

STATEMENT IN SUPPORT OF AN APPEAL
OF THE ISSUANCE BY THE ZONING ADMINISTRATOR FOR THE DISTRICT OF COLUMBIA,
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS, OF BUILDING PERMIT NO. B1103986
FOR THE CONSTRUCTION OF AN ADDITION TO A SINGLE FAMILY DWELLING IN THE
TREE AND SLOPE PROTECTION OVERLAY ZONE DISTRICT
AT 2750 32ND STREET N.W. (LOT 25 IN SQUARE 2119) (THE "SUBJECT PROPERTY")

This Statement of Reasons is submitted on behalf of the Appellants, Lawrence M. and Kathleen B. Ausubel ("Appellants"), the owners of property adjoining the Subject Property

Jurisdiction. The Board of Zoning Adjustment is authorized to hear this appeal pursuant to 11 DCMR § 3100.2.

Appellants. Appellants are the owners of property immediately adjacent to the Subject Property. Three mature trees in excess of 75 inches in circumference, located at or near the property line between the Appellants' property and the Subject Property, would be fatally damaged by construction pursuant to Building Permit No. B1103986. Appellants' home is located in the immediate area of the proposed construction on the Subject Property, such that, if the impacted trees (as defined herein) were to suffer fatal damage as a result of the proposed construction, it is likely that such tree loss would cause significant harm to Appellants' home or property.

The Subject Property. The Subject Property is located at 2750 32nd Street, N.W., Washington D.C., 20008, and is known of record as Lot 25 in Square 2119. The Subject Property is classified within the R-1-A Zone District and is subject to the requirements of the Tree and Slope Protection ("TSP") Overlay Zone. The Subject Property is improved with a single family dwelling constructed approximately 70 years ago.

The 2750 32nd St Trust (the "Trust") purchased the Subject Property in December 2010. In February 2011, the Trust filed six applications for building permits seeking authority to expand and alter the existing house on the Subject Property. Among the filings was a February 22, 2011 application for a Building Permit to construct a large addition on the south side of the property close to the Appellants' home and property ("Proposed Construction"). That application was assigned Tracking Number B1103986. The Department of Consumer and Regulatory Affairs ("DCRA") approved the application and issued Building Permit No. B1103986 on July 13, 2011 (the "Building Permit," which, along with the application submitted by the Trust, is attached hereto as Exhibit A).

Exceptions to Administrative Decisions. The Appellants appeal from the approval and issuance of Building Permit No. B1103986 for the Proposed Construction. The Appellants submit that the Zoning Administrator's decision to issue Building Permit No. B1103986 was erroneous for the following reasons:

1. The Proposed Construction Will Impact Protected Trees Under the TSP Overlay and Requires a Special Exception Prior to Issuance of a Building Permit.
 - a. *The TSP Requirements*

The TSP Overlay District was designed for "residential neighborhoods . . . located at the edge of stream beds or public open spaces and that have a significant quantity of steep slopes, stands of mature trees, and undeveloped lots and parcels subject to potential terrain alteration and tree removal." 11 DCMR § 1511.4. It was "established to preserve and enhance the park-like setting of designated neighborhoods adjacent to streams or parks by regulating alteration or

disturbance of terrain, destruction of trees, and ground coverage of permitted buildings and other impervious surfaces.” 11 DCMR § 1511.1.

The TSP Overlay contains several restrictions on matter-of-right construction, and proposed construction that does not comply with those provisions requires an approved special exception prior to issuance of building permit. 11 DCMR §1515.1. This furthers a primary purpose of the TSP Overlay District: to “preserve . . . mature trees to the maximum extent feasible in a residential neighborhood.” 11 DCMR § 1511.3. The regulations clearly state that the restrictions on matter-of-right construction apply to “cutting down, removal, *or fatally damaging*” protected trees, 11 DCMR § 1514.1(a) (emphasis added), as well as simply prohibited “cutting” of trees without cutting them down altogether, 11 DCMR § 1514. Thus, the term “removal” reasonably includes, and the regulations prohibit, proposed actions that are likely to cause fatal damage to trees, necessitating removal.

The TSP Overlay requires a special exception where any of the following is proposed:

1. No tree having a circumference of “seventy-five inches (75”) or more at a height of four and one-half feet (4 ½ ft) above ground may be removed or cut down.” 11 DCMR § 1514.1(c).

