



January 23, 2026

D.C. Zoning Commission
Anthony Hood, Chairperson
441 4th Street NW, Suite 200S
Washington, DC 20001
(transmittal via zsubmissions@dc.gov)

Re: ZC 24-11: Supplemental Filing Responding to Post-Hearing Statement (Exhibit 151)

Dear Chairman Hood and Members of the Commission,

The Applicant’s third supplemental filing (Exhibit 151) takes steps to address some community feedback related to the requested zoning relief, but does not engage with concerns raised by Zoning Commissioners and ANCs regarding enforceable limits on chemical storage and distribution. This omission is particularly concerning given that such activity in the requested PUD would exacerbate an existing history of environmental racism in this area. As such, Advisory Neighborhood Commission 5D asks the Commission to pursue clear, enforceable limits on chemical storage and distribution by seeking input from neutral expert agencies before advancing the case.

Clear, Enforceable Limits on “Chemical Storage and Distribution”

At the December 18, 2025 meeting regarding this proceeding, members of the Zoning Commission raised concerns about approving permanent zoning relief without clear, enforceable limits on future Chemical Storage and Distribution, including how such uses would be bounded over time and reviewed if operations evolve. Commissioners emphasized the need for clarity and enforceability given the irreversible nature of a map amendment and expressed discomfort relying solely on assurances or generalized conditions.

ANC 5D shares these concerns. Accordingly, we request that, should this Application be approved, the requested zoning relief should include clear and enforceable limits on chemical storage and distribution. Such limits could include restrictions by activity, substance, or volume; as discussed below, we support ANC 5C’s suggestions that such limits be developed in consultation with DOEE.

Environmental Justice Implications of the Application

The New York Avenue corridor has long carried a disproportionate share of industrial and infrastructure uses, and that legacy continues to negatively impact surrounding communities. ANC 5D remains committed to advancing a vision of this corridor that supports economic activity while protecting public health, encouraging housing diversity, preventing displacement and ensuring environmental balance.



Ivy City and the adjacent neighborhoods of Ward 5 have a long and well-documented history of environmental justice concerns—from trucking depots and waste transfer facilities to chronic air-quality issues. Ivy City is affected because the traffic will be directed towards West Virginia Avenue, which is part residential, further intensifying local environmental and safety impacts. Considering this history, it is all the more imperative that any zoning relief approved by this Commission takes into account the potential for continued racially disproportionate environmental harm.

Ivy City suffers from the urban heat island effect. The community houses the DPW fleet on acres of land located on Okie Street and West Virginia Avenue; numerous auto repair and maintenance shops; gas stations; a facility that uses cancer causing chemicals; the Amtrak maintenance rail yard; high levels of Black Carbon from New York Avenue traffic emissions; high levels of PM 2.5 pollution; and numerous warehouses with industrial uses. Through air quality testing and monitoring, it is noted that Ivy City is the most polluted neighborhood in the District. The Application’s requested zoning relief would direct truck traffic from the proposed warehouse development onto West Virginia Avenue, which is part residential. This proposed warehouse will further exacerbate the history of harmful pollutants and toxins that has caused Ivy City’s air quality to be significantly worse from decades of industrial activity and further intensify local environmental and safety impacts.

These issues have been highlighted by the Cumulative Impacts Analysis Amendment Act, introduced to the DC Council by Councilmember Parker. This Act, currently before the Council, would “require a Cumulative Impacts Statement for any major action in an overburdened community or any action at an applicable facility in an overburdened community”.¹ Should this Act become law, it may require such a Cumulative Impacts Statement to be prepared for a facility that may be developed on the land contemplated by the Application. As such, ANC 5D urges that, should this act become law, the Commission and the Council ensure that it is fully and justly applied to actions taken on the land contemplated by this Application.

Support for ANC 5C’s Recommendations

ANC 5C states in its recent filing that it wishes for the Zoning Commission to “consider input from neutral subject-matter experts, such as the District Department of Energy and Environment (DOEE), before determining whether the case is ready to advance.” ANC 5D strongly supports this recommendation, particularly in light of the concerns raised above. DOEE’s expertise in environmental affairs means that their input would be valuable in crafting appropriate boundaries or limitations on chemical storage and distribution.

Conclusion

ANC 5D appreciates the continued engagement by the Office of Planning, the Applicant, and the Commission on this case. We strongly support ANC 5C’s recommendations. These steps are

¹ B26-0104 - Cumulative Impacts Analysis Amendment Act of 2025, <https://lims.dccouncil.gov/Legislation/B26-0104>.



necessary to uphold the District's commitments to health equity and environmental justice, and to ensure a sustainable future for Ivy City and its surrounding communities.

Sincerely,

Sebrena Rhodes

Commissioner Sebrena Rhodes
Chair, ANC 5D
ZC24-11 Representative
SMD 5D02

Isabel Cholbi

Commissioner Isabel Cholbi
Secretary, ANC 5D
Chair, ANC 5D Zoning Committee
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