

# Holland & Knight

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October 9, 2015

## VIA EMAIL

Zoning Commission of the District of Columbia  
441 4th Street, N W  
Suite 210  
Washington, DC 20001

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**Re: Comments on Z.C. Case No. 14-13  
Penthouse Regulations**

Dear Members of the Commission

Holland & Knight LLP submits the following comments on Z C Case No 14-13, Penthouse Regulations On December 11, 2014, the Zoning Commission took proposed action on the case The proposed rulemaking was published in the DC Register on August 7, 2015 In addition to the comments provided below, which describe those sections of the proposed regulations we believe warrant the most amount of consideration, attached hereto is a set of more detailed comments and recommendations for several other sections.

### Definition of "Penthouse"

The proposed definition of "penthouse" should be modified to enumerate the structures that were previously regulated as "roof structures " Simply referring back to the previous set of roof structure regulations should be avoided for purposes of administrative efficiency and ease of use Currently, Section 411.1 defines those elements that are regulated as roof structures These include mechanical equipment, stairways and elevator penthouses, and, when not in conflict with the Height Act, penthouses on apartment buildings for storage, showers, and lavatories that are incidental and accessory to swimming pools or communal recreation space, and other enclosed areas used for recreational uses accessory to communal recreation space The proposed penthouse regulations should include a similar enumeration

In addition, there are other rooftop elements that have become increasingly common that are not identified in the existing regulations as either being a roof structure or not a roof structure, such as trellises and guardrails This frequently causes confusion as to whether these elements are regulated as roof structures, including whether and under what circumstances they are subject to setback requirements The proposed penthouse regulations should provide this additional clarity

ZONING COMMISSION  
District of Columbia  
CASE NO. 14-13  
EXHIBIT NO. 136  
District of Columbia  
EXHIBIT NO. 136

### **Restriction of habitable space near the White House**

The prohibition on habitable space within a penthouse on any building within the area defined by I Street, NW, Constitution Avenue, NW, 13th Street, NW, and 19th Street, NW is excessive relative to the scope of comments submitted into the record by the U S Secret Service (USSS). In its letter dated, April 30, 2015, Exhibit 120 of the case record, the USSS specifically expressed concern regarding habitable penthouse space that is used as residences, and penthouses that exceed 10 feet in height, stating that these types of rooftop penthouses could adversely affect White House security. In response, the proposed penthouse regulations go far beyond the actual concerns expressed by the USSS by unnecessarily prohibiting *all* habitable space within a penthouse regardless of use.

It is clear in the letter submitted by the USSS that the mere use of a penthouse for habitable purposes is not the concern, rather it is the type of habitable use (i.e. residences). Specifically, the letter states “unlike penthouses that are open to the public for commercial or recreational purposes, such as rooftop restaurants or swimming pools, residential penthouses can easily be used to shield an occupant’s activities - to include activities intended to harm Secret Service protectees – from view.”

We understand the concerns of the USSS, and therefore suggest the proposed penthouse regulations should be modified to be tailored closer to the specific concerns expressed by the USSS which are derived from two factors: use and line of sight. Rather than an absolute prohibition, which affects all properties equally within the specific area around the White House, the proposed regulations should be modified to allow any use permitted in the zone, other than residential dwellings, within a penthouse as a matter-of-right, with dwellings permitted as a special exception with a referral to the USSS. In the alternative, the regulations could be amended to require a special exception for any use that is permitted in the zone. Finally, should the Commission decide not to implement either of these alternatives, then at a minimum the area defined around the White House should be treated similar to the Naval Observatory (NO) Overlay District and permit habitable uses that are ancillary to a rooftop deck or terrace such as a communal function or recreation room, and properties that may be lower than buildings that are closer to the White House should be exempt.

### **Height of mechanical space**

There are several zone districts where the permitted penthouse height would be reduced from 18’6” to 15 feet. These include R-5-A, R-5-B, C-1, C-2-A, C-M-1, W-0, W-1, WP/C-2-A, WP/C-2-B, RC/C-2-B, RC/R-5-B, NO, HE-1, ES, and certain StE districts. This also includes R-5-A, R-5-B, C-1, W-0, W-1, and C-M-1 under the PUD Standards.

Per the testimony presented by DCBIA during the public hearings on this case, and described in detail in its letters submitted to the record (Exhibits 69, and 105), while alternatives to “over the top” elevator systems are available, these alternatives do not perform as well as an over the top system. In addition, even with the 18’6” height that is currently permitted, the headroom available to accommodate access requirements, hoist, structural components, and other mechanical override components while also providing access to the roof level is extremely limited.

