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**Outline of Comments on ZRR (ZC Case 08-06 et al)**

- WHEW! This case has been underway for a long time and the record is huge, maybe even larger than you think (08-06-01 - 08-06-15, 08-06A and Height (see ZC Orders 08-06-B and 12-11, and another for GAR) -- **What is "the record" you will have in front of you going forward?**
- Most recent text proposals include a host of definitional changes, along with clusters of uses ("use groups"), the latter more or less conceptual so far.
- There are many defined terms. One class of definitions specifies areas, heights, widths, minimum yard widths or depths, setbacks, etc , and have explicit or implicit **rules of measurement**, some also already have helpful **proposed diagrams; the more, the better.**
- Harmonize with the Height Act to extent possible (as stated in ZC Order 08-06-B)
- Definitions are now set out at section 199.1 (for the most part -- a big, and confusing, exception is "building, height of" in Residence districts)
- Consider adopting at least the definitions that provide specification of measurement in the near future **within a modestly reorganized 199.1** (to avoid regulatory havoc):
  - (a) General definitions (those that are not measurement --all not in (b))
  - (b) Definitions that measure, with accompanying **"Rules of Measurement"** that are outside of the definition itself (see height for a host of complex rules, also FAR for perimeter rule) **and diagrams (Definitions, rules of measurement and diagrams need to be co-located (columns) in the code, not chapters away from each other)**
  - (c) Use groups (for eventual application, but not now -- just have it ready for use later on as zone-specific rules are refined)
- **Anticipate arising non-conformities (height, FAR for example) just from definitional/measurement rule changes** Protect owners and land from inadvertent definitional damage (grandfather); give the ZA authority to make minor allowances while informing ZC of fact pattern involved for possible adjustment short of full rulemaking.
- Consider why the regulations still require "record lots" when modern survey data have seemed fully adequate for years (unlike the bad old days)
- Consider effective date of changes, phase in or opt in Maybe let old rules linger a while and be an option to use, but publish the new ones pronto and allow use (front door) or allow back door to prior rules for a while.