



October 5, 2026

Paul Stoddard, Director,
Department of Planning and Zoning
City of Alexandria
City Hall, Room 2100
Alexandria, VA 22314

Re: Master Plan Amendment #2026 - 00002 / Zoning Text Amendment #
2026-00003: CHanges to Special Use Permit requirements for substandard lots

Dear Mr. Stoddard:

The Executive Board and the Land Use Committee of the Del Ray Citizens Association support, in part, the proposed amendments to the Zoning Ordinance to establish new regulations for the development and redevelopment of substandard lots (the "Proposal"). The proposal contains two tests; a lot that meets either test could be developed or redeveloped without the need for a special use permit ("SUP"). We support the proposed "90%" test, where a lot that has a size, width, and frontage equal to at least 90 percent of the zone's minimum requirements would no longer require a SUP for development or redevelopment. We understand that of the approximately 2,900 substandard lots City-wide, approximately 290 would meet this test.

The second test, the "block face" test, would require a substandard lot to be at least as large, wide, and have as much frontage as more than 50 percent of lots within the "contextual block face." The Zoning Ordinance defines contextual block face as: "abutting property developed with buildings that share a common street frontage or frontages with the property in question." The Staff's analysis concludes that about 1640 substandard lots would meet this test, or about 56% of the substandard lots city-wide.



We support the 90% test because it is clear and easily calculable. The block face test yields inconsistent results; two similar substandard lots could be treated differently depending on their surrounding lots.

Del Ray contains a significant number of substandard lots, and has experienced an increase in infill development in the last ten years. The destruction of older houses and their replacement with larger houses (sometimes with ADUs) has concerned many Del Ray residents. The SUP process gives residents notice and the opportunity for public comment; in our experience residents have raised concerns about flooding, tree removal, and structures that are oversized or do not reflect the development pattern of Del Ray. It is time to revisit the City's Infill Development regulations, and the DRCA LUC is interested in continuing to work with Staff and the Planning Commission to craft future Text Amendments and Zoning changes that help reduce overdevelopment of individual lots while simultaneously addressing our housing shortage.

To ensure consistency and transparency in future land-use reviews, the Department of Planning & Zoning should clearly outline the official procedure used to verify parcel status. Specifically, the guidelines must establish a standardized process for determining whether a non-conforming parcel was legally recorded pursuant to the substandard lot criteria—qualifying it as a buildable lot of record—or if it was instead created and designated as a non-buildable outlot or lot remnant. This determination should be required as the first step of any substandard lot review.

We understand from the Staff that most SUP requests are approved, and that the SUP process typically takes about three months, which can lead to delays in construction. We are not trying to stop development of substandard lots. But by removing more than half of the substandard lots in the City (many in Del Ray) from the SUP process, the Proposal would deprive residents of notice and a chance





to express their views on development in their neighborhood. The City should encourage rather than seek to eliminate citizen engagement.

Thank you for your consideration of this letter.

Sincerely,

Monica Parry and Amy Vander Vliet, Co-Chairs
Del Ray Citizens Association
Land Use Committee

Caitlin Leach, President
Del Ray Citizens Association

Cc: Sam Shelby, Principal Planner

