

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission



ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO. 25-01
Z.C. Case No. 25-01
Ward Memorial AME Church
(Zoning Map Amendment @ Squares 5088 & 5087)
October 23, 2025

Pursuant to notice, the Zoning Commission for the District of Columbia (“Commission”) held a public hearing on September 15, 2025 to consider the application (the “Application”) of Ward Memorial AME Church (“Applicant”) for approval of an amendment to the Zoning Map from the RA-1 zone to the RA-2 zone (the “Map Amendment”) for the property located at 241 42nd Street, N.E. (Square 5088, Lots 147 and 852) and 227 42nd Street, N.E. (Square 5087, Lot 74) (collectively, the “Property”) pursuant to Subtitle X § 500.1 of the Zoning Regulations for 2016, Title 11 of the District of Columbia Municipal Regulations (the “Zoning Regulations”). The Commission determined the Map Amendment is not appropriate for Inclusionary Zoning Plus (“IZ+”).

The Commission considered the Application as a contested case pursuant to Subtitle A § 210 and Subtitle Z, Chapter 4. For the reasons set forth below, the Commission hereby **APPROVES** the Application.

FINDINGS OF FACT

I. Background Information

Parties

1. The following were automatically parties to this proceeding pursuant to Subtitle Z § 403.5:
 - The Applicant; and
 - Advisory Neighborhood Commission (“ANC”) 7F, the ANC in which the Property is located and, therefore, an “affected ANC” pursuant to Subtitle Z § 101.8.
2. The Commission received no requests for party status.

Notice

3. Pursuant to Subtitle Z § 304.5, on July 26, 2024, the Applicant mailed a Notice of Intent to file a Zoning Application to all property owners within 200 feet of the Property and to ANC 7F (Exhibit (“Ex.”) 3E).
4. Pursuant to Subtitle Z § 402, the Office of Zoning (“OZ”) provided notice of the September 15, 2025 public hearing by:
 - On June 9, 2025, a letter with the Notice of Public Hearing were sent to:
 - The Applicant;
 - ANC 7F;

- ANC SMDs 7F01 and 7F03;
 - Councilmember Wendell Felder;
 - Office of ANCs;
 - Office of Planning (“OP”);
 - District Department of Transportation (“DDOT”);
 - Department of Buildings (“DOB”);
 - Office of Zoning Legal Division (“OZLD”);
 - Department of Energy and Environment (“DOEE”);
 - At-Large Councilmembers and the Chair of the Council; and
 - Owners of property within 200 feet of the Property.
- (Ex. 15, 16).

- Publication of the Notice of Public Hearing in the June 20, 2025, edition of the *District of Columbia Register* (72 DCR 006817 *et seq.*) as well as on the calendar of the OZ website (Ex. 14).

5. Pursuant to Subtitle Z § 402.3, the Applicant posted notice of the hearing on the Property on August 5, 2025, and maintained such notice in accordance with Subtitle Z § 402.10 (Ex. 18, 24).

The Property

6. The Property is comprised of three lots totaling 31,502 square feet. Lots 147 and 852 (the “Sanctuary Lots”) in Square 5088 are improved with a church building and fellowship hall used by the Applicant; and Lot 74 in Square 5087 (the “Vacant Lot”) is improved with a two-story building previously used as a child development center, but currently vacant (collectively, the “Property”) (Ex. 3).
7. The Property has frontage on 42nd Street, N.E. The Sanctuary Lots are contiguous and located between Brooks Street, N.E. and Clay Street, N.E. The Vacant Lot is located across Brooks Street, N.E. to the south of the Sanctuary Lots (Ex. 3).
8. The Property is located in the “Mahaning Heights” neighborhood in Ward 7. The surrounding area is residential with some commercial uses along Benning Road. The areas to the south of the Property are also zoned RA-1 and feature low- to moderate-density multi-family buildings. The areas to the north and east of the Property are primarily single-family homes in the R-2 zone. Fort Mahan Park is located directly across 42nd Street to the west of the Property (Ex. 3).
9. The Benning Road and Minnesota Avenue Metrorail Stations are approximately ½ mile from the Property. Metrobus lines V7 and V8 run along Benning Road, N.E. with the closest bus stop less than one block from the Property (Ex. 3).

