

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Karen Thomas, Case Manager
MBR Maxine Brown Roberts, Associate Director Development Review

DATE: May 29, 2026

SUBJECT: BZA Case 21419 (4101 Alabama Ave SE) to permit a vehicle towing and storage use in an existing gas service station and repair garage.

I. OFFICE OF PLANNING RECOMMENDATION

The Office of Planning (OP) recommends **approval** of the following special exception relief:

- To permit vehicle towing and related storage use, under Subtitle U § 511.1(f), pursuant to Subtitle X § 901, as part of the existing gasoline service station at 4101 Alabama Avenue SE.

The use will remain in harmony with the MU-3A zone and is not anticipated to generate adverse impacts on neighboring properties.

Consistent with DDOT's findings, OP supports approval subject to conditions requiring removal of non-compliant paving within the Alabama Avenue public parking area and relocation of the Lot 13 access gate to ensure all circulation occurs internally from Lot 22. With these conditions, the expanded operation will function safely, efficiently, and fully within the intent of the Zoning Regulations.

OP also notes DDOT's other comments:

- regarding Lot 13's 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.

II. LOCATION AND SITE DESCRIPTION

Address	4101 Alabama Avenue, SE
Applicant	PMG Mid Atlantic LLC, Sullivan & Burros
Legal Description	Square 5369N, Lots 0022, 0013
Ward, ANC	7/ANC 7B
Zone	MU-3A

Historic District	N/A
Lot Characteristics	The lot is irregularly shaped, fairly flat, and with a partial lining of trees along the property line to the east.
Existing Development	The property is developed with a gas station, an associated vehicle repair garage and a convenience store.
Adjacent Properties	Adjacent properties to the east are within the MU-3A zone and properties to the south are residential development within the R-2 and RF-1 zones. The subject site fronts on 41 st Street and is east of the Fort Davis Recreation Center.
Surrounding Neighborhood Character	The surrounding neighborhood is primarily residential developed with detached and semi-detached homes.
Proposed Development	The Applicant proposes to expand the gas station use to incorporate vehicle towing and associated vehicle storage on Lot 13 as a primary and essential component of the service station operation on Lot 22.

III. ZONING REQUIREMENTS and RELIEF REQUESTED

A gasoline service station is permitted by **special exception** within MU-Use Group D under Subtitle U § 511. The Applicant seeks to expand the approved use to include **vehicle towing** and **associated vehicle storage** on Lot 13. These functions will operate as an integrated extension of the existing service garage and fueling station, enabling a full suite of vehicle-related services—fueling, repair, towing, and short-term storage—within a single coordinated operation.

Accordingly, the Applicant requests **special exception relief under Subtitle U § 511.1(f)**, pursuant to the **general special exception criteria of Subtitle X § 901.1**, to allow the towing and storage component as part of the established gasoline service station use.

IV. OFFICE OF PLANNING ANALYSIS

a. Special Exception Relief from Subtitle U § 511.1 (f)

(f) Gasoline service station to be established or enlarged, subject to the following conditions:

(1) The station shall not be located within twenty-five feet (25 ft.) of a residential zone or unless separated from the residential zone by a street or alley;

The gasoline station existed at this location prior to the existing regulations, with a Certificate of Occupancy dating to May 14, 1968, and as recent as March 2016, which predates the 2016 Regulations. The site is located approximately **30 feet** from the nearest residential zone (R-2) to the south, satisfying the required separation. The proposed towing and storage component does not alter the station's footprint or encroach closer to residentially zoned property.

The application satisfies the distance requirement herein.

(2) The operation of the use shall not create dangerous or other objectionable traffic conditions; and

DDOT's report explicitly states that the proposed towing and storage use **"does not raise significant transportation network concerns."** This confirms that the expanded operation will not generate unsafe or objectionable traffic impacts.

However, DDOT did identify public space compliance issues, which relate to [public realm design](#), not traffic safety, including:

- A non-compliant paved access path through public parking behind the Alabama Avenue sidewalk must be removed.
- The proposed gate for Lot 13 must be relocated internally, so access occurs from Lot 22 rather than through public space.
- Any curb cut modifications must comply with DDOT's [Design and Engineering Manual](#).

These issues are addressed through conditions and do not constitute traffic hazards. Once the Applicant restores the public parking area and shifts access internal to the site, all vehicle movement will occur through the existing, compliant curb cuts.

Therefore, through application of DDOT's recommended conditions, the use should not create dangerous or objectionable traffic conditions.

(3) Required parking spaces may be arranged so that all spaces are not accessible at all times. All parking spaces provided under this subsection shall be designed and operated so that sufficient access and maneuvering space is available to permit the parking and removal of any vehicles without moving any other vehicle onto public space;

Simply stated:

- Required parking spaces may be arranged so that not all spaces are accessible at all times;
- However, the design must allow the parking and removal of any vehicle without moving another vehicle onto public space.

The Applicant proposes to manage all towing, storage, and maneuvering entirely on private property. DDOT's report reinforces this requirement by directing the Applicant to eliminate reliance on public space for access and to route all circulation internally from Lot 22.

Once the gate is relocated and the public parking area restored:

- All vehicle movement will occur within the Property boundary as required;
- No vehicle will need to enter or cross public space to be parked, repositioned, or removed;
- The storage area is not open to the public, and all maneuvering will be performed by trained station and towing personnel, ensuring controlled operations.

This configuration would satisfy the requirement that no vehicle movement relies on public space.

OP concludes that subject to DDOT's required conditions, the application would satisfy the maneuvering and parking requirements of Subtitle U § 511.1(f)(3).

b. Subtitle X § 901.2 — General Special Exception Criteria

i. Is the special exception in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps?

The MU-3A zone is intended to accommodate moderate-density commercial uses, including gasoline service stations and related auto-oriented functions. The proposed towing and vehicle storage component is operationally related to the existing fueling and repair functions, creating a managed vehicle-service operation consistent with the zone's intent. Lot 13 has historically been used for overflow parking associated with the station. Formalizing this activity as towing/storage does not introduce a new intensity of use but would regularize and better manage an existing pattern of operation.

ii. Would the special exception appear to tend to affect adversely, the use of neighboring property?

The site has buffers on three sides including a church parking lot, community center, and Alabama Avenue frontage. Residential uses to the south are separated by distance and topography, thereby reducing potential impacts.

With fencing, screening, and internalized circulation, the use is not expected to generate noise, glare, or operational impacts beyond existing conditions.

Based on the analysis of **Subtitle U § 511.1 (f) and Subtitle X § 901.2** the proposal is in harmony with the MU-3A zone and will not adversely affect the use and enjoyment of neighboring properties.

V. OTHER DISTRICT AGENCIES

At the writing of this report, DDOT's report is noted in [Exhibit 22](#). No other agency report is included.

VI. ADVISORY NEIGHBORHOOD COMMISSION

ANC 7B's report is not included in the record to date.

VII. COMMUNITY COMMENTS TO DATE

Community or neighbors' comments are not included in the record at the writing of this report.

The Applicant has submitted an account of the community interactions at [Exhibit 25](#).

Zoning Map and Location

