

April 18, 2018

**Via IZIS**

Anthony Hood, Chairperson  
District of Columbia Zoning Commission  
441 4th Street, NW, Suite 210-S  
Washington, DC 20001

Re: **Zoning Commission Case No. 17-23; Support for Text Amendment to Changes to Definitions and Rules of Measurement in Subtitles D, E, and F**

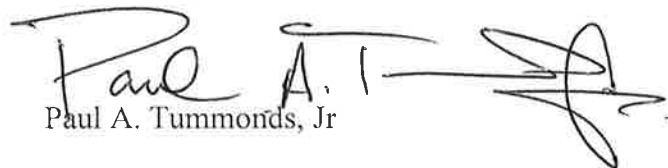
Dear Chairperson Hood:

On behalf of all the members of the Zoning and Land Use Group at Goulston & Storrs, we support the proposed modifications proposed in ZC Case No. 17-23. We agree with the comments made by the Office of Planning in their April 9, 2018 Hearing report that the proposed text amendment will “more closely align the treatment of side yards in the zoning regulations with past practice and Office of Zoning Administrator (OZA) practice.”

The need for the change to the definition of a “Building, Attached” is clear. As currently written, the Zoning Regulations require a row house to provide a side yard if it abuts an adjacent lot, even if both lots are located in a zone which permits row house development. We believe that this was not the intent of the Zoning Commission or the Office of Planning when the definition to an attached building was changed with the 2016 Zoning Regulations. The proposed amendment to the definition of an attached building appropriately addresses the unintended consequence of the change to the definition in the 2016 Zoning Regulations and is entirely consistent with previous treatment of row houses throughout the District.

We thank you for your consideration of our views and we look forward to your expeditious approval of ZC Case No. 17-23.

Respectfully Submitted,

  
Paul A. Tummonds, Jr