



THE WASHINGTON CHAPTER OF THE  
AMERICAN INSTITUTE OF ARCHITECTS

9 January 2026

District of Columbia Zoning Commission  
441 4th St NW # 200  
Washington, DC 20001  
DCOZ@dc.gov

Re: ZC 25-06 Alley Lot Text Amendment

Chairman Hood and members of the Commission:

I am representing the Washington Chapter of the American Institute of Architects (AIA | DC) as a member of the Advocacy Committee. Additionally, I volunteer with the Small Firm Exchange (SFX), where many of my colleagues design buildings directly impacted by these regulations. AIA | DC also has a Custom Residential Architect Network (CRAN) committee who has also weighed in on the proposed text amendment.

The mission of AIA is to empower our members, our profession, and our community to advance the value of architecture and design in Washington, DC. For AIA | DC, Design Matters, Equity Matters, and Climate Change Matters. Our Advocacy Committee's mission is to promote and advocate for issues important to DC architects, as well as to support and advance equity in the built environment. As previously noted, the Advocacy Committee is currently reviewing Zoning Commission cases to provide informed feedback from our membership.

As with prior cases, we recognize the Office of Planning for their dedicated work in addressing this matter, diligently collecting and disseminating data, clarifying procedures, conducting significant public outreach, and ensuring thorough consideration throughout this proposal.

Alley Lots offer an opportunity to increase the number of homes in the city. Although Alley Lot Dwellings on their own may not greatly boost overall housing production, they represent one of multiple strategies the city can use to support future growth.

We fully support the proposed text amendment and would like to share these thoughts:

- We support reducing the minimum area requirement for alley lots to 450 square feet across all zones. Historically and in recent years, neighborhoods throughout the city have included clusters of modest alley dwellings that exemplify effective development practices.



Notable examples include Groff Court and Duvall Court, two alley dwelling complexes designed in distinct architectural styles, which demonstrate the feasibility of constructing multiple alley dwellings on several small lots.

- We support the use of the special exception process for subdivision, as it provides a suitable framework to assess both the advantages and potential issues associated with atypical or reduced lot sizes. The special exception process serves as an appropriate mechanism to evaluate whether relief is justified, facilitates a discussion regarding design considerations, and assesses potential impacts on neighboring properties.
- We recommend increasing the matter-of-right building height to 25 feet, as shown on the following page. The current proposed 22-foot height limit encourages the design of two-story buildings with slab-on-grade foundations. This approach places living spaces at the same elevation as traffic areas, potentially reducing privacy. Greater separation between vehicular access and habitable zones, achieved by elevating the ground floor, can enhance occupant safety. The increased height provides flexibility for structural and mechanical systems and makes it easier to adapt to the site's topography. Additionally, utilizing a crawlspace rather than a slab-on-grade foundation supports energy efficiency, promotes sustainability, and contributes to improved indoor air quality.

- We suggest removing the parking requirement for alley dwellings. For instance, at Capitol Court, mandatory off-street parking changed how buildings were placed on the site and reduced the overall quality of the alley lot building experience. Many of these lots are located where strong transportation options already exist, reducing the need for parking. Alley lots are often small or irregular, making off-street parking difficult. Additionally, an off-street parking space measuring 9' x 18' (144 square feet) is more than double the minimum size needed for a bedroom (70 square feet), requiring parking could mean losing space that could otherwise be used for a bedroom.



- Additionally, we wish to express our concerns regarding the proposed increase in pervious surface requirements from 10% to 25%. Although sustainability is one of our core AIA|DC values, we are apprehensive about the practicality of this change and the associated costs of exceeding the standards applied to adjacent non-alley lots.

Alley dwellings cost more to build because utilities must be extended into block centers, and owners pay these expenses. Allowing more flexibility, such as special exceptions for subdivisions, increased height limits, and dropping parking requirements, could help create more city housing units.

Thank you for the opportunity to submit comments, and for your continued attention to issues that shape the built environment of our city. We look forward to testifying

Respectfully submitted,

A handwritten signature in black ink, consisting of stylized, overlapping letters that appear to be 'W', 'T', and 'A', followed by a long horizontal line extending to the right.

Will Teass, AIA  
2024 AIA | DC President  
Member, AIA | DC Advocacy Committee

Cc Malina Pickard, Co-chair, AIA | DC Advocacy Committee  
Liz Kovacevic, Co-chair, AIA | DC Advocacy Committee  
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