

**BEFORE THE BOARD OF ZONING
ADJUSTMENT OF THE DISTRICT OF
COLUMBIA**

**APPEAL OF 2101 CONNECTICUT AVENUE
COOPERATIVE APARTMENTS, INC. FROM A
DETERMINATION OF THE ZONING
ADMINISTRATOR PERTAINING TO A PROPOSED
REAR ADDITION TO 2012 KALORAMA ROAD,
NW, WASHINGTON, DC 20009
SQUARE 2537, LOT 0150 (R-5-B)**

AND REQUEST FOR STAY

A. INTRODUCTION

2101 Connecticut Avenue Cooperative Apartments, Inc. (the “Cooperative”), the owner of Square 2537, Lot 0300 with the street address of 2101 Connecticut Avenue N.W. (the “2101 Residence”), by and through its duly authorized counsel, Linowes and Blocher LLP, files this Appeal pursuant to Section 6-641.07(f) of the D.C. Code Annotated (“D.C. Code Annotated”) and sections 3100.2, 3112.2, and 3112.5 of Title 11 of the District of Columbia Municipal Regulations (“DCMR”) (the “Zoning Regulations”) from a determination of the Zoning Administrator rendered on December 5, 2012 (provided to counsel for the Cooperative on December 7, 2012) concluding that the proposed rear addition to 2012 Kalorama Road and conversion of an existing single-family dwelling to an eight-unit apartment building (the “Project”) can be constructed by “matter of right.” A copy of the Zoning Administrator’s December 5, 2012 letter (the “Letter”), which includes by reference the graphic “2012 Kalorama Rd, NW Zoning Analysis” (the “Zoning Analysis”), is attached at Exhibit “A”. The Letter and Zoning Analysis will be collectively reference herein as the “Determination” or the “2012 Determination” where necessary.¹

¹ On December 7, 2012, the Zoning Administrator also provided the Cooperative’s counsel a determination letter for the companion project at 2014 Kalorama, which proposes a similar development that will be constructed simultaneously with the conversion of 2012. The projects at 2012 and 2014 Kalorama are intended to be developed simultaneously and delivered as one development. The Cooperative separately appeals the 2014 Kalorama determination letter (“2014 Determination Letter”) for many of the same reasons that it files the subject appeal.

The 2101 Residence is located just 30-feet away from the existing structure at 2012 Kalorama Road, NW, Square 2537, Lot 301 ("2012"), which is the subject of the Determination. The Cooperative submits the following Appeal as it is directly aggrieved by numerous errors made in the Determination, including incorrectly determining that the Project provides sufficient parking and maneuvering room, need not provide a side yard, complies with lot occupancy requirements, and is exempt from Inclusionary Zoning. Due to these and other errors discussed below, the Determination allows the Department of Consumer and Regulatory Affairs ("DCRA") to issue building permits for a project that plainly does not comply with the Zoning Regulations. Such action will permanently and irrevocably damage the Cooperative's members' enjoyment of their property, their property values, as well as a recognized historic setting and potential historic structures. The grounds for Appeal are stated in further detail below.

B. FACTUAL BACKGROUND

1. The Cooperative

The Cooperative is composed of 64 units. Many of the Cooperative's members have resided in the 2101 Residence for more than three decades. The 2101 Residence was erected in 1927 by renowned architects Joseph Abel and George Santmyers, who purposefully designed the structure to capitalize on the significant, surrounding natural light afforded by the 2101 Residence's location at the crest of Connecticut Avenue, just south of the Taft Bridge and Rock Creek Park. Specifically, rather than designing all the units to be flush along one hallway, like most modern apartment buildings, the 2101 Residence is designed in eight "tiers" that extend out from the facade allowing all units to have multiple exterior windows on at least three sides. Of the 64 units, 32 units face west, across Connecticut Avenue, and the rest (32 units) face east looking over trees, a small courtyard and the rear yards of 2014 and 2012 Kalorama Road. This view is highly prized by the Cooperative members because it provides sunlight, air, privacy and security. The 2101 Residence is located in the Kalorama Triangle Historic District, and is specifically mentioned in the "City Beautiful" chapter of the District of Columbia Inventory of Historic Sites.

