

March 7, 2018

Mr. Frederick L. Hill, Chairperson
Board of Zoning Adjustment
441 4th Street, NW
Washington, DC 20002

RE: Support for alley lot conversion from tax to record lot, pertaining to BZA Case No. 19683

Dear Chairperson Hill and Members of the Board:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, DC region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We request that the BZA enable the conversion of historic alley tax lots to alley record lots, as it would for street-facing lots. Similar treatment would also enable the conversion of historic tax lot to record lot when the lot does not meet the excessive standards of 1,800 square feet and 24-foot alley width. This approach would support the predictable development of historic alley lots and fulfill the intent of ZR16 to foster more housing opportunities in appropriate locations.

We were pleased when the DC Zoning regulations were updated in 2016 to allow residential uses in alleys. Given the District's many historic alleys and history of residential use, we strongly supported new rules to allow lots and alley buildings for dwellings. Alley housing is an important additional source of housing opportunities for a growing population and helps accommodate new homes in a discreet way in historic neighborhoods. Many of these historic neighborhoods offer desirable features such as access to transit, employment, education, training, and services.

We are concerned, however that the zoning code, while facilitating the development of housing in historic alley lots with certain restrictions, made an unintended distinction between alley record lots and alley tax lots. We are writing to ask the Board to support consistent treatment of historic alley lots for the purposes of creation of new housing opportunities. In light of ZR16's intent to facilitate alley lot housing, we ask that an alley tax lot in a historic area be afforded the same treatment as a street-facing property, allowing the conversion of a tax lot to a record lot.

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Support for historic alley tax lot conversion to record lots per BZA Case No. 19683

Coalition for Smarter Growth

Even when a street-facing lot does not meet minimum lot size requirements, a tax to record lot conversion is a straightforward process. We ask that the same treatment be provided to alley lots. Given how many existing historic lots do not meet minimum lot size requirements, it is inconsistent with ZR16 goals to single out alley tax lots for overly restrictive treatment. Holding historic tax lots to the excessive standards of 1,800 square feet and 24-foot alley width is contrary to the overall intent to support residential uses in alley. Given that residential uses for alley lots are permitted with a 15-foot wide alley within 300 feet of a public street, we ask that historic alley tax lots not be excluded from this zoning standard.

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