

The Committee of 100

on the Federal City



October 24, 2025

Mr. Anthony J. Hood, Chairman
DC Zoning Commission
One Judiciary Square
441 4th St. N.W., Second Floor
Washington, D.C. 20016

Re: Z.C. Case No. 25-11

Dear Chairman Hood and Members of the Commission:

The Committee of 100 on the Federal City opposes the provision of this proposed text amendment for the reasons set forth below. However, we would first like to express concern over the continuing cascade of text amendments filed by the Office of Planning (OP). It seems to us that whenever OP sees that a current rule blocks a proposed development, it moves to change the rule. Why do we even have rules if they can be changed to meet the whims of developers? This year, for example, the Zoning Commission at OP's request has approved accessory buildings partly built in the required rear yard of R and RF zones (Case No. 24-20). In addition, the Commission has on its docket amendments to permit what most people would consider a large deck in a rear yard without regard to lot occupancy and to increase the size of accessory buildings (Case No. 25-12).

OP now moves to increase the length of matter of right additions to semi-detached and row houses. OP's text amendment proposes extending the limit on rear additions to semi-detached and row houses from ten feet (10 ft) to sixteen feet (16 ft) as a matter of right.¹ There is no persuasive substantive reason provided by the OP for changing the zoning regulation. It doesn't provide facts to show that the current allowance for a 10-foot addition is inadequate to permit aging in place or accommodations for disabled residents. The C100 opposes the change and urges the Zoning Commission to reject it.

In our view, OP's proposal fails to give adequate weight to the negative impact the proposal will have on the access to light and air by the adjoining attached homes. Without any basis or explanation, OP states that the proposal "maintain[s] a reasonable level of light and privacy for adjoining back yards." How do they come to this conclusionary statement? The submission from ANC 3A letter states that OP

¹ More precisely, the limit applies "beyond the farthest rear building facade wall of any adjoining principal residential building on any adjacent property, whichever building façade is more restrictive" Proposed sec. 207.4, Subtitle D (R Zones) and proposed sec. 207.4, Subtitle E (RF Zones), Ex.14, ZC 25-11 Text Amendment to the Zoning Regulations Rear Additions (OP Hearing Rep. at 12, 13-14) (Oct. 17, 2025).

told them at a public meeting that it did no studies to validate its claim that there is no impact from this amendment on neighboring property.

When the 10-foot standard was promulgated in 2016, OP said in its Setdown Report:

The proposed text amendments address concerns about excessively disproportionate rear additions to adjoining row buildings.... The rear addition language establishes a ten foot limit as a matter of right and would allow for more than ten feet as a special exception. The new language would be applicable in combination with the other existing development standards such as lot occupancy and rear yards, to regulate the overall development of a lot. The ten foot rear addition limit could not be used to encroach into a required rear yard or to exceed lot occupancy.²

Nothing has changed since 2016 to make a 16-foot extension less obtrusive now that it was then. Nothing, that is, except OP's increasing willingness to accommodate applicants without regard to reasonable zoning standards, and the seeming inability of the Commission and Board of Zoning Adjustment to say no.

Also, OP relies on Comprehensive Plan provisions that encourage the production of units that are visitable, ADA-accessible, or universally designed in new housing construction. However, we all know that the real driving force here is the desire to cram as many units as possible into row house neighborhoods. Special Exception relief is available when needed. In fact, OP states in the Setdown report that it has no information on whether any of the BZA cases were based on senior or disabled issues.

Finally, this amendment does not – because it cannot – make a case that a longer addition would maintain the scale and character of a block of rowhouses or semi-detached homes or that it would not compromise the prevailing pattern of rear facades and rear yards.

The DC Comprehensive Plan Land Use Element has policies not mentioned in the OP Set Down Report that are applicable to this case.³ The prevailing limit on additions to semi-detached and row houses was the requirement when these policies were adopted by the Council to ensure the general character and scale of these types of housing and the open space that they provide.

C100 finds the current regulation is consistent with the DC Comprehensive Land Use Element, allows for a reasonable increase in living space on lots where additions will have impacts on neighbors, and

² ZC 14-11B, Ex. 1, Text Amendment to the Zoning Regulations re Rear Additions (OP Setdown Rep. at 1) (Apr. 29, 2016).

³ Policy LU-2.1.5: Support Low-Density Neighborhoods

Support and maintain the District's established low-density neighborhoods and related low-density zoning. Carefully manage the development of vacant land and alterations to existing structures to be compatible with the general design character and scale of the existing neighborhood and preserve civic and open space.

Policy LU-2.1.7: Row House Neighborhood Character

Respect the character of row house neighborhoods by ensuring that infill development is compatible with existing design patterns and maintains or expands the number of family-sized units. Upward and outward extension of row houses that compromise their design should be discouraged.

provides a Special Exception option to the regulation. We urge the Zoning Commission to reject entirely these text amendments.

Please let me know if you have any questions.

Shelly Repp
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