2. 2012 Kalorama

2012 is a two-story, brick Colonial Revival-style dwelling constructed in 1908 by famed Washington architects Hill and Kendall for the Iowa Apartment House Company. Located in the

Kalorama Historic District, the 4,230 square foot lot extends from Kalorama Road to a 7.5-foot wide public alley (the “2012 Lot”) and is in the R-5-B Zone. 2012’s existing open garden provides residents in the eastern tiers of the 2101 Residence with open views, sunlight and air.

The Determination does not include a Survey for 2012, however a survey of the 2012 Lot provided as part of the previously filed Historic Preservation Review Board (“HPRB”) application for the redevelopment of 2012-2014 Kalorama (attached hereto as Exhibit “B”) shows that the existing 2012 structure has a total gross square footage of approximately 2,097 square feet. Moreover, the 2012 structure has a 5-foot side yard, and a 28-foot front yard. The east facing units in the 2101 Residence, currently overlook the rear yards of the 2012 and 2014 Lots. Lock 7 Development (the “Developer”) is the contract purchaser of the 2012 Lot and was the applicant for the Determination.

3. The Proposed Addition

Based on a review of the Determination, the Zoning Administrator concluded that the Project is a conversion from a “single-family dwelling into an eight-unit apartment building.” The Project intends to more than double the size of the existing 2012 structure. The total proposed floor area, as referenced in the Zoning Analysis is 5,921 square feet. Therefore, the gross floor area will increase from approximately 2,097 square feet to 5,921 square feet as proposed, almost tripling the total square footage on the 2012 Lot. Moreover, the Project includes a 40-foot tall, 60-foot long windowless brick wall along the eastern property line, eliminating the required side yard between the building and the adjacent property to the east (the Stratford Condominium). With this expanded width of the building, there is no room for trash receptacles to be stored or accessed or HVAC units to be located so as to comply with noise and visual requirements.

Furthermore, in violation of the Zoning Regulations, even though the use is changing and the gross floor area is almost tripling, the Project does not include any additional parking spaces. Instead, the Developer proposes to demolish the existing garage, and locate three, new, inadequately-sized and inaccessible surface parking spaces in the same location.

In sum, the Project:

- Almost triples the gross square footage of the existing structure (from approximately 2,097 square feet existing to 5,921 square feet);
- converts an existing single-family dwelling to an eight-unit apartment building;
- does not provide sufficient or adequately-sized parking and maneuvering areas;
- eliminates the required side yard by constructing an approximately 40-foot tall, 60-foot-long, windowless brick wall along the lot line between the 2012 Lot and the adjacent property.
- does not provide for an appropriate loading or trash area; and
- fails to provide space for HVAC units

For the reasons discussed below, the Cooperative asserts that the Zoning Administrator's conclusion that the Project, can be constructed by "matter of right" is erroneous and should be reversed because it more than doubles the size of the building, provides seven new residential units without adding any parking spaces, eliminates the required side yard, fails to provide Inclusionary Zoning Units, and lacks adequate loading space. Without this Board's swift action to grant the Appeal and reverse the Determination, the Cooperative will be harmed, and violations of the Zoning Code will be unlawfully permitted.

C. ERRORS IN THE DETERMINATION

The Determination is erroneous in several respects, and the Project should not be allowed to go forward as a matter of right. Instead, the Developer must amend the design to comply with the Zoning Regulations or obtain necessary zoning relief from this Board.

1. Specific Zoning Errors

The Determination includes four errors in the interpretation of the Zoning Regulations pertaining to parking, side yard, lot coverage and Inclusionary Zoning.

a. Parking

The Project, which is a "conversion from a single-family dwelling into an eight-unit apartment building" (Determination, Comment No. 1) only provides three parking spaces. However, without citing to any section of the Zoning Ordinance, in Comment No. 5, the Zoning Administrator concludes that three parking spaces are sufficient because "the existing parking spaces of the building will be maintained and will be grand-fathered into the proposed building."