2. “No more than three (3) trees that each have a circumference of more than thirty-eight inches (38 in.) at a height of four and one-half feet (4 ½ ft.) above ground may be removed, and none of these may be located within twenty-five feet (25 ft.) of any building restriction line or lot line abutting a public street.” 11 DCMR § 1514.1(d).

3. “The total circumference inches of all trees removed or cut down on a lot shall not exceed twenty-five percent (25%) of the total circumference inches of all trees on the lot having a circumference of twelve inches (12 in.) or greater at a height of four and one-half feet (4 1/2 ft.) above ground” 11 DCMR § 1514.1(e).

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Accordingly, each of the following is a Protected Tree under the TSP Overlay (“Protected Tree”): (1) a tree with a circumference of at least 75 inches; (2) more than three trees, each with circumferences of at least 38 inches; (3) any tree having a circumference of at least 38 inches located within 25 feet of a building restriction line; and (4) multiple trees on a lot cumulatively exceeding 25% of the total circumference of all 12-inch or greater trees on the lot. In the event that any proposed construction would cause either the cutting down, removal, or fatal damage of any Protected Tree, no permit may issue without a special exception first having been granted by this Board. 11 DCMR § 1515.1.

b. *The Proposed Construction*

The Subject Property includes many large, mature trees, including several trees located along the boundary adjacent to Appellants’ property. See Aerial Photograph, Exhibit B, and Site Plan, attached hereto as p. 4, Exhibit C. The plans submitted with the Trust’s application for the Building Permit, attached hereto as Exhibit C (the “Plans”), and upon which the Building Permit was ultimately granted, depict five (5) significant trees within the immediate vicinity of the Proposed Construction (the “Impacted Trees”). As will be discussed below, the Plans do not accurately list the size or species of these Impacted Trees.¹ Despite these inaccuracies, three (3) of the Impacted Trees are in fact each greater than 75 inches in circumference; each is within 25 feet of a building restriction line; and, pending a tree inventory (see Section 2, *infra*), the Impacted Trees in the aggregate may exceed 25% of the total circumference inches of all protected trees on the lot; meeting (in as many as three separate ways) the threshold requirements

¹ The Site Plan, Exhibit C, p. 4, lists the Impacted Trees as follows: “30 in. Oak,” “13 in. Tree,” “30 in. Pop.,” “12 in. Tree,” and “25 in. Beech.”

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for Special Exception. Appellants submit that each of the Impacted Trees is a Protected Tree under the TSP Overlay Regulations.

The Proposed Construction is sufficiently proximate ² to the Impacted Trees so as undoubtedly to impact these trees and to create immediate and grave concerns about their survival. Concerned about the impact of the Proposed Construction on the Impacted Trees, Appellants commissioned a report from a certified arborist, Keith C. Pitchford, regarding the trees located near the property line and the impact on those trees posed by the Proposed Construction (the “Arborist Report”, attached hereto as Exhibit D). The Arborist Report found that the cutting of structural roots of the Impacted Trees contemplated by the Proposed Construction would cause the Impacted Trees on the Subject Property to become “structurally unsound” and, if those trees did not come down during the Proposed Construction, the damage from the construction would almost certainly kill the trees.

Moreover, the Arborist Report revealed that the Impacted Trees were listed on the Plans with their diameters, not circumferences. The TSP Overlay regulations require the Zoning Administrator to review for impacts on trees “having a *circumference* of twelve inches or greater at a height of four and one-half feet above ground.” 11 DCMR § 1514.1(a) (emphasis added). The Plans do not even specify that the measurements listed are diameters, or the height above grade at which the measurement listed was taken.

² As depicted in the Trust’s LTP100 dated April 7, 2011, Exhibit C, p. 6, the proposed root pruning line is approximately seven (7) feet from a 96-inch-circumference White Oak, approximately six (6) feet from an 80-inch-circumference Northern Red Oak, and approximately four and one-half (4.5) feet from a 75.5-inch-circumference American Beech. Measurements are approximate due to variations in plans and measurements reported from locations other than the root pruning line.

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On April 5, 2011, Appellants met with the Zoning Administrator to express their concerns that the Proposed Construction violates the TSP Overlay regulations. Appellants shared their arborist's report with the Zoning Administrator, who at that point in time had received no detailed information from the Trust with respect to the Impacted Trees. In fact, the Zoning Administrator expressed surprise when informed that the plans depicted the *diameter* rather than *circumference* of the Impacted Trees, and stated that he believed the Impacted Trees were at least three times smaller than they actually are.

