total</b>	<b>23,897</b>		<b>1,546</b>	
	Population with a disability	1,246	5%	45	3%
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>271</b>		<b>32</b>	
	Population with a disability	22	8%	0	0%
<b>Some Other Race alone</b>	<b>Total</b>	<b>29,489</b>		<b>9,997</b>	
	Population with a disability	1,392	5%	291	3%
<b>Two or More Races</b>	<b>Total</b>	<b>18,055</b>		<b>2,051</b>	
	Population with a disability	1,289	7%	173	8%
<b>Hispanic or Latino</b>	<b>Total</b>	<b>68,513</b>		<b>16,601</b>	
	Population with a disability	3,874	6%	974	6%

**Table 7: Population with a Disability 2017-2021**

<b>RACE AND ETHNICITY</b>	<b>VARIABLE</b>	<b>DISTRICT</b>	<b>DISTRICT %</b>	<b>RCE</b>	<b>RCE %</b>
<b>Total</b>	<b>Total</b>	<b>673,717</b>		<b>78,570</b>	
	Population with a disability	75,752	11%	9,021	11%
<b>White alone</b>	<b>Total</b>	<b>273,195</b>		<b>19,065</b>	
	Population with a disability	15,339	6%	1,183	6%
<b>Black or African American alone</b>	<b>Total</b>	<b>299,848</b>		<b>41,415</b>	
	Population with a disability	51,925	17%	6,284	15%
<b>American Indian and Alaska Native alone</b>	<b>Total</b>	<b>1,951</b>		<b>243</b>	
	Population with a disability	385	20%	0	0%
<b>Asian alone</b>	<b>Total</b>	<b>27,676</b>		<b>1,416</b>	
	Population with a disability	1,567	6%	54	4%
<b>Native Hawaiian and Other Pacific Islander alone</b>	<b>Total</b>	<b>356</b>		<b>0</b>	
	Population with a disability	11	3%	0	
<b>Some Other Race alone</b>	<b>Total</b>	<b>32,212</b>		<b>10,875</b>	
	Population with a disability	2,463	8%	780	7%
<b>Two or More Races</b>	<b>Total</b>	<b>38,479</b>		<b>5,554</b>	
	Population with a disability	4,062	11%	720	13%
<b>Hispanic or Latino</b>	<b>Total</b>	<b>76,233</b>		<b>17,540</b>	
	Population with a disability	5,903	8%	1,624	9%

Tables 6 and 7 show that as of 2021, the total percentage of people with disabilities in the planning area is lower than compared to the District. When broken down by race or ethnicity, residents who are either Black or African American or two or races have the highest percentage of the population with a disability.

A comparison of the 2016 and 2021 ACS data for the planning area shows that the total number of people with disabilities remained generally the same.

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). Within the context of the planning area, residents who are either American Indian or Alaska Native and some other race have the lowest median household income followed by Hispanic or Latino residents and then Black or African American residents.

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 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 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.

As discussed in Section VI of this report, the planning area as of January 2023 had achieved 57.9 percent of its 2025 affordable housing production goals (approximately 869 units) and is estimated to only reach 84.4 percent of its 2025 affordable housing goal. The potential affordable housing units that could be created under the requested RA-2 zone is higher than if the property was not rezoned and could help the planning area get closer to meeting its affordable housing production goal. Making room for affordable housing also 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 likely 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 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. Analysis and compilation of relevant policies can be found in Section VII and Appendix II of OP's set down report in [Exhibit 12](#).

### **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.

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 about 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.

## **VIII. OTHER DISTRICT AGENCIES**

No reports from other District agencies were received at the time this report was filed to the record.

## **IX. ADVISORY NEIGHBORHOOD COMMISSION**

ANC 4B and 4D filed reports to the record at Exhibits 11 and 20 in support of the map amendment.

## **X. COMMUNITY COMMENTS**

Two comments were received at the time this report was filed to the record at Exhibits 21 and 22.

## XI. APPENDIX I

### Proposed Zoning Map