Therefore, the permitted penthouse height should remain at 18'6" for these zones. Alternatively, per the recommendation by DCBIA which was informed by consultations with the development community, should a reduced height still be desired the height should be no less than 16'6".

In addition, as currently proposed penthouses would be allowed to have three separate heights rather than be required to have walls of equal height. These three heights correspond to habitable space, mechanical space, and equipment screening. However, we recommend that the proposed regulations be modified to allow mechanical space to have one height for elevator overrides and a second height for other mechanical equipment and stair towers that do not require the same height as the override. As currently proposed, property owners will be required to unnecessarily increase the height of a mechanical space penthouse to be equal to an elevator override, even if the mechanical equipment or stair tower within the penthouse do not require the additional height. The recommendation would help further reduce the visibility of penthouses while still maintaining a reasonable degree of architectural control over the roof level of a building.

#### **Height of habitable space in zones with lower permitted building height**

As proposed, zone districts with a maximum allowable building height of 65 feet or less would be permitted to have a maximum penthouse height of 10 feet. These zones are specifically listed in the attached comment table. However, as detailed in the attached letter prepared by Dennis Connors, a licensed architect with SK+I Architectural Design Group, a minimum penthouse height of 12 feet, not inclusive of mechanical equipment, stairways, and elevator overrides, is necessary in order to provide the necessary roof drainage and mechanical systems and still be able to meet all egress requirements.

#### **Required setback adjacent to historic property**

Under the proposed Section 411.18(a)(5), a 11-foot setback would be required in any zone where an adjacent property is improved with a designated landmark or contributing structure to a historic district that is built to a lower height regardless of the permitted matter-of-right building height. This provision should be modified to only require a 11-foot setback for properties where the proposed construction is not subject to review by the Historic Preservation Review Board (HPRB). This limitation would provide protection to a historic resource in the absence of the evaluation of the impacts of an adjacent project that is part of the HPRB review process. Meanwhile, for projects where a setback would not be required if not for the presence of an adjacent historic building, property owners should be allowed to provide a setback that is less than 11 feet, or for that matter no setback at all, if approved by the HPRB.

Respectfully submitted,

HOLLAND & KNIGHT LLP

**HOLLAND & KNIGHT LLP**

**Z.C. Case No. 14-13**

**Comments on Proposed Text Amendment to  
Chapters 1, 4, 5, 6, 7, 8, 9, 12, 12, 14, 15, 16, 18, 19, 24, 26, 27, 28, 29, 31, and 33, Penthouse Regulations**

**Published in DC Register August 7, 2015**

**Public Comment Period August 7 – October 9, 2015**

|             | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| "Penthouse" | <p>The proposed definition of "penthouse" needs to be modified to enumerate the structures that were previously regulated as "roof structures." Referring back to a previous set of regulations should be avoided for purposes of administrative efficiency and ease of use.</p> <p>The current Section 411.1 defines these elements as</p> <ul style="list-style-type: none"><li>• Mechanical equipment,</li><li>• Stairway and elevator penthouses</li></ul> <p>and when not in conflict with the Height Act on an apartment building roof</p> <ul style="list-style-type: none"><li>• Penthouses for (a) storage, showers, and lavatories incidental and accessory to roof swimming pools or communal recreation space located on the roof and (b) other enclosed areas, within the area permitted as a roof structure, used for recreational uses accessory to communal rooftop recreation space</li></ul> <p>A similar enumeration should be included in the new regulations.</p> |

|             | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|             | <p>In addition, there are other rooftop elements that have become increasingly common that are not identified in the existing regulations as either roof structures or not roof structures, and frequently cause confusion as to whether they are regulated as roof structures, such as trellises and guardrails.</p> <p>The proposed penthouse regulations should provide clarity regarding the elements that are subject to the new penthouse regulations and additional clarity on what elements are not</p> <p>Articulate within the new definition of "penthouse" the elements that are to be regulated as penthouses to include, but not limited to</p> <ul style="list-style-type: none"> <li>• Habitable space</li> <li>• Mechanical equipment</li> <li>• Elevator overrides</li> <li>• Stair tower</li> <li>• Communal or recreation space</li> <li>• Storage</li> <li>• Lavatories and showers</li> </ul> <p>Expand upon the provision that identifies those elements that are not considered penthouses, proposed Section 411 22, to include other elements that are now common</p> |
| "Story"     | <p>Since under the proposed regulations penthouses will be permitted to have one, and in some cases two stories The proposed definition could be further clarified to state the maximum number of stories does not include those stories permitted to be located within a penthouse</p> <p>Modify definition to state "For purposes of determining the maximum number of permitted stories, the term "story" shall not include cellars or any stories permitted to be located within a penthouse "</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| "Top Story" | <p>This definition could be simplified. Modify definition to state "The uppermost story of any building or structure that is not located in a penthouse The term 'top story' shall exclude architectural embellishments "</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|                                                                | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| Term usage / consistency                                       | The proposed regulations include slight inconsistencies in how certain terms are used which is unnecessary and could cause confusion. For example, while "penthouse" is the proposed defined term, there are provisions that unnecessarily use the phrase "penthouse structure" when using "penthouse" would suffice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Use of term "Mechanical Space"                                 | As described in 411.2, mechanical space is inclusive of mechanical equipment, elevator over-runs, or stairways. Therefore, there is no need to itemize these elements in each of the tables throughout the different zone districts that define permitted penthouse heights. Rather, they could be replaced with the defined term "mechanical space." This would make it easier to update the Zoning Regulations when new elements are identified that can be included in mechanical space. Also, see comment below regarding having "mechanical space" and "habitable space" as defined terms.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Use of the term "Communal recreation space"                    | A number of sections use the term "communal rooftop recreation" and others sections use the term "communal recreation space" but neither is defined. Are these intended to be the same thing? The proposed regulations should include a definition of either both terms, if not intended to be the same, of just one term that is used consistently throughout the regulations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Reduction of permitted penthouse height in certain zones       | <p>There are several zone districts where the permitted penthouse height would be reduced from 18'6" to 15 feet, including R-5-A, R-5-B, C-1, C-2-A, C-M-1, W-0, W-1, WP/C-2-A, WP/C-2-B, RC/C-2-B, RC/R-5-B, NO, HE-1, ES, and certain StE districts. This also includes R-5-A, R-5-B, C-1, W-0, W-1, and C-M-1 under the PUD Standards.</p> <p>Per the testimony presented by DCBIA during the public hearings on this case, <i>see</i> Exhibits 15, 69, and 105, while alternatives to over the top elevator systems are available such as side slung and hydraulic, these alternatives do not perform as well as an over the top system. In addition, even with the 18'6" height currently permitted, the headroom available to accommodate the required hoist, structural components, and other mechanical override components, while providing elevator access to the roof is very limited.</p> <p>Therefore, the permitted penthouse height should remain at 18'6" for these zones. Alternatively, per the recommendation by DCBID which was informed by consultations with the development community, should a reduced height still be desired the height should be no less than 16'6".</p> |
| Maximum penthouse height in certain R, C, and W zone districts | As proposed, zone districts with a maximum allowable building height of 65 feet or less are permitted a maximum penthouse height of 10 feet. These zones include R-5-B, R-5-C, C-1, C-2-A, C-2-B, C-3-A, and W-0 thru W-3. This also includes C-1 and W-0 under the PUD Standards. However, when taking into consideration standard ceiling assemblies, roof slope requirements for water attenuation, and proper insulation for buildings constructed using conventional stick construction a minimum penthouse height of 12 feet is necessary, not inclusive of mechanical equipment, stairways, and elevator overrides. See attached letter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 400.1                                                          | This amendment doesn't seem necessary since currently the height of the building doesn't include roof structures per Section 400.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 400.5                                                          | The use of the term "rooftop" isn't necessary and should be removed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

|                        | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| 411 2                  | <p>The terms mechanical space and habitable space should be included as definitions in Section 199 1, so that it can be used universally throughout the regulations and easily updated is something else is considered to be included. For example, in Section 400 5, rather than listing the specific elements that are permitted a height of 15 feet (mechanical equipment, stairway, elevator overrides) the defined term "mechanical space" can be used</p> <p>Additionally, the term "elevator core" should be included within mechanical space to make it clearer in Section 411 8 that buildings can have separate penthouses on each level. Alternatively, Section 411 8 could be modified to replace "enclosure" with "penthouse "</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 411 4(b) and 1402 4(c) | <p>The manner in which the 20% area limitation on ancillary space is described is inconsistent with established ZA interpretations. The method for calculating the 20% limit includes the unenclosed roof area devoted to deck, terrace, and recreation space <u>AND</u> the enclosed space that is devoted to uses that are considered accessory to the outdoor deck, terrace, and recreation space</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 411 4(d)               | <p>The prohibition on habitable space within a penthouse on any building within the area defined by I Street, NW, Constitution Avenue, NW, 13th Street, NW, and 19th Street, NW is excessive relative to the scope of comments submitted into the record by the U S Secret Service (USSS). In its letter dated, April 30, 2015, Exhibit 120 of the case record, the USSS specifically expressed concern regarding habitable penthouse space that is used as <u>residences</u>, and penthouses that exceed 10 feet in height, stating that these types of rooftop penthouses could adversely affect White House security. In response, the proposed penthouse regulations go far beyond the actual concerns expressed by the USSS by unnecessarily prohibiting <i>all</i> habitable space within a penthouse regardless of use</p> <p>It is clear in the letter submitted by the USSS that the mere use of a penthouse for habitable purposes is not the concern, rather it is the type of habitable use (i.e. residences). Specifically, the letter states "unlike penthouses that are open to the public for commercial or recreational purposes, such as rooftop restaurants or swimming pools, residential penthouses can easily be used to shield an occupant's activities - to include activities intended to harm Secret Service protectees - from view "</p> <p>We understand the concerns of the USSS, and therefore suggest the proposed penthouse regulations should be modified to be tailored closer to the specific concerns expressed by the USSS which are derived from two factors: use and line of sight. Rather than an absolute prohibition, which affects all properties equally within the specific area around the White House, the proposed regulations should be modified to allow any use permitted in the zone, other than residential dwellings, within a penthouse as a matter-of-right, with dwellings permitted as a special exception with a referral to the USSS. In the alternative, the regulations could be amended to require a special exception for any use that is permitted in the zone. Finally, should the Commission decide not to implement either of these alternatives, then at a minimum the area defined around the White House should be treated similar to the Naval Observatory (NO) Overlay District and permit habitable uses that are ancillary to a rooftop deck or terrace such as a communal function or recreation room, and properties that may be lower than buildings that are closer to the White House should be exempt</p> |

|                 | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 411 5           | The reference to "guard-rail for a roof deck required by the Building Code" should be eliminated from this provision. A guard-rail should not be considered a penthouse.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 411 6           | This provision should also be modified to state whether multiple standalone stair towers are permitted. For example, if there is a large "L-shaped" building that has a main mechanical penthouse in the middle of the building, can there be two standalone stair towers with one at either end of the building's two wings?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 411 9           | This provision should be modified to allow mechanical space penthouses to have two different heights, one for elevator overrides and a second height for other mechanical equipment that doesn't require the same height as the override. As proposed, property owners will be required to unnecessarily increase the height of a mechanical space penthouse to be equal to an elevator override, even if the mechanical equipment or stair tower within the penthouse doesn't require the additional height.                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 411 12          | Depending on lot size, the cumulative limitations on penthouses along Independence Avenue, one-third area restriction and setbacks in excess of the typical 1:1 (411 18(c)), could make it very difficult to accommodate required mechanical equipment on the roof of a building. The requirement for 2:1 penthouse setback along Independence Avenue should be eliminated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 411 16 & 411 17 | These provisions use the term "GFA." However, this term isn't defined until section 414 1. It should be introduced earlier in this chapter.