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Advisory Neighborhood Commission 5D

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To:

The District of Columbia Zoning Commission

441 4th Street NW, Suite 200S

Washington, DC 20001

**RE: Opposition to the Proposed Warehouse Development
ZC Case #24-11**

Dear Members of the Zoning Commission:

I write in strong opposition to the proposed warehouse development on NY Ave at the Montana Triangle. Our community is already overburdened with industrial uses that emit toxins into the air, and we remain in the most polluted neighborhood in the District due to the heavy concentration of industrial and PDR uses. Allowing additional industrial or warehouse development in this area directly contradicts both the letter and intent of the District's planning, sustainability, and racial equity goals.

The Industrial Land Use Study and Industrial Land Use Element of the Comprehensive Plan and the (ICSAP) established a 70% cap on the preservation of industrial land

in the city, with an emphasis on transitioning some industrial areas to mixed-use and residential development. The Ivy City area was identified as a location where industrial intensity should be reduced, and environmental justice concerns addressed. This proposal runs counter to those recommendations.

Per the Ivy City Small Area Plan (ICSAP), “Residents in Ivy City will see a variety of improvements to their quality of life with the implementation of Sustainable DC 2.0.”

The Department of Energy and Environment (DOEE), in collaboration with community partners, has been working to establish community resilience hubs along the New York Avenue NE Corridor — including one in the space currently occupied by National Engineering Products. Approving another warehouse in this corridor undermines these public commitments to community resilience, environmental restoration, and quality-of-life improvements.

Additionally, the ICSAP states that “existing zoning guidelines for PDR uses require physical and visual buffers between new PDR buildings and neighboring residential properties to reduce impact from emissions, noise, smells, and visual disruption.” The proposed warehouse is not consistent with this policy — it would increase industrial impacts rather than mitigate them.

The Ward 5 Works plan (2014), which remains only partially implemented, further recommended the creation of additional buffers to strengthen transitions between industrial and residential neighborhoods. Many of the currently vacant warehouses in Ivy City serve as informal buffers, shielding residents from harsher industrial activity. Converting these spaces back to active industrial use directly contradicts the intent of these prior planning efforts.

The PDR section of the Comprehensive Plan also emphasizes that “it is critical that the District screen and buffer harsh industrial uses from places where people live.” This guiding principle — supported by both the ICSAP and the engagement of the Ivy City community, Empower DC, and ANC 5D — should inform every zoning case that affects our neighborhood. The plan explicitly states that “the Zoning Commission will review zoning map amendments and PUDs that are important to implement recommendations,” and that partner agencies and community stakeholders play an important role in this process. However, despite several reports in the UrbanTurf newsletter referencing Douglas Development’s plans to construct a warehouse at a site long intended for mixed-use development, in Ivy City, and Ivy City will be impacted, there have been no community engagement with us.

Furthermore, the zoning designations themselves raise major inconsistencies with the Comprehensive Plan's racial equity lens.

- The MU-5 zone is intended to “permit medium-density compact mixed-use development with an emphasis on residential use and to provide facilities for shopping, housing, and business needs” (11-G DCMR §101.10).
- By contrast, the PDR-1 zone permits “moderate-density commercial and production, distribution, and repair activities” (11-J DCMR §203.2), with a 50-foot height limit but no cap on stories.
- No residential protections were mentioned during any of the applicants' reports or exhibits to reflect future housing that is slated for NY Ave.
- DDOT is currently studying the traffic surveys in which discrepancies were found. We would like to see the final report.
- OP is using “buffering” and “landscaping” as multiple community benefits, but both are the same. We would like to see visual examples of both.
- We are still not sure if; this is a displacement risk, having access to opportunities will be available, this will be another warehouse that will sit for decades, or have

warehouse uses that are not compatible to housing, and that the truck traffic, which we already have truck traffic from DPW, from the warehouse will be directed to NY Ave/W. Va.Ave/Bladensburg Rd, where W. Va. Ave has residents who will be impacted by the heavy trucks.

- Ivy City will be impacted by this warehouse.

Replacing potential mixed-use or residential development in a historically Black neighborhood — one already overburdened with pollution and environmental hazards — with another industrial warehouse is incompatible with the Comprehensive Plan’s racial equity analysis requirements. The Comp Plan directs the District to evaluate land use decisions for their differential impacts on communities of color, especially where cumulative environmental harm exists. Approving this proposal would perpetuate environmental inequities and directly contradict one of the Sustainable DC 2.0 goals which is to “Use Community Priorities as Foundation”.

In sum, this project:

- Exceeds the intended industrial land preservation cap.
- Contradicts the ICSAP and Ward 5 Works recommendations for buffering and transition.
- Undermines DOEE’s resilience hub planning efforts.

- Fails to align with the MU-5 zone’s intended residential emphasis; and
- Deepens environmental and racial inequities in Ivy City.

For these reasons, I urge the Zoning Commission to deny approval of this proposed warehouse development. Our community deserves a future that prioritizes health, sustainability, and equity — not an additional industrial burden.

Sincerely,

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