

**CLOSING ARGUMENT**  
**By Edward Hanlon For**  
**DUPONT CIRCLE CITIZENS ASSOCIATION**

This is a contested case. Under § 2–509 of the *Administrative Procedures Act* the burden of proof is on OP and never shifts to the opponents. Opponents do not have to prove anything. On the other hand, OP has burdens and has completely failed to meet its burden of proof and its burden of persuasion.

This case has opened the eyes of the people of the District of Columbia.

There are over 300 letters in Opposition, over 1000 names on a Petition opposing, scores who waited days to testify against and every civic organization in the area opposes this Map Amendment. Both the Committee of 100 on The Federal City and Empower DC oppose it. The DC Police Union opposes it. The Freedom Baptist Church opposes this Map Amendment.

Consider the real world effects of approving this Map Amendment as the Comp Plan thru its policies expects this Commission to do. Approving this Map Amendment opens up major safety issues and the possibility that millions of dollars of public property, police station and a fire station, could be destroyed in the middle of the worst crime wave in 25 years. The OTR website states the buildings alone, not the land, just the buildings, which will be destroyed if upzoning is approved, have a tax appraised value of over **\$19.3 million**.

Huge new infrastructure costs for water, sewer, transportation will be involved in putting an MU-10 building on this site. Yet, OP has provided nothing in this record as to any infrastructure planning any DC agency has yet done, if the site is upzoned to MU-10 or who will bear the financial burden.

Where is the police station going during construction? No one knows. Will the police station ever come back to the site, highly unlikely. Using the construction site itself as a “swing” site as Mr. Lyons suggested, moving 150-200 vehicles and 235 police officers around from one side of the site to the other as construction proceeds, is not practicable or safe for the officers or the public, given major site construction and excavation for an underground garage for up to 300 vehicles.

*So many people are upset because they think they are not being told the truth by OP in this case.*

According to the US Department of Justice there are over 18,000 local police departments in this country. [www.justice.gov/d9/policing\\_101\\_content.pdf](http://www.justice.gov/d9/policing_101_content.pdf) We challenge this Commission and Commissioner Imamura, who is an architect, to find another police station *anywhere* in this country, for any of the 18,000 police departments, that has an apartment building sitting on top of it. *We cannot find one*. There are no examples in the record.

**Admission by Omission.** It would have been natural for OP to give some examples of apartments buildings on top of police stations, if there were any examples across the country. There aren't any for very practical reasons:

A police station has to have a secure, operational building, housing everything from tactical training, evidence storage, public safety communications, holding cells, interview rooms,

secure areas for police and tactical vehicles, sally ports and docks for secure inmate transfer. You cannot have that on the first floor of your luxury apartment building. OP is spinning us all. There will be no people in handcuffs coming in one side of this luxury apartment building and no sally ports out the other side.

Further and pointedly, OP has put *no evidence in the record that the police station and fire station are actually in poor condition* (which is one of OP/DMPED's justifications for this Map Amendment). OP submitted no appraisals, no estimates for renovations, no photos documenting the alleged "poor" condition of these facilities. And, as Jack Evans pointed out in his February 7, 2024 letter to the Commission, the fire station "recently underwent a multi million dollar renovation." And, in his live testimony, while answering questions from Commissioners, Mr. Evans explained the city already has money in its capital budget for any needed renovations or upgrades to the police station.

DMPED's Lyons would not promise on the record that the police station, once moved, will ever come back to this site. He would not promise 3<sup>rd</sup> District MPD would remain permanently on the site. He said he has to 'look at' all the proposals.

### ***OP's complete lack of community engagement...***

There was **zero** community engagement by OP and DMPED. OP's Kirschenbaum admits OP did no outreach whatsoever, zero, to the community.

This is not a situation in which some Community outreach was done and the parties are arguing about the quality or depth of that outreach. Here, DMPED and OP made it easy to analyze. They did zero. And, even in the months after this case was filed and after so many people and organizations complained in this case about the lack of outreach, OP still made no effort to reach out and engage.

The "Engagement Log" was filed in June 2023. DMPED/OP spoke to less than a dozen members of the Community, the majority of these on the day OP was hanging notice placards on the site.

