



GOVERNMENT OF THE DISTRICT OF COLUMBIA

Advisory Neighborhood Commission 2E

Representing the communities of Burleith, Georgetown, and Hillandale

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November 9, 2025

Mr. Anthony Hood
Chairperson, Zoning Commission
441 4th Street NW, Suite 200S
Washington, DC 20001
zcsubmissions@dc.gov

RE: Proposed Text Amendment (ZC 25-06) Amend the Zoning Regulations Governing Alley Lots

Dear Chairperson Hood,

On November 3, 2025 ANC 2E held its regularly scheduled public meeting, which was properly noticed and attended by eight commissioners, constituting a quorum. At this meeting the Commission adopted the following resolution by a vote of (8-0-0) with regard to the above-referenced matter:

In reference to Zoning Commission case 25-06, which proposed to change the Zoning Regulations Governing Alley Lots, ANC 2E appreciates the steps taken by the Office of Zoning to clarify the alley lot regulations and to make adjustments to facilitate the use, development and improvement of underutilized alley lots. The proposed changes would be by-right, thus no review required.

We understand that last week (on the day of our ANC meeting) you postponed the hearing on these proposed amendments from November 13, 2025 to January 12, 2026. Thus, this resolution addresses our current concerns regarding the proposed regulations, but our position may be updated prior to the hearing based on input from you, Office of Planning or feedback from constituents.

According to the Office of Zoning, Georgetown has 180 alley lots, roughly 50 of which are vacant. ANC 2E requested a copy of the alley lots for ANC 2E (see [Attachment A](#)). It is unclear from this map how many of these lots would or would not be impacted by the proposed language change given their size, current usage and ability for adjoining alley lots to be merged to meet the newly proposed alley size requirements. Thus, the scale of lots impacted within ANC 2E is not clear, including for the federal historic area of ANC 2E. This said, some of the existing alley lots are in poor condition, while others are not.

COMMISSIONERS:

Kishan Putta, District 1	Topher Mathews, District 2	Paul Maysak, District 3
Peter Sloniewsky, District 4	Mimsy Lindner, District 5	Gwendolyn Lohse, District 6
Daniel Chao, District 7	Knox Graham, District 8	

The relatively modest changes proposed by the Zoning Commission would make it easier for the owners of these lots to take steps to improve the property by constructing new housing.

Of the 180 alley lots in Georgetown, 75 are less than 450 square feet. Under existing regulations, that will be unchanged by the proposal lots smaller than this threshold are not eligible to be used for residential purposes. Thus to convert these to alley dwellings, the lots would need to be joined with adjacent lots to meet the lot size minimum, which is possible in several spots. The proposed rule changes would make such subdivisions easier (subdivision is merging two lots).

We support this move to facilitate improvements to alley lots, understanding that any subdivisions in Georgetown will continue to be reviewed by the Historic Preservation Review Board and any proposed building designs in the federal historic district must be reviewed by the Old Georgetown Board (OGB). ANC 2E also requests the Commission ask for Office of Planning to adjust the proposed Alley Lot zoning regulation language to ensure the proposed changes address:

- Airbnb: The proposed amended Section U.600.1 appears to enable the use of alley dwellings for short term rentals as an accessory use. It is unclear to ANC 2E whether this change would enable free-standing AirBnB style rental homes on alley lots, which we object to and request the language is clear that freestanding Airbnb that are not part of a primary residence of a DC taxpayer are not allowed. All too often ANC 2E is seeing free standing residential homes and condos used as full time Airbnbs, and not permanent housing. Airbnb rules in DC are to help owners with mortgages, thus per DC law any AirBnB must be on the tax record of an individual (not an LLC) and that individual's home where the Airbnb is must be the individual's primary residence per their filed taxes. Given the semi-private nature of alleys and experiences to date with illegal Airbnbs, we do not believe a steady stream of short term visitors would be a positive addition, plus it would not meet the goals of increased permanent housing. Moreover, hundreds of new hotel rooms have been built in Georgetown in the last few years. These hotels employ a significant number of people. Clarify what is and is not proposed.
- Height: Confirm that the newly proposed language is allowing for no more than two stories with no penthouse option, including special exceptions.
- Parking: Parking minimums can dramatically increase the cost of housing construction and make the smaller dwellings contemplated by these changes economically unfeasible. The changes are unclear on the requirements to construct parking in any new alley dwelling. All of ANC 2E has no metro and reduced bus service as of June of this year. ANC 2E certainly supports the ability of alley lot owners to construct parking along with new housing or solely parking, but it also supports giving the owners flexibility to not construct expensive parking if they do not wish to do so. Confirm parking or no parking is allowable.

Alleys can be a vibrant part of an urban neighborhood. Georgetown has a rich history of alley dwellings and maintains many of those vintage dwellings to this day on streets like Pomander Walk and Poplar Street. Steps taken to enable this history to continue would be

consistent with the historic fabric of the neighborhood. It is understood, of course, that any such construction would continue to be reviewed by the Old Georgetown Board to ensure the impacts are consistent with the principles of historic preservation.

Commissioners Gwendolyn Lohse (2E06@anc.dc.gov) and Topher Mathews (2E02@anc.dc.gov) are the Commission's representatives in this matter. In the coming weeks we hope to have a dialog with the Office of Planning or Zoning Commission staff regarding our comments so that we can prepare for the new hearing date in January 2026 and update our comments accordingly.

Respectfully submitted,

A handwritten signature in black ink, reading "Gwendolyn Lohse", followed by a long horizontal flourish line.

Gwendolyn Lohse
Chair, ANC 2E

ATTACHMENT A

