

Government of the District of Columbia

Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Meredith Soniat
Acting Associate Director *MS*

DATE: September 5, 2025

SUBJECT: ZC Case No. 25-01 – 227 & 241 42nd Street NE (Ward Memorial AME Church)

PROJECT SUMMARY

Ward Memorial AME Church (the “Applicant”) seeks approval of a Map Amendment to rezone 31,502 square feet of property spread across three (3) lots from RA-1 to RA-2. The subject properties are located at 227 42nd Street NE (Square 5087, Lot 74) and 241 42nd Street NE (Square 5088, Lots 147 and 852) on the east side of 42nd Street from approximately Brooks Street NE to Clay Street NE, north of Benning Road NE. Lot 147 is currently improved with a church building used by the Applicant with Lot 852 improved with a two-story building used as a fellowship hall. The church and fellowship hall are both separated from the homes to the east of the property by a 15-foot-wide public alley that runs between Brooks and Clay Streets; the northern half is an unimproved paper alley. Lot 74 is developed with a two-story building that was previously used by the Applicant as a child development center, but it remains vacant at present.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. To achieve this vision, DDOT works through the Map Amendment process to evaluate the requested zoning change and inform the Zoning Commission on the order of magnitude impacts on the transportation network. After an extensive review of the case materials submitted by the Applicant, DDOT finds:

- The site is less than ½ mile from both the Benning Road Metrorail Station and Minnesota Avenue Metrorail Station;
- The proposed RA-2 (Residential Apartment - Moderate Density) zone would allow for approximately 38 more residential units on the property than the maximum allowed in the existing RA-1 zoning;

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- The increased density is expected to generate a minor increase in the amount of transit, biking, and walking trips and a minor increase in the amount of vehicle trips generated;
- The additional vehicle trips generated by the additional density are expected to have a minimal impact on the roadway network;
- Any future development proposals must analyze the potential impact of the additional vehicle trips generated by the additional density on the roadway network in accordance with DDOT's most recent *Guidance for Comprehensive Transportation Review*;
- The site is within ½ mile of Metrorail stations and DDOT encourages the Applicant to minimize the amount of off-street parking provided with any future redevelopment proposals. Per DDOT's May 2024 *Guidance for Comprehensive Transportation Review*, ideally the development would provide no more than 0.35 vehicle spaces per unit (1 per 3 units);
- Any development proposals for the site will need to account for a long-term bicycle parking storage room, either below- or at-grade in an easily accessible location from the lobby, as well as short-term bicycle parking, as required by Title 11 of the *District of Columbia Municipal Regulations (DCMR)* Subtitle C, § 801 and Title 18 of the *DCMR* § 1214;
- Two lots on the site have access to an existing 15-foot rear public alley. When this portion of the site redevelops, it is expected that all loading, trash pick-up, and vehicle parking will take place from the rear alley;
- DDOT will not support any new curb cuts to the property from Brooks Street, 42nd Street, or Clay Street NE; and
- The proposed rezoning would support nearby transit and generate additional foot traffic to support nearby businesses. This is consistent with DDOT's approach to infill sites which should be dense, compact, transit-oriented, and improve the public realm.

RECOMMENDATION

DDOT has no objection to the approval of the requested Map Amendment.

CONTINUED COORDINATION

Given the achievable matter-of-right density possible on the subject property if the rezoning is granted, it is expected that the Applicant will coordinate with DDOT through the permitting process on the following actions to minimize impacts of a future development proposal on the transportation network:

- Depending on the final development program and if any future relief is requested from the Board of Zoning Adjustment (BZA) or Public Space Committee (PSC), a Comprehensive Transportation Review (CTR) study or some other transportation analysis may be required;
- When the property develops, the site should be designed so that loading occurs without trucks performing backing maneuvers through sidewalk space. Also, coordinate with DDOT on an appropriate Loading Management Plan (LMP), if necessary;
- Submit a detailed curbside management and signage plan to DDOT, consistent with current DDOT policies. If meter installation is required, they will be at the Applicant's expense;
- Coordinate with DDOT's Urban Forestry Division (UFD) and the Ward 7 Arborist regarding the preservation of any existing Heritage Trees or Special Trees on the property. According to the

District's [Tree Size Estimator map](#), the property's Clay Street frontage has one (1) Heritage and one (1) Special Tree; and

- Continue coordination with DDOT on the public space design elements noted in the Streetscape and Public Realm section of this report.

