

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Joshua Mitchum, Development Review Specialist
for Jennifer Steingasser, Deputy Director, Development Review & Historic Preservation

DATE: September 5, 2025

SUBJECT: ZC 25-01 – Public Hearing Report for a Map Amendment to re-zone the properties located at 227 42nd Street NE (Square 5087; Lot 0074) and 241 42nd Street NE (5088; Lots 0147 and 0852) from RA-1 to RA-2

I. BACKGROUND

Ward Memorial AME Church (the “Applicant”) requests a map amendment to rezone 227 42nd Street NE (Square 5087, Lot 0074) and 241 42nd Street NE (Square 5088, Lots 0147 & 0852) from the RA-1 Zone to the RA-2.

The OP Setdown report can be found in [Exhibit 10](#). At its May 8th, 2025 public meeting, the Zoning Commission set down for a public hearing as a contested case Zoning Map Amendment application ZC 25-01, at which time the Zoning Commission asked if there was any opposition to the application as presented. The Applicant in their supplemental submission, Exhibit 19, provided a statement detailing further outreach efforts with ANC 7F and the surrounding community.

II. RECOMMENDATION

The Office of Planning recommends that the Zoning Commission **approve** the proposed map amendment for the following squares and lots:

Square	Lot(s)	Existing Zone	Proposed Zone
5087	0074	RA-1	RA-2
5088	0147, 0852	RA-1	RA-2

On balance, the proposal would not be inconsistent with the Comprehensive Plan. OP does not recommend IZ Plus in this case, as the Far Northeast/Southeast Planning Area has a considerable number of dedicated affordable units and exceeds the target for the production of affordable housing.

III. APPLICATION-IN-BRIEF

Applicant:	Ward Memorial AME Church c/o Eric DeBear
Proposed Map Amendment:	RA-1 to RA-2
Address:	227 & 241 42 nd Street NE
Ward / ANC:	Ward 7 / ANC 7F

Legal Description:	227 42 nd Street NE: Square 5087, Lots 0074 241 42 nd Street NE: Square 5088; Lots 0147 & 0852
Property Size:	31,502 square feet in total: <ul style="list-style-type: none"> • 227 42nd Street NE: 5,988 sq.ft. • 241 42nd Street NE: 25,514 sq.ft.
Existing Development:	227 42 nd Street NE: Vacant Child Development Center 241 42 nd Street NE: Church and support space
Generalized Policy Map Designation:	Neighborhood Enhancement Area
Future Land Use Map Designation:	Moderate-Density Residential
Historic District:	N/A

IV. COMMENTS FROM SET-DOWN MEETING

The following summarizes comments and requests for additional information relating to the petition, from the setdown meeting:

Comment	Applicant Response	OP Analysis
The Zoning Commission asked if there was any known opposition to the application.	The Applicant, at the setdown meeting, stated that they were not aware of any opposition to the application as presented. The Applicant, in Exhibit 19, has provided a statement detailing further outreach efforts that have taken place since the setdown meeting.	The Applicant's supplemental statement indicates that several community meetings have since taken place, along with the Applicant having obtained eighty (80) signatures from the community in support of the application.

V. SITE AND AREA DESCRIPTION

The property is located north of Benning Road NE and east of Fort Mahan Park, and is comprised of three lots with frontage on 42nd Street NE. On Square 5088, north of Brooks Street NE, Lot 0147 is currently improved with a church building used by the Applicant, while Lot 0852 is improved with a two-story building used by the Applicant as a fellowship hall. Both are separated from the homes to the east of the property by a 15-foot-wide public alley that runs between Brooks Street NE and Clay Street NE.

On Square 5087, south of Brooks Street NE, Lot 74 is currently improved with a two-story building that was previously used by the Applicant as a child development center, but is vacant at present.



The 31,502 square foot subject site is bounded to the north by Clay Street NE and single-family detached homes in the R-2 Zone. Brooks Street NE runs between the parcels, and to the south are two-family attached homes. To the west are 42nd Street and Fort Mahan Park, and to the east are single-family detached homes in the R-2 Zone. The property is located approximately a half mile away from the Minnesota Avenue and Benning Road Metrorail stations.

VI. DEVELOPMENT CAPACITY OF EXISTING AND PROPOSED ZONES

The Applicant's map amendment request would rezone 227 42nd Street NE and 241 42nd Street NE from RA-1 to RA-2. Both are low to moderate density residential zones, which as discussed in the OP Setdown Report and applicant filings, would be consistent with Comprehensive Plan direction.

