



AIA Washington DC

The Washington Chapter of the American Institute of Architects

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WASHINGTON CHAPTER OF THE AMERICAN INSTITUTE OF ARCHITECTS

September 25, 2008

Testimony of the Washington Chapter/AIA to the District of Columbia Zoning Commission Regarding proposed changes to the Zoning Code related to Building Height

Good evening Chairman Hood and distinguished members of the Commission. My name is Barbara Laurie. I am President of the Washington Chapter of the American Institute of Architects. I am speaking today on behalf of our Chapter, which represents more than 1875 architects who live and practice in Washington DC and the surrounding metropolitan community. The Chapter is pleased to be part of the Task Force and commends OP's process for its inclusiveness. We support many of the height recommendations such as:

1. **Recommendation A.1:** Allowing any street abutting a building to be used to determine maximum height will allow building entrances to be placed in the most optimal location for the site rather than through a contrived standard.
2. **Recommendation A.3:** Providing greater clarity regarding the determination of residence and business streets by block face rather than by property will ensure that low and moderate density residential areas are protected (precluding future buildings higher than 90 feet) and medium-to-high-density residential areas are potentially allowed greater height (up to 130 feet).
3. **Recommendation B.3:** Requiring measurements to be from natural grade rather than artificial elevations such as bridges or ramps is an important clarification that will prevent abuses of the intent of the zoning regulations.
4. **Recommendation B.4:** Allowing four-foot parapet heights on buildings under the maximum height permitted by the Height Act is a significant improvement that is much more practical with respect to the thickness of roofing assemblies and code-required guardrail height. This will allow the integration rather than separation of parapets and guardrails. This change is in keeping with the current movement towards sustainable design and green roofs as well as the reconsideration of underutilized roof areas as amenity space.

ZONING COMMISSION
District of Columbia

CASE NO. 08-06-1
EXHIBIT NO. 25

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5. Recommendation C.1: Clarifying that

- a. ornamental features can be used to cover/hide/mask utilitarian or amenity features;
- b. adding building components for environmental sustainability to the definition of Utilitarian features; and
- c. adding a provision for enclosed recreation space, structures accessory to communal recreation space, and communal pergolas (accessible to all building tenants) to the definition of Amenity features

are all important refinements to current definitions. We strongly support the recommendation for communal recreation space which will allow for the use (but not occupancy) of rooftop amenities and enhance the quality of life / urban experience for building occupants. We believe that it is unrealistic and inappropriate that rooftop recreation space be included within the allowable FAR envelope, as suggested by a few participants in the working group.

6. Recommendation C.2: Limiting rooftop structures to 40 percent of the total area and removing the requirement for uniform height; increasing the allowable height of penthouses to 20 feet; and allowing special exceptions for utilitarian and amenity features enclosed within ornamental features not setback from exterior walls are all important refinements to current definitions that will allow greater flexibility in the design of the upper portion of buildings. However, we agree with OP's suggestion that rooftop structures in low and moderate residential zones may require different standards than those in business zones.

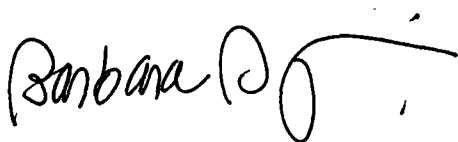
In addition, we applaud OP's insertion of graphic illustrations that help to clarify the intent of the recommendations. We hope that these types of illustrations will be incorporated into the updated zoning regulations.

However, we have concerns regarding several recommendations which we believe need additional review by OP and the Commission:

1. **Recommendation B.2** While we agree that allowing a two percent gradient from curb to property line with a twelve inch cap will result in better relationships between buildings and the adjacent streetscape and reduce the need for contrived first floor elevations (depressed entries), we are concerned, however, that the Office of Planning's comment response was not definitive. This recommendation will create a much better urban design solution that will result in improved public space. We recommend that OP provide an illustration in order to explain the importance of this concept.

2. While **Recommendation A.2** provides much greater clarity of interpretation, OP points out the current zoning regulation relationship between wider streets and taller buildings and lack of a relationship between larger open spaces and taller buildings. OP states "This disjunction may warrant additional consideration." When energy efficiency and smart growth are so important to the future of our city, we believe that greater density and mixed uses, especially in areas that are Metro accessible, are appropriate. With creative design and careful massing, additional density and height can be integrated into buildings adjacent to public reservations. Thus, we support an approach that would provide flexibility for taller buildings adjacent to larger open spaces. The 1910 Height Act reinforces this approach by allowing height to be determined from the width of the widest street adjacent to public space.
3. **Recommendation B.1:** We do not support Option 1, which is a significant change from current practice and will reduce allowable density of sites abutting multiple streets. Again, when energy efficiency and smart growth are so important to the future of our city, we believe that greater density and mixed-uses, especially in areas that are Metro accessible, are appropriate. The massing concern raised by OP can easily be mitigated by requiring setbacks from the narrower street and the wider street rather than making a drastic change to existing practice. If the slope in OP's illustration is reversed and their recommendation is followed, the result is still a taller building on a narrow street. However, this massing problem can also be easily mitigated by requiring setbacks on the narrow street. Thus, we strongly support Option 2 which reflects existing practice and over 50 years of precedent, while enhancing a smart growth strategy for the future of our city. The Height Act will always serve as a backstop to prevent excessive height.
4. **Recommendation C.2** as it relates to limiting the height of ornamental features to 30' unless approved by special exception is a significant change from current practice. We recommend that the current practice be maintained.

We look forward to continuing to work with OP on the Task Force and Working Groups to further refine the proposed revisions to the zoning regulations. By working together we believe that the resultant changes to the regulations will be in the best interest of the community as a whole.

A handwritten signature in black ink, appearing to read "Barbara", followed by a large, stylized flourish or loop.