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 411 18(a)(5)    | Under the proposed Section 411 18(a)(5), a 1:1 setback would be required in any zone where an adjacent property is improved with a designated landmark or contributing structure to a historic district that is built to a lower height regardless of the permitted matter-of-right building height. This provision should be modified to only require a 1:1 setback for properties where the proposed construction is not subject to review by the Historic Preservation Review Board (HPRB). This limitation would provide protection to a historic resource in the absence of the evaluation of the impacts of an adjacent project that is part of the HPRB review process. Meanwhile, for projects where a setback would not be required if not for the presence of an adjacent historic building, property owners should be allowed to provide a setback that is less than 1:1, or for that matter no setback at all, if approved by the HPRB. |
| 411 18(c)       | The 2:1 setback along Pennsylvania Avenue may make it difficult to accommodate required mechanical equipment on the roof of a building considering the additional building setbacks at the ground level and above a certain height that are required under the PADC Plan and Zoning Regulations. The requirement for 2:1 penthouse setback along Pennsylvania Avenue should be eliminated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 411 19          | The reference to Section 411 12 is incorrect.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|                | COMMENT(S)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 414.2          | This provision should be modified to clarify whether the first 1,000 sq. ft. of habitable penthouse gross floor area is exempt, or whether the entire amount is used if 1,000 square feet is exceeded.                                                                                                                                                                                                                                                                                              |
| 414.7          | The provision requires an average of 850 sq. ft. per affordable unit. However, if the total habitable space provided is, for example, 1,000 sq. ft., then under Section 414.6 the range of required affordable housing would be only 250 sq. ft. to 500 sq. ft. Thus, Section 414.7 should be clarified to indicate that the requirement to provide an average of 850 sq. ft. is not a minimum, and only applies to projects that are required to provide over 1,700 sq. ft. of affordable housing. |
| 414.8          | The definition of rehabilitation is vague and leaves open to interpretation who will determine the meaning of "substantial" and how that determination is made. This provision should be modified to include some sort of measureable standard by which a rehabilitation can be deemed to be "substantial".                                                                                                                                                                                         |
| 414.9 & 414.10 | These provisions are unclear as to how these affordable units are administered. Are these affordable units treated the same as IZ units? Are they subject to the IZ covenant? Will they be administered by DHCD and subject to the DHCD IZ regulations?                                                                                                                                                                                                                                             |
| 414.11         | This provision should be modified to address instances where an owner satisfies their affordable housing requirement by constructing one-family dwellings since certificates of occupancy are not issued for one-family dwellings pursuant to Section 3203.1(a).                                                                                                                                                                                                                                    |
| 414.14         | This provision uses the term "fair market value" but the OTR website does not use such a term.                                                                                                                                                                                                                                                                                                                                                                                                      |
| 630.4          | This provision should follow the same format as the others and include the permitted penthouse height and number of stories in table format.                                                                                                                                                                                                                                                                                                                                                        |
| 770.6          | Consistent with other zone districts where a 20-foot penthouse is permitted, a mezzanine should be permitted within the C-2-B-1 and C-3-B districts.                                                                                                                                                                                                                                                                                                                                                |