The purpose and intent of the existing RA-1 Zone (Subtitle F § 101) is as follows:

The following table summarizes the proposed RA-2 Zone in comparison to the existing RA-1 Zone:

Development Standard	Existing Zone: RA-1	Proposed Zone: RA-2
Permitted Uses:	Residential apartment, as well as any uses permitted in the RF Zones under Subtitle U § 301	Residential apartment, as well as any uses permitted in the RF Zones under Subtitle U § 301
Height:	40 feet max. 3 stories max.	50 feet max. No story limit
FAR:	0.9 max. 1.8 max. (IZ)	1.8 max. 2.16 max. (IZ)
Penthouse Height:	12 feet max.	12 feet max. 15 feet mechanical max. 1-story max. (2-story permitted for mechanical space)
Lot Occupancy:	40% max.	60% max.
Rear Yard:	20 feet min.	15 feet min.
Side Yard:	8 feet min. (detached or semi-detached)	0 feet min. (4 feet min. if provided)
GAR:	0.4 min.	0.4 min.

VII. IZ PLUS EVALUATION

As discussed in the Setdown Report, OP is not recommending the application of IZ Plus in this case. Although the proposed map amendment would rezone the property to RA-2, which allows for a higher maximum FAR than its existing RA-1 zoning, the Far Northeast/Southeast Planning Area, where the subject property is currently located, 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 exceeds the planning area's new affordable housing production target of 490 units.

VIII. PLANNING CONTEXT

Brief History of the Site

According to the Applicant's website, the Christian fellowship of the African Methodist Episcopal (AME) denomination began in May of 1877 in Philadelphia, Pennsylvania. In 1879, a group of worshippers organized into a permanent religious body and obtained ownership of land in the Manning Division of the District of Columbia in order to establish and operate a church. Ward Memorial AME Church was initially named Grace Chapel, and was founded in May 1877. In 1883, the first church was located at 42nd Street NE, adjacent to the subject site, and led by its first pastor, Rev. Johnson.

The church continued to grow under Rev. Bowen. Grace Chapel was renamed in 1921 to Ward Memorial AME Church after the late Bishop Thomas M.D. Ward, who was the 10th Bishop of the AME Church. In 1923, Rev. A.D. Holder and the congregation moved the frame structure across the street to its present site. In 1953, Rev. J. Haskell Mayo continued the plans for building the present structure started by Rev. S.A. Thompson. In 1957, he led the congregation in \$118,000 edifice that seated 450 persons. The cornerstone was laid by Prince Hall Affiliated, F. & A.M., and its corps of officers. Bishop Frank M. Reid, Sr., led them in the dedicatory rites.

COMPREHENSIVE PLAN

A. COMPREHENSIVE PLAN MAPS

As described in the Guidelines for Using the Generalized Policy Map and the Future Land Use Map (Chapter 2 Framework Element, Section 226, Attachment III), the maps are intended to provide generalized guidelines for development decisions. They are to be interpreted broadly and are not parcel-specific like zoning maps; i.e. the maps, in and of themselves, do not establish detailed requirements or permissions for a development's physical characteristics, including building massing or density; uses; or support systems such as parking and loading. They are to be interpreted in conjunction with relevant written goals, policies and action items in the Comprehensive Plan text, and further balanced against policies or objectives contained in relevant Small Area Plans and other citywide or area plans.

The applicant has provided analysis of the proposal against the Comprehensive Plan, including through a racial equity lens, as part of Exhibit 3. As described below, the proposed zoning map amendment would not be inconsistent with the map designations.

Generalized Future Land Use Map (FLUM)

This site is designated for Residential Moderate Density (RMOD) uses on the FLUM. In the 2021 Comprehensive Plan update, the designation for the subject property did not change.

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.



Generalized Policy Map (GPM)

Portions of the site are designated for Neighborhood Enhancement Area and Neighborhood Conservation Area on the GPM.

This proposed map amendment would not be inconsistent with these designations. 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.



B. ANALYSIS THROUGH A RACIAL EQUITY LENS USING THE ZONING COMMISSION'S RACIAL EQUITY TOOL

The Comprehensive Plan requires an examination of zoning actions through a racial equity lens. A full analysis of the proposal against the Comp Plan including through a racial equity lens is provided in the [OP Setdown Report](#), and in applicant filings at [Exhibit 3](#). The Commission's four-part Racial Equity Tool outlines information to be provided to assist in the evaluation of zoning actions through a racial equity lens. A summary of OP analysis is provided below.

