Government of the District of Columbia

Department of Transportation

d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Kelsey Bridges
Manager, Neighborhood Planning Branch

DATE: September 18, 2026

SUBJECT: ZC Case No. 25-16 – Allow Fast-Food Establishments to Continue Existing Drive-Through Facilities as a Special Exception

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APPLICATION SUMMARY

The McDonalds Corporation (the "Applicant") proposes various amendments to the Zoning Regulations text to permit the continuation of fast-food establishments with existing drive-throughs to be newly constructed, modernized or expanded if approved through Special Exception at the Board of Zoning Adjustment (BZA).

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 Text Amendment process to evaluate the requested zoning text change and inform the Zoning Commission (ZC) on the transportation impacts. After an extensive review of the case materials submitted by OP, DDOT finds:

- DDOT discourages drive through uses as they generate more trips, contribute to traffic delays at local intersections, and exacerbate safety concerns associated with vehicle turning movements compared to a fully built out mixed-use building even in a higher-intensity zone;
- The Zoning Map Amendment process does not provide the ZC, District agencies, nor the public adequate ability to evaluate the site-specific impacts of an expanded drive through use, nor require appropriate mitigation measures; and
- A Special Exception review by the BZA that requires Applicants complete a Comprehensive Transportation Review (CTR) study, scoped and approved by DDOT, is a more appropriate means for evaluating the site-specific transportation impacts associated with an expanded drive-through restaurant, whereby BZA Orders will require appropriate mitigations.

ZONING COMMISSION
District of Columbia
CASE NO. 25-16
EXHIBIT NO. 19

RECOMMENDATION

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

TRANSPORTATION ANALYSIS

Related Case History

In recent years, DDOT has reviewed two related Zoning Map Amendment cases from the Applicant; ZC Case No. 22-19 and 24-13. In both cases, the Applicant was pursuing a higher density mixed-use zone, consistent with the Comprehensive Plan Future Land Use Map designations and, in the case of 24-13, Council-approved Pennsylvania Avenue SE Small Area Plan. In both cases, the Applicant was not seeking the map amendment to construct a higher density mixed use building, but rather to retain and modernize their fast-food restaurant with drive through. DDOT was aware of this intent given the Applicant's concurrent public space permit applications to make streetscape improvements to support their project.

DDOT discourages drive-throughs as they generate a substantial number of vehicle trips, contribute to traffic delays at local intersections, and exacerbate safety concerns associated with vehicle turning movements. Therefore, DDOT's reports to the ZC for both cases objected to the proposed zone and recommended the ZC encourage the Applicant to pursue another zone that would achieve the Comprehensive Plan goals for higher density mixed-use development that did not allow an expanded drive-through as a matter of right. DDOT's reports for these cases included vehicle trip generation projections under existing and proposed zoning, as well as existing and expanded drive-through operations. The analysis noted that existing and expanded drive-throughs generated more vehicle trips than a fully built out mixed-use building under the proposed zones by orders of magnitude. DDOT's reports are accessible as Exhibit 20 for ZC Case No. 22-19 and Exhibit 23 for ZC Case No. 24-13.

Proposed Text Amendment

In their Prehearing statement, the Applicant stated that OP identified nine locations where a Special Exception approval would be applicable (see Figure 1, below), if the proposed Zoning Text Amendment is approved. Based on the proposed text amendment language (Exhibit 17B), the Special Exception would not apply to any other establishments and may apply to fewer than the nine identified locations, if they have been closed for longer than one year.

DDOT concurs that rezonings are not the most appropriate process for evaluating the impacts of drive through expansions and strongly supports the inclusion in the proposed Zoning Text Amendment requiring that future Applicants complete a CTR to evaluate the impacts on transportation safety and operations associated with drive through expansions during the BZA Special Exception review. Importantly, the CTR will be part of the case record and public deliberations conducted by the BZA. The outcome of the CTR may include recommendations for offsite mitigations and improvements to the transportation network, which DDOT would recommend be conditions of approval in the BZA Order.

Figure 1 – Existing Restaurants with Drive Through Uses Potentially Expanded via Special Exception

Property Address	ANC	Existing Zone
2334/2328 Georgia Avenue, NW	1E07	MU-10
3900 Georgia Avenue, NW	4C02	NMU-7B/GA
7425 Georgia Avenue, NW	4B01	MU-4/R-2
5200 Georgia Avenue, NW	4E03	MU-4
3200 Bladensburg Road, NE	5C02	PDR-1
1539 Pennsylvania Avenue, SE	6B09	MU-4/RA-2
1401 Maryland Avenue, NE	6A06	NMU-4/H-A
1635 Benning Road, NE	7D06	MU-5A
601 Malcolm X Avenue, SE	8C03	MU-4

MS:eo