



Government of the District of Columbia  
Advisory Neighborhood  
Commission 6C

October 26, 2025

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

Re: ZC 25-11 (OP text amendment to increase matter-of-right rear additions)

Dear Chairman Hood:

ANC 6C writes to express its strong opposition to the proposed text amendment.<sup>1</sup>

In 2017, the Zoning Commission the current rule limiting matter-of-right rear additions to ten feet past the rear wall of any adjacent dwelling. *See* ZC Order 14-11B. In the eight years since then, ANC 6C has reviewed numerous applications for special exceptions from this rule. In our neighborhoods, dominated by row dwellings, we have found that the current standards strike an appropriate balance.

The current rule allows for substantial matter-of-right rear additions while requiring public review – and an opportunity for neighbor and ANC input – in circumstances where there may be significant adverse impacts on the air, light, and privacy afforded to the residents of adjacent homes. The threshold for approval is not unduly demanding and, more importantly, special-exception review allows for thoughtful consideration of the varying conditions that exist in historic rowhouse neighborhoods.

OP's proposal would upend that appropriately struck balance. At the time we held our vote, OP was calling for increasing the matter-of-right addition from 10 feet to 16. We believed then, and still believe, that such a change would have broad, unwarranted adverse impacts on the interests of adjacent property owners.

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<sup>1</sup> On September 10, 2025, at a duly noticed and regularly scheduled monthly meeting, with a quorum of seven out of seven commissioners and the public present via videoconference, this matter came before ANC 6C. The commissioners voted 7-0 to adopt the position set out in this letter and to authorize Vice-Chair Mark Eckenwiler (6C04) to represent the ANC in this matter.

Those impacts stem from two separate factors. The obvious, surface impact is that an owner could extend their structure an additional six feet past a neighbor's rear wall, with serious potential adverse effects on the air, light, and privacy of the neighbor(s).

The second, less obvious factor is the way in which the BZA assesses such impacts in special-exception applications for rear additions. BZA's standing practice is to measure the adverse impacts not by comparing **existing** conditions with the proposed conditions, but rather by comparing what could be built as a matter of right with the proposed conditions. If OP's proposal were adopted, owners would be heavily incentivized to build even farther than 16 feet past a neighbor's rear wall because an addition of 18, 19, or 20 feet would almost always have negligible **incremental** adverse impacts on the neighbor(s).

In its setdown report (Exhibit 2), OP attempted to justify this disproportionate change by claiming it would result in greater efficiency. This glib assertion does not withstand even casual scrutiny. First, OP identified a mere 16 cases over the past three years that would not have required relief from the 10-foot rule. *Id.* at 4. That works out to roughly five cases a year, a negligible fraction of the BZA's caseload.

Moreover, OP's analysis fails to note whether any of those applications required other areas of relief – typically for excess lot occupancy or reduction of rear yard depth below the mandatory minimum – that further undercut the claim of administrative efficiency for the BZA (or cost savings for applicants). And it stands to reason that if the proposed text amendment were adopted, many beneficiaries of the new 16' "pop-back" would still require relief in those other areas.

We note that since ANC 6C adopted its position, OP has attempted to mollify its critics by limiting the proposed 16' rule to the owner's ground floor, with upper stories allowed a smaller increase to 12'. See OP Hearing Report (Exhibit 10). It is obvious that this retreat is insufficient, for several reasons.

First, there will be instances where grade differences between two properties cause even a one-story rear addition to have serious adverse impacts on a neighbor's light and air. And even absent such topographical differences, the predictable rooftop deck on the one-story addition poses the risk of serious adverse impacts on the privacy of the neighbor(s). Moreover, OP's alternate proposal would expressly affect only R zones; as presented, the new text does not clearly make any change with respect to RF zones.

In sum, ANC 6C believes that OP's proposal (in either form) is an unjustified attempt to solve a non-existent problem. The balance struck by the Zoning Commission in 2017 made sense then and makes no less sense today.

If, notwithstanding our comments (and those in the record of numerous other opponents), the Commission is dead-set on altering the standards set eight years ago, ANC 6C urges – as a last-resort fallback position – that the Commission set the new matter-of-right addition standard at no more than 12'. This is very far from our preferred outcome, but if the standard simply must be relaxed, we implore the Commission to make the change a modest one. (For clarity, our strongly held view is that no change at all is necessary or appropriate.)

Thank you for giving great weight to the views of ANC 6C.

Sincerely,



Karen Wirt  
Chair, ANC 6C