Current Zoning

10. The Property is currently in the RA-1 zone, which provides for “areas predominantly developed with low- to moderate-density development, including detached houses, row houses, and low-rise apartments.” (Subtitle F § 101.4). The RA-1 zone has a maximum floor-area-ratio (“FAR”) of 0.9 that can increase to 1.08 with Inclusionary Zoning (“IZ”)

(Subtitle F §§ 201.1, 201.4). The maximum building height is 40 feet and three stories (Subtitle F § 203.2). The maximum lot occupancy is between 40% and 60% depending on the type of structure (Subtitle F § 210.1). Multi-family residential uses are not permitted as a matter-of-right in the RA-1 zone (Subtitle U § 401.1(d)(1)).

Comprehensive Plan (“10-A DCMR”)

11. Pursuant to Subtitle X § 500.3, the Commission shall find that the Map Amendment is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the Property.
12. The Commission is required to determine whether the Map Amendment is not inconsistent with the Comprehensive Plan as viewed through a racial equity lens (10-A DCMR §§ 2501.4-2501.6, 2501.8). The consideration of equity is intended to be based on the policies of the Comprehensive Plan, and part of the Commission’s consideration of whether the Map Amendment is “not inconsistent” with the Comprehensive Plan, rather than a separate determination about a zoning action’s equitable impact.
13. The Comprehensive Plan’s Framework Element states that equity is achieved by targeted actions and investments to meet residents where they are, to create equitable opportunities, but is not the same as equality (10-A DCMR § 213.6). Further, “[e]quitable development is a participatory approach for meeting the needs of underserved communities through policies, programs and/or practices [and] holistically considers land use, transportation, housing, environmental, and cultural conditions, and creates access to education, services, healthcare, technology, workforce development, and employment opportunities.” (10-A DCMR § 213.7). The District applies a racial equity lens by targeting support to communities of color through policies and programs focusing on their needs and eliminating barriers to participate and make informed decisions (10-A DCMR § 213.9).
14. The Comprehensive Plan’s Implementation Element provides guidance to help the Commission in applying a racial equity lens to its decision making. Specifically, the Implementation Element states “[a]long with consideration of the defining language on equity and racial equity in the Framework Element, guidance in the Citywide Elements on District-wide equity objectives, and the Area Elements should be used as a tool to help guide equity interests and needs of different areas of the District.” (10-A DCMR § 2501.6). In addition, 10-A DCMR § 2501.8 suggests to prepare and implement tools to use as a part of the Commission’s evaluation process. Consistent with Comprehensive Plan guidance, the Commission utilizes a Racial Equity Analysis Tool (the “Tool”) in evaluating zoning actions through a racial equity lens; the Commission released a revised Tool on February 3, 2023. The revised Tool requires submissions from applicants and the Office of Planning analyzing the zoning action’s consistency with the Citywide and Area Elements of the Comprehensive Plan, and Small Area Plans, if applicable; a submission from applicants including information about their community outreach and engagement efforts regarding the zoning action; and a submission from the Office of Planning including disaggregated race and ethnicity data for the Planning Area affected by the zoning action.

Generalized Policy Map (the “GPM”)

15. The Comprehensive Plan’s GPM identifies the Sanctuary Lots as a “Neighborhood Enhancement Area,” a designation that is intended for neighborhoods with “substantial amounts of vacant and underutilized land. They include areas that are primarily residential in character; as well as mixed-use and industrial areas.” (10-A DCMR § 225.6). “These areas present opportunities for compatible infill development, including new single-family homes, townhomes, other density housing types, mixed-use buildings, and, where appropriate, light industrial facilities.” (*Id.*) Further, “[n]ew housing is encouraged in a Neighborhood Enhancement Area “to improve the neighborhood and must be consistent with the land-use designation on the Future Land Use Map and with Comprehensive Plan policies.” (10-A DCMR § 225.7).
16. The GPM identifies the Vacant Lot as a “Neighborhood Conservation Area.” These areas are “generally residential in character,” where “maintenance of existing land uses and community character is anticipated over the next 20 years.” (10-A DCMR § 225.4). While “major changes in density over current (2017) conditions are not expected. . .some new development and reuse opportunities are anticipated, and these can support conservation of neighborhood character...” (*Id.*) Accordingly, “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.” (*Id.*; 10-A DCMR § 225.5).

Future Land Use Map (the “FLUM”)

17. The Comprehensive Plan’s FLUM identifies the Property for “Moderate Density Residential” use. This designation is intended for “areas characterized by a mix of single-family homes, two- to four-unit buildings, row houses, and low-rise apartment buildings.” (10-A DCMR § 227.6). Density is typically up to 1.8 FAR “although greater density may be possible when complying with Inclusionary Zoning or when approved through a Planned Unit Development.” (*Id.*) The “R-3, RF and RA-2 Zone Districts are consistent with the Moderate Density Residential category.” (*Id.*)

Far Northeast and Southeast Area Element “FNS Area Element”

18. The Property is within the Far Northeast and Southeast Area Element, which calls for, among other policies:
 - Recognizing the value and importance of established single-family neighborhoods to the character of the local community and to the entire District (10-A DCMR § 1708.2); and
 - Encouraging new mixed-use, mixed-income development for area residents on vacant lots and around Metro stations and on underused commercial sites along the area’s major avenues. Also seek to ensure that the housing remains affordable for current and future residents (10-A DCMR § 1708.3).

II. The Application

Proposed Zoning

19. The Application requests to rezone the Property to the RA-2 zone.

20. The purpose of the RA zones are to, among other things:
 - Promote flexibility by allowing all types of residential development;
 - Promote stable residential areas while permitting a variety of types of urban residential neighborhoods;
 - Promote a walkable living environment; and
 - Ensure that buildings and developments around fixed rail stations, transit hubs, and streetcar lines are oriented to support active use of public transportation and safety of public space.(Subtitle F § 101.2).
21. The RA-2 zone “provides for areas developed with predominantly moderate-density residential” uses (Subtitle F § 101.5).
22. The RA-2 zone provides for a maximum FAR of 1.8, which can increase to 2.16 with Inclusionary Zoning (Subtitle F §§ 201.1, 201.4). The maximum building height in the RA-2 zone is 50 feet (Subtitle F § 203.2). The maximum lot occupancy is 60% (Subtitle F § 210.1). A multi-family residential use is permitted as a matter-of-right in the RA-2 zone (Subtitle U § 401.1(d)(1)).

III. Applicant’s Justification of Relief

Not inconsistent with the Comprehensive Plan

23. The Applicant asserted that the proposed Map Amendment is not inconsistent with the Comprehensive Plan, including the Property’s designations on the GPM and FLUM, and advances policies of the Citywide Elements, the FNS Area Element, and racial equity goals, as more fully set forth below.

GPM

24. The Applicant asserted that the Map Amendment is not inconsistent with the GPM because the Property’s designations as “Neighborhood Enhancement Area” and “Neighborhood Conservation Area” encourage compatible infill or new development, including new housing to support city-wide housing needs, provided it is consistent with the FLUM and other Comprehensive Plan policies (Ex. 3).
25. The Applicant also asserted the proposed RA-2 zone would allow for increased residential density at the Property that can help to address city-wide housing needs. Nonetheless, the RA-2 zone is a moderate-density residential zone that will ensure limited impact and changes in density to the residential character of the area (Ex. 3).

FLUM

26. The Applicant asserted that the Map Amendment is not inconsistent with the FLUM because the Property’s “Moderate Density Residential” designation expressly states that the RA-2 zone is consistent with that category. The contemplated density in the “Moderate Density Residential” category is up to 1.8 FAR, although increased density can be possible

when complying with IZ or when approved through a PUD. The RA-2 zone allows a maximum FAR of 1.8, which can increase to 2.16 with IZ (Ex. 3).

Land Use Element

27. The Applicant asserted that the Map Amendment is not inconsistent with the policies of the Comprehensive Plan's Land Use Element because the Map Amendment will allow for the adaptive reuse and reinvestment of underutilized property near Benning Road N.E., a major thoroughfare connecting the District on each side of the Anacostia River. Further, the Application will upzone the Property to allow for more housing in close proximity to public transit and a large public park (LU-1.4.6). The RA-2 zone represents a modest increase in permitted density that ensures redevelopment at the Property will remain compatible with the surrounding neighborhood (LU-2.1.1, LU-2.1.3, LU-2.1.5, LU-2.1.8) (Ex. 3).

Transportation Element

28. The Applicant asserted that the Map Amendment is not inconsistent with the policies of the Comprehensive Plan's Transportation Element because the Map Amendment would allow for greater residential density in close proximity to Metrorail and Metrobus lines (T-1.2.2) (Ex. 3).