TRANSPORTATION ANALYSIS

Mode Split and Trip Generation Comparison

DDOT conducted a trip generation analysis for the site to compare the transportation impacts of residential development scenarios under the existing RA-1 with the proposed RA-2 zones. To complete the analysis, DDOT first assessed the theoretical maximum development potential of the site based on current and proposed zoning.

The existing RA-1 zone allows for the site to be developed with low- to moderate-density development, including detached dwellings, rowhouses, and low-rise apartments. If rezoned to RA-2, the site could potentially achieve a 2.16 FAR for a residential development assuming an Inclusionary Zoning (IZ) bonus. It is estimated that a maximum of 76 residential units could be constructed on-site if the rezoning to RA-2 is granted, as compared to approximately 38 dwellings under RA-1.

It is important to note that a specific development has not been proposed and that these are just estimates of a potential development based on lot sizes and configuration, lot coverage, FAR, by-right uses, and building heights allowed by zoning, which DDOT obtained from the Office of Planning Setdown Report. These estimates also do not account for the existing church facilities and assume a "blank slate" for the three (3) parcels rather than a development program that incorporates the existing or potentially renovated church facilities. The estimates also assume two (2) separate buildings, one (1) on the connected Lots 147 and 852 of Square 5088 and one (1) building on Lot 74 of Square 5087. Granting the rezoning would not lock in the development program estimated in this report since the site may include additional constraints that will affect the amount of developable space.

To determine the number of trips generated by each scenario, DDOT utilized the rates published in the Institute of Transportation Engineers' *Trip Generation Manual, 11th Edition*, webtool. A 75% non-auto mode share was assumed based on the site's proximity to Metrorail. Table 1 below presents a summary of DDOT's estimate of person and vehicle trips for each development scenario.

As shown below, development of the site with the maximum number of allowable units (estimated 76 units) will generate approximately six (6) vehicle trips in the weekday morning peak hour and approximately eight (8) vehicle trips during the weekday evening peak hour, as compared to the approximately two (2) and four (4) vehicle trips during the weekday morning and evening, respectively, that could be generated under maximum build-out under existing zoning. This represents a minor increase in vehicle trips on the transportation network.

Table 1 | Trip Generation Comparison

Development Scenario	Development Program	AM Peak Person Trips	PM Peak Person Trips	Sunday Peak Person Trips	AM Peak Vehicle Trips	PM Peak Vehicle Trips	Sunday Peak Vehicle Trips
Existing Conditions	450 Church Seats	53	75	362	24	34	163
Maximum Build-out under Existing Zoning	38 Residential Units	6	18	37	2	4	8
Maximum Build-out under Proposed Zoning	76 Residential Units	26	35	47	6	8	10
Net Change Existing vs Proposed Zoning	38 Residential Units	20	17	10	4	4	2

Vehicle Parking, Bicycle Parking, and Loading Requirements

Since the site is located within ½ mile of the Benning Road Metrorail station, DDOT encourages the Applicant to take advantage of the allowable 50% reduction in the parking minimum, per Title 11 of *DCMR*, Subtitle C, § 702.1(a), when the site redevelops.

According to DDOT's May 2024 *Guidance for Comprehensive Transportation Review*, a site this proximate to priority transit should provide no more than 0.35 spaces per residential unit (1 space per 3 units). The presence of surplus parking has the potential to induce demand for additional driving on the roadway network. During public space permitting, the Applicant will be required to commit to a Transportation Demand Management (TDM) plan if the project has 20 or more residential units and a curb cut, the contents of which will be determined at that time and will be influenced by the amount of off-street parking provided. The Applicant will need to meet the requirements for electric vehicle (EV) charging infrastructure in accordance with the Comprehensive Electric Vehicle Infrastructure Access, Readiness, and Sustainability Amendment Act of 2024, which goes into effect in 2027.

The project must meet all bicycle parking requirements. DDOT encourages the Applicant to meet or exceed the bicycle parking, showers, and lockers requirements of Title 11 of the *DCMR* Subtitle C § 800 and Title 18 of *DCMR* § 1214. Long- and short-term bicycle parking should be designed in accordance with the 2018 DDOT *Bike Parking Design Guide*. As required by zoning, at least 50% of long-term bicycle parking spaces must be located horizontally on the floor or easily accessible on the bottom level of a two-tier rack system. Additionally, DDOT requires at least 5% of spaces to be designed for cargo and larger bikes (10 feet by 3 feet rather than 6 feet by 2 feet) and 10% of spaces be served by electrical outlets for e-bikes and scooters.

