



June 4, 2026

TECHNICAL STAFF REPORT

TO: Prince George's County Planning Board

FROM: Natalia Gomez Rojas, AICP, Planner IV - Planning Director's Office

SUBJECT: Legislative Drafting Request LDR-106-2026
Use Regulations and Dimensional Standards – Places of Worship

The Prince George's County Planning Department's legislative team has reviewed the proposed amendment to the Zoning Ordinance. Following its evaluation, the Department finds that the underlying objective of the amendment, to provide greater flexibility for places of worship by accommodating diverse forms of religious practice and associated accessory activities, is appropriate and consistent with the evolving operational needs of religious institutions. **Notwithstanding its support for the amendment's intent, the Department recommends the Planning Board OPPOSE the legislative approach proposed in LDR-106-2026**, as detailed in the Recommendation section of this technical staff report.

I. BACKGROUND

- A. Purpose:** To amend the definition of a place of worship; amending the intensity and dimensional standards in certain residential zones to allow such standards to be modified when applied to a place of worship; and amending use regulations to provide modified design standards for places of worship on assemblages of twenty-five acres or more to provide, subject to the approval of a detailed site plan.
- B. Impacted Property:** This bill would impact properties in the Regional District where the use place of worship is permitted, particularly in assemblages of twenty-five (25) acres or more.

II. EVALUATION CRITERIA

Proposed legislative amendments to the Zoning Ordinance are reviewed under the requirements of Section 27-3501, Legislative Amendment, of the Prince George's County Zoning Ordinance. The Planning Department has considered the following in reviewing this proposed legislative amendment:

- A. The Prince George's County Zoning Ordinance;
- B. *The Plan Prince George's 2035 Approved General Plan*;
- C. The current area master plans, sector plans, and functional master plans for Prince George's County;

- D. The Prince George's County Climate Action Plan; and
- E. Referral comments.

III. COMPLIANCE WITH LAW, ASSESSMENT OF TECHNICAL DRAFTING CONVENTIONS, AND PROPOSED AMENDMENTS

The Department has determined that the proposed bill was not drafted in a manner consistent with the legislative style and conventions of the current Zoning Ordinance. Several provisions are located in sections where they would not typically appear under the Ordinance framework, and the bill contains other technical inconsistencies. It also appears designed for one specific property. Therefore, staff recommends the sponsor engage in further consultation with the Department to develop a new LDR designed for more broad application. Should the sponsor decide to move forward with LDR-106-2024, the Department proposes the amendments set forth in **Attachment 1** at the end of this staff report, which have been prepared to ensure consistency with the legislative style and conventions of the current Zoning Ordinance.

IV. POLICY ANALYSIS

LDR-106-2026 proposes to i) amend the intensity and dimensional standards and use specific standards for places of worship within the Residential, Rural (RR), Residential, Estate (R-E), and Residential, Single Family (RSF-95) Zones that are located on assemblages of twenty-five (25) acres or more, ii) amend the definition of place of worship to allow certain uses that support the religious function and iii) modify standards related to height, lot coverage, exterior lighting, and signage.

As drafted, the proposed bill raises important policy and implementation concerns. LDR-106-2026 departs from the organizational structure of the Zoning Ordinance, creates ambiguities regarding its scope and applicability, and may result in unintended consequences for existing and future religious properties throughout the County. Accordingly, the proposed legislation would benefit from substantial revision before further consideration. If the Council chooses to proceed with LDR-106-2026, a proposed alternative draft is included in **Attachment 1**.

In addition, the intent of the legislation is to provide flexibility for large places of worship and associated cultural facilities, convents, and monasteries within the RE, RR, and RSF-95 zones. This is inconsistent with the Zoning Ordinance's purpose and intent to improve compatibility among uses, because it creates an unequal and disparate treatment of similarly situated religious institutions elsewhere in the County. Such distinction would potentially create concerns under constitutional principles, equal protection doctrines, or the federal Religious Land Use and Institutionalized Persons Act (RLUIPA).

RLUIPA generally prohibits local governments from imposing land use regulations that place substantial burdens on religious exercise or treat religious assemblies on less than equal terms with comparable nonreligious assemblies. Although the legislation seeks to provide

additional flexibility rather than impose restrictions, applying unique standards only in three selected zones and only for certain sized properties could create interpretive issues regarding equal treatment of religious institutions across the County. It is important to note that places of worship, including those with community facilities similar to those described in the proposed bill, exist and thrive in urban neighborhoods like those envisioned in the Transit-Oriented/Activity Center Zones.

Regarding the proposed definition for place of worship:

“Place of worship

A building, structure, or area of land where people regularly assemble to conduct religious worship, ceremonies, rituals, and related education. Places of worship include chapels, churches, mosques, shrines, synagogues, tabernacles, temples, and other similar religious places of assembly. Places of worship may contain administrative offices, an assembly hall, a banquet facility (including a shared commercial kitchen), a cafeteria for worshipers and visitors, indoor recreational facilities, or similar uses that support the religious function.” See page 2, lines 9-11 of LDR-106-2026.

The proposed accessory uses are already permitted in every zone in which a place of worship use is allowed and it will create confusion to include specific accessory uses in the definition as it suggests other accessory uses may not be allowed. If the Council believes specific accessory uses need to be identified, they should be specifically identified as **allowed accessory uses** to a place of worship in the Accessory Use Table.

From a planning perspective, the expanded definition also does not clearly distinguish between principal religious activities and accessory functions. Without such clarification, uses such as banquet facilities, commercial kitchens, assembly halls, recreational facilities, and administrative offices could evolve into independent principal uses rather than remaining subordinate components of a religious campus.

Also, due to the lack of background information that sustains the amendments to the definition of place of worship, staff considers that the proposed bill is a property-specific text amendment. Generally, property-specific text amendments, further encourage the practice of businesses and institutions acquiring property without regard to the applicable master plan or land use regulations, investing in pre-development activities, and then asking the District Council to relieve regulations the property developer should have known and understood prior to buying the property.

This uniquely Prince George’s County practice leads to the opposite of the “orderly growth and development of the County” stated as a purpose of the modern County Zoning Ordinance (See Section 27-1300(d)) approved specifically to implement this recommendation of Plan 2035. It further erodes the public trust in the planning and zoning process. In the same manner, LDR-106-2026 does not include any data or background information that determines the 25 acres threshold proposed in the bill. Therefore, the Department is unable to comment on the applicability and appropriateness of such threshold to preserve the equal treatment of place of worship throughout the County.

In addition, LDR-106-2026 it would increase the complexity of the regulatory environment by incorporating a significant inconsistency that may require time and cost to interpret: a footnote in Section 27-4202(b)(2), (c)(2), and (d)(2) stating that “Intensity and Dimensional Standards for a Place of Worship, Cultural Facility, or Convent or Monastery may be modified in accordance with Section 27-5102(d)(2)(C)(vii), Requirements for Permitted Use”. However, proposed Section 27-5102(d)(2)(C)(vii), page 7, lines 6-9, states “Notwithstanding any other provision to the contrary in this Ordinance, a place of worship...may be approved with modified design standards.”

A characteristic of a modern, simple, and streamlined ordinance is that it contains standards the general public can understand and interpret. The proposed bill creates a complex and contradictory set of standards for places of worship with the apparent intent of limiting such standards for large places of worship with certain accessory uses within certain residential zones. However, as drafted, LDR-106-2026 applies to the entire County.

The intent of this bill, and the public understanding of it, suggests that it was created to address specific concerns or opportunities created by one proposed institutional campus. The drafting and summary of this bill could create unfair expectations among applicants and the public that these standards only apply to properties in RR, R-E, RSF-95 Zones when the “notwithstanding” (See page 7, line 6) clause applies the proposed provisions to any place of worship in the county on an assemblage of property containing a minimum of 25 acres. This provision, is generally problematic because it exempts a place of worship of greater than 25 acres from the height restrictions of the Military Installation Overlay (MIO) Zone, even though such restrictions apply to all development within the Zone.