OP admits that it reached out to none of the following civic organizations:

Dupont Circle Citizens Association,  
Shaw Dupont Citizens Alliance,  
Dupont East Civic Action Association  
Kalorama Citizens Association  
Dupont Circle Conservancy  
Empower DC  
Committee of 100 of the Federal City

In fact OP reached out to not a single civic organization. **Zero**

OP did not reach out to a single business organization. OP did not reach out to any area B.I.D. OP did not reach out to any business group along U Street to get their input and take into consideration their recommendations.

OP did zero outreach to the business community along U Street, in Ward 1 or in Ward 2. **Zero**

OP also did not speak to a single businessman or businesswoman about this proposed Map Amendment

***OP is asking this Commission to ignore its own “Racial Equity Tool”...***

The Commission’s own website states:

“Recent updates to the Comprehensive Plan require the Zoning Commission to evaluate all zoning actions through a racial equity lens as a part of its overall Comprehensive Plan consistency analysis...

The Zoning Commission expects racial equity analysis submissions that analyze a zoning action through a racial equity lens *to include a detailed discussion from the Applicant/Petitioner on community outreach and engagement efforts.”*

OP totally ignored the Commission’s own requirements to analyze this Map Amendment thru a racial equity lens.

OP’s Kirschenbaum admits that OP did not reach out to a single Black church or faith based group. These include:

*St Augustine’s Catholic Church* is at 15<sup>th</sup> and V. It is the oldest Black Catholic Church in the city. OP did not reach out to St. Augustine’s.

*Freedom Baptist Church* is one block away. OP did not reach out this Black congregation which has been at its location for decades. Rev. Younger complained in writing at #619 that OP and DMPED did not reach out to his congregation.

*St. Luke’s Episcopal Church* is a historic Episcopal church located at 1514 15th Street, N.W, D.C. and is home to the oldest African-American Episcopal congregation in the city. Op did not reach out to St. Luke’s.

Kirschenbaum also admitted that OP also did not reach out to any Black business organization, any Black businessman or Black businesswoman about this Map Amendment.

Kirschenbaum admitted that OP did not reach out to a single Black civic organization.

OP admits it did not reach out to a single Black resident in the area surrounding the site, not Mr. Greg Adams who lives a hundred feet away from the site; not a single member of the historic Black Co-op directly across V St from the police station.

A poignant video clip of testimony of Black residents gave in this case, called *Do Black Neighbors Matter?* is posted on the IZIS Docket and I urge the Commissioners to view it. The video is posted on the IZIS docket at #678: <https://www.youtube.com/watch?v= jLKYM-tanU>

In addition, as the testimony made clear, the Strivers Section Historic District surrounds this site on 3 sides. Frederick Douglass built 3 of the houses on 17<sup>th</sup> across from the site. Frederick Douglass' son lived across the street from the site. This area immediately surrounding the site has immense historic significance to the Black history of DC.

To make excuses for OP's failure to do any outreach at this point is to diminish the importance of racial equity generally, and where it really matters, in the areas of zoning and land use.

*A contested case is not the forum for Community engagement. To the extent anyone suggests hearings held under the **contested** case provisions of the APA fulfils the broad Comp Plan mandate for extensive community outreach, they are wrong. Meaningful community engagement takes place from the very beginning as a project is contemplated and neighborhood input sought at to what type of project. Here, cross-examination was limited as objections were raised. Questions and subjects ruled out of order. Each party was given an average of only 8 minutes, 8 minutes, to present their case-in chief. This was not community engagement. This was an evidentiary hearing.*

***The Comp Plan, violates 'best practices' in the field of demography, uses 2010 Census Data for 2024 planning decisions...***

We know from Demographer Catherine Bray's testimony that the Comp Plan relies on 2010 Census data, 14 year old data. Against all best practices in the field of demography, the Comp Plan has never been updated to use 2020 Census data.

The Comp Plan is over estimating DC's population by tens of thousands of people. By July 2025 the Comp Plan is projecting 90,000 more people will live in DC than the Council of Governments estimates. Why? Because the Council of Governments has recalibrated its population and housing estimates to incorporate 2020 Census data and the DC government is still using 2010 Census data.