If the redevelopment proposal triggers loading requirements, the Applicant must ensure that there is no backing of trucks across the sidewalk and that all movements through sidewalk space are head-in/head-out with turns occurring on private property or an alley. If an alley is available, access must be provided via the alley. If the project has more than three (3) residential units, the Applicant must contract a

private trash collection service. Trash must be stored on private property out-of-view of the sidewalk and collected from the alley or parking lot. Move-ins and move-outs should occur from a loading berth, off-street parking space, alley, or parking lot, if provided. Future residents may also obtain “emergency no parking” signs through DDOT’s Transportation Online Permitting System (TOPS) to reserve an on-street parking space for move-ins and move-outs.

Note that exact zoning requirements for vehicle parking, bicycle parking, and loading will be determined by the Department of Buildings (DOB) and will be based on the specific development ultimately proposed.

HERITAGE AND SPECIAL TREES

According to the District’s [Tree Size Estimator map](#), the property has no Heritage or Special Trees; however, the tree box in public space along Lot 147 and Lot 852’s Clay Street frontage contains one (1) Heritage and one (1) Special Tree. DDOT expects the Applicant to coordinate with the Ward 7 Arborist regarding the preservation and protection of these existing Heritage and Special and other small street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space per DDOT Green Infrastructure Standards, if proposed or recommended by DDOT’s Urban Forestry Division (UFD).

Heritage Trees have a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and DDOT’s UFD, Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan to preserve the Non-Hazardous Heritage Trees.

Special Trees are between 44 inches and 99.99 inches in circumference. Special Trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, a Tree Protection Plan (TPP) will be required.

STREETSCAPE AND PUBLIC REALM

If the site develops or there are any substantial renovations to future buildings, the property owner will be expected to rehabilitate streetscape infrastructure between the curb and the property lines, in line with District policy and practice. This includes curb and gutters, street trees and landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site. It is noted that the site has a 10-foot Building Restriction Line (BRL) along both the Brooks Street and Clay Street NE frontages. The area between the property line and BRL is the building restriction area, which is regulated like DDOT public space and should remain “park-like” with landscaping.

Specifically, there are potential access and public space issues that the Applicant should be aware of and continue to coordinate with DDOT on, when the site develops:

- All vehicular site access to the site, as well as loading facilities and trash pick-up, must be via the existing rear public alley network. The closest alley entrance is from Brooks Street NE;
- Depending on the final site design of the proposed development, DDOT may require the paper alley along the northeastern property line be constructed to provide additional access;
- No new curb cuts to the property from Brooks Street, 42nd Street, or Clay Street NE should be proposed;

- If the redevelopment proposal triggers loading requirements, ensure there is no backing of trucks across the sidewalk and all movements through sidewalk space are head-in/head-out;
- Install concrete curb extensions on the corners surrounding the site where an on-street parking lane exists, and ensure all curb ramps and crosswalks are up to modern standards;
- Ensure any pedestrian entrances to a future multi-family building are at-grade with the public sidewalk so that no stairs or ramps are required in public space;
- Provide a plan showing the detailed design of the long-term bike storage room so DDOT can confirm it meets the requirements of Title 11 of *DCMR* Subtitle C, § 800, Title 18 of *DCMR* § 1214, and DDOT *Bike Parking Guide* best practices;
- During permitting, submit a Curbside Management Plan for all public streets surrounding the site showing existing and proposed signage and curbside designations;
- All overhead power lines should be moved to underground at the time of redevelopment so that poles and wires do not clutter DDOT public space; and
- Any existing Cobra Head-style streetlights along the site perimeter should be replaced with either Washington Globe or Decorative Tear Drop-style streetlights. Exact style to be installed will be determined at the time of permitting.

DDOT encourages the Applicant to participate in a Preliminary Design Review Meeting (PDRM) with the Office of Planning and DDOT to discuss the public space design when a future development is proposed.

In conjunction with the *District of Columbia Municipal Regulations (DCMR)*, DDOT's *Design and Engineering Manual (DEM)* and the *Public Realm Design Manual* will serve as the main public realm references for the Applicant. DDOT staff will be available to provide additional guidance during the public space permitting process.

MS:pj