



September 15, 2014

Anthony Hood, Chairman and Members  
Zoning Commission of the District of Columbia  
One Judiciary Square, Suite 210-South  
441 Fourth Street, NW  
Washington, DC 20001

Re: **Floor Area Ratio Definition in ZC Case 08-06A** (Alternative Language to Certain Advertised Text - Title 11, Zoning Regulations – Comprehensive Text Revisions) and Adjusting Same to Clarify Provisions Relating to Ramps in Garages (on behalf of PDS) and Better Calibrate the Exclusions (on behalf of LW)

Dear Chairman Hood and Members:

This submission is on behalf of both Parking Development Solutions and citizen Lindsley Williams, both of whom raise issues with the definition proposed mid-July by the Office of Planning for which we have suggested adjustments that would resolve the problems we identify.

Briefly, PDS notes that the “ramp” provisions exclude certain ramps and drive aisles that lead to a **“parking garage”** as proposed. That is a defined term, elsewhere, and that could be an issue with unintended consequences. Thus, for that, PDS suggests that the focus be on “vehicular storage areas” instead and possibly add related provisions to exclude, if below grade, namely “loading and service delivery” areas.

PDS also notes that the point where the exclusions begin, as proposed, is tied to the **“ground floor,”** another defined term. This poses a potential problem for sites where vehicular entrances are higher than the ground floor. Driveways and public alleys can lead to entrances well above the ground floor and, to the extent that is the case, the ramp exclusion should apply, albeit just to the area of ramps and drive aisles, not any flanking parking, loading, or service delivery areas.

Lindsley Williams, adds the following comments and recommendations:

- The order and manner in which the exclusions are written could be interpreted several ways. To correct that, he suggests that the rule restate that any area **below the basement be excluded**, and that **areas at or above the basement be included unless otherwise exempted**.
- Elevator floor areas are currently “counted” at every floor level at or above the basement through which the elevator passes, whether it serves that floor or not. The only “floor” to an elevator is its cab and it cannot be at more than one floor at a time, though the pit could itself also be counted as a floor if at or above the basement level.



Attached please find a chart that lays out the existing, OP's Mid-July Recommendation, and the combined suggestions of PDS and Mr. Williams

Thank you.

A handwritten signature in black ink, reading 'Frederick E. Gorove'.

**Frederick E. Gorove**  
Founding Member  
Direct: (202) 293-7263  
Mobile: (202) 550-4006  
[fgorove@parking-pds.com](mailto:fgorove@parking-pds.com)  
[www.parking-pds.com](http://www.parking-pds.com)

A handwritten signature in black ink, reading 'Lindsley Williams'.

**Lindsley Williams**  
3307 Highland Place, NW  
Washington, D.C. 20008-3234  
Land Line: (202) 537-4884  
Email: [LWilliams@his.com](mailto:LWilliams@his.com)

Attachment

| Floor Area Ratio in the District of Columbia Zoning Regulations – Existing, Advertised, and Combined Recommendations of PDS and LW                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Existing Definitions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Definitions Advertised for Hearing July 2014                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | What PDS and LW Recommend Mid-Sept 2014                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><b>Gross floor area</b> - the sum of the gross horizontal areas of the several floors of all buildings on the lot, measured from the exterior faces of exterior walls and from the center line of walls separating two (2) buildings</p> <p>The term "gross floor area" shall include basements, elevator shafts, and stairwells at each story; floor space used for mechanical equipment (with structural headroom of six feet, six inches (6 ft., 6 in.), or more); penthouses; attic space (whether or not a floor has actually been laid, providing structural headroom of six feet, six inches (6 ft., 6 in.), or more); interior balconies; and mezzanines.</p> <p>The term "gross floor area" shall not include cellars and outside balconies that do not exceed a projection of six feet (6 ft.) beyond the exterior walls of the building. (Case 62-32, May 29, 1962)</p> | <p><b>Floor Area, Gross (GFA):</b> The sum of the <b>total</b> gross horizontal areas of <b>all of the</b> several floors of all buildings on a lot, measured from the exterior faces of exterior walls and from the center line of walls separating two (2) buildings.</p> <p><b>GFA</b> shall include basements, elevator shafts, and stairwells at each story; <b>;</b> floor space used for mechanical equipment (<del>covered parking and ramps</del> with structural headroom of six feet, six inches (6 ft., 6 in.), or more) <b>;</b> penthouses <b>;</b> attic space, (whether or not a floor has actually been laid, providing structural headroom of six feet, six inches (6 ft., 6 in.), or more) <b>;</b> interior balconies; and mezzanines.</p> <p><b>GFA</b> shall not include cellars, exterior balconies that do not exceed a projection of six feet (6 ft.) beyond the exterior walls of the building, all projections beyond the lot line that may be allowed by other Municipal codes, vent shafts, and pipe <b>chaser</b> shafts above the ground floor, atriums above the ground floor, ramps on the <b>ground floor</b> leading to a <b>parking garage</b> on a lower level; and in residential zones, the first floor or basement area designed and used for</p> | <p><b>Floor Area, Gross (GFA):</b> The sum of the <b>total</b> gross horizontal areas of <b>all of the</b> several floors of all buildings on a lot, measured from the exterior faces of exterior walls and from the <b>centerline</b> of walls separating two (2) buildings.</p> <p><b>GFA</b> shall include <b>basements</b>, and, <b>where at or above</b> <b>basement levels, the areas of: the floors of elevator cabs and elevator pits;</b> stairwells at each <b>story;</b> floor space used for mechanical equipment (with structural headroom of six feet, six inches (6 ft., 6 in.), or more); penthouses; attic space, (whether or not a floor has actually been laid, providing structural headroom of six feet, six inches (6 ft., 6 in.), or more); interior balconies; and <b>mezzanines</b>.</p> <p><b>GFA</b> shall not include: <b>;</b> <b>cellars</b>, exterior balconies that do not exceed a projection of six feet (6 ft.) beyond the exterior walls of the building, all projections beyond the lot line that may be allowed by other Municipal codes, vent shafts, and pipe <b>chase</b> shafts <b>above the basement</b>, atriums <b>above the basement</b>, <b>aisles and</b> ramps on <b>any level at or below which vehicles enter or exit the building leading to or from</b></p> |

|                                                                                                                               |                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                               | <p>parking or recreation spaces provided that not more than 50% of the perimeter of that space may be comprised of columns, piers, walls, or windows, or similarly enclosed.</p> | <p>vehicular storage, loading, or service delivery areas on that or a lower level; and in residential zones, the first floor or basement area designed and used for parking, loading, service delivery or recreation spaces provided that not more than 50% of the perimeter of that space may be comprised of columns, piers, walls, or windows, or similarly enclosed.</p> <p><i>[Key change above is to exclude ramps leading down to or up from lower levels but not to tie vehicular entrances to a defined ground floor level as it may not be the same as the building's front door or other pedestrian entrances and exits – alleys and driveways not always at “street level”.]</i></p> |
| <p><b>Ground floor</b> - the floor that is nearest in grade elevation to the adjacent surface of the public right-of-way.</p> | <p><b>Floor, Ground:</b> The floor level nearest to and above the adjacent finished grade.</p>                                                                                   | <p><i>[Adopt alternative language advertised, but do not apply this term within FAR definition limiting where ramps start/end.]</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |