



July 11, 2020

Mr. Anthony Hood, Chairman
DC Zoning Commission
441 4th Street, NW, South
Washington, DC 20001
Via zcsubmissions@dc.gov

RE: Support for ZC Case Number 19-13, Proposed Text Amendments to the Zoning Regulations Governing Alley Lots

Dear Chairman Hood and members of the Commission:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, DC metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We worked over several years on the DC zoning regulations that were finalized in 2016. We appreciate taking up the need to refine alley lot development regulations.

In March 2019, we coordinated a tour of four alley lots. We looked at attractive and distinctive buildings and spaces. We also visited one unbuilt lot with plans that are not financially feasible. Our tour showed us how alley lot homes can be charming living spaces that add variety to neighborhoods. However, alley lot developments encounter many obstacles. We found that alley lot development is excessively difficult and expensive, and often only occurs due to rare and unique circumstances. Cumulative constraints drive up costs which in turn push up prices for the finished product. We hope that reforms to the zoning regulations can facilitate more feasible development to provide new homes in underutilized but accessible places. Permitting the use of the District's many alley lots for new homes not only benefits individual households seeking a place to live, it also puts underutilized space to work and expands the tax base. More reasonable rules for alley lot housing development contributes to DC's overall goal to add 36,000 new homes by 2025, and helps make more homes more affordable.

Below are specific comments on the proposed text.

(1) Subtitle D 5100.1, Subtitle E 1100.1, Subtitle F 5100.1, Subtitle G 1001.1, Subtitle J 300.1:
Adjust minimum alley centerline setbacks to allow 7.5 feet

As proposed by the Office of Planning, we support the proposed adjustment to alley line setbacks from 12' to 7.5'.

(2) Subtitle C, Chapter 3 306.1 and 306.2: Allow new alley record lots consistent with existing record lot rules

We support changing the alley lot subdivision rules to facilitate matter-of-right subdivision of existing alley properties, and support applying the same rules to new alley record lots as those that apply to existing record lots.

The current (and proposed) language C-306.1(a) provides that to create a new alley record lot, the lot must: "Have frontage along a public alley with a minimum alley width of twenty-four feet (24 ft.)...and have access from the lot to a street through an alley or alleys with an alley width of not less than twenty-four feet (24 ft.) at any point between the lot and the street;"

DC has also almost no 24' wide alleys, and this provision is inconsistent with requirements for residential use of an existing alley record lot (15-foot wide alley within 300 feet of a street). If development of an existing alley record lot is acceptable under certain conditions, then the creation of new alley record lots should be allowed if they meet the same criteria.

(3) Subtitle C, Chapter 3 306.1c: Reduce minimum lot size requirements for subdivision

The current subdivision requirement for any new subdivided alley lot is 1,800 square feet. However, code already allows 450 square feet as an acceptable size for a building residential structure. We support reducing the minimum subdivided lot size requirement to below 1,800 square feet. Perhaps half of 1,800 square feet or 900 square feet would be appropriate.

(4) Subtitle C Chapter 7: Eliminate parking requirement

We support elimination of a vehicle parking requirement. Space for car parking consumes a disproportionate amount of space on a small lot, meaning the District would be placing a priority on car storage over allowing for a home for people to live in. Since alley lots are not eligible for Residential Parking Permits, eliminating parking requirements would not push cars onto public streets, and these homes are likely to attract residents who do not own a car.

(5) Subtitle U, Chapter 6, Subsection 600.1: Matter-of-right uses on alley lots (R, RF, RA).

We support allowing residential alley lot uses in all R zones. The current language is overly restrictive. We also support allowing accessory apartments on alley lots. A significant number of large alley lots could support accessory apartments.

(6) Subtitle U, Chapter 6, Subsection 600.1f and elsewhere:

Residential use of alley lots are limited to those exceeding 450 square feet. This is overly restrictive, and a special exception process should be permitted for lots that could be developed that are less than 450 square feet. For well over a decade, micro housing has been a popular trend and dozens of municipalities have codes to support it. Through a special exception process, we can accommodate small lot housing in DC too.

Thank you for your consideration. We hope that you will act to ease restrictions on alley lots that greatly limit the potential of creating desirable and needed new homes.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort
Policy Director