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To District of Columbia Zoning Commission

Re Public Hearing ZC #14-13, Rooftop Penthouses

Dear Commissioners

I am writing to strongly support proposed amendments to the D C Zoning Regulations permitting rooftop penthouse occupancy and use as habitable space. Occupancy and use could include apartment units, recreation rooms, offices, meeting spaces and other appropriate functions allowed in each respective zone. Such functions within penthouses promise to architecturally enhance and constructively activate rooftops of many buildings in the nation's capital.

My understanding is that proposed zoning amendments would in no way change the fundamental building massing and geometric parameters that currently exist, as required by D C Zoning Regulations: the 1:1 (45 degrees) slope provision governing penthouse height and setback from exterior building walls, and overall building height limits established within each zone.

Portions of rooftop penthouses will still house mechanical equipment. However, portions of rooftop penthouses usable for habitable space clearly will cost more to build than penthouse mechanical space. In fact, habitable penthouse space will be substantially more expensive to build per square foot than a square foot of floor space within the building.

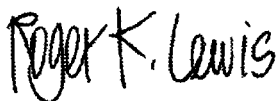
This extra cost is attributable to several factors. To comply with building code and life safety requirements, the building's service core - elevators, two fire egress stairs, utility closets - must extend vertically to serve habitable penthouse space. But this yields an inefficient, lower net-to-gross floor area ratio at the penthouse level. And walls and roofs enveloping habitable penthouse space must be constructed to provide substantial thermal, acoustic and vibration insulation, especially adjacent to mechanical rooms. This further increases the cost of habitable penthouse space.

In light of the above, the Zoning Commission should choose and adopt amendments to achieve two primary goals: given extra penthouse development costs, incentivize investment in desirable penthouse occupancy and use, and ensure maximum design flexibility enabling project developers and architects to creatively shape penthouse exteriors and interiors.

Excluding habitable penthouse square footage from computation of a building's FAR would continue current penthouse zoning policy and is an essential incentive. Equally essential is allowing 20-foot high penthouses in higher density zones, potentially enabling two levels of habitable space to be developed within a penthouse structure. Again, the overall building height and profile would be no different than it would be under current zoning regulations.

Adopting these essential zoning amendments will benefit the city, its neighborhoods and its streetscapes, as well as owners, occupants and neighbors of individual buildings.

Sincerely,



Roger K. Lewis, FAIA

ZONING COMMISSION
District of Columbia
CASE NO. 14-13
EXHIBIT NO. 68
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