

Mr. Anthony Hood
Chairman, Zoning Commission of the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

January 10, 2026

RE: Support for Zoning Case No. 25-06

Dear Chair Hood:

My name is Tanya Topolewski and I am the owner of an R-3 alley lot in Petworth/Brightwood in Ward 4. I am also a 25 year resident of the District of Columbia, proudly living in Ward 4.

I am writing in strong support of the proposed alley lot text amendment changes proposed by the Office of Planning.

I am also a sustainable real estate developer practicing solely in DC. My company built some of DC's most sustainable housing beginning with the first LEED Platinum multifamily building in DC in 2009, followed by multiple LEED Platinum single family homes and including DC's first net zero energy building.

DC's Comprehensive Plan highlights the need for housing and DC's strong sustainability goals. I am a big supporter of infill development of housing as it is some of the most sustainable building that can be done. I've also long believed that alley lots should be part of the solution to provide housing that DC desperately needs. The zoning code has long been an impediment to these needs and goals and I enthusiastically support this effort to make alley lots viable for housing.

As a sustainable real estate developer, I've had extensive experience building roads for the and extending water and sewer mains and laterals for projects in the District of Columbia. In my direct experience, the costs of this infrastructure is exorbitant. It routinely costs over \$500 a linear foot for a water or a sewer main extension. So 100' of extension is \$50k per line (\$100k), plus the tie in to the street main (\$20) plus the manholes (\$10k), the individual house laterals (\$20K), plus the engineering (\$50k) the permits (\$10k) the coordination with agencies (\$20k), the street closure safety precautions, street repair (\$25k) and more. This off the top of my head example is >\$250k and I'm sure I forgot a lot of costs. In my

experience, without specific changes to the DC zoning code, building housing on alley lots will not be financially viable due to the costs of infrastructure.

While I strongly support in general the Office of Plannings proposed language changes, there are items that have not been included where additional square footage could be discreetly added to help projects overcome the infrastructure cost hurdle.

There are also points where late input from agencies are in direct conflict with the goal of supporting housing being built on alley lots.

SUMMARY

Strongly support removing parking minimum requirements

A parking space is ~ 200sf (10x20). The sales price per sq ft in many areas of DC is \$400-600 per sq ft. So each required parking space is \$80,000-120,000 in lost revenue. These revenue dollars are necessary to offset the cost of infrastructure and make projects financially feasible.

With the advent of Uber, electric bikes and scooters and other personal transportation solutions beyond the car, parking is just not as necessary in more and more locations in the city. The reality is that if lot owners or developers feel they want or need parking, they will put it in.

I echo OAG's desire to simplify and not over regulate. Give owners the ability to make alley lot projects financially feasible without a trip for special exception relief, which will only further amplify costs.

Strongly support the special exception relief for height

OP has proposed height be allowed by special exception for R zones up to 35' and three stories. The ability to approach the BZA for a special exception for height is a crucial option for allowing more square footage in situations where a third story is in character and not impactful to the surrounding neighborhood.

Projects obtaining a special exception for height will increase the marketable square footage by 33%. No doubt, this is the only way some projects will become financially feasible. Candidly, many alley lot projects will not be financially viable without this tool. It is a necessity for creating housing in alleys in DC.

Strongly support changing by right alley lot height to 25' from 20'

OP proposes changing the by right height alley lot height from 20' to 22'. OAG proposed 2/3 the height of the zone be the by right allowed height. For RF-1 that would be changing from 20' to 23.5'. Both of these numbers have been seemingly arbitrarily chosen.

The determination of what is the most appropriate height has not been done with input from professionals: architects who focus on work in DC. Architects I know have coalesced on 25' as being the appropriate by right height. This allows 9' ceiling heights (the now expected norm in this market), cost effective structural elements (important for dealing with the infrastructure cost hurdle), appropriate roof and parapet heights that allow roof stormwater management slopes and raising properties from slab on grade for privacy and security reasons. I respectfully ask the Zoning Commission to consider this minor change.

Strongly oppose the increased the pervious surface requirement from 10 to 25% for all R and RF zones

This increase will remove 25% of developable land from alley lots. This will make getting over the infrastructure cost hurdle impossible for many lots. This requirement is in direct opposition to the state goals of the Comp Plan to make more housing.

Current code requirements for pervious surface in the underlying zone are: R-1 50%, R-2 30%, R-3 20%, RF: >2,000 sf is 20%, 1,800-2,000 10% and 1,800 = 0%. The smaller the lot, the lower the pervious surface requirement. At 1,800 sf the pervious surface requirements go to 0%. Over 50% of the alley lots are under 1,800. If street facing lots are at 0% required pervious surface alley lots should have the same standard.

DOEE has a 1,000 page manual with 30+ best management practices for stormwater. However, as proposed, the only way for alley lots to meet the pervious surface standard (beyond losing 25% of developable land) is installing green roofs. Owners need access to many tools, not just one, to solve the real and important challenges of stormwater management.

Moreover, green roofs are an expensive solution to stormwater. They cost between \$10 and 30 per extensive green roof sf. This \$10,000 - \$30,000 cost for a 1,000 sf lot will hinder projects clearing the infrastructure cost hurdle and is in direct opposition to the stated goal of building more housing. There are less costly ways to manage stormwater effectively. Owners need access to those.

Given the above, I respectfully suggest the pervious surface requirement for alley lots be: 0% <1,800sf and 10% >1,800 sf. This matches the requirements for street facing lots and

the existing pervious surface requirements in the code. Both support building more housing in DC.

I also strongly support many recommendations made by the Office of the Attorney General that did not make it into the proposed text amendment. All of which would subtly increase the amount of allowed square footage in manners that will be unnoticeable to the surrounding neighborhood:

- **proposed uniform minimum lot area at 450 sf.** This would allow the by right development of 259 more in demand small homes in RF-1. This is really an important opportunity that should not be missed.
- **reducing the required square footage for ADU units** to: R-1A - 5,025 sf, R-1B - 3,350 sf, R-2 – 2,010 sf, R-3 – 1,340 sf. (Table U 600.f.2). ADU's make a property more valuable. This will help projects get over the infrastructure cost hurdle.
- **lot occupancies at 80-100% for R-1, R-2 and RA zones.**
- **setbacks at 15' for R-1, R-2 rear and side yards.** The proposed 25' is excessive.
- **minimum lot size in R-1 and R-2 to be 2/3 of the underlying zone.**

Lastly, while the alley lot minimum width requirements for subdivision is not proposed to change from 24', **I respectfully request that the Zoning Commission consider dropping the required width from 24' to 20'.** This is the lane width I was able to use on my last project when I rebuilt an unfinished road for DDOT. Any decrease in the alley width would be helpful.

Respectfully submitted,

Tanya Topolewski, ASLA, MSRED