

Erin Palmer
715 Van Buren Street, NW
Washington, DC 20012
(202) 821-6333
erin@erinfordc.com

January 12, 2026

District of Columbia Zoning Commission
441 4th Street, NW, Suite 2005
Washington, DC 20001

Re: ZC Case No. 25-06 – Support and Feedback for Proposed Zoning Text Amendment to Regulations Governing Alley Lots

Dear Chair Hood and Members of the Zoning Commission:

I am writing in strong support of the Office of Planning’s proposed zoning text amendment in Zoning Commission Case No. 25-06 to facilitate the reuse and development of alley lots. I am a Takoma resident, a former Advisory Neighborhood Commissioner, and former Chair of Advisory Neighborhood Commission 4B’s Housing Justice Committee. I have seen firsthand how land use policy shapes who can live in our neighborhoods and how difficult it can be to add even modest housing in amenity-rich, transit-accessible communities like mine. At a moment of deep and persistent housing need, enabling small-scale infill housing in established neighborhoods is both a practical and values-driven response that advances equity, access, and opportunity.

During my time as an Advisory Neighborhood Commissioner, my Single Member District included an alley lot that reflects these challenges. Over years, the property owner expressed interest in developing the site for housing, yet the lot has remained undeveloped. While I cannot speak for the owner’s specific decisions, it is clear that the existing regulatory framework creates hurdles to moving an alley lot housing project forward: even where there is interest in creating housing, the current alley lot regulations often make development complex, risky, or expensive enough that housing does not get built.

Alley Lots are a Housing Justice Opportunity. Alley lots are a modest but meaningful opportunity to support gentle density and a greater variety of housing types across the District. These lots are often located in amenity-rich, transit-accessible neighborhoods with strong access to public transportation, schools, parks, libraries, and daily necessities. Enabling housing on alley lots allows more people to access opportunity.

Incremental infill development helps distribute new housing more equitably across the city rather than concentrating growth in only a few areas. Alley homes tend to be smaller in scale and can provide naturally more attainable options, including rental units, ownership opportunities, and accessory dwellings. This kind of housing diversity strengthens neighborhood resilience and expands who can live in communities.

Bringing life and regular use to long-vacant or underutilized alley lots can also improve safety, maintenance, and stewardship of these spaces, benefits that accrue not just to new residents but to surrounding neighbors as well.

Standards should support housing production on constrained alley lots. To ensure that alley lot housing can actually be built, zoning standards must reflect the physical realities of these sites and the District's urgent housing needs. On small, constrained lots, requirements related to parking, unit count, and height are often the deciding factors in whether building housing is feasible at all. When these standards are misaligned with context and zoning intent, they function less as safeguards and more as barriers to housing.

The regulations should not include parking requirements for alley homes. For many alley lots, particularly those under 1,000 square feet, requiring on-site parking consumes scarce buildable space, increases construction complexity, and raises costs to the point where housing becomes infeasible. In amenity-rich, transit-accessible neighborhoods, these mandates frequently do not reflect how residents actually travel and instead privilege long-term vehicle storage over homes. Eliminating parking minimums would remove one of the most significant structural barriers to housing on alley lots and help ensure these sites are used for people, not parking.

In addition, I support the Office of Planning's original proposal to allow matter-of-right subdivision of alley lots abutting alleys that are at least 15 feet wide, rather than retaining the current 24-foot minimum. This change would significantly increase the usability of many legacy alley lots across the District. DC's alley network has long included alleys narrower than 24 feet, and public safety agencies routinely operate within these constraints. Allowing subdivision as a matter of right adjacent to 15-foot-wide alleys would better align the regulations with on-the-ground conditions and meaningfully expand opportunities for modest infill housing.

At the same time, unit and height limits for alley lot housing should be aligned with the underlying zone. Where zoning already allows multiple units or apartment-scale buildings on street-facing lots, more restrictive standards for alley lots unnecessarily suppress housing production and introduce cost, delay, and uncertainty. Aligning unit count and height with the underlying zone would allow projects to proceed more predictably and, in some cases, enable projects to reach a scale where inclusionary zoning or other affordability tools can apply.

These changes would put housing first on constrained sites and ensure that zoning standards do not privilege long-term vehicle storage over people's homes. With these changes, alley lots can better support small-scale, context-sensitive housing that expands access to opportunity in neighborhoods across the District.

Thoughtful flexibility through special exceptions supports better housing outcomes. The Office of Planning's proposal appropriately focuses on simplifying and clarifying alley lot regulations that have long been confusing, inconsistent, and difficult to navigate. The proposed revisions to subdivision standards, lot dimensions, yard requirements, and permitted uses will make the regulations more predictable and easier to administer, benefiting property owners, neighbors, and reviewing agencies alike.

I am particularly supportive of the use of special exception relief to allow additional height and additional residential units within alley lot buildings (like accessory dwelling units). Special exception review is the appropriate mechanism to enable more housing where site conditions support it. Housing on alley lots often requires targeted flexibility rather than rigid caps, and special exception review provides a transparent and accountable path for making those determinations.

Housing feasibility should guide how development standards are applied to alley lots. As the Zoning Commission finalizes this amendment, I encourage continued attention to how development standards affect the feasibility of housing on constrained alley lots. Requirements that are difficult to meet on small or irregular sites risk undermining the goal of new housing, even where that housing would be modest and context-sensitive.

Consistent with recommendations from the Office of the Attorney General, I support targeted adjustments to standards like lot size, yard requirements, lot occupancy, and pervious surface coverage to ensure they are not overly restrictive. Preserving open space, environmental performance, and neighborhood compatibility are important goals, but these standards should be calibrated so they do not unintentionally prevent much-needed housing from being built. Taken together, thoughtful alignment of these requirements can help ensure that alley lots are used for homes rather than remaining vacant or underutilized, advancing the District's housing goals while maintaining appropriate safeguards.

I strongly support the Office of Planning's proposed zoning text amendment in Zoning Commission Case No. 25-06 and urge the Zoning Commission to approve it. On balance the proposed amendments would not be inconsistent with the Comprehensive Plan, including when viewed through a racial equity lens. With careful implementation and close attention to how parking and other development standards affect feasibility on constrained alley lots, these reforms can help transform long-vacant spaces into homes, strengthen neighborhoods, and meaningfully advance the District's housing goals.

Thank you for your time and consideration.

Sincerely,
Erin Palmer