By overestimating population by tens of thousands, the Comp Plan is also over estimating the need for housing by thousands of units.

*Planning has become **twisted** by this outdated, inaccurate data. In this and other ZC cases OP is pushing upzoning, especially on publicly owned land, to build housing units for residents which don't exist and won't exist in the next 25 years according to the Census Bureau and the Council of Governments.*

This Commission is being asked to weigh various, often competing, elements of the Comp Plan.

But, bad data, characterized by inaccuracies, incompleteness, and inconsistencies, can have far-reaching impacts, leading to **flawed strategies and misguided decisions by this Zoning Commission.**

This Commission cannot correctly balance these competing elements and competing needs using 14 year old data? Do we really need a 650 unit, MU-10, building on this valuable public land to fulfil Comp Plan objectives if our true need for additional housing is much less, as the Council of Governments projections say?

*Remember, this is not a rulemaking hearing. This is a contested hearing.* The Administrative Procedures Act states:

Every decision and order adverse to a party to the case, rendered... shall be in writing and shall be accompanied by findings of fact and conclusions of law. The findings of fact shall consist of a concise statement of the conclusions upon each contested issue of fact. ***Findings of fact and conclusions of law shall be supported by and in accordance with the reliable, probative, and substantial evidence.***

It will be extraordinarily difficult for this Commission to makes findings of fact based on “reliable, probative, and substantial evidence” when the data being used is from the 2010 Census. OP could have, but chose not to, updated its estimates using 2020 Census data, as is “best practice” in the field of demography.<sup>1</sup>

***OP’s proposed upzoning is inconsistent with the Comp Plan’s CITY WIDE ELEMENTS, MID-CITY AREA ELEMENT and the site’s designation as a NEIGHBORHOOD CONSERVATION AREA...***

OP’s proposed upzoning is inconsistent with the Comprehensive Plan’s City Wide Elements, Mid-City Area Element and the site’s designation as a Neighborhood Conservation Area.

The proposed upzoning would deal a serious blow to the principle of adapting infill development to the surrounding neighborhood.

As Shelly Repp of the Committee of 100 testified, any transformation of low-moderate density neighborhoods to high density development, such as proposed here, will result in *displacement*.

*OP’s reports and analysis incorrectly state that because no one is living on the site now, there can be no displacement.* But, the expert witnesses presented by Black Neighbors of 1617 U Street make a compelling case that area displacement of lower income and Black residents in the neighborhood around the site will occur. Mr. Greg Adams and Ms. Deborah Akel testified quite movingly about the effect on them and their neighbors of displacement and of their well-founded fear of displacement that will be caused by approving this Map Amendment application. The Committee of 100 also stated its opinion that for these displacement reasons the application does not satisfy the Commission’s racial equity criteria.

Again, I urge the Commission to review the 7 1/2 minute video at IZIS # 678:

<https://www.youtube.com/watch?v=jLKYM-tanU>

The site lies within the Comprehensive Plan’s Mid-City Area Element. That Element of the Comprehensive Plan sets general policies and actions to guide growth and neighborhood conservation decisions in the Mid-City Planning Area, including that:

1. The historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and

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<sup>1</sup> The DCMR was also never updated from 2021 until December 2023 to include provisions of the revised 2021 Comp Plan.

walkable neighborhood shopping districts, be retained and reinforced; and

2. Infill development should be compatible in scale and character with adjacent use

The Generalized Policy Map shows the back half of the site (the northern half) to be a Neighborhood Conservation Area.

The Comp Plan provisions concerning Neighborhood Conservation Area is quite clear and applicable to this case:

#### 225.4 Neighborhood Conservation Areas

... 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.... 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.

#### 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. Limited development and redevelopment opportunities do exist within these areas... new development... should be compatible with the existing scale, natural features, and character of each area.

OP's proposed Map Amendment clearly is inconsistent with the Generalized Policy Map, City Wide Elements, Mid-City Area Element and the site's designation as a Neighborhood Conservation Area. OP never even attempted to dispute some of the allegations of inconsistencies of the application with the Comp Plan.

