



Commissioner Gwendolyn Lohse

Advisory Neighborhood Commission 2E, District 2E06

Testimony on 11/3/2025 on ZC 25-12

Dear Chairperson Hood and Zoning Commissioners,

The proposed Text Amendments under consideration are all proposed to be 'by right', thus proposing to remove the current review requirements. The focus of these 24 proposed Text Amendments is extremely varied and unrelated. Several entities including ANC's have understandably voiced concerns about the ability for a meaningful public review of such a vast and varied set of proposals.

Today, you will be reviewing *4 of the 24 proposed* Text Amendments. Due to the overarching 'by right' nature of the proposals, I am sharing opposition/support with conditions for 3 of the 4 sections of the proposed Omnibus Text Amendments to Subtitles A-I, U, & Y (ZC-25-12). I urge the Zoning Committee to not support these Text Amendment proposals at this time.

As you will see, my opposition is focused on the historic areas of the District and the historic buildings, one of which is in our ANC, Georgetown's federal historic district. All design proposals in Georgetown must be reviewed by the Old Georgetown Board. However, even with this, our city cannot recreate these historic districts. Taking a universal 'by right' approach for the below outlined areas is irresponsible. In doing so our city proposes to ignore the thoughtful planning needed to protect some of the District's most unique (and profitable) assets as well as public review processes that have proven to be valuable.

Balconies (proposes to amend Subtitle B 304 and Subtitle B 312)

- **RATIONALE:** Many of the new multi-story apartment/condo buildings have balconies overlooking sidewalks; these are sought after amenities for these new/converted residential buildings. These amenities make sense. However, applying a universal 'by right' balcony in our zoning regulations is not appropriate for all zones or in the city's historic districts, including ANC 2E's federal historic district. Our ANC has seen many, many, many proposals for balconies that would change the character of a neighborhood and impact the privacy and quality of life of surrounding neighbors.
 - **RECOMMENDATION – SUPPORT WITH CONDITIONS:** Oppose 'by right' balconies for all historic districts and consider cost-benefit of allowing such in residentially zoning areas for which there are many row homes or smaller lots and dense row housing such as Burleith, which are not historic districts.



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Decks (proposes to amend Subtitle B 312)

- **RATIONALE:** Not counting 200 sq ft decks that sit more than 4 ft off the ground towards lot occupancy is concerning for residential and historic areas. Maintaining lot occupancy is critical to drainage, green space, quality of life, privacy and architectural integrity. Higher deck that can project out past your neighbor and potentially into a good portion of a lot's green space does none of that. Two hundred (200) square feet is the size of many studio apartments/hotel rooms or 6 queen size beds.
- ANC 2E has heard and reviewed many, many cases involving proposed decks – and current zoning language has been extremely useful for having and encouraging dialog among neighbors. Saying the decks would not be covered does not change the fact that 200 sq ft is a large surface – potentially an entire lawn for some lots.
 - **RECOMMENDATION – SUPPORT WITH CONDITIONS:** Oppose 'by right' for historic districts and residential areas for which homes are close or immediately attached to one another such as Burleith. Adding 'by right' decks in these areas will have a negative impact on character and architectural integrity and privacy.

Lot Frontage for RF and RA Zone Subdivisions

- **RATIONALE:** As understood, the currently writing zoning language is to protect the integrity of the contributing buildings while supporting Apartment Buildings/permanent residential housing and use of public transportation. Building conversions in the RA-2 should be done carefully to meet the desired goals of RA-2, and a by right conversion means community thought and input will be bypassed.
 - **RECOMMENDATION – SUPPORT WITH CONDITIONS:** Oppose for historic districts.

I would also like to note that the above comments must also be considered in unison with the other city-wide amendments that OP has proposed to ZC (Rear Additions, and Alley Lots). The package of these proposed amendments do impact one another and someone in OP should be considering how/where the cross-overs are, e.g. re-zoning of a split lot to a more dense lot.