Housing Element

29. The Applicant asserted that the Map Amendment is not inconsistent with the policies of the Comprehensive Plan's Housing Element because the Map Amendment would upzone the Property to allow for more housing, including affordable housing, on site (H-1.1.3, H-1.2.1, H-1.2.2, H-1.2.3, H-1.2.7). Potential development of the Property, under the RA-2 zone, could create homeownership opportunities as well as larger family units, which are desired in the District to diversify its housing stock (H-1.1.5, H-1.1.9, H-1.3.1, H-3.1.1) (Ex. 3).

FNS Area Element

30. The Applicant asserted that the Map Amendment is not inconsistent with the policies of the Comprehensive Plan's FNS Area Element by promoting the development of new housing while also ensuring the Property remains compatible with the surrounding low- to moderate-density neighborhood (FNS-1.1.1, FNS-1.1.2) (Ex. 3).

Racial Equity

31. The Applicant asserted that the Map Amendment would not be inconsistent with the racial equity policies and goals of the Comprehensive Plan. The Applicant analyzed Comprehensive Plan consistency as viewed through a racial equity lens by applying the Tool. The Applicant detailed its community outreach and engagement efforts regarding the Map Amendment, including outreach with ANC 7F and the community through multiple events hosted by the Applicant. A petition in support of the Application signed by approximately 80 community members has been submitted to the case record (Ex. 20). The Applicant also outlined the history of the Mahanig Heights neighborhood as a majority-Black area that has long faced discrimination and disinvestment that results in lower levels of household income and homeownership (Ex. 3). The Applicant asserted that the Map

Amendment would not result in direct physical displacement of residents because there are no residential tenants at the Property. The Applicant also asserted that the future development facilitated by the Map Amendment could positively impact transportation and infrastructure because the Property is proximate to public transit options and a redevelopment would require improvements to adjacent public space (Ex. 3).

III. Responses to the Application

Office of Planning

32. OP submitted a report dated April 28, 2025 (the “OP Setdown Report”) recommending that the Commission set down the Application for a public hearing (Ex. 10). OP concluded that, on balance, the Map Amendment would not be inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens. OP’s analysis of the Map Amendment stated the following:
- **GPM** – This proposed map amendment would not be inconsistent with the GPM designations for the subject property. The proposed RA-2 zoning is consistent with the policy of promoting modest infill housing while also strengthening the Applicant’s existing institutional use as a church. Furthermore, the proposed RA-2 zoning represents a modest increase in density that still maintains an overall residential neighborhood character;
 - **FLUM** – The proposed rezoning to RA-2 would not be inconsistent with the FLUM designation for the subject property; RA-2 is specially noted as being consistent with this category. The RA-2 Zone allows for more density and, subsequently, potential for the production of more affordable housing units, consistent with the planning and development strategy of the surrounding area;
 - **Land Use Element** - The proposed map amendment would not be inconsistent with the Land Use Element of the Comprehensive Plan. The site is about ¼ mile from the Benning Road Metro Station, and ½ mile from the Minnesota Avenue Metro Station. It is also well served by buses on Benning Road and will be adjacent to the pending Benning Road streetcar line. Through the amendment, the property would be upzoned to allow it to provide a citywide need of more affordable housing units. The proposed RA-2 rezoning would ensure that future development for the property will remain compatible with the surrounding neighborhood (*See* LU-1.4.3, LU-1.4.4, LU-1.4.6, LU-2.1.1, LU-2.1.3, LU-2.1.8, LU-2.3.6);
 - **Housing Element** - The proposed map amendment would not be inconsistent with the Housing Element of the Comprehensive Plan. The proposed upzoning to the RA-2 zone would allow for more affordable housing units. The Applicant has stated that it intends to focus on providing family and senior housing, thus diversifying the neighborhood’s housing stock (*See* H-1.1.3, H-1.1.9, H-1.2.1, H-1.2.3, H-1.2.9, H-1.3.1, H-2.1.9);
 - **Transportation Element** – The proposed map amendment would not be inconsistent with the Transportation Element of the Comprehensive Plan. The subject property is currently transit-oriented due to its close proximity to the Benning Road and Minnesota Avenue Metrorail stations. Benning Road NE is a major corridor in the District, and the proposed RA-2 rezoning would allow additional housing that would have access to local transit options for residents of a wider income variety. This access to more transit

options furthers the Plan’s goals by reducing transportation barriers to economic and educational opportunities (*See* T-1.1.7);