#### ***The Proposed Map Amendment is inconsistent with more than 20 separate provisions and policies of the Comp Plan...***

I have attached to this Closing Statement and also filed as IZIS #688 a list which identifies more than 20 provisions and policies for which the proposed Map Amendment is inconsistent with the Comp Plan. They include inconsistencies with the City Wide Element, the Mid-City Element, the Framework Element, the Housing Element and the Implementation Element.

#### ***Case 23-26...***

Finally, I wish to point out that that "companion" case, Case No.23-26, has been improperly set down as a "text amendment" rulemaking case depriving residents of their right to a contested hearing.

For reasons more fully to be expressed on the docket of Case 23-26, Case 23-26, OP's attempt to change the development standards on the back half of the site by creating a new zone and then mapping the back half of the site to the new zone, must be heard as contested case.

The City is the owner of the property and any map amendment application by the City with respect to Lots 826 or 827 must be done under the contested hearing provisions of the Zoning Regulations.

Case 23-26 is not a "rulemaking" case,



### CONCLUSION

It is clear that this Map Amendment Application does not meet the standard of the law set down in Subtitle X § 500.3

***"In all cases, the Zoning Commission shall find that the amendment is **not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.**"***

This Map Amendment violates numerous Comp Plan provisions and Comp Plan Policies. This proposed Map Amendment would destroy a cohesive, tightly knit, row house neighborhood and destroy a Neighborhood Conservation Area.

The application violates some of the most fundamental foundations of the Comp Plan, including community engagement and racial equity. The expert testimony is that it will further polarize the neighborhood on the basis of race, it eschews diversity, it totally ignores racial equity and it fosters imminent displacement of low and middle income residents.

OP incredulously called no experts and put forward no countervailing expert testimony. On cross OP challenged none of the testimony of the experts called by the parties opposing the application. This Commission should, on this record, fully credit the uncontested expert testimony it heard.

Further, OP did not even pretend to place before this Commission in this case reliable population or housing data. OP is violating "best practices" in the field of demography by relying on 14 year old Census data to make planning decisions. No private company could do this and stay in business. OP should be held to a similar professional standard.

The *Administrative Procedures Act* is a statute, it takes precedence over any Zoning Regulation, and it requires that all ***"Findings of fact and conclusions of law [by this Commission in this case] shall be supported by and in accordance with the reliable, probative, and substantial evidence."*** Under the APA OP has the burden of proof and has failed to meet its burden of proof or burden of persuasion in this case.

In summary, the Dupont Circle Citizens Association submits that on the record before the Commission and applying the requirements of the APA, that this Map Amendment must be DENIED.

**Partial List Of Comprehensive Plan Provisions  
Which The Map Amendment Is Inconsistent With**



## CITY WIDE ELEMENTS

### 225.4 Neighborhood Conservation Areas

Neighborhood Conservation areas have little vacant or underutilized land. They are generally residential in character. 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.

### 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. 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.

### 227.8

**High Density Residential:** This designation is used to define neighborhoods and corridors generally, but not exclusively, suited for high-rise apartment buildings. Pockets of less dense housing may exist within these areas. Density is typically greater than a FAR of 4.0, and greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development. The RA-4 and RA-5 Zone Districts are consistent with the High Density Residential category, and other zones may also apply. 227.8

### 228.1 Guidelines for Using the Generalized Policy

#### Map and the Future Land Use Map

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guidance for development and conservation decisions, and are considered in concert with other Comprehensive Plan policies. Several important parameters, defined below, apply to their use and interpretation.

a. The Future Land Use Map is not a zoning map. Whereas zoning maps are parcel-specific, and establish detailed requirements and development standards for setbacks, height, use, parking, and other attributes, the Future Land Use Map is intended to be “soft-edged” and does not follow parcel boundaries, and its categories do not specify

allowable uses or development standards. By definition, the Future Land Use Map is to be interpreted broadly and the land use categories identify desired objectives...

d. The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the Citywide Elements and the Area Elements.

e. The designation of an area with a particular Future Land Use Map category does not necessarily mean that the most intense zoning district described in that category is automatically permitted.