END OF COMMENTS

October 7<sup>th</sup>, 2015

Christine Shiker, Partner  
Holland & Knight, LLP  
800 17<sup>th</sup> Street NW (Suite 1100)  
Washington, DC 20006

Re: District of Columbia Penthouse Regulations  
Subject Proposed height of Penthouses

Dear Ms. Shiker,

I have reviewed the draft of the pending penthouse regulations for the amendments to the current Zoning Regulations, and we have concerns over the proposed height of 10'-0" for the enclosed penthouse spaces with habitable spaces

I have prepared an illustrative section, which is attached, based upon what we consider to be an industry standard for a multi-family residential building. A residential building typically has a floor area which is approximately 65 feet deep, which is important to understand to determine the size and height of a penthouse space which would sit atop and be set back from the floors below. If using 65 feet as the example of a typical floor width then a penthouse if set back 10 feet from each edge could be at least 45 feet wide.

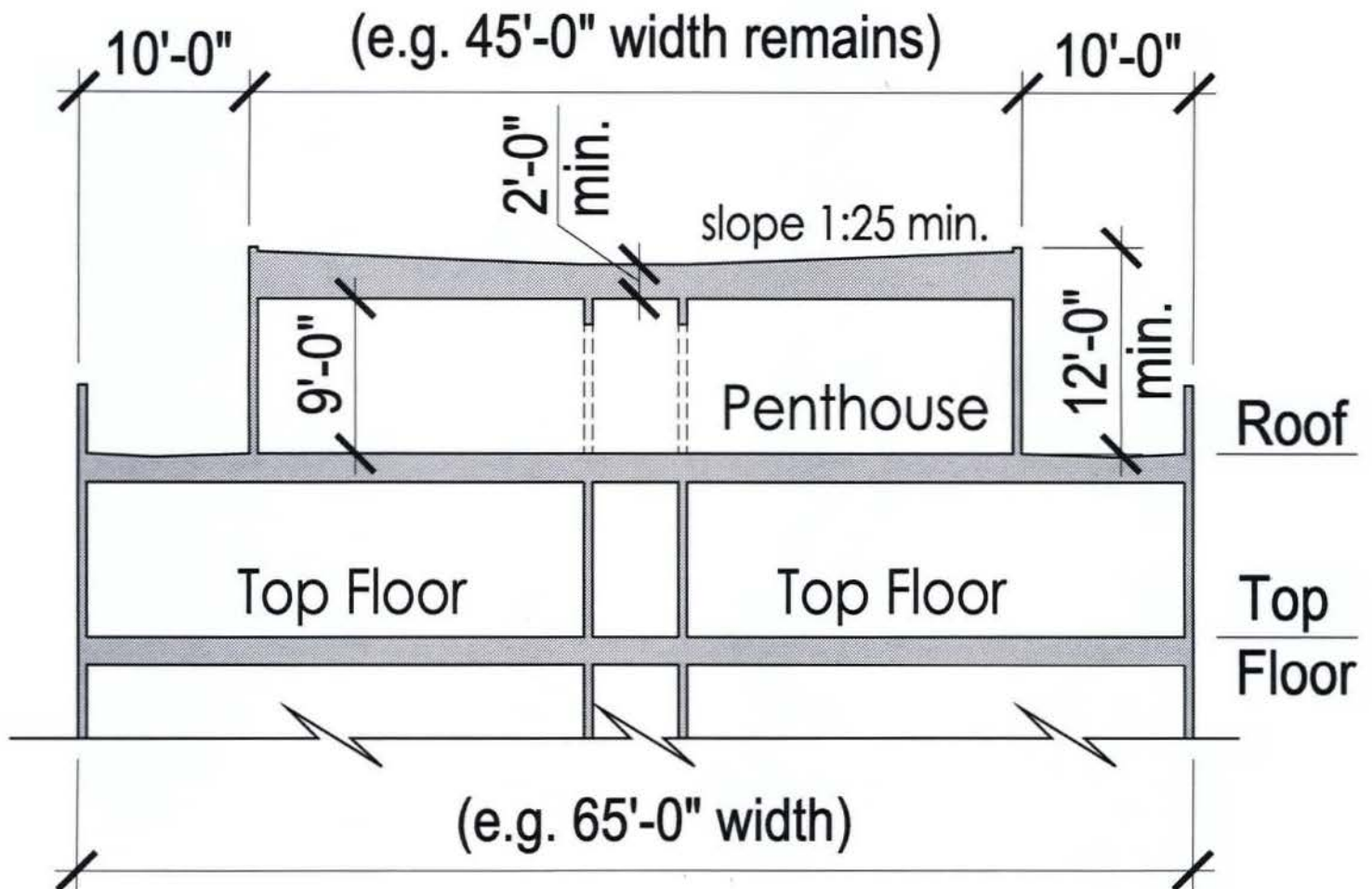
Regardless of type of construction a roof of a penthouse with habitable space has to both slope and to be insulated. An industry standard for minimal slope for a "flat-roof" is 1/25, which means that over the course of 25 feet length at least 1 foot of vertical slope has to be implemented into the roof trusses, roof slab, or tapered roof insulation. To minimize height a roof could either have gutters at both sides or could have central drains which would cut down the total distance of sloping by 50%. In the example, we are using of the 45 foot wide penthouse, that would mean that the roof would slope a distance of 22.5 feet or approximately 11" vertical rise minimum. In other words, if the penthouse regulations were to limit a structure to 10'-0", then without considering any other factors, the leftover height for a structure would be 9'-1".

The next thing to consider is that a habitable space including egress requires 7'-6" minimum clear ceiling height. This space or clear path has to be free of additional ceiling drops, bulk heads, interstitial space, sprinklers, roof drains, etc. This is the reason that the industry standard for a minimum clear floor structure to ceiling structure is 9'-0", because that interior height can handle those additional ceiling drops within the approximate 1'-6" leftover height to still allow for the code minimum of 7'-6" clear.

Therefore, we feel that a more appropriate minimal height of a penthouse structure would be at least 12'-0" tall as measured from the adjacent roof surface to its highest point. This is still fairly tight for most normal methods of construction whether wood, concrete, steel, or some hybrid form of construction. A 9'-0" clear floor to underside of structure, with a 2'-0" minimum this roof system, and 1'-0" for sloping would add up to at least the 12'-0" total height shown.

Sincerely,

Dennis Connors, AIA  
SK+I Architectural Design Group / Associate  
LEED Green Associate



Illustrative Sectional Diagram  
Top of Building with Habitable Penthouse  
scale: 1" = 20'-0"  
date: October 8th, 2015