



August 19, 2014

Anthony Hood
Chairman
DC Zoning Commission
441 4th Street NW, Suite 200 South
Washington, DC 20001

2014 OFFICERS

Sean Patrick Nohelty, AIA
President

Steven White, AIA
President Elect

Sean Stadler, AIA
Treasurer

Carolyn Sponza, AIA
Secretary

David Haresign, FAIA
Past President

Mary Fitch, AICP, Hon. AIA
Executive Director

Re: Zoning Case No. 08-06A

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

In our testimony before the Commission on February 26, 2014 we asked, at the request of our members, that the height of mechanical penthouses be increased from 18.5 feet above the level of the roof to 20 feet above the height of roof or green roof-like structure. We explained the current height often limits the type of elevator equipment that can be used, especially with standard traction elevators. In addition we also requested that the provision that requires enclosing walls to be of equal height be modified to allow some design variation. Two members of the Commission requested additional information on these topics which is provided below.

1. Height of Mechanical Penthouses

1.1. GAR requirements make the current height of penthouses problematic

Allowing an additional foot and one-half on the height of mechanical penthouses will help architects and builders more easily meet the GAR. Often to meet these requirements a large portion of the roof need to be planted. This leaves less room for necessary mechanical equipment. Such equipment could be stacked if the height requirement were relaxed as proposed.

1.2. Traction elevators bump up against the height limit with a planted roof

To bring an elevator to the roof, the door of the elevator should be flush with the level of the plantings. Because the plantings are generally on a raised bed this can push the mechanical equipment for a traction elevator outside the current height restriction. While traction elevators aren't used in every project, giving builders a choice in elevator equipment helps reduce cost. Rather than require a variance or special exception for one type of elevator but not another, we believe this modest increase would save administrative time and serve the public interest.

1.3. A similar increase in height is proposed for residential buildings

On July 24 the DC Office of Planning presented a report (ZC-14-13) to increase the height of rooftop penthouses in non-low density residential development. While this proposed text amendment has not been acted upon yet we understand that it is to address the one change made to the 1910 Height law: a 20-foot height limit on penthouses. In addition to the reasons noted above we believe having a standard height for penthouses will be simpler for all parties.



Where Architecture
Meets the City

421 7th Street, NW
Washington, DC 20004
p: 202.347.9403
f: 202.347.9408

www.aiaadc.com

ZONING COMMISSION
District of Columbia
CASE NO.08-06A
EXHIBIT NO.756

2. Enclosing walls of varying height could improve the design of many building

In our February testimony, we also requested modification to the requirement that enclosing walls be of equal height. We believe structures can be more visually interesting if the walls aren't required to be so monolithic. While one commissioner noted that one isn't supposed to be able to see mechanical penthouses, given DC's building height, the truth is, even with setbacks, these enclosing walls are often quite visible. While walls still need to enclose some rather tall things like water towers and elevators, allowing some variation when enclosing lower mechanical equipment could add to the design quality of a building.

Thank you for the opportunity to present additional information in support of our testimony. We are happy to work with the Commission and the staff if further documentation is required.

Sincerely,



Mary Fitch, AICP, Hon. AIA
Executive Director



Sean Nohelty, AIA
President