The Zoning Administrator's conclusion completely ignores that 11 DCMR § 2120.3, requires parking for projects, like the one proposed for 2012.

Specifically, 11 DCMR § 2120.3 states,

A historic resource and any additions thereto are exempt from the requirement of § 2100.4 to provide additional parking as a result of a change of use and from the requirement of § 2100.6 to provide additional parking as a result of an increase of intensity of use, except that parking shall be required for any addition where:

- (a) The gross floor area of the historic resource is being increased by 50% or more, and
- (b) The parking requirement attributable to the increase in gross floor area is at least four (4) spaces.

This provision squarely applies to the Project at hand. First, as stated above, the Project is a conversion of the existing single-family dwelling into an eight-unit apartment building, thereby triggering the application of 11 DCMR § 2120.3. Next, the Project clearly increases the gross floor area by more than 50% by increasing the existing approximately 2,097 square foot gross floor area to 5,921 square foot gross floor area in satisfaction of 11 DCMR § 2120.3(a). Finally, the Project also meets the requirement of 11 DCMR § 2120.3(b), because the Zoning Administrator determined the Project is converting a single-family dwelling into an eight-unit apartment building, thereby adding seven dwelling units. In the R-5-B Zone District, "apartment house or multiple dwellings" are required to have "one [parking space] per two dwelling units." *See* 11 DCMR § 2101.1 (for apartment buildings the parking space calculation is based on number of units, not gross square feet of apartment use). As referenced above, the Project proposes to add seven new apartment units, and, therefore, must have at least the corresponding four parking spaces, assuming the existing single-family dwelling does not require any parking. (7 units/2 spaces per unit = 3.5 spaces, which must be rounded up to 4 pursuant to 11 DCMR § 2118.6). Accordingly, the Project is subject to the requirement of 11 DCMR § 2120.3(b) because the additional parking "attributable to the increase in gross floor area is at least four spaces." Therefore, the Determination that three parking spaces satisfy the Zone's requirements is in error. Instead, the Project must either provide four parking spaces or apply to this Board for a Special Exception to reduce the number of spaces provided pursuant to 11 DCMR § 2120.6.

Moreover, the Project's proposed parking does not meet the Zoning Regulations' access requirements. In particular, the access requirements of Sections 2117.7 and 2117.8 of the Zoning Ordinance are not met because the Zoning Analysis does not show "rear bumper guards, curbs, guard rails and/or screening between the property line and the perimeter of the parking area" as required, and the public alley is only 7.5 feet in width, falling far short of the 12 foot-width required for one-way access or the 14-foot-width required for two way access. See 11 DCMR §§ 2117.7 and 2117.8. Furthermore, as shown in the parking study produced by the Cooperative's expert architect, attached as Exhibit "C", as designed, ingress and egress out of the parking spaces will be impossible. Consequently, the proposal provided to the Zoning Administrator does not satisfy the Zoning Regulations and should be reversed on Appeal

b. Side yard

At Comment No. 7, the Zoning Administrator concludes that "the existing non-conforming side yard will be eliminated through the introduction of a conforming open court at the termination of the side yard." This conclusion is not supported by the facts or Zoning Regulations.

First to the facts, the building on the 2012 Lot was constructed in 1908 and has an existing, non-conforming side yard approximately 5-feet in width. The Project intends to retain this non-conforming side yard for this portion of the building. Therefore, this non-conforming side yard will not be eliminated, as the Zoning Administrator contends. Rather, it will continue to exist and remain non-conforming.

Next, pursuant to 11 DCMR § 405.8

In the case of a building existing on or before May 12, 1958, with a side yard less than eight feet (8 ft.) wide, an extension or addition may be made to the building; provided, that the width of the existing side yard shall not be decreased; and provided further, that the width of the existing side yard shall be a minimum of five feet (5 ft.).

