



**GOVERNMENT OF THE DISTRICT OF COLUMBIA
HOMELAND SECURITY AND EMERGENCY MANAGEMENT AGENCY**

Muriel Bowser

Mayor

Dr. Christopher Rodriguez

Director

April 14, 2021

Jamie Dunlop
Capitol Hill Baptist Church
525 A Street, N.E.
Washington, DC 20002

Re: HSEMA response to Capitol Hill Baptist Church's Waiver Request for Exemption to Business Closure

Dear Mr. Dunlop:

On April 5, 2021, you submitted a seating plan for services at the Capitol Hill Baptist Church located at 525 A Street N.E., Washington DC. The plan does not identify a specific date for services and hence, we interpret this to serve as an on-going seating plan to correspond to all assemblies at the location. The proposed seating plan requests approval of two sections of seating within the structure and is described as follows:

1. Non-Immune seating. Seating for the general public with at least six feet of distance in all directions between seating groups. Seats are grouped together to accommodate variously sized

families or quarantine pods.

Initially, these sections will be divided as follows with capacities as listed. As the vaccination

rollout continues, additional sections would be converted to COVID-Immune Seating. Seating charts are available to support this proposal.

Non-Immune Seating – six feet of distance between seating groups

- Main Hall main level – 135 seats (43% of capacity)
- Main Hall balcony level – 104 seats (47% of capacity)
- West Hall balcony level – 53 seats (39% of capacity)
- Room 4 – 40 seats (43% of capacity)
- Room 5 – 40 seats (48% of capacity)
- Room 6 – 44 seats (49% of capacity)
- Fellowship Hall – 124 seats (50% of capacity)
- Outdoors – 110 seats

2. COVID-Immune seating. Seating designated for those who have been fully vaccinated. This seating will not have any special distancing requirements. Located in West Hall main level up to 328 seats.

After careful review of the plan and in consultation with public health experts, HSEMA will grant the following seating arrangement within the structure.

COVID-19 Non-immune section

Capitol Hill Baptist Church may seat attendees within the sections of the building described as “COVID Non-Immune seating” in accordance with the plan offered. This proposed seating arrangement is consistent with the Center For Disease Control (CDC) guidelines for social distancing and mask/face covering indoors.

COVID-19 Immune section

Capitol Hill Baptist Church proposes a “COVID-Immune” seating section within the structure’s West Hall allowing for a maximum of 328 seats with no social distancing requirements. This area would be reserved for persons who can confirm that they are fully vaccinated for COVID-19. Capitol Hill Baptist Church offers in its seating proposal that it interprets the CDC guidelines as permitting the fully vaccinated to “gather indoors with fully vaccinated people without wearing a mask.”¹

After consultation with public health experts at the Department of Health and a review of the CDC guidelines for gatherings of fully vaccinated persons, we cannot grant the seating arrangement proposed for the “COVID-Immune” seating section.

CDC guidelines for fully vaccinated persons provide that vaccinated persons may meet indoors with other vaccinated persons “in home or private setting”² without social distancing or wearing a mask. CDC continues to recommend that fully vaccinated persons continue to wear a mask and practice social distancing in public or when gathering with unvaccinated persons from more than one household.³ We do not find the seating plan for the “COVID-Immune” seating section to be consistent with CDC guidelines. For this reason, we reject the seating proposal for this area because it does not provide for social distancing. However, HSEMA will grant a seating proposal for this area that permits for socially distanced seating consistent with the “COVID Non-Immune” plan.

Please adhere to the ingress and egress plan as described in the application to avoid large gatherings near entryways.

This permission is granted in a good faith effort to address CHBC’s concerns regarding capacity limits. The total capacity CHBC proposes—and that we hereby permit—is beyond what we believe to be sound as a matter of public health.

¹ CHBC Meeting Proposal and Seating Chart of March 31, 2021.

² <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>.

³ Id.

Thank you for your time and attention in this matter and your continued commitment to controlling the spread of COVID-19. If you have any questions, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Rodriguez', written in a cursive style.

Dr. Christopher Rodriguez
Director

Cc: Dr. LaQuandra Nesbitt, Director, DC Health