

May 18, 2026

Anthony Hood, Chairman
D.C. Zoning Commission
441 4th Street, N.W.
Suite 200-S
Washington, D.C. 20001

Re: Comments on Z.C. Case No. 25-08 Notice of Proposed Rulemaking

Dear Chairman Hood and Members of the Zoning Commission,

I live in the Brookland neighborhood of northeast DC. I'm very concerned about the Office of Planning's (OP) proposed changes pertaining to new developments or expansions within the Residential Apartment (RA-1) zone.

Most of Brookland is zoned R-1-B for single-family houses, but some of Brookland is zoned RA-1. The RA-1 zoning is located predominantly in the area west of Turkey Thicket Recreation Center, between the Recreation Center and the Metro tracks. There is also some RA-1 zoning along Rhode Island Avenue, NE, north and east of 10th Street, NE. Brookland's RA-1 zones is where most of Brookland's "naturally-occurring" affordable housing now exists. Unfortunately, that affordable housing is rapidly disappearing as flippers and developers raze and renovate it into "luxury" housing.

Currently, under existing regulations, if developers want to expand existing residential buildings or build new rowhouses in the RA-1 zone, they must go through a zoning review process with and get approval from the Board of Zoning Adjustment (BZA). If OP's proposal is adopted, much new development in the RA-1 Zone will be development "by-right" which means residents there will lose the valuable zoning review currently provided by the Board of Zoning Adjustment, the Office of Planning and sometimes by DDOT, DPR, DCPS, and other city agencies in charge of monitoring the impacts of new development on traffic, schools, and city infrastructure. Perhaps most importantly, ANC Commissioners and residents will lose the now legal opportunity they have to engage, make suggestions for improvement, and mitigate concerns in an enforceable way through zoning orders. Participating in these cases isn't mandatory; ANC Commissioners and residents can choose not to participate and they often choose not to. But, they should always have the option to participate, if they choose to.

I've done some looking into zoning case files in Brookland to get a sense of what the experience with zoning review has been in Brookland's RA-1 zones. There have been several cases there in recent years: several involving building out unfinished basements to incorporate new apartment units and several involving razing existing single-family homes to replace them with 7 & 8-unit apartment houses. The level of involvement in each was mixed. One was withdrawn after application by the developer. Several were approved without any public involvement. Several were approved subject to conditions identified by DC agencies (e.g., keep trash bins away from cellar windows and objections to the developer's proposed curb cut and parking arrangement for the new building). Others involved neighbor engagement and were

managed at the time by ANC 5B Commissioners. Commissioners used the opportunity to negotiate and incorporate Construction Management Agreements addressing such things as hours of construction, not blocking alleys with parking, protecting adjacent properties from damage, littering, maintaining good communication, etc. Commissioners also identified other constituent concerns and requests (e.g., curbing stormwater runoff, parking, compatible design) and these were often addressed as "conditions" in the BZA enforceable orders approving developers' applications.

While ANC and public engagement may pose a minor inconvenience and delay to developers, BZA review and the process it affords is incredibly valuable to ANC constituents and to providing a community-building venue for accommodating sometimes discrepant interests.

I am very skeptical when transparency and opportunity for meaningful input are taken away. To me, these are fundamental bedrocks of democracy and environmental justice. I urge the Zoning Commission to reconsider its support for OP's proposed changes to the existing review requirements in the RA-1 zone.

Sincerely,

Caroline Petti
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