

October 30, 2025

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

RE: **Support** for Omnibus Text Amendment Zoning Commission Case 25-12 - re. Accessory apartments, accessory buildings, other comments

Dear Chairman Hood:

Please accept this updated testimony on behalf of the Coalition for Smarter Growth, the leading organization advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the Washington, DC region to grow and provide opportunities for all.

We wish to comment on a number of provisions in Case No. 25-12.

**Support: ACCESSORY BUILDING SIZE IN R AND RF ZONES SUBTITLES D§5003, E§5003**

Support OP proposal to increase the maximum footprint permitted for an accessory building. in the R and RF zones from 450 square feet (SF) to 600 or 550 SF. But 650 square feet would be better.

We urge the Commission to allow a more appropriate **650 square feet** for an accessory building, or for an accessory building built to be used as an accessory or second dwelling.

A 450 sq. foot building area allows for a studio apartment that can provide minimal accessible clearances for wheelchairs. However a 650 SF building area would provide flexibility to provide a one-bedroom unit that could accommodate conditions such as an aging-in-place couple or a parent and child with a disability.

If the Zoning Commission prefers to be more restrictive, without unduly burdening a proposal for a living unit design to accommodate greater accessibility, it could allow as a matter of right the 650 footprint with the following restrictions:

1. The building is limited to one (1) story;
2. The interior and exterior features provide an accessible entry into the building, an accessible route within the building and accessibility in the kitchen, plumbing and electrical elements and facilities , in accordance with the criteria in the ICC/ANSI A117.1 -2017 Standard for Accessible and Usable Buildings and Facilities.

Permitted as a matter of right, this action would incentivize accessible, universally designed units, better preparing our community for increased housing options for those with mobility impairments and assistive devices.

**Support CHAPTER 52 RELIEF FROM REQUIRED DEVELOPMENT STANDARDS FOR RESIDENTIAL FLAT (RA) ZONES - 5201 SPECIAL EXCEPTION RELIEF FROM CERTAIN REQUIRED DEVELOPMENT STANDARDS**

**Support: NEW DWELLING IN AN ACCESSORY BUILDING IN RF ZONES - SUBTITLE U§301**  
- Support OP proposal to remove the existing requirements that an accessory building must be in existence for five years before a dwelling unit is permitted within it, and expansion of an accessory building for a residence be permitted only by special exception

We enthusiastically support this change, which we have called for since the adoption of ZR-16.

**Support: SUBTITLE E RESIDENTIAL FLAT (RF) ZONES - CHAPTER 52 RELIEF FROM REQUIRED DEVELOPMENT STANDARDS FOR RESIDENTIAL FLAT (RA) ZONES - 5201 SPECIAL EXCEPTION RELIEF FROM CERTAIN REQUIRED DEVELOPMENT STANDARDS**

**Support: IZ OPT-IN PROVISIONS FOR R-2, R-3, AND RF ZONES SUBTITLE C§1001; D§201, E§201** - Support OP proposal to remove a current requirement for special exception review for opting into IZ in the R-2, R-3, and RF zones.

**Support: SUBTITLE C GENERAL RULES, CHAPTER 7 VEHICLE PARKING, 702 EXEMPTIONS FROM MINIMUM VEHICLE PARKING REQUIREMENTS** - Support revision of Bus priority corridors language. We strongly support deleting a clause related to the parking reduction along bus corridors and street eligibility for Residential Parking Permits. We agree this is administratively difficult and also unnecessary.

**Support: SUBTITLE C GENERAL RULES - CHAPTER 7 VEHICLE PARKING - 701 MINIMUM VEHICLE PARKING REQUIREMENTS** - Support removal of parking requirements under ZR-58.

**Issues not addressed in this case**

A number of important issues were not addressed in this case. In addition to our comments above, we wish to make the following recommendations:

- Eliminate parking requirements entirely. Vehicle parking requirements unnecessarily consume costly space that might otherwise have a better use and lowers the cost of housing.
- Regarding accessory apartment provisions - we are happy to note that three of our top recommendations are addressed in Case 25-12. Here is the list of our remaining recommendations:
  1. Eliminate parking replacement requirements.
  2. Eliminate the requirement that an accessory apartment can only be permitted on the second story of an accessory building in R-19 and R-20 zones.
  3. Remove special exception requirements for accessory apartments in the R-19 and R-20 zones.
  4. Allow more flexibility for non-conforming properties.
  5. Eliminate the owner occupancy requirement in the R zones.

6. Permit cellar/basement accessory apartments to use the full footprint of the principal dwelling even if the size of the accessory unit exceeds 35% of the gross square footage of the principal dwelling.

Thank you to OP, OZ, and the Zoning Commission for the painstaking work on this code revision. We appreciate the effort.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort

Policy Director