f. Some zone districts may be compatible with more than one Comprehensive Plan Future Land Use Map designation. As an example, the MU-4 zone is consistent with both the Low Density Commercial and the Moderate Density Commercial designation, depending on the prevailing character of the area

## **MID-CITY AREA ELEMENT**

### **2000.4**

Many Mid-City neighborhoods have a strong sense of identity, including the historic districts of U Street NW, Mount Pleasant, LeDroit Park, Bloomingdale, and Striver's Section and their historic landmarks, such as the True Reformer Building, Meridian Hill/Malcolm X Park, the Lincoln and Howard Theaters, and the Prince Hall Masonic Temple. Activities like Adams Morgan Day and the DC Funk Parade on U Street NW celebrate local culture and build community pride.

### **2000.6**

Parts of the Mid-City Planning Area have changed rapidly during the last 10 years. Already one of the densest areas in Washington, DC, Mid-City contains approximately 19 percent of the District's new housing units, and almost 14 percent of the area's housing units are affordable. Although Mid-City is close to having a fair amount of affordable housing, the distribution of that affordable housing has been concentrated in a few neighborhoods such as Columbia Heights, Reed-Cooke, and the U Street corridor.

### **2007.3**

Pedestrian safety, improved traffic operations, and parking management are all high priorities. Increased density within this already dense Planning Area creates busier streets—both for cars and for people.

## **MC-1 General Policies**

### **MC-1.1 Guiding Growth and Neighborhood Conservation 2008**

The following general policies and actions should guide growth and neighborhood conservation decisions in the Mid-City Planning Area. These policies and actions should be considered in tandem with those in the Citywide Elements of the Comprehensive Plan. 2008.1

#### **Policy MC-1.1.1: Neighborhood Conservation**

Retain and reinforce the historic character of Mid-City neighborhoods, particularly its mix of row houses, apartment houses, as well as historic districts, and walkable neighborhood shopping districts. The Planning Area's squares, alleyways, and historic alley lots offer opportunities for preservation and creative development. The area's rich architectural heritage and cultural history should be preserved and enhanced. 2008.2

#### **Policy MC-1.1.3: Infill and Rehabilitation**

... Infill development should be compatible in scale and character with adjacent uses and encourage more housing opportunities 2008.4

#### **Policy MC-1.1.5: Conservation of Row House Neighborhoods**

Recognize the value and importance of Mid-City's row house neighborhoods as an essential part of the fabric of the local community. Ensure that the Comprehensive Plan and zoning designations for these neighborhoods reflect the desire to retain the row house architectural pattern. 2008.6

#### **Policy MC-2.3.1: Uptown Destination District**

Encourage the growth and vibrancy of U Street NW between 6th Street NW and 12th Street NW and Georgia Avenue NW/7th Street NW between Rhode Island Avenue NW and Barry Place NW as a mixed-use center with restored theaters, arts and jazz establishments, restaurants, shops, and housing serving a range of incomes and household types. 2013.5

#### **Policy MC-2.3.7 Use of Public Sites**

Utilize public land at the Reeves Center, Housing Finance Agency, Garnet-Paterson, Engine 9, and MPD 3rd District Headquarters to create mixed-use neighborhood landmarks that acknowledge and continue the history of U Street as a Black business corridor. Added density at these public sites should be used to create a significant amount of new affordable housing, establish space for cultural uses, and provide for additional public facilities, such as a new public library. New construction should concentrate density towards U Street and use design strategies to visually reduce building height and bulk to provide appropriate transitions to adjacent lower density areas. 2013.11

## FRAMEWORK ELEMENT

213.6

Equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities. Equity is not the same as equality.

213.7

Equitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices that reduce and ultimately eliminate disparities while fostering places that are healthy and vibrant.