This section directly applies to the subject Project, because the 2012 existing structure is a historic property constructed prior to 1958 with a five-foot, non-conforming side yard. Accordingly, based on the clear language of 11 DCMR § 405.8, read together with the definition of "side yard" (a yard between any portion of a building or other structure and the adjacent side

lot line, extending for the full depth of the building or structure (11 DCMR §199.1)), any addition to the existing structure shall maintain the five-foot width of the existing, non-conforming side yard. The Project does not do so. Rather, after retaining the existing, non-conforming side yard for the front of the building, it eliminates the side yard all together for the addition, in clear violation of the Zoning Regulations. The Zoning Administrator's conclusion that such activity is permissible is clearly in error. The Zoning Regulations cannot be read to require a certain side yard for a portion because 11 DCMR § 405.8 specifically mandates that a new addition must retain the existing side-yard width. Accordingly, based on a reading of the regulation's plain language, it is clear that the side yard requirements must be interpreted such that if a side yard is provided, (which it is in this case), then that side yard must be at least 5 feet in width (or potentially 8 feet pursuant to 11 DCMR § 405.6) for the whole length of the building. The Project does not retain the required side yard width, and accordingly, the Determination the Project satisfies the Zoning Regulations is in error.

c. Lot Occupancy and FAR

The Zoning Administrator's determination that the Project is a "matter of right" development is based on the Developer's assertions in the Zoning Analysis that the design has an FAR of "1.4" and a Proposed Lot Coverage of "58%." As discussed more below, the Zoning Analysis provided by the Developer is incomplete and cannot be used to support the Zoning Administrator's determination because it lacks dimensions or an accurate scale. Further, the Zoning Analysis is fraught with factual errors. Accordingly, from the information provided by the Developer, it would have been impossible for the Zoning Administrator to confirm that the Project satisfies the R-5-B zone requirements of 1.8 FAR and 60% lot occupancy. *See* 11 DCMR §§ 402.4 and 403.2. For this reason, the Determination regarding FAR and Lot Occupancy is in error, and the Zoning Administrator's conclusion that the Project can be built by matter of right must be reviewed on Appeal.

d. Inclusionary Zoning

In Comment No. 9, the Zoning Administrator determines, without citing to any support in the Zoning Regulations, that "Inclusionary Zoning shall not be required as a net increase of seven units are being proposed." The Cooperative asserts that the Developer's intention to jointly develop 2014 and 2012 with a total of 17 units (nine units on 2014 and eight units on

2012) triggers the Inclusionary Zoning requirements of 11 DCMR §2602.1. To that end, the Inclusionary Zoning sections of the Zoning Regulations apply to “developments” in the R-5-B district that “have ten (10) or more dwelling units (including off-site inclusionary units)” and are an existing development “for which a new addition will increase the gross floor area of the entire development by fifty percent (50%) or more.” See 11 DCMR § 2602.1(a-c). The term “inclusionary development” is defined as “a development subject to the provisions of this Chapter pursuant to § 2602.1” (11 DCMR § 2601.1). Apartment house projects on contiguous lots under common ownership, like the ones proposed for 2014 and 2012, that generate ten or more total units should not be able to avoid the Inclusionary Zoning law. Because the Project increases the gross floor area by more than 50%, and the total development generates 17 total units, the Cooperative asserts that the Zoning Administrator erred when he determined that “Inclusionary Zoning shall not be required.”

2. Factual Errors and Mistakes in the Determination

In addition to the specific zoning errors discussed above, the Determination lacks accurate and key information from the Developer, which call into question all of the conclusions. A summary of these errors is discussed below:

a. Zoning Analysis is Incomplete

As stated above, the Determination includes by reference a “Zoning Analysis.” However, a review of the Zoning Analysis establishes that it includes mistakes and does not contain information necessary for the Zoning Administrator to make his determination.

