

The Committee of 100
on the Federal City



October 30, 2025

Re: Case No. 25-12

To: Chairman Hood and Members of the Zoning Commission:

Below are the Committee of 100's Comments on the proposed text amendments to be discussed at the Zoning Commission's Public Hearing on November 3, 2025. At the hearing Aidan Jones will be testifying for the Committee of 100. Please contact Mr. Jones if you have any questions (202-493-2386); aidanjones20016@gmail.com).

Balcony and Gross Floor Area (FAR) Exemption (OP Setdown Report #4)

Brief Summary of the Proposal. OP proposes to exempt inset balconies up to 6 ft depth from GFA (By Zoning Administrator Interpretations inset balconies are not exempt from GFA). OP also proposes for external balconies to increase the exemption from GFA from 6 ft. protrusion to 8 ft.

Committee of 100 Comment.

- a. For example, for inset balconies, assuming a balcony of 12' width, 72 sq. ft. of every inset balcony in a building would be exempt from GFA. Assuming an average apartment size of 480 sq. ft. in the building, and assuming all apartments had inset balconies, such exemption would amount to 10% from GFA for every apartment. If the IZ requirement in such a building of 200 apartments were 20 apartments, this exemption would result in a diminution of at least 3 IZ apartment units.
- b. For external balconies, increasing the exemption from GFA from 6 ft. protrusion to 8 ft would also result in diminution for IZ apartment units.
- c. This proposal conflicts with citywide policy to produce more affordable housing. OP should not be designing buildings through zoning regulations, nor should OP be encouraging balconies that contribute to higher rents, especially when doing so directly reduces the amount of affordable housing produced.

d. Also, rents for apartments with balconies (inset or external) are higher and usually with less internal sf than apartments without balconies. This encouragement to build balconies conflicts with efforts to provide more affordable housing - not only subsidized units but also a general lower price point that more households can afford also contributes to smaller apartment units. The Zoning Commission should reject the amendments to Reg §304 as an anti-affordable housing proposal.

e. These proposals would reduce the square footage used to calculate affordable housing, conflicting with citywide policy. OP should not be encouraging balconies that contribute to higher rents when doing so would reduce affordable housing.

Balconies and Lot Occupancy Exemption (OP Setdown Report #5)

Brief Summary of the Proposal.

OP is proposing to exempt open balconies to a maximum depth of eight feet from lot occupancy.

Committee of 100 Comment. The Zoning Commission should also reject the amendment to Reg §312. OP's proposal could result in a wall of external balconies extending 8 feet from the building wall. This will affect the use and aesthetic of open space and could loom over a public sidewalk depending on where the building is sited on a lot. It is a fantasy to think that structure above the ground level is somehow not really a structure. OP staff may be considered expert planners, but they are not architects, and they should not be designing buildings, which is what they are doing when they propose regulations that incentivize one type of architectural feature.

Ground Level Deck Lot Occupancy Exemption (OP Setdown Report #6)

Brief Summary of Proposal. OP proposes to exempt 200 SF of a deck from lot occupancy limitations if it adjoins the main level of a house. Currently, decks no taller than 4' off the ground are exempt. Per the OP proposal only the deck SF that is in excess of 200 SF would apply to the lot occupancy calculation.

Committee of 100 Comment. Encouraging or incentivizing tall decks primarily in rowhouse zones aggravates an already sensitive issue. This proposal would essentially allow 200 SF of bonus structure which in a rowhouse zone could mean a deck 10 foot deep and the full width of the house even if the lot occupancy were already maxed out. Like the balcony amendment (Proposed Amendment 5), OP's proposal would add structure whether or not it affects affordability and even if it limits our ecosystem and the potential for biodiversity. No one will be planting under the deck. The deck proposal also removes an expectation for neighbors that nothing tall will be built on a neighbor's property that exceeds what they are allowed to build per the zone designation.

The Zoning Commission should reject this proposed change to Reg B§ 312

Thirty Foot Frontage for Apartment Building Subdivision (OP Setdown Report #7)

The Committee of 100 has no position on this proposal.