

Cochran, Patricia (DCOZ)

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To: DCOZ - ZC Submissions (DCOZ)
Subject: CASE NO. 19-13

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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 the lack of affordable housing in the District, and a desire that the Office of Zoning, Office of Planning and the Commission adhere to the Mayor's May 10, 2019 [Order on Housing](#), which requires District agencies to seek ways to build 36,000 new housing units in DC by 2025. While it completes the [Housing Framework for Equity and Growth](#) mandated by this order, I believe OP and Zoning should take every step to increase DC's housing supply. A small but significant step would be encouraging additional homes on DC's 1046 alley lots, 923 of which could be potentially developed (or further developed) into housing stock.

I am also motivated to comment as a resident interested in increasing the property tax base to further support our many valuable DC services, as well as an urbanist committed to sustainably increasing our urban density back to our earlier, far higher levels. 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: Minimum alley centerline setbacks

I strongly support the proposed adjustment to alley line setbacks from 12' to 7.5'.

(2) Subtitle C, Chapter 3 306.1 and 306.2: New alley 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;*"

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.

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.

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

The current subdivision requirement for any new subdivided alley lot is 1800 sq ft. However, code already allows 450ft² as an acceptable size for building residential structure. I support harmonizing the minimum subdivided lot size requirement with the current minimum buildable alley lot size, 450ft². I believe there should be logical consistency with existing text.

(4) Subtitle C Chapter 7: Parking

I support having an expedited review process or administrative waiver to waive parking requirements for alley lots.

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

1. I support allowing residential alley lot use in **all** R zones. The current language is overly restrictive: *Residential dwelling use, provided that the use shall be limited to one (1) dwelling unit on an alley lot, subject to the following limitations conditions: Alley Lot is not wholly or partially within the R-1-A, R-1-B, R-2, R-6 through R-12, R-14 through R-16, or R-19 through R-21 zones.*
2. I support *allowing* accessory apartments on alley lots. There are a significant number of large alley lots that could support accessory apartments.
3. In section 600.1.f and elsewhere, I believe limiting residential use of alley lots to lots exceeding 450ft² is overly restrictive. For well over a decade now microhousing has been a well established trend and dozens of municipalities have codes to support it. A 200ft² lot with the allowed 100% lot occupancy could support a 400ft² micro-unit, which is the size of many DC studios. Throughout all Subtitles I support allowing record lot conversion and residential use for lots over 200ft².

Thank you for considering these comments.

Regards,

Kayvan Farchadi

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