

February 13, 2019

TO: Zoning Commission  
FR: Alan Gambrell  
RE: 19-21 Comments

Thanks to the Office of Planning and the Zoning Commission for undertaking revisions related to solar panels and RF-1 protections. Below are my recommendations.

## **SOLAR PANELS**

Expansion of protection of solar panels across R zones, which is clearly necessary to improve the ability of citizens to play a meaningful role in reaching the city's environmental goals.

RECOMMENDATION: Expand protection of solar panels but keep current shading study criteria in place. Additionally, do not provide option for Zoning Administrator to craft impact standards as this seems to not be within the purview of DCRA.

## **RF-11 and SPECIAL EXCEPTIONS**

RF-1 14-11 proposed revisions dealing with special exceptions strike me as far too complicated for purposes of being clearly interpreted, applied and reviewed by DCRA and the Board of Zoning Adjustment. Clearly, all parties will benefit from clarity, which OP is commended in trying to provide for your consideration. As such, I would recommend putting OP back to the task of additional revisions. In particular:

### Special exceptions for removal rooftop architectural elements

RECOMMENDATION: Reject this suggestion and keep the provision as is (i.e., only currently allowable when the building height is proposed to be increased from 35' to 40' or the project will convert the row house from single family to multi-unit. and conduct additional study). The Board of Zoning Adjustment should not be put in the position of having to field even more such requests. At the least, further study is warranted.

### Exempt special exception review for RF-1 building located in an historic district or an area under the jurisdiction of Commission of Fine Arts

RECOMMENDATION: Reject this suggestion. Historically protected properties from a lower level of zoning review.

### RF-1 development standards when converting buildings to apartment houses

RECOMMENDATION: List all applicable development standards or ensure that cross-reference clearly means all such standards.

### Eliminate provisions that a project cannot impede the operation of a neighboring chimney or other external vent

RECOMMENDATION: Reject this suggestion and/or justify why this is no longer necessary (e.g., is this covered under construction codes?).