## HOUSING ELEMENT

Policy H-1.4.6: Whole Neighborhood Approach

Ensure that planning and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, childcare, services for older adults, food access, parks, libraries, community gardens, and open spaces, health care facilities, police and fire facilities, transportation, and emergency response capacity. 506.1

Action H-2.1.1: Anti-Displacement Strategy

Track neighborhood change, development, and housing costs to identify areas of Washington, DC that have experienced, are experiencing, or are likely to experience, displacement pressures. Collect, disaggregate, and monitor data to consider income and racial characteristics of the neighborhoods and households affected by or at risk of displacement. Conduct racial equity analyses that identify the policies and underlying forces contributing to any inequities. Such analyses must consider different sources of displacement pressures, including a lack of new housing in high-demand neighborhoods and effects new development may have on housing costs in adjacent areas. Monitor best practices and identify new strategies for displacement prevention. Use the information to create a District-wide anti-displacement strategy, prepare reoccurring reports, improve program performance, and identify targeted areas within which to deploy resources to prevent displacement and help residents with the highest displacement risks stay in their neighborhoods. Examine ways to support low-income residents in areas that have already experienced rapid displacement, such as those in Mid-City and Near Northwest. 510.22

## LAND USE ELEMENT

### Policy LU-2.1.5: Support Low-Density Neighborhoods

Support and maintain the District's established low-density neighborhoods and related low-density zoning. Carefully manage the development of vacant land and alterations to existing structures to be compatible with the general design character and scale of the existing neighborhood and preserve civic and open space. 310.12

### Policy LU-2.1.7: Row House Neighborhood Character

Respect the character of row house neighborhoods by ensuring that infill development is compatible with existing design patterns and maintains or expands the number of family-sized units. 310.14

### 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. Build upon the guidance of the April 2020 Single Family Housing Report to diversify the cost of housing available in high-opportunity, high-cost low- and moderate-density neighborhoods, especially near transit. However, neighborhood planning and engagement is a condition predicate to any proposals. Infill and new development shall be compatible with the design character of existing neighborhoods. Minimize demolition of housing in good condition. 310.15

## IMPLEMENTATION ELEMENT

### Policy IM-1.5.5: Transparency in Decision-Making

Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents, and maintaining open lines of communication with the public as plans are developed. 2506.6

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Ensure that planning and new construction of housing is accompanied by concurrent planning and programs to improve neighborhood services, schools, job training, childcare, services for older adults, food access, parks, libraries, community gardens, and open spaces, health care facilities, police and fire facilities, transportation, and emergency response capacity. 506.1

Action H-2.1.1: Anti-Displacement Strategy

Track neighborhood change, development, and housing costs to identify areas of Washington, DC that have experienced, are experiencing, or are likely to experience, displacement pressures. Collect, disaggregate, and monitor data to consider income and racial characteristics of the neighborhoods and households affected by or at risk of displacement. Conduct racial equity analyses that identify the policies and underlying forces contributing to any inequities. Such analyses must consider different sources of displacement pressures, including a lack of new housing in high-demand neighborhoods and effects new development may have on housing costs in adjacent areas. Monitor best practices and identify new strategies for displacement prevention. Use the information to create a District-wide anti-displacement strategy, prepare reoccurring reports, improve program performance, and identify targeted areas within which to deploy resources to prevent displacement and help residents with the highest displacement risks stay in their neighborhoods. Examine ways to support low-income residents in areas that have already experienced rapid displacement, such as those in Mid-City and Near Northwest. 510.22

## LAND USE ELEMENT

### Policy LU-2.1.5: Support Low-Density Neighborhoods

Support and maintain the District's established low-density neighborhoods and related low-density zoning. Carefully manage the development of vacant land and alterations to existing structures to be compatible with the general design character and scale of the existing neighborhood and preserve civic and open space. 310.12

### Policy LU-2.1.7: Row House Neighborhood Character

Respect the character of row house neighborhoods by ensuring that infill development is compatible with existing design patterns and maintains or expands the number of family-sized units. 310.14

### 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. Build upon the guidance of the April 2020 Single Family Housing Report to diversify the cost of housing available in high-opportunity, high-cost low- and moderate-density neighborhoods, especially near transit. However, neighborhood planning and engagement is a condition predicate to any proposals. Infill and new development shall be compatible with the design character of existing neighborhoods. Minimize demolition of housing in good condition. 310.15

## IMPLEMENTATION ELEMENT

### Policy IM-1.5.5: Transparency in Decision-Making

Strongly encourage transparent decision-making in all land use and development matters, making information available and accessible to residents, and maintaining open lines of communication with the public as plans are developed. 2506.6