

Lindsley Williams
3307 Highland Place, NW
Washington, DC 20008-3234

Mobile 202-246-4814
Email LWilliams@his.com

April 30, 2015

The Honorable Anthony Hood, Chairperson
Zoning Commission of the District of Columbia
One Judiciary Square – Suite 210 South
441 Fourth Street, NW
Washington, DC 20001

Re ZC Case 14-13 – Text Amendments to Multiple Chapters Affecting Definitions, Use
Permissions, Size and Other Attributes of Rooftop Penthouses and Other Elements

Dear Chairman Hood and Members of the Commission

This letter provides one area of comments on the texts (and alternatives) set out in the Notice published in the DC Register March 20, 2015 in this case, ZC 14-13. The main focus is on the allowed height of elevator cores and overrides rising above the main roof.

Broadly, I support taking a range of steps to give rooftops more value than just keeping a building's interior dry. More use brings more value, value adds to tax base and, when balanced against flanking residential uses so the new value does not detract from that which is nearby, is an overall benefit to the District of Columbia's residents, businesses, those employed here, visitors – and municipal coffers.

Over the years, the Zoning Commission has had several cases on use of roofs and the attributes and uses of penthouses – I have been involved in all of these in one capacity or another; this is a new chapter and more will surely follow.

§ 400.7(c) (Limiting height of roof structures)

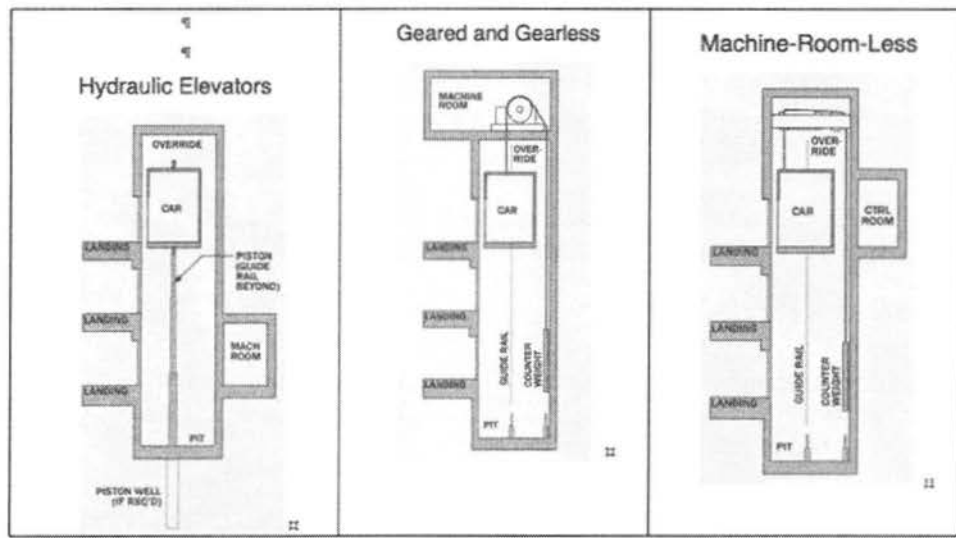
As to elevators, the text proposes limiting their height, in some situations, to just ten feet (10 ft.) above the roof level. Such a limit is sufficient for the machinery that typically sits at the uppermost level of an elevator core, such a limit is completely insufficient to provide elevator access to that roof level.

An elevator's override is that portion that sits above the cabin and its superstructure, the frame of the cabin that extends above the part in which passengers (and goods) are raised and lowered. The frame can easily add one foot (1 ft.) or more. The mechanical space above that can easily add another foot (1 ft.) below the ceiling of the roof over the elevator core. Above that is where motors and lift equipment are located in traditional elevators (the most affordable ones in many instances), that equipment often taking four feet (4 ft.) or more. If a mechanic must be able to work within the area, then the final roof (allow another foot (1 ft.)) for a **working total of at least seven vertical feet (7 ft.)**. This is on top of the height inside the elevator cabin, which must be sized to the uses of the floors it serves, but typically not less than seven feet (7 ft.) for all-residential use and more typically eight feet (8 ft.) or more, more being more typical in commercial settings. Thus, I recommend more study but, for the moment, changing the ten foot limit of these provisions to at least sixteen feet (16 ft.) where the elevator is to provide access to the level.

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of the roof. This is so close to the existing allowed maximum, I would have to question of taking away just thirty inches (30") accomplishes much. Given setback rules that would already apply, designers will want to keep verticals to a minimum to allow placement as close as possible to building edges and have as consistent a height of elevator overrides with any other roof structures housing stairways, mechanical equipment, or other allowed uses..

Below see images of typical elevator profiles (extracted from <http://www.archtoolbox.com/materials-systems/vertical-circulation/elevatortypes.html>):



Addendum: Not all Buildings Have Flat Roofs, but Typical Elevator Overrides Do:

Please note that in the above diagrams, all the overrides have a flat roof. I recommend that the Zoning Commission allow sloped roofs that rise above this plane when they are associated with a building whose other main roof surfaces slope so the resulting roof structure can be more compatible with the building of which it is a part by right, at the discretion of the Zoning Administrator, if the uppermost flat portion is or could have been flat and complying with height limits.

Other Issues:

I intend to listen to all the other testimony at the hearing April 30 and comment on the overall resulting record, doing so before the record closes.

Thank you for moving forward on this case.

Respectfully,

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