The proposed standards would exempt places of worship of 25 acres or greater size from certain requirements, such as the Neighborhood Compatibility Standards and Section 27-6306(d), Maximum Number of Off-Street Parking Spaces, and create new height standards. Regarding the latter one, it is unclear the purpose of allowing building height standards to be increased by one foot for every one foot of additional setback for just these places of worship, versus all places of worship countywide. The Zoning Ordinance already establishes criteria by which major and minor variances and departures may be approved. It is unclear whether the subject legislation is intended to exempt places of worship from these relief mechanisms since placing a maximum height on a building with no maximum parking requirement is contradictory.

Similarly, the proposed exemption from Section 27-61002, Nonresidential and Mixed-Use Form and Design Standards may create incompatible development within the zones where those standards apply. As an example, the purpose of exempting place of worship from Section 27-6305(d) is unclear. The revised definition of Places of Worship to include the identified accessory uses means that the entire campus envisioned by this legislation falls under “All Other Uses”. Except in the Transit-Oriented/Activity Center base and PD Zones (where a new 25-acre place of worship would be costly and inconsistent with most approved master, sector, and transit district development plans and where parking maximums are critical to mitigate traffic congestion), Section 27-6305(d) does not establish a maximum parking requirement for Community Service Uses (including Places of Worship).

Allowing certain accessory structures within front yards raises compatibility concerns. Accessory structures may include playgrounds, recreational facilities, swimming pools, sheds, maintenance buildings, and similar features that may not be appropriate when prominently visible from public streets. In addition, locating recreational facilities near roadways may create safety concerns. Staff does not recommend allowing accessory structures within required front yards.

To implement the sponsors' intent, the proposed bill should expressly identify the circumstances under which qualifying places of worship, cultural facilities, and convents/monasteries are exempt from or permitted to modify specific Neighborhood Compatibility Standards. As well as defining whether the height standards are only the principal use or for any accessory which shall subordinate in height to the principal structure. Lastly, the proposed bill should include clear performance standards, metrics, or review criteria for evaluating environmental offsets.

Another consideration is that land use regulations should be clear and objective, with standards that are quantifiable, measurable, or binary (yes/no). The proposed language includes several subjective and/or undefined terms or phrases that are difficult to consistently and evenly enforce, including:

Page	Line(s)	Potential Subjective Findings
2	11	...similar uses that support the religious function.
7	25	...or similar environmental benefits.

Overall, the review of a development application of these provisions would be more complex than a review under the current requirements since the proposed bill would allow the Planning Board and the Department of Permitting, Inspections, and Enforcement (DPIE) to approve site plans and permits for all places of worship on “an assemblage of property containing a minimum of 25 acres” under an alternate regulatory regime that contains two pages of exemptions, additional requirements, and modified requirements.

This complexity translates into additional time and costs for an applicant and uncertain outcomes for the public. The Department recognizes that small businesses, nonprofits, and community institutions may not have the resources of large regional or national businesses and the County’s costly and time-consuming discretionary review processes can be insurmountable obstacles to their development.

Finally, the Department also recognizes that large religious campuses (that require 25 acres or more), by default include multiple ancillary institutional uses, cultural facilities, housing components, and recreational facilities often function more like planned developments than traditional places of worship. As a result, rezoning or Planned Development (PD) Zoning Map Amendment may provide a more appropriate planning mechanism than broad by-right modifications to development standards. These applications allow for site-specific review of building placement, environmental impacts, transportation considerations, neighborhood compatibility, and community benefits. Such approaches also provide greater flexibility while maintaining public review and oversight.

Nonetheless, should the County Council elect to pursue the proposed goal in LDR-106-2026 through a Zoning Ordinance text amendment, the Department believes a more appropriate approach would be to establish a new use category for religious campuses comprising 25

acres or more, with clearly defined use-specific standards. Such standards should identify the use as a permitted principal use and specify the zoning districts in which it would be permitted by right or, alternatively, allowed by special exception subject to additional review criteria and conditions. This approach would require further coordination with the Department to assist in the preparation of the amendment language and to ensure that the proposed provisions are consistent with the intent, purpose, and overall framework of the Zoning Ordinance.

Beyond the drafting, planning and implementation issues identified in this staff report, LDR-106-2026 does not establish a compelling public policy rationale for the proposed exemptions from the development standards. Since a countywide planning need has not been identified or nexus to adopted policy objectives, the proposed amendment appears to function primarily as a mechanism to facilitate a limited set of potential development projects rather than advance a broader public purpose. Statutorily required consultation with the Planning Director did not take place, which would have assisted the Department in this review.

In consultation with the sponsor, the Department reviewed the current Zoning Ordinance procedures (Planned Development Zoning) designed to address the type of development projects for which this LDR appears to be designed. Specifically, staff identified the current misconceptions concerning timing and cost as well as the benefits to the District Council and the County of requiring such projects to proceed through the Planned Development process.

V. COMPLIANCE WITH EVALUATION CRITERIA

Pursuant to Section 27-3501(c)(2)(B), staff finds the following with respect to the proposed amendment:

- (i) **Is consistent with the goals, policies, and strategies of Plan Prince George’s 2035 (or any successor General Plan), area master plans, sector plans, functional master plans, and any other applicable approved plans;**

LDR-106-2026 is not “consistent with the goals, policies and strategies of Plan Prince George’s 2035 [Plan 2035] (or any successor General Plan), area master plans, sector plans, functional master plans, and any other applicable approved plans” pursuant to Section 27-3501(c)(2)(B)(i) of the Zoning Ordinance”.

Consistency with General Plan

Modern, Streamlined, Simpler Ordinance

The first critical initiative identified in Plan 2035 is to “undertake a comprehensive update of the County’s Zoning and Subdivision Ordinances to modernize, streamline, and simplify the County’s regulatory environment.” (Emphasis added)

In general, requiring approval of a Detailed Site Plan by the Planning Board rather than a Special Exception is consistent with this General Plan recommendation by

reducing the time, cost, and unpredictability of the entitlement and permitting processes.

However, this legislation, particularly the addition of specific accessory uses not previously identified in the Ordinance, suggests this legislation was drafted to enable construction of one specific institutional campus. Property-specific text amendments generally conflict with Plan 2035’s recommendation to “modernize” the Zoning Ordinance, an inconsistency exacerbated by the unclear applicability of the proposed legislation.

Complex Requirements

In addition, initiatives to increase the time, costs, and complexity of the development review process are generally inconsistent with Plan 2035’s recommendation for a modern, streamlined, simplified Ordinance. Plan 2035 and the existing Zoning Ordinance strive to eliminate, not exacerbate, complex and costly entitlement and permitting processes.

Efforts to streamline the application review and approval process have been recommended in several area master, sector, and transit district development plans, including those identified in Table 2:

Table 2: Relevant Recommendations of Area Master, Sector, and Transit District Development Plans

Plan	Page	Policy/Strategy	Recommendation
2006 <i>Approved Master Plan for the Henson Creek-South Potomac Planning Areas</i>	94	Community Character: Revitalization: Policy 3	Streamline the development process for projects within...suitable locations.
		Community Character: Revitalization: Policy 3, Strategy 3	Expedite the development review and permitting process. Encourage developers to meet with both the Prince George’s County Planning Department and Department of [Permitting, Inspections and Enforcement] before the design phase begins to ensure projects meet the minimum standards of the Zoning Ordinance and other applicable requirements.
2009 <i>Approved Landover Gateway Sector Plan</i>	114	Chapter 6: Community Development Elements: Market Potential, Policy 6	Streamline the review process and provide incentives for private investment.

Plan	Page	Policy/Strategy	Recommendation
2009 <i>Approved Marlboro Pike Sector Plan</i>	96	Chapter VII: Economic Development Strategies: E. Development Regulations, Policy 2	Streamline the development review approval process to ensure a more timely approval by the Planning Board and County Council to help projects move more rapidly toward implementation.
		Chapter VII: Economic Development Strategies: E. Development Regulations, Policy 2, Strategy 1	If necessary, revise and amend development review procedures to expedite approval of projects.
2010 <i>Approved Subregion 4 Master Plan</i>	374	Part V: Plan Implementation: Growth Centers: Financing and Funding Assistance	Streamlined/Fast-Track Development Review: The length of time spent in the review of plans can influence the cost of redevelopment, with speedier time frames for review associated with more cost effective redevelopment. To the extent that jurisdictions can offer “fast track” permitting for growth centers in Subregion 4, such streamlining of review could serve as an indirect incentive for redevelopment.
2013 <i>Approved Largo Town Center Sector Plan</i>	92	Chapter 5: Implementation: Public-Private Partnerships	The county has shown a willingness to help facilitate economic development by providing incentives and identifying opportunities for joint development that will leverage and strengthen public-private investment, such as expedited site plan and permit processes and analyzing various innovative financing mechanisms and techniques.
2013 <i>Approved Greenbelt Metro Area and MD 193 Corridor Sector Plan</i>	195	Table 35: Recommended Implementation Actions: Development Regulations (DR), DR3	Streamline development procedures and approval processes.
2015 <i>Approved College Park-Riverdale Park Transit District Development Plan</i>	154	Implementation: Action Table: Development Regulations (DR), DR3	Streamline development procedures and approval processes.

Legislation that increases the complexity, cost, and time of the entitlement process generally conflicts with these recommendations.

(ii) Addresses a demonstrated community need;

"Identified community need" is not defined by the Zoning Ordinance and is subjective. Also, as mentioned above, the Department has not received sufficient input from the bill sponsor or from residents to demonstrate that proposed amendment constitutes a community need.

(iii) Is consistent with the purpose and intent of the zones in this Ordinance, or would improve compatibility among uses and ensure efficient development within the County;

As extensively noted in this report, LDR-106-2026 is inconsistent with the purpose and intent of the zones in this Ordinance, as it creates a separate set of standards for place of worship in the RE, RR, and RSF-95 Zones. Therefore, contrary to ensuring that efficient development, this bill may create incompatible development within the zones where the proposed standards apply.

(iv) Is consistent with the implementation of the strategies and priority recommendations of the Prince George's County Climate Action Plan;

Staff find that this bill may be inconsistent with the Prince George's County Climate Action Plan. Particularly with recommendation A-9 "Adopt codes, standards, and practices to support climate ready green buildings and development" by modifying and exempting place of worship that have a minimum of 25 acres from certain development standards including the exemption from the maximum parking requirement in Section 27-6303(d).

(v) Is consistent with other related State and local laws and regulations; and

LDR-106-2026 complies with this criterion. However, as noted in the analysis above, this bill could be in potential violation of the Religious Land Use and Institutionalized Persons Act of 2000.

(vi) Would avoid creating significantly adverse impacts on the natural environment, including but not limited to water, air, noise, stormwater management, wildlife, vegetation, wetlands, and the natural functioning of the environment.

Staff cannot specifically determine immediate adverse impacts. However, the multiple exemption for place of worship that have a minimum of 25 acres from certain development standards including but not limited to nonresidential and mixed-use form and design standards, neighborhood compatibility standards, and maximum number of off-street parking spaces, would potentially impact on the adjacent natural environment.

VI. PLANNING BOARD PUBLIC HEARING

Section 27-3501(c)(2)(D) requires the Prince George’s County Planning Board to hold a public hearing and make comments on the proposed legislative amendment within 30 days of the date of the transmittal of the Clerk of the Council. Said public hearing must be noticed by electronic mail at least 21 days prior to the public hearing, sent to every community organization in the County registered pursuant to Section 27-3407(b)(3) of the Zoning Ordinance, and to any person or organization registered pursuant to Section 27-3402(d) of the Zoning Ordinance.

Notice for the public hearing on LDR-96-2026 was sent on May 28, 2026, as required by the Zoning Ordinance. The Planning Board public hearing will be held on June 18, 2026, thus meeting the notice requirement of the Zoning Ordinance.

Comments offered by the public prior to and during the Planning Board’s public hearing will be summarized, along with the Planning Board’s comments, in the Board’s recommendation to Clerk of the Council.

VII. PROPOSED AMENDMENTS

Following review of LDR-106-2026 the Department does offer the amendments contained in **Attachment 1**, included in this staff report.

VIII. RECOMMENDATION

Based upon the foregoing evaluation and analysis, the Planning Department’s legislative team recommends that the Planning Board adopt the findings of this report and recommend Planning Board **SUPPORT for the amendment’s intent to provide greater flexibility for places of worship, but OPPOSE the legislative approach proposed in LDR-106-2026.**