In particular, the Zoning Analysis lacks crucial information necessary to show compliance with the Construction Code and support the Zoning Administrator’s decision. Specifically, the Zoning Analysis does not comply with the requirements for a “Zoning Compliance Review Data” set forth in section 106.1.12 of the District’s 2008 Construction Codes codified at Title 12A-DCMR §§ 101A *et seq* (the “Construction Code”). Generally, this regulation requires applications for zoning compliance review include “plans drawn to a scale indicated numerically as well as depicted graphically, showing the orientation of the property as to true North” and showing “the shape and location in plan of all existing and proposed structures, fully dimensioned, including orientation and distances to lot lines so as to define without ambiguity the dimensions and location of said structures.” This information is necessary

for the Zoning Administrator to determine the Project's compliance with the Zoning Regulations. A review of the Zoning Analysis establishes that this document fails to meet all of these requirements. In particular, the Zoning Analysis lacks almost all dimensions, an identification of the front or rear portions of the property, notation of heights, a unit count or even an orientation to true North. Rather, the Zoning Analysis appears to be conceptual designs accompanied by unsupported conclusions that the Project satisfies the FAR and lot coverage requirements. Such a document does not allow for a determination of Code compliance.

b. No Survey Submitted to the Zoning Administrator

The Determination does not include a survey of the 2012 Lot. Accordingly, the Cooperative concludes that the Developer did not submit this necessary piece of information to the Zoning Administrator. Without a survey, it would have been impossible for the Zoning Administrator to determine the size of the existing structure, and, accordingly, how much square footage is being added to the Property. This information is necessary to determine whether sufficient parking is proposed or whether Inclusionary Zoning may apply. Without evidence that the Zoning Administrator was able to review a survey of the 2012 Lot, the Determination lacks support for its conclusion that no additional parking is required, because, as discussed above, pursuant to 11 DCMR § 2120.3, additional parking is required when a project increases the gross floor area of the existing, historic structure by more than 50%. A review of the 2012 survey submitted with the HPRB filing in conjunction with the Zoning Analysis establishes that the Project proposes to almost triple the size of the structure, but without reviewing that survey, there is no way for the Zoning Administrator to have known that fact. Perhaps if the Zoning Administrator had reviewed the 2012 survey, he would have been able to conclude that the Project more than doubled the square footage of the existing structure, meaning that it was required to have at least four parking spaces pursuant to 11 DCMR § 2120.3. However, the fact that the 2012 survey was not provided to the Zoning Administrator and was not included with the Determination is clearly an error that provides sufficient basis for this Board to reverse the Zoning Administrator's decision on Appeal.

For the reasons stated above, the Cooperative asserts that the above clearly demonstrate that the Determination was issued in error and respectfully request that the Board grant this Appeal and reverse the Determination.

D. COOPERATIVE'S CASE

To support its position, the Cooperative will retain consultants and experts who will testify regarding the application of the Zoning Regulations to the 2012 Lot. In addition, there may be sworn testimony from members of the Cooperative, the ANC and affected neighbors, as well as other photographic and documentary evidence as necessary.

E. REQUEST FOR A STAY

Furthermore, due to what we understand to be the potentially imminent issuance of raze, demolition and/or building permits by DCRA, the Cooperative asks the BZA to stay all processing and approval of any permits related to the Proposed Addition.

The D.C. Court of Appeals has established that administrative agencies, such as the Board are entitled to issue stays when the party seeking the stay demonstrates "it is likely to prevail on the merits, that irreparable injury will result if the stay is denied, that the opposing parties will not be harmed by a stay, and that the public interest favors granting of a stay." See *Kuflom v. District of Columbia Bureau of Motor Vehicle Services*, 543 A.2d 340 (D.C. 1988).

The subject case meets this standard. First, the Cooperative asserts that the Determination is fatally flawed for the reasons stated above, and this Board will reverse the Zoning Administrator's finding that the Project can be constructed by matter of right. Second, if the Determination stands and permits are issued leading to construction in violation of the Zoning Code, trees may be removed and destruction of other features and structures will occur along with construction of a 40-foot wall through the 2012 rear garden that will irreparably harm the current access to light, air and views of many residents of 2101. The impact of constructing the Project will be irreversible and has the potential of decreasing property values by hundreds of thousands of dollars. Third, the Developer will not be harmed by a stