

January 11, 2026

District of Columbia Zoning Commission
One Judiciary Square 441 4th Street, NW, Suite 200-S
Washington, DC 20001

Re: Zoning Commission Case No. 25-06, Text Amendment to Regulations Governing
Alley Lots

Chairperson Hood and Members of the Commission:

[DC YIMBYS](#) is a volunteer-led organization dedicated to addressing DC's housing shortage by providing families more housing choices of all types so that more people can afford to live in the communities they love.

We support the Office of Planning's proposal and recommend that the Commission approve the alley lots text amendment in this case. This proposal is a thoughtful way to turn overlooked, underused spaces into starter homes and small apartments to help alleviate DC's housing shortage.

However, we believe the proposal should be strengthened in targeted ways to ensure more homes can be built, including income-restricted, affordable homes, and unnecessary regulatory burden can be avoided.

Eliminate expensive parking mandates

We ask that the Zoning Commission revise the amendment to remove minimum parking requirements for alley homes.

Parking requirements are one of the biggest reasons small infill projects don't get built. On a tight alley lot, a required parking space can swallow up living space, drive up construction costs, and make a project financially impossible. It can force households to pay for parking they don't want or need. And it encourages car ownership and increased pollution in a city so walkable and transit-accessible that nearly 40% of households don't own a car.

OP's report notes that community members suggested exempting alley dwellings from parking requirements, but that this change was not incorporated into the current proposal. We believe this is exactly the kind of fix that will determine whether these text amendments result in housing in the real world.

We note that there is broad support on the record for eliminating parking mandates for alley homes. Three Councilmembers, five ANCs (including the two ANCs with the most alley lots in the District), and hundreds of District residents have written in to support removing these requirements.

Align height limits with the underlying zone

We also ask that the Zoning Commission revise the amendment to align height and unit limits with the underlying zone.

The proposed framework sets unnecessary restrictions on the height and units in alley homes which are inconsistent with surrounding buildings. These arbitrary restrictions limit the potential of this proposal to produce homes, especially in zones that already anticipate multifamily buildings.

As drafted, the proposal sets a baseline height limit for alley homes in most zones of 22 feet/2 stories. Some higher-density zones would allow up to 30 feet/3 stories. In part because of feedback they received, OP recently amended its proposal to include a special exception pathway to allow up to 35 feet/3 stories in residential zones and 40 feet/4 stories in commercial zones.

This is a step in the right direction, but introduces a burdensome regulatory process to achieve heights that, in many cases, are still lower than the limits of the zone. That added burden can kill small projects, like those we expect on many alley lots.

The proposal also limits alley homes in RA zones, which typically do not have unit limits, to 2 units. It also prohibits more than 1 unit in RF zones unless the lot is greater than 1,800 square feet, a condition which does not apply to street-facing lots.

These arbitrary restrictions severely limit the amount of housing that alley homes could provide, especially in RA zones, where street-facing buildings can reach 90 feet and hundreds of units. Limiting alley dwellings in these areas to 2 units in a 2-story building is unnecessary.

Aligning height and unit limits with the underlying zone would increase the likelihood that projects are financially feasible, produce more naturally smaller (and therefore often more attainable) homes, and better match the District's housing goals. It would also allow DC's inclusionary zoning provisions to kick in on some projects in RA zones and produce more income-restricted, affordable homes.

We note that there is broad support on the record for these provisions. Two ANCs (including the ANC with the most alley lots in the District) and over 170 District residents

have written in to support removing these requirements. In addition, Councilmember Henderson supports removing the height requirement. A supplementary presentation submitted to the case record includes specific examples of alley lots where these requirements would constrain homebuilding.

15 foot alley width

OP's setdown report proposed to reduce the matter of right (MOR) alley width for a subdivision to 15 feet. OP notes in its January 2 report that FEMS personnel indicated a preference to keep the existing standard but allow review of applications on a case-by-case basis to ensure adequate emergency vehicle access. OP now proposes to leave the MOR alley width at 24 feet but to allow subdivision by special exception on alleys of less than 24 feet in width, to allow FEMS and community review.

We support necessary requirements for emergency vehicle access, but note that this change has the potential to significantly restrict alley home building and increase burden for homebuilders. We ask that OP and the Zoning Commission explore whether the current 24 foot requirement is genuinely necessary and what modifications could be made to encourage the building of more homes while preserving emergency vehicle access.

Conclusion

DC YIMBYS supports a clear set of standards for alley homes. But DC's zoning map already reflects community expectations about scale and form. By aligning alley lot rules with existing zoning and avoiding extra restrictions, we can add homes in a way that is both predictable and fair.

We look forward to a future where DC's iconic alleys are filled with car-free starter homes and apartments, woven into the fabric of our city.

Thank you for the opportunity to testify,
Dennis Sendros
Lead, DC YIMBYS