- **Economic Development Element** – The proposed zoning would not permit new commercial development, consistent with FLUM and GPM direction, but the new residents of any potential development facilitated by the proposed zoning would support existing close by retail nodes (*See* ED-1.1.1);
- **Far Northeast and Southeast Area Element** - The proposed map amendment would not be inconsistent with the FNS Area Element of the Comprehensive Plan. The proposed RA-2 upzoning would increase the amount of affordable housing units available to better utilize the land while still conserving the overall low-to-moderate-density characteristic of the surrounding neighborhood. The subject site is not located within a Policy Focus Area (*See* FNS-1.1.1, FNS-1.1.2, FNS-1.1.3);
- **Racial Equity** – The Map Amendment is not inconsistent with the Comprehensive Plan when evaluated through a racial equity lens, primarily because the rezoning would facilitate the production of new housing opportunities for the area, including larger sized and affordable units. This conclusion was based on OP’s application of the Tool, including analysis of disaggregated race and ethnicity data for the Far Northeast and Southeast Planning Area, in which the Property is located. OP provided population, median income, and housing tenure data for the Planning Area showing racial disparities within the Planning Area and when compared with Districtwide data. OP further found that the Map Amendment would not result in direct displacement of tenants or residents because part of the Property is currently used as a church and the other part is vacant; OP also does not anticipate any indirect residential displacement as the proposal will facilitate new housing; and
- **Benning Road Corridor Redevelopment Framework Plan (“Plan”)**- The proposed map amendment would not be inconsistent with the Plan. Through the proposed RA-2 upzoning, the map amendment would further the Plan’s goal of providing more mixed-income housing for residents along the corridor, doing so without causing displacement of existing residents.

(Ex. 10).

33. The OP Setdown Report stated that IZ Plus should not apply to the Map Amendment because the Far Northeast/Southeast Planning Area already contains a disproportionately high number of the District’s affordable housing. Within this Planning Area, 1,267 new affordable units have been added since 2019, which significantly exceeds the Planning Area’s new affordable housing production target of 490 units (Ex. 10).
34. OP submitted a hearing report dated September 5, 2025 (“OP Hearing Report”) that largely reiterated the findings and conclusions in the OP Setdown Report and continued to recommend approval of the Map Amendment (Ex. 23).
35. At the September 15, 2025, public hearing, OP testified in support of the Map Amendment and reiterated its recommendations from its reports.

DDOT Report

36. DDOT submitted a report dated September 5, 2025 (the “DDOT Report”) stating no objection to the proposed Map Amendment. DDOT’s report notes that the Map Amendment is expected to generate a minor increase in the amount of transit, biking, walking trips, and vehicle trips; however, the additional vehicle trips generated by the additional density are expected to have a minimal impact on the roadway network (Ex. 21).

Office of the Attorney General (“OAG”)

37. OAG filed a letter in support and recommended that the Commission approve the Map Amendment due to its many consistencies with the Comprehensive Plan, including the land use maps’ guidance, and numerous planning policies supporting increased density for housing and affordable housing near transit. However, OAG requested that the Commission apply IZ Plus to the Map Amendment to ensure that the increased density provides the higher minimum level of permanently affordable housing, and to mitigate any displacement impacts of future development along the Benning Road, N.E. and Minnesota Avenue, N.E. corridors and the planned redevelopment of the RFK Stadium site (Ex. 22).

ANC Report

38. ANC 7F did not submit a written report in the case record and a representative of ANC 7F did not appear to testify at the public hearing.

Letters in Support or Opposition

39. A petition in support was filed in the record that is signed by 80 individuals, many of whom live near the Property (Ex. 20).
40. Kia Chatmon, a resident of 42nd Street, N.E. filed a letter in opposition. Ms. Chatmon argued that the proposed RA-2 zone, with a potential building height of up to 50 feet and six stories, is not sufficiently sensitive and will allow development that is too tall and out of scale with the lower density homes of the surrounding residential neighborhood. Ms. Chatmon encouraged the church to assess whether the current buildings at the Property could be renovated under the existing RA-1 zoning. Ms. Chatmon also raised concern about pedestrian safety and parking/traffic congestion during future construction at the Property (Ex. 27).