On June 3, 2011, the Urban Forestry Administration ("UFA") submitted a memorandum to the Zoning Administrator regarding the Building Permit, which remained under review at the Department of Consumer and Regulatory Affairs. See Exhibit E. Regarding the Impacted Trees, the UFA report found that "all of these trees are healthy...UFA has great concern and *does not feel that these trees will survive the construction* in the long term. ... Coupled with the fact that the roots on the upward side are the tension roots, once these are root pruned [as proposed in the Plans] the trees *will be questionable as to their ability to remain standing* during wind events over the next several years" (emphasis added).

To the best of the Appellants' knowledge, no further information regarding the current health of the Impacted Trees or the likelihood of survival of the Impacted Trees beyond the Proposed Construction was submitted to or reviewed by the Zoning Administrator. Yet, faced with two reports of experts in arboriculture stating that the Impacted Trees were not likely to survive, and thus would be fatally damaged by the Proposed Construction, the Zoning Administrator approved and the Department of Consumer and Regulatory Affairs issued the Building Permit on July 13, 2011. Appellants submit that no building permit should have issued

without approval of a special exception pursuant to 11 DCMR §§ 1515.1, 1514.1(c), and, possibly, 1514.1(d) and 1514.1(e).

2. The Submitted Building Permit Application and Plans Are Facially Insufficient to Grant Permit.

Upon filing the application for the Building Permit, the Trust submitted numerous plans and other information detailing the Proposed Construction for review by the Zoning Administrator. The Appellants submit that the Plans do not provide a complete or accurate inventory of trees subject to the TSP Overlay regulations.³ While the application documents include a TSP Affidavit stating that there are Protected Trees on the Subject Property, the extent trees are identified on the plans, no sizes of trees are marked on many of the Trust's plans. As a result, both the number and size of the existing trees on the property and the impact of construction on significant trees that the TSP regulations were designed to protect are facially unknown.

For example, without an inventory of trees meeting the size threshold under the TSP Regulations, it is impossible for the Zoning Administrator to determine that no more than three (3) protected trees (as defined in Chapter 15 of the Zoning Regulations) will be impacted by the Proposed Construction. It is likewise impossible for the Zoning Administrator to determine that no more than 25% of the total protected trees located on the Subject Property will be impacted by the Proposed Construction, since there is no information on the plans providing an accurate

³ The Appellants submitted a Freedom of Information Request to DCRA on July 6, 2011. The results of that request were delivered to Appellants' counsel on August 12, 2011. These plans are attached hereto as Exhibit C. Appellant has omitted detailed construction drawings that are not relevant to this appeal, but all documents depicting the site, the trees impacted, and the limits of disturbance for sediment control purposes are included in Exhibit C. The Appellants are unaware of, and DCRA's own record does not contain any additional information upon which the Zoning Administrator could have based a determination that the Proposed Construction did not violate The TSP Overlay.

inventory of the number of protected trees. Appellants asked the Zoning Administrator on several occasions to require the Trust to revise the Plans so that the circumferences of all trees with a circumference of 12 inches or more at a height of four and one-half (4.5) feet above ground – the relevant standard under 11 DCMR § 1514 – were clearly labeled, and that a chart calculating the total circumference inches of all such trees on the lot be included with the plans in order to determine compliance with 11 DCMR §1514.1(e) specifically. This was never done.

As discussed *supra*, the initial drawings submitted by the Trust listed a measurement in inches for each tree shown, without identifying whether the measurements were the trees' diameters or circumferences. When Appellants met with representatives of the Trust and later with the Zoning Administrator, it was discovered that in fact, the measurements were the diameters of the trees. The TSP Overlay regulations refer to circumference of trees, not diameter. Moreover, diameter is less than approximately one third of the circumference of any circle. The Zoning Administrator subsequently informed Appellants that he was, in fact, misled by the submission and believed the trees to be a third of the size they actually are.

In response to the Zoning Administrator and Appellants' inquiries, the Trust submitted revised drawings to DCRA with no tree measurements at all. *See* LP100 and LTP100, Exhibit C, pp. 5 & 6. It is apparently these revised plans on which the Zoning Administrator based his approval. Appellants submit that the shortcomings of the application prohibited the Zoning Administrator from fully considering the requirements of Sections 1514 and 1515 of the Zoning Regulations.

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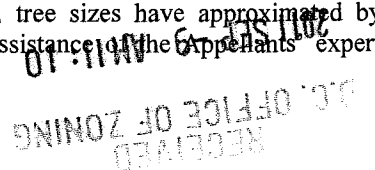
3. The Trust's Plans Are Unreliable and Misleading.

In addition to the omission of accurate circumference of all trees on the Subject Property, there are several other red flags indicating that the Trust's plans are untrustworthy. For example, both the LP100 (Tree Plan) and LTP100 (Tree Protection Plan) (*see Exhibit C*, pp. 5 & 6) include circles drawn to indicate the "Critical Root Zone" ("CRZ") areas for trees. Without explanation or disclosure of the formulas used, the determinations of these circles' sizes and location are not consistent for each tree.

The arboriculture industry, and in fact the District's own UFA, has standard formulas for determining CRZs of trees. The UFA's Construction Guidelines for Tree Protection, attached as Exhibit F hereto, state that the CRZ is equal to one foot of tree protection for every inch in tree diameter. Within that CRZ, no alteration or disturbance of the existing grade is permitted, so as to prevent severing of structural or "anchor" roots and to prevent soil compaction, the "leading cause of tree death on construction sites."

For all depicted CRZs except for one, the trees are centered in the middle of the circles; however, for the largest tree at issue – a White Oak with a 96 inch circumference⁴ and the closest Protected Tree to Appellants' house – the CRZ is, without explanation, sketched significantly off-center with respect to the trunk of the tree. It is implausible that the tree's CRZ extends under the foundation of Appellants' 82-year-old house, as indicated on the Trust's filed Tree Protection Plan. Based on the information available to Appellants, we can only assume that the tree's CRZ was drawn off-center in order to conceal and minimize the extent to which the

⁴ Given the fact that the submitted plans do not list the sizes at all, tree sizes have approximated by comparing and measuring related sizes and distances on the plans with the assistance of the Appellants' expert arborist.



footprint of the Proposed Construction would extend into the CRZ and thus impact the Protected Tree.

Appellants have subsequently learned that this inaccuracy was sufficiently blatant that UFA required the Trust to correct the CRZ in its Tree Protection Plan. On July 20, 2011, a week after the Building Permit was issued, the Trust filed an amended Tree Protection Plan in which the CRZ of the 96-inch-circumference White Oak is centered at the trunk of the tree. See Exhibit H, attached. Although this correction was made after the Building Permit had already issued, and thus the Zoning Administrator's approval could not have been based on this information, as shown on this revised Tree Protection Plan, the impact of the Proposed Construction is even more significant.

Appellants submit that these and other inaccurate and incomplete elements of the application warranted further inquiry and prevented the Zoning Administrator from fully considering the requirements of Sections 1514 and 1515 of the Zoning Regulations.

4. The Proposed Construction Will Result In Fatal Damage To Protected Trees.

The Arborist Report explains that the roots of a tree can be divided into two categories; first, the CRZ, which is defined by the American National Standards Institute as "the minimum volume of roots necessary for tree health and stability,"⁵ and second, the structural or "anchor roots," which Mr. Pitchford refers to as the "minimum clearance zone." Mr. Pitchford's conclusion that the Impacted Trees are likely to suffer fatal damage is based on the location of the proposed root pruning line – the area in which the Trust and its contractors will sever any

⁵ ANSI A300 (part 5)-2005 § 52.4. See Exhibit G, attached.

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existing tree roots in order to excavate for the foundation of the Proposed Construction – and the location of the Proposed Construction as shown on the Plans. *See* Tree Protection Plan, Exhibit A, p. 6.

A tree's roots in its "root plate"⁶ are critical to a tree's structural integrity. Citing industry standards, the arboriculture industry defines this zone as being present in an area measured radially around the tree equal to between six (6) inches and one (1) foot for every one (1) inch of trunk diameter.⁷ Such roots cannot be cut without fatally damaging the tree, causing the tree to fall either immediately or within five (5) years.

The trees impacted by the Trust's Proposed Construction include five (5) healthy trees exceeding the minimum circumferences – individually and collectively – of section 1514.⁸ One tree studied by Appellants' arborist is a White Oak tree abutting the Trust's and Appellants' property line.⁹ The arborist observed the tree has a diameter of about 30.5 inches (96 inches in circumference), is in "good to excellent" condition, and has a root plate extending out 15 feet in all directions (30.5 inches x 6). He concluded that the Proposed Construction would inflict irreparable harm to the White Oak because the edge of the Proposed Construction is

⁶ A tree's root plate is the area immediately around the tree and consists of large, woody structural roots.

⁷ There are exceptions to this rule especially when there are impenetrable surfaces, like a retaining wall or a building foundation that will deflect these roots. However, this is not the case here. There are no impenetrable surfaces to re-direct these large roots.

⁸ Appellants understand that the proposal also calls for the removal of a 100-inch tree at the front of the Subject Property. Appellants do not contest the removal of this tree, which the Zoning Administrator and UFA deem unhealthy.

⁹ Causing damage to trees on public property or property owned by another is a criminal offense in the District of Columbia, punishable by up to 90 days in jail or fines of up to \$15,000.00 per tree. D.C. Code § 22-3310.

approximately nine (9) feet from the tree. Even if there were no standard overdig¹⁰ needed to construct the Proposed Construction's foundation the new foundation would be well within the tree's 15-foot root plate.

The Arborist Report concludes:

Therefore, if this construction proceeds as planned the structural roots of the white oak on the project side will be cut very close to this tree and it will then become structurally unstable. And, this is very bad news for you since these are the roots that keep the tree from falling in your direction. I could also predict that even if somehow the tree were to remain upright despite the loss of these support roots, this amount of damage will almost certainly kill this tree within a period of five years, or less. Not only is this prediction based upon industry reference books, but I can concur that this amount of time is consistent with my own experience with trees in construction situations from my 22 years of work in the DC area.

Appellants' arborist also observed a Northern Red Oak in excellent condition on the Trust's land. The foundation of the Proposed Construction is also very close to this tree – separated by approximately six (6) feet. The tree's diameter is 25 inches (75 inches in circumference); thus, Section 1514.1(c) of the TSP Overlay regulations prohibits its removal. The tree's root plate extends about 12.5 feet around the tree (25 inches x 6); thus, it is probable that digging the proposed foundation will lead to a severe loss of structural integrity. Accordingly, if the Proposed Construction is allowed to proceed, this Northern Red Oak's important root plate will be fatally damaged and it will then become structurally unstable and fall either immediately or within a period of five years or less. This not only violates the plain

¹⁰ A standard overdig beyond the footprint of the Proposed Construction in this situation would be roughly an additional three (3) feet. If a standard overdig is used, this would put the limit of disturbance at approximately six (6) feet from the base of the tree.

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language of the Zoning Regulations, but as the Arborist Report warns, has the potential to cause “catastrophic damage” to the Appellants’ home or property.

Appellants’ arborist’s findings are consistent with the findings of the District’s own expert agency. Regarding the affected trees on the south side of the Subject Property, the UFA found “All of these trees are healthy....*UFA has great concern and does not feel that these trees will survive the construction in the long term....*Coupled with the fact that the roots on the upward side are the tension roots, once these are root pruned the trees *will be questionable as to their ability to remain standing during wind events* over the next several years” (emphasis added). See UFA Report, Exhibit E.

It was uncontroverted before the Zoning Administrator, therefore, that the Trust’s Proposed Construction would either immediately, or within the short term, kill trees protected by the TSP Overlay District, necessitating their removal. Appellants submit that this violates Sections 1514 and 1515 of the Zoning Regulations and thus the Proposed Construction must first be approved by this Board in the nature of a special exception before any building permit authorizing such construction may be issued.

5. The Zoning Administrator’s Standard for “Fatal Damage” to Trees Is Erroneous and Insufficient to Meet the Purposes and Intent of the TSP Overlay.

As discussed above, the TSP Overlay prohibits “fatally damaging” protected trees. 11 DCMR § 1514.1(a). The regulations do not define “fatal damage,” nor do they provide the standards for judging whether construction causes fatal damage to a tree necessitating a Special Exception.

On July 15, 2011, the Appellants met with the Zoning Administrator to discuss their significant concerns over the building permit, which had been issued just days before. *See* Meeting Minutes, prepared by Appellants, at Exhibit I. In that meeting, the Zoning Administrator revealed that he imposed *his own* standard for determining whether construction activity causes fatal damage to a tree: if a tree is sure to die within one year, it is fatally damaged. Independently applying his own standard to forecast the anticipated life expectancy of protected trees after construction of the Proposed Construction, the Zoning Administrator found the Proposed Construction allowable under the TSP Overlay.

During the same meeting, the UFA opined that one cannot say whether a tree will die within any particular time frame after suffering fatal damage. In fact, trees will not necessarily evidence fatal damage within a year, but often take a few years to die from such catastrophic events. *See also* UFA Construction Guidelines for Tree Protection, Exhibit F.

The Zoning Administrator's standard for fatal damage provides a serious unintended loophole in the TSP Overlay: a developer can simply choose to build within CRZs of a protected tree, cutting roots vital to its long-term survival but sufficient to live at least a year and not violate the Zoning Administrator's standard. This loophole is contrary to the TSP Overlay, which provides a longer outlook. *See, e.g.,* 11 DCMR § 1514(f) In fact, Section 1514(f) is the only provision in the TSP Overlay that makes reference to any specified time period, providing a *seven-year* prohibition on new building permits, absent a special exception, if prohibited "cutting" occurs to Protected Trees without first obtaining a special exception. Under the Zoning Administrator's interpretation, one could sever the roots of or cause other significant damage to a Protected Tree, but if the tree survives for one year and one day, fatal damage has not occurred

and the prospective provisions of the TSP Overlay, which require a special exception for further building permits within seven years of fatal damage to Protected Trees, would not apply. Such an interpretation renders the prospective provisions of the TSP Overlay found in Section 1514(f) superfluous in violation of well-established principles of statutory interpretation. *Grayson v. AT&T Corp.*, 15 A.3d 219, citing *Tangoren v. Stephenson*, 977 A.2d 357, 360 n. 12 (D.C.2009) (quoting *Thomas v. District of Columbia Dep't of Employment Servs.*, 547 A.2d 1034, 1037 (D.C.1988) (“A basic principle of statutory interpretation is that each provision of a statute should be construed so as to give effect to all of the statute's provisions, not rendering any provision superfluous.”).

Appellants submit that the Zoning Administrator’s standard for judging fatal damage is unsupported by substantial evidence in the record before the Zoning Administrator, too lenient, violates established principles of statutory interpretation, and finally was not applied with sufficient tree expertise and input.

The Appellants will prove its case relying on: (1) the plain language of the Zoning Regulations; (2) testimony of the Appellants and expert witnesses designated on the attached Witness List; (3) documents itemized in the Exhibit List and attached hereto; and (4) such additional evidence and testimony as deemed necessary.

CONCLUSION

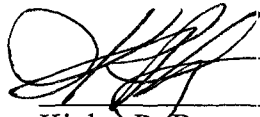
For the reasons stated herein and for the reasons provided at the hearing, the Appellants urge this Board to reverse the decision of the Zoning Administrator and order that Building Permit No. B1103986 should be revoked.

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Respectfully submitted,

ARENT FOX LLP

By:

A handwritten signature in black ink, appearing to be 'Kinley R. Bray', is written over a horizontal line.

Kinley R. Bray
1050 Connecticut Avenue, N.W.
Washington D.C. 20036
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of September, 2011, a copy of the foregoing was mailed, first-class, postage pre-paid, to the following:

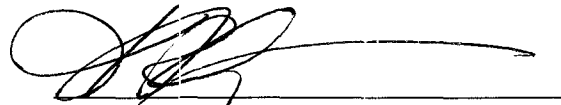
2750 32nd St Trust
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Washington, D.C. 20008

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Washington, DC 20016-1843

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Kinley R. Bray

WITNESS LIST

1. Keith Pitchford, Pitchford Associates*
2. Ellen McCarthy, Director of Planning and Land Use, Arent Fox LLP*
3. Lawrence M. Ausubel and/or Kathleen B. Ausubel

Appellants reserve the right to name and call additional witnesses as necessary to support Appellants' case, subject to the Board's Rules of Procedure.

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*Expert witness

EXHIBIT LIST

- A. Building Permit Number B1103986 issued on July 13, 2011, and application
- B. Aerial Photograph, Google Earth
- C. Architectural Plans associated with Building Permit, various dates
- D. Pitchford Associates letter to Larry Ausubel dated March 23, 2011
- E. UFA memo to Matthew LeGrant dated June 3, 2011
- F. UFA Construction Guidelines for Tree Protection
- G. ANSI Standards for Tree Protection
- H. Revised Tree Protection Plan, July 20, 2011
- I. Minutes of July 15, 2011 meeting with Zoning Administrator and UFA officials

Appellants reserve the right to submit other exhibits as deemed necessary by the Appellants in accordance with the Board's Rules of Procedure.

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