

## Cochran, Patricia (DCOZ)

---

**From:** Aurora Ferrari <ferrari.aurora@gmail.com>  
**Sent:** Saturday, July 11, 2020 2:34 PM  
**To:** DCOZ - ZC Submissions (DCOZ)  
**Subject:** Improve & Support for Zoning Commission Case No. 19-13, Proposed Text Amendments to the Zoning Regulations Governing Alley Lots

**CAUTION:** This email originated from outside of the DC Government. Do not click on links or open attachments unless you recognize the sender and know that the content is safe. If you believe that this email is suspicious, please forward to [phishing@dc.gov](mailto:phishing@dc.gov) for additional analysis by OCTO Security Operations Center (SOC).

DC Zoning Commission:

I am writing as a District resident in regards to Case No 19-13, Office of Planning Proposed Text Amendment to Clarify Regulations Governing Alley Lots.

My comments are first motivated out of deep concern for DC's shortage of affordable housing, along with its shortfall in a variety of housing options overall. I endorse the action by the Mayor's May 10, 2019 [Order on Housing](#), requiring District agencies to seek ways to build 36,000 new housing units in DC by 2025. This order was furthered by the [Housing Equity Report](#), which recommended increased housing opportunities in every part of the city. A small but significant step to fulfilling this directive would be to encourage additional homes on DC's 1046 alley lots, 923 of which could be potentially developed (or further developed) into new homes.

Permitting the use of the city's many alley lots for residential use not only benefits individual households seeking a place to live, it also puts underutilized space to work, building the tax base, and increasing sustainable living with new homes that can tap into existing services.

My comments are as follows:

(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

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

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

I support a change to the alley lot subdivision rules to facilitate matter-of-right subdivision of existing alley properties, and strongly support harmonizing requirements for new alley Record Lots with those rules that apply to existing Record Lots. I believe there should be logical consistency with existing text.

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;"

First, there are also almost no 24' wide alleys in the District. Second, 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 1800 square feet. However, code already allows 450 square feet as an acceptable size for a building residential structure. I support harmonizing the minimum subdivided lot size requirement to below 1800 square feet.

(4) Subtitle C Chapter 7: Eliminate parking requirement

I support eliminating a parking requirement. There are several good reasons to eliminate parking requirements. First, alley lots are not eligible for Residential Parking Permits. Space for car parking consumes a disproportionate amount of space on a small lot. This makes the use of this lot a trade off between storing a car versus providing a home for a person or household to live in. Zoning should allow this trade off, an permit a new home to be built instead of car storage.

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

I support allowing residential alley lot use in all R zones. The current language is overly restrictive. I also support allowing accessory apartments on alley lots. There are a significant number of large alley lots that 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 established for lots that could be developed that are less than 450 square feet. For well over a decade, micro housing has been a well established trend and dozens of municipalities have codes to support it.

I want to thank you again for considering these important reforms to permit dwellings on alley lots. Thank you.

Sincerely,  
Aurora Ferrari  
3016 Rodman Street NW  
Washington DC