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Anthony J Hood, Chairman
District of Columbia Zoning Commission
441 4th Street NW
Washington, DC 20001

Re ZC 14-11 / R-4 changes – letter of discussion
Sent via email to zcsubmissions@dc.gov and Sharon.schellin@dc.gov

Thank you for the opportunity to present our concerns with the proposed zoning changes. As practicing architects, rowhouse owners and R-4 residents, we are particularly suited to understand the full impact of the proposed changes. Additions and alterations to rowhouses constitute a large portion of our work in Washington DC. We endeavor to guide our clients, both private owners and developers, to improve the building stock of the city while also meeting their programmatic requirements. However, we also recognize that a problem exists in the R-4 district and that the Zoning Commission is the most appropriate forum for discussion and reform.

If properly designed, we believe that third floor additions can allow for more density, expansion of undersized rowhouses, and improve property value, while also contributing positively to the existing urban fabric. Attached to our letter is a survey of some of the more successful pop-ups (many in historic districts) that illustrate this point. Furthermore, we agree with Harriet Tregoning's recommendation (exhibit 94) for an advisory panel to provide design guidance. We offer to volunteer our time to participate in such a panel.

In regard to the proposed zoning change (14-11), we would urge the Zoning Commission to consider the following modifications:

- Include vesting language in the proposed regulations that would implement the regulations for building permit applications after 1 October 2015. For those property owners or potential owners who have recently purchased or committed to purchasing properties in the past few months, this abrupt change jeopardizes their investments. A vesting period will more allow for a reasonable transitional period for projects in development under current zoning regulations.
- Eliminate the 10' rear projection. In many cases our single-family dwelling clients wish to add an additional room to the rear of a row house. For example, a typical bedroom might be 12' deep. When you subtract out exterior wall thickness a 10' projection limit would arbitrarily yield mediocre and largely unusable spaces.
- Eliminate the language regarding chimneys vent and solar panels. These elements are best handled by the building code. DCRA has begun requesting additional documentation of roof-top features to ensure building safety. We feel that solar panels should be considered "at-risk" improvements on properties, similar to windows on lot lines.
- Eliminate the 35' height requirement. The 5' reduction has no meaningful impact on the 'pop-up' condition, in our experience it would arbitrarily force mediocre ceiling heights.

Respectfully submitted,



Will Teass, AIA



Charles Warren, AIA



