October 2, 2013

L. Preston Bryant, Jr.
Chairman
National Capital Planning Commission
401 9th Street, NW
Washington, DC 20004

Dear Chairman Bryant:

Our Chapter has followed the discussion regarding the Height of Buildings study with great interest. We understand this study to be specifically focused on what, if any, federal interest there should be in the height of buildings in Washington DC. This letter states the Chapter’s position on that question and also provides comments on the study presented by NCPC and DCOP.

The 1910 Height Act was necessary to insure the safety of the citizens of the District of Columbia. The Act was an appropriate response to a very real threat to fire safety. Considerable time has passed, however, and in that time the District has enacted zoning and building codes that go well beyond the 1910 Act and in many cases provide more protection to the city’s unique skyline than the Act does. Moreover, the language of the Act is limited to the architectural technology and building science of the early 20th century. For example, in 1910 it was not possible to include life safety equipment in a mechanical penthouse, so occupancy of a penthouse was prohibited. Many of the Act’s other requirements include similarly archaic language that is at odds with modern building and life safety codes.

It is our conclusion that this outmoded language should be brought up to date to reference modern building codes in place in the District. NCPC staff received a briefing on this very issue from the Chapter earlier this summer and we believe many of those recommendations have already made their way to the Executive Director’s Report presented at your last meeting.

Further, we believe that the federal interest in the height of buildings should be limited to areas immediately adjacent to the Monumental Core and critical view corridors. We believe that current building and zoning codes in the District now provide better protection for non-federal areas of the city than the Act. Furthermore, we strongly agree with the recommendations included in DC’s Height Master Plan for the District of Columbia most particularly that protecting the cultural resources and physical character of the District of Columbia is the job of the District of Columbia and not that of the federal government.
Finally, with respect to the alternatives described in the study, we believe additional height may be possible in carefully selected spots, with adequate public input, around the District. Moreover, we believe that the proposed 200-foot cap used in the study is arbitrary and that additional height above that cap may also be appropriate for areas outside the Monumental Core and its environs. While we respect the horizontal character that makes Washington DC unique, we believe well-designed, taller structures would provide an interesting counterpoint and add visual interest. This would, of course, require a more thorough, in-depth study than was possible for this current effort.

We commend the District and NCPC for their collaboration on this study and look forward to future such collaborations. We thank you for the opportunity to comment.

Sincerely,

[Signatures]

David T. Haresign, FAIA
President

Mary Fitch, AICP, Hon. AIA
Executive Director