National Capitol Planning Commission (“NCPC”)

41. On September 16, 2025, the Commission referred the Map Amendment to NCPC for review and comment pursuant to the District of Columbia Home Rule Act of 1973, as amended (87 Stat. 790, Pub. L. No. 93-198, D.C. Code § 1-201 *et seq.*) (Ex. 29).
42. NCPC staff submitted letter dated October 1, 2025, stating that NCPC staff has determined that the proposal falls under an exception of NCPC’s submission guidelines and is exempt from NCPC review (Ex. 31).

IV. Conclusions of Law

Authority

1. Section 1 of the Zoning Act of 1938 (effective June 20, 1938, as amended, 52 Stat. 797, ch. 534; D.C. Official Code § 6-641.01, et seq. (2012 Repl.)) (the “Zoning Act”) authorizes the Commission to create zones within which the Commission may regulate the construction and use of property in order to “promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital.”
2. Section 2 of the Zoning Act (D.C. Official Code § 6-641.02) further provides that:
Zoning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and zoning regulations shall be designed to lessen congestion on the street, to secure safety from fire, panic, and other dangers, to promote health and the general welfare, to provide adequate light and air, to prevent the undue concentration and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.
3. The Commission must ensure that the Zoning Map, and all amendments to it, are “not inconsistent” with the Comprehensive Plan pursuant to § 492(b)(1) of the District of Columbia Home Rule Act (§ 2 of the Zoning Act; D.C. Official Code § 6-641.02). Subtitle X § 500.3 incorporates this intent to the Zoning Regulations by requiring that Map Amendments be “not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.”

Not Inconsistent with the Comprehensive Plan (Subtitle X § 500.3)

4. Pursuant to Subtitle X § 500.3, the Commission shall find that the Map Amendment is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the Property.
5. The Commission concludes, based on the filings and testimony of the Applicant and OP, that the Map Amendment from the RA-1 zone to the RA-2 zone advances the purposes of the Zoning Act and is not inconsistent with the Comprehensive Plan, including the Comprehensive Plan’s maps and elements, and will advance a number of Comprehensive Plan elements as discussed below (Finding of Fact (“FF”) 15-18, 24-32, 34).
6. Even if the Map Amendment conflicts with one or more individual policies associated with the Comprehensive Plan, this does not, in and of itself, preclude the Commission from concluding that the Map Amendment would be consistent with the Comprehensive Plan as a whole (*See Durant v. D.C. Zoning Comm’n*, 65 A.3d 1161, 1168 (D.C. 2013)). For the reasons stated below, the Commission finds that the Map Amendment is not inconsistent

with the Comprehensive Plan, on the whole. The Commission notes that the Applicant and OP did not identify any Comprehensive Plan policies as being inconsistent with the Map Amendment. Therefore, to the extent the Map Amendment is potentially inconsistent with any Comprehensive Plan policies, the Commission finds such inconsistencies to be outweighed by the numerous Comprehensive Plan policies of the Citywide Elements and the FNS Area Element that would be advanced by the Map Amendment, as discussed below (FF 24-32, 34).

Racial Equity

7. The Commission concludes the Map Amendment is not inconsistent with the Comprehensive Plan when evaluated through a racial equity lens because:
- The Map Amendment will increase allowable density on the Property, which will enhance the opportunity to redevelop the Property with housing and affordable housing and allow the Applicant to reinvest in its Property and congregation;
 - The Property is in a transit-oriented neighborhood thereby increasing accessibility and opportunity for potential future residents at the Property;
 - The Map Amendment and potential redevelopment of the Property will not result in any displacement of existing residents because the Property is not currently used for residential purposes;
 - The Applicant conducted sufficient community outreach and engagement regarding the Map Amendment, including obtaining 80 signatures in support of the Map Amendment; and
 - OP provided disaggregated race and ethnicity data for the Far Northeast and Southeast Planning Area showing racial disparities. The Commission is encouraged that the provision of increased density at the Property will allow for the production of more new housing opportunities in the area (FF 31, 32, 34, 39).

GPM

8. The Commission concludes the Map Amendment is not inconsistent with the GPM's designation for the Property as a Neighborhood Enhancement Area and Neighborhood Conservation Area because:
- The Neighborhood Enhancement Area designation encourages compatible infill development, including for new housing, that is otherwise consistent with the FLUM and District-wide Comprehensive Plan policies. The proposed RA-2 zone is directly consistent with the FLUM designation and the Applicant has demonstrated several other District-wide policies that are not inconsistent with the Map Amendment;
 - While the Neighborhood Conservation Area is generally intended for stable residential neighborhoods where maintenance of existing land uses is anticipated, development is not precluded in Neighborhood Conservation Areas, particularly where it can help to address city-wide housing needs. The proposed RA-2 zone can support this goal of addressing city-wide housing needs while conserving neighborhood character; and
 - The impact of increased density on the surrounding neighborhood, some of which is low-density, is further limited by the fact the Property does not directly abut other properties, as it is circumscribed by three public streets and a public alley (FF 15, 16, 24-29, 32, 34).

FLUM

9. The Commission concludes the Map Amendment is not inconsistent with the FLUM’s designation of Moderate Density Residential uses for the Property because:
- The Moderate Density Residential designation expressly states that the RA-2 zone is consistent with that category; and
 - The RA-2 zone permits a maximum density of 1.8 (2.16 with IZ), which is within the FAR contemplated in the Moderate Density Residential category of up to 1.8 with greater density possible when complying with IZ or when approved through a PUD (FF 17, 26, 32, 34).

Land Use Element

10. The Commission concludes the Map Amendment is not inconsistent with the Land Use Element because:
- The Map Amendment will encourage redevelopment and reinvestment in the Property, by allowing for the potential of new housing and affordable housing opportunities in a neighborhood that is proximate to public transit options; and
 - The proposed RA-2 zone represents a modest increase in density and, therefore, will respect the pattern of development in the neighborhood (FF 27, 32, 34).

Housing Element

11. The Commission concludes the Map Amendment is not inconsistent with the Housing Element because it encourages new housing and affordable housing opportunities that will include potential homeownership and large unit sizes (FF 29, 32, 34).

Transportation Element

12. The Commission concludes the Map Amendment is not inconsistent with the Transportation Element because the Map Amendment would allow for greater residential density in close proximity to Metrorail and Metrobus lines and would potentially result in improvement to surrounding public space if the Property is redeveloped (FF 28, 32, 34).

FNS Area Element

13. The Commission concludes the Map Amendment is not inconsistent with the Far Northeast and Southeast Area Element, which encourages new housing opportunities while respecting the character of surrounding low- and moderate-density neighborhoods (FF 18, 30, 32, 34).

“Great Weight” to the Recommendations of OP

14. The Commission must give “great weight” to the recommendation of OP, pursuant to § 5 of the Office of Zoning Independence Act of 1990, effective September 20, 1990 (D.C. Law 8-163; D.C. Official Code § 6-623.04 (2018 Repl.) and Subtitle Z § 405.9 (*Metropole Condo. Ass’n v. D.C. Bd. of Zoning Adjustment*, 141 A.3d 1079, 1086-87 (D.C. 2016)).
15. The Commission finds persuasive OP’s evaluation of the Map Amendment and concurs with OP’s conclusion that the Map Amendment is not inconsistent with the Comprehensive

Plan as a whole and other applicable public policies (FF 32, 34). The Commission also concurs with OP's recommendation that the Map Amendment is not appropriate for IZ Plus because the Far Northeast and Southeast Planning Area has a disproportionately high number of the District's affordable housing and has exceeded its affordable housing production goal, as established by the Mayor (FF 33). The Commission acknowledges OAG's request that the Commission apply IZ Plus to the Map Amendment to ensure a higher minimum level of permanently affordable housing on the Property and mitigate any displacement impacts of future development in the surrounding area; however, the Commission agrees with OP's recommendation and is persuaded that regular IZ on the Property is sufficient given the high number of existing affordable housing in the area (FF 32, 33, 37).

