



January 11, 2026

Chairman Hood and Members of the Zoning Commission:

Re: Committee of 100 Comments on Case No. 25-06 – Text Amendment on Alley Lots

The Committee of 100 offers these comments on the proposed text amendment that would revise the Zoning Regulations governing alley lots. While the proposed changes are extensive, the overall structure provides a set of by-right standards for the development of alley lots with a list of more flexible standards that could be approved by special exception. C100 supports this approach, which is more sympathetic to community involvement than the matter-of-right proposals under consideration in other cases, including the text amendments calling for the up zonings in Cleveland Park/Woodley Park and upper Wisconsin Avenue (Case Numbers 25-09 and 25-13).

At the outset, we should say that we are surprised by the volume of public interest in this proposal. As of January 10, two days before the hearing, there were 221 exhibits in the record, all but one supporting the proposal, including supporting comments from three Councilmembers. We do not see how the proposal, if approved, will meaningfully move the needle on housing availability. OP's report states that there are 1897 alley lots in the city, of which 890 are vacant. OP believes that these vacant lots are the ones most likely to experience new development. Of those, 379 (43%) are less than 450 square feet in size, so would not be permitted to have a residential use unless they were enlarged through a lot consolidation. In fact, the median lot area for all the vacant lots is only 552.5 square feet, hardly sufficient for a residence after taking into account minimum yard requirements. Also, the costs of water, sewer, and electric connection, which we assume would need to be borne by the landowner, are likely to be time consuming and expensive, presenting another hurdle to development.

According to OP, city-wide there are only two vacant alley lots located in R-1A Zones, the least dense zone. It should be apparent that the proposal will not achieve additional housing in the top tier of the high opportunity, amenity rich neighborhoods that OP has targeted for additional density. This is not a reason not to go forward. We introduce these points simply as a reality check. We recognize the potential for many more units through the ADU process. It would be interesting to hear how many alley lots OP believes might be developed in the next ten years. Approximately 1000 ADUs have been permitted since the program was instituted in 2016.

OP states that the proposed text amendments are in response to requests from the Zoning Commission and the Board of Zoning Adjustment. OP provides a table that shows that, since 2016, twenty-nine alley lot cases have been filed with the Board of Zoning Adjustment. Twenty-one of these cases were approved, with six being denied (two were withdrawn). Thus, the BZA had a problem with more than twenty percent of the applications. We suggest that the Commission ask OP whether any of the denied

cases would have been approved if the by-right proposals contained in the proposed text amendments were in effect. We also wonder whether there is a pattern of deficiencies in the denials that informed OP's thoughts in drafting these amendments.

As a general comment, C100 believes that compatibility with the surrounding area should be the most decisive component of the development standards for alley lots. We support the proposed 22-foot height maximum for by-right development and agree that greater height must be approved through special exception. Many homes in the City are two stories tall. In these neighborhoods, an alley structure of greater height could very well raise incompatibility concerns. The proposed special exception standard would permit an alley structure of 35 feet or three stories in residential zones. This makes sense to us, as it would allow the landowner and the neighbors to air their positions before a neutral body.

At setdown, OP proposed to reduce the matter of right alley width for all residential uses to 15 feet, whereas today the standard is 24 feet. OP states that it discussed that proposal with FEMS personnel, who indicated a preference to keep the existing standard, which includes a special exception for alleys not meeting the MOR standard. In response, OP now proposes to leave the MOR alley width for residential uses as-is, including the existing special exception process, which allows FEMS and community review. We note alley width was an issue in an alley lot case in ANC3E, since withdrawn, where neighbors raised the issue of fire and emergency vehicle access.

Since setdown, OP deleted minimum side and rear yard dimensions and replaced them with a new minimum yard requirement. OP now states that: "After setdown, because they were identical, the rear and side yard provisions were combined to simplify the development standards table and reduce user confusion about yard location." We look forward to hearing OP's explanation of how the revised rule would work in practice. Regardless, it is clear that a sizable lot would be required.

Thank you. I'm available to answer any questions you might have.

Shelly Repp  
Co-Chair of the Committee of 100 Zoning Subcommittee  
202-494-0948; repper3@aol.com