

Government of the District of Columbia

Department of Transportation



d. Planning and Sustainability Division

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: *KB for* Meredith Soniat
Associate Director

DATE: February 27, 2026

SUBJECT: BZA Case No. 21419 – 4101 Alabama Avenue SE

APPLICATION

PMG Mid Atlantic, LLC (the “Applicant”), pursuant to Title 11 of the *District of Columbia Municipal Regulations (DCMR)*, requests the Board of Zoning Adjustment (BZA) grant a Special Exception from the gasoline service station requirements of Subtitle U § 511.1(f) to permit a vehicle towing and storage use in an existing gasoline service station, retail store, and repair garage. The site is located in the MU-3A Zone at 4101 Alabama Avenue SE (Square 5369N, Lots 13 and 22) and is served by three (3) existing curb cuts – two (2) on Alabama Avenue and one (1) on 41st Street SE.

SUMMARY OF DDOT REVIEW

DDOT reviewed the application and finds that the proposed use does not raise significant transportation network concerns. However, DDOT identified public space issues that must be addressed prior to approval:

- Plans show a vehicular access easement extending from the east-most Alabama Avenue curb cut through the public parking area behind the sidewalk to access Lot 13, perpetuating a non-compliant paved condition;
- The proposed gate for Lot 13 relies on this paved public space for access rather than internal circulation from Lot 22;
- Public parking areas should remain park-like, and DDOT does not support non-compliant driveways through public space like the one the Applicant proposes. If curb cuts or aprons are modified, they must meet current standards in DDOT’s Design and Engineering Manual (DEM); and
- To resolve these issues, DDOT recommends conditions requiring restoration of the public parking area and relocation of the gate access internal to the site.

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RECOMMENDATION

DDOT has no objection to the approval of the Special Exception with the following conditions:

- The Applicant shall remove excess paving within the public parking area behind the sidewalk along Alabama Avenue SE and restore this area to park-like landscaping consistent with DDOT standards; and
- The Applicant shall relocate the gate and vehicle access for Lot 13 so that entry occurs internally from Lot 22, not through public space.

STREETScape AND PUBLIC REALM

DDOT's lack of objection to this application should not be viewed as an approval of the public realm. All elements of the project proposed within District-owned right-of-way require the Applicant to pursue a public space construction permit. Along the site's Alabama Avenue frontage, the area between the property line and the back of sidewalk is referred to as "public parking," which is DDOT-regulated public space and is intended to remain park-like with landscaping.

DDOT identified two major issues that must be addressed:

- **Excess Paving in Public Parking** – The plans show a "vehicular access easement" extending from the east-most Alabama Avenue curb cut through the public parking area behind the sidewalk to access Lot 13. DDOT views this as a proposal to modify the existing curb cut and create a non-compliant driveway through public space. While some paved or gravel access currently exists, DDOT does not support perpetuating or expanding this condition. Instead, the Applicant should remove this paving and restore vegetation to maintain the park-like character intended for public parking.
- **Gate Access through Public Space** – The proposed gate for Lot 13 relies on the non-compliant paved public space for access. Instead, the Applicant should relocate Lot 13's gate along the shared property line between Lots 22 and 13 so that circulation to Lot 13 occurs internally from Lot 22 via the existing curb cut, not through public space.

DDOT expects the adjacent public realm to meet all District standards. The Applicant should refer to Titles 11, 12A, and 24 of the [DCMR](#), the most recent version of DDOT's [Design and Engineering Manual](#), and the [Public Realm Design Manual](#) for public space regulations and design guidance. A permit application can be filed through the DDOT [Transportation Online Permitting System](#) (TOPS) website.

The Applicant is encouraged to participate in a Preliminary Design Review Meeting (PDRM) with DDOT and the Office of Planning (OP) to discuss the public space comments in this report.

HERITAGE AND SPECIAL TREES

According to the District's [Tree Size Estimator map](#), Lot 13 contains three (3) Special Trees either on-site or directly adjacent, with critical root zones that overlap the property. Additionally, there is a Heritage Tree in the public tree box immediately west of the east-most curb cut to Lot 22 on Alabama Avenue SE. The Applicant must coordinate with the Ward 7 Arborist regarding the preservation and protection of these Heritage and Special Trees, as well as the planting of new street trees consistent with DDOT Green Infrastructure Standards.

Heritage Trees have a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and DDOT's Urban Forestry Division (UFD), Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan to preserve the Non-Hazardous Heritage Trees.

Special Trees are between 44 inches and 99.99 inches in circumference. Special Trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, a Tree Protection Plan (TPP) will be required.

MS:pj