"Great Weight" to the Written Report of the ANC

16. The Commission must give great weight to the issues and concerns raised in the written report of an affected ANC that was approved by the full ANC at a properly noticed public meeting pursuant to § 13(d) of the Advisory Neighborhood Commissions Act of 1975, effective March 26, 1976 (D.C. Law 1-21; D.C. Official Code § 1-309.10(d) (2012 Repl.)) and Subtitle Z § 406.2. To satisfy this great weight requirement, the Commission must articulate with particularity and precision the reasons why an affected ANC does or does not offer persuasive advice under the circumstances (*See Metropole Condo. Ass'n v. D.C. Bd. of Zoning Adjustment*, 141 A.3d 1079, 1087 (D.C. 2016)). The District of Columbia Court of Appeals has interpreted the phrase "issues and concerns" to "encompass only legally relevant issues and concerns." (*See Wheeler v. D.C. Bd. of Zoning Adjustment*, 395 A.2d 85, 91 n.10 (1978) (citation omitted)).
17. ANC 7F did not submit a written report in the case record (FF 38). Accordingly, there are no issues and concerns for which the Commission shall give great weight.
18. The Commission acknowledges the opposition raised by Kia Chatmon arguing that the RA-2 zone will allow for development on the Property that is too tall and out of scale with the character of the surrounding low-density neighborhood; and citing concerns about pedestrian safety and parking/traffic congestion during future construction of the Property (FF 40). The Commission notes that its evaluation in a map amendment is limited to whether the matter of right development standards and uses of the proposed zoning are not inconsistent with the Comprehensive Plan and other adopted public policies and active programs related to the Property (Subtitle X § 500.3). Thus, the Commission is not reviewing a proposed development project and its potential impacts in its evaluation of a map amendment case. For the reasons stated herein, the Commission finds the proposed RA-2 zone to satisfy the map amendment evaluation criteria and finds the RA-2 zone to be a modest increase in allowable density above the Property's existing RA-1 zoning. The Commission encourages the Applicant to continue community outreach efforts and dialogue with immediate neighbors during any future development of the Property to address any concerns that may arise.

DECISION

In consideration of the record for Z.C. Case 25-01 and the Findings of Fact and Conclusions of Law contained in this Order, the Zoning Commission concludes that the Applicant has satisfied its burden of proof and, therefore, **APPROVES** the Application to amend the Zoning Map as follows:

Square	Lot	Map Amendment
5088	147, 852	RA-1 to RA-2
5087	74	RA-1 to RA-2

Proposed Action

Vote (September 15, 2025): 4-0-1

(Gwen Wright, Joseph Imamura, Anthony Hood, and Robert Miller to approve; Tammy Stidham not present, not voting).

Final Action

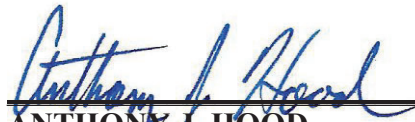
Vote (October 23, 2025): 3-0-2

(Anthony J. Hood, Robert E. Miller, and Gwen Wright to approve; Tammy Stidham and Joseph Imamura not present, not voting).

In accordance with the provisions of Subtitle Z § 604.9 of the Zoning Regulations, this Order shall become final and effective upon publication in the *District of Columbia Register*; that is, on May 8, 2026.

BY THE ORDER OF THE D.C. ZONING COMMISSION

A majority of the Commission members approved the issuance of this Order.



ANTHONY J. HOOD
CHAIRMAN
ZONING COMMISSION



SARA A. BARDIN
DIRECTOR
OFFICE OF ZONING

IN ACCORDANCE WITH THE D.C. HUMAN RIGHTS ACT OF 1977, AS AMENDED, D.C. OFFICIAL CODE § 2-1401.01 ET SEQ. (ACT), THE DISTRICT OF COLUMBIA DOES NOT DISCRIMINATE ON THE BASIS OF ACTUAL OR PERCEIVED: RACE, COLOR, RELIGION, NATIONAL ORIGIN, SEX, AGE, MARITAL STATUS, PERSONAL APPEARANCE, SEXUAL ORIENTATION, GENDER IDENTITY OR EXPRESSION, FAMILIAL STATUS, FAMILY RESPONSIBILITIES, MATRICULATION, POLITICAL AFFILIATION, GENETIC INFORMATION, DISABILITY, SOURCE OF INCOME, OR PLACE OF RESIDENCE OR BUSINESS. SEXUAL HARASSMENT IS A FORM OF SEX DISCRIMINATION WHICH IS PROHIBITED BY THE ACT. IN ADDITION, HARASSMENT BASED ON ANY OF THE ABOVE PROTECTED CATEGORIES IS PROHIBITED BY THE ACT. DISCRIMINATION IN VIOLATION OF THE ACT WILL NOT BE TOLERATED. VIOLATORS WILL BE SUBJECT TO DISCIPLINARY ACTION.