RACIAL EQUITY TOOL PART 1 – COMPREHENSIVE PLAN GUIDANCE

In the context of zoning, certain priorities of equity are explicit throughout the Comprehensive Plan, including affordable housing, displacement, and access to opportunity. Below is an outline of Comprehensive Plan policies related to this proposal which, when viewed through a racial equity lens, provides the Commission with a framework for evaluating the map amendment. Please refer to Attachment I to this report for the full text of each policy statement, or refer to the Comprehensive Plan that is available on the Office of Planning website at www.planning.dc.gov.

As noted above, the proposal would not be inconsistent with both the Comprehensive Plan Generalized Policy Map and the Future Land Use Map. The proposed development, on balance, would be not inconsistent with the Citywide Elements of the Comprehensive Plan. Although it can be difficult to assess the exact impact of development in a map amendment case, the proposed map amendment would provide additional opportunity to further the policies of the Land Use, Transportation, Housing, and Economic Development Elements. Furthermore, it would also advance a number of development policies for the Far Northeast/Southeast Area Element. Please refer to the OP Setdown Reports for the full text of each policy statement.

Citywide and Area Elements:

Land Use Element

- *Policy LU-1.4.3: Housing Around Metrorail Stations*
- *Policy LU-1.4.4: Affordable Rental and For-Sale Multifamily Housing Near Metrorail Stations*
- *Policy LU-1.4.6: Development Along Corridor*
- *Policy LU-2.1.1: Variety of Neighborhood Types*
- *Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods*

- *Policy LU-2.1.8: Explore Approaches to Additional Density in Low and Moderate-Density Neighborhoods*
- *Policy LU-2.3.6: Places of Worship and Other Religious Facilities*

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, as well as being well served by buses on Benning Road. The proposed change in zoning would allow more affordable housing units, serving a local and citywide need. The proposed RA-2 rezoning would ensure that future development for the property will remain compatible with the surrounding neighborhood.

Transportation Element

- *Policy T-1.1.7: Equitable Transportation Access*

The proposed map amendment would not be inconsistent with the Transportation Element of the Comprehensive Plan. The subject property is 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.

Housing Element

- *Policy H-1.1.3: Balanced Growth*
- *Policy H-1.1.9: Housing for Families*
- *Policy H-1.2.1: Low and Moderate-Income Housing Production as a Civic Priority*
- *Policy H-1.2.3: Affordable and Mixed-Income Housing*
- *Policy H-1.2.9: Advancing Diversity and Equity of Planning Areas*
- *Policy H-1.3.1: Housing for Larger Households*
- *Policy H-2.1.9: Redevelopment of Affordable Housing*

The proposed map amendment would not be inconsistent with the Housing Element of the Comprehensive Plan. As stated above, the proposed upzoning to the RA-2 Zone would allow for more affordable housing units. The Applicant has stated that they intend to focus on providing family and senior housing, thus diversifying the neighborhood's housing stock.

Economic Development Element

- *Policy ED-1.1.1: Neighborhood Commercial Vitality*

New residents of any potential development would support existing close by retail nodes.

Far Northeast/Southeast Area Elements:

- *Policy FNS-1.1.1: Conservation of Low-Density Neighborhoods*
- *Policy FNS-1.1.2: Development of New Housing*
- *Policy FNS-1.1.3: Directing Growth*

The proposed map amendment would not be inconsistent with the Far Northeast/Southeast Area Elements of the Comprehensive Plan. The RA-2 upzoning would further the above policies by increasing 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.

RACIAL EQUITY TOOL PART 2 – APPLICANT/PETITIONER COMMUNITY OUTREACH AND ENGAGEMENT

The Applicant has provided a timeline of events detailing their outreach and community engagement efforts, as part of [Exhibit 3](#), and an undate as part of [Exhibit 19](#). Notable events from the provided timeline include a virtual presentation to ANC 7F on October 15, 2024, an in-person community meeting and information session held at the Ward Memorial AME Church on November 23, 2024, and more recent ANC meetings (June 17, 2025) and community events (July 19, 2025 and August 16, 2025). A petition in support signed by approximately 80 community members has been submitted into the record as Exhibit 20.

RACIAL EQUITY TOOL PART 3 – FAR NORTHEAST/SOUTHEAST PLANNING AREA DISAGGREGATED DATA

Part 3 of the Racial Equity Tool asks for disaggregated data to assist the Commission in its evaluation of zoning actions through a racial equity lens for the planning area. This is provided in detail in the [OP Setdown Report](#), using data sourced from the 2012-2016 and 2019-2023 American Community Survey 5-Year Estimates by Planning Area via the OP State Data Center (ACS DATA).

The report compares data for this planning area with District-wide data. In summary, the data indicated that between the two time periods:

- Black residents saw a slight decrease in the total percentage of the planning area's population, but make up the largest portion of FNFS at 88.4%. The "Two or more races" group, while still remaining a relatively small portion of the area's population, saw the greatest increase among the groups – increasing from 1.15% in 2012-2016 to 4.20% in 2019-2023.
- The area experienced a median income increase but this was less than that for the Districtwide as a whole. Black residents continued to have the lowest median income
- The area experienced a much higher increase in the percentage of owner-occupied housing units, although Black and Two or More Races groups were on the lower end of owner occupancy for the planning area.
- Although the planning area's unemployment rate fell to 13.5% in the 2019-2023 period, it remains more than double the Districtwide rate of 6.5%.
- The rising cost of housing in the District limits the ability to provide housing for a variety of household types, which include family and senior housing, renter and owner-occupied housing, and mixed income housing. The cost burden for housing in FNFS was greater than that of the District across both periods. The FNFS unemployment and cost burden rates may reflect the area's overall poverty rate, which remains substantially higher than the Districtwide average.

The proposed rezoning would facility the production of new housing opportunities for this area, including larger sized and affordable units.

RACIAL EQUITY TOOL PART 4 – ZONING COMMISSION EVALUATION FACTORS

Factor	Question	OP Response
Direct Displacement	Will the zoning action result in displacement of tenants or residents?	The zoning action would not result in displacement of tenants or residents. The subject property is in part currently used by the Applicant as a church, and the existing residential structure was previously used as a childcare center and is currently vacant.
Indirect Displacement	What examples of indirect displacement might result from the zoning action?	OP does not anticipate any indirect residential displacement, as the proposed rezoning would facilitate development would create new affordable housing units for the neighborhood.
Housing	Will the action result in changes to: <ul style="list-style-type: none"> • Market Rate Housing • Affordable Housing • Replacement Housing 	The map amendment, if granted, would result in more housing opportunities for the area, which would include affordable units consistent with or exceeding the IZ program. Due to the amount of affordable housing already available in the area, OP is not recommending IZ Plus be applied to the map amendment, potentially providing new market-rate home-ownership opportunities for area residents.
Transportation	<ul style="list-style-type: none"> • Access to public transit • Transportation improvements 	The subject property is located less than a ½ mile from the Minnesota Avenue and Benning Road Metrorail stations. The Applicant does not anticipate any transportation-related improvements as a result of the map amendment.
Physical	Will the action result in changes to the physical environment such as: <ul style="list-style-type: none"> • Public Space • Streetscape 	The map amendment, if granted, could likely result in improvements to adjacent streetscape improvements as part of any new development on the site.
New Jobs/ Access to Jobs	Is there a change in access to job opportunities	The proposed RA-2 would provide more residents with access to the nearby transit stations, thus reducing transportation barriers to employment opportunities. New residents would also support existing local neighborhood businesses.
Environmental	<ul style="list-style-type: none"> • LEED Rating • Stormwater management • Etc. 	The Applicant has stated that they will be exploring sustainable design options for development. Any new development would be required to meet DOEE environmental standards.
Community	How did community outreach and engagement inform/change the zoning action?	<p>The Applicant's filings indicate the extensive community discussions and outreach measures that took place.</p> <p>Applicant's supplemental statement indicates that several community meetings have since taken place, along with the Applicant having obtained eighty (80) signatures from the community in support of the application.</p>

C. OTHER RELEVANT PLANNING DOCUMENTS

Benning Road Corridor Redevelopment Framework Plan

The Benning Road Corridor Redevelopment Framework Plan, approved on July 15, 2008, includes all property fronting Benning Road from Southern Avenue to Bladensburg Road. The subject property is on the edge of the plan's boundary, and the plan recommends *the encouragement of the construction of new, mixed-income housing along the corridor and improving the living conditions for existing residents without causing displacement.* 14.

The proposed map amendment would not be inconsistent with this 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.

D. SUMMARY OF PLANNING CONTEXT ANALYSIS

As discussed above, the proposed map amendment would rezone the site to a zone that is consistent with the Comprehensive Plan's land use recommendations for the subject property. The proposed RA-2 rezoning could potentially guide the site to further realize the Moderate-Density Residential development strategy as recommended by the Future Land Use Map.

IX. AGENCY COMMENTS

As of the date of this report, comments from other District agencies have not been received.

X. ANC COMMENTS

As of the date of this report, a report from ANC 7F has not been added to the record.

XI. COMMUNITY COMMENTS

The application includes a petition in support signed by some 80 neighbors, including directly adjacent property owners (Exhibit 20).