



AIA Washington DC

The Washington Chapter of the American Institute of Architects

February 4, 2014

Anthony Hood

Chairman

DC Zoning Commission

One Judiciary Square

441 4th Street NW, Suite 200 South

Washington, DC 20001

Re: Zoning Case No. 08-06A

Dear Chairman Hood and the D.C. Zoning Commission:

Please accept these comments on behalf of the Board of Directors of the Washington Chapter of the American Institute of Architects (AIA|DC). AIA|DC represents more than 2,100 architects in Washington and is the fifth largest chapter in the country.

We very much appreciate the process that the Zoning Commission, Office of Zoning and Office of Planning have undertaken to bring the city's zoning code into the 21st Century. We commend the work and extensive public outreach that has been done. It's clear that the Commission has listened to the public and softened a number of requirements that were particularly controversial. We believe that the ZRR addresses many of the 'hot button' issues such as building height measurement, chancery location and changes to the PUD process in a way that will protect neighborhood character yet still allow our city to grow and prosper. As a result, the draft is a thoughtful but relatively modest update to a very old code. We offer the following observations and recommendations in support of the ZRR:

Complexity of the code

The complexity of the updating the code required making some difficult choices about format. We understand that instead of simplifying the document zone-by-zone you have tailored it to the specific circumstances of neighborhoods. While this may make it harder to read from a city-wide perspective, this format may make it easier to use on case-by-case basis. This may remove some of complexity for an individual user. This format choice is consistent with other cities similar to Washington with complex codes such as San Francisco and Boston. Boston's code, in fact may be more complex, containing three volumes and 73 articles. Its code, however, has a searchable database by address and includes clear graphics, which we recommend for reference and application in DC.

Parking Requirements

We strongly support the reduction in the parking minimums as it more accurately reflects changes in travel behavior that are present in the city today – let alone how they may further manifest in the coming decades. With Metro, buses, a new streetcar system, car-sharing services and Capital Bikeshare, to name just a few options, there are many ways to travel around the city other than by car. The proposed reductions to parking minimums in areas well served by transit, the standardization of 1:3 ratio for multifamily housing and allowing a special exception to further reduce parking are all reasonable.



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ZONING COMMISSION
District of Columbia
CASE NO.08-06A
EXHIBIT NO.509

Accessory Apartments

Recent Census Data shows that Washington DC is the city with the largest percentage of people living alone in the country. This warrants greater attention and our Chapter is currently looking at many housing alternatives, some of which would be lower cost. Included in those alternatives are well-designed accessory apartments that can provide both lower cost housing and help to improve the age and income diversity of neighborhoods. Making these conversions easier will improve housing choices around the city and also help to support neighborhoods where large numbers of citizens are aging in place.

Making rooftops look better: Height and form of Mechanical Penthouses

In the discussions of the 1910 Height Act, AIA|DC recommended that the height of mechanical penthouses be increased to 20 feet above the height of the roof or any green roof-like system (from the current requirement of 18.5 feet) to better conceal mechanical equipment to improve the design of Washington rooftops. Although there has been a controversy about changing overall approach to the Height Act, most witnesses agreed that this proposal would provide a modest improvement to the design of rooftops. Since it is the Zoning Code that specifies a particular height, we recommend that this very modest increase be included in the update, as part of Subtitle C – Section 505.3.

In addition, we believe that the requirement of “enclosing walls from roof level shall be of equal height” can lead to very big, bulky roof structures. Variation of height could provide better designed rooftops while still masking the equipment. We recommend that this requirement be removed in the following sections: Subtitle D – Section 1502; Subtitle E –Section 1002.4; Subtitle F – Section 1001.3.

In summary, we commend the Zoning Commission for its five-year effort to update the Code. We appreciate the significant tradeoffs that had to be made to make such a complex document workable. With the minor addition noted above, we believe this update will improve the city and we urge its adoption.

Sincerely,



Sean Patrick Nohelty, AIA
President



Mary Fitch, AICP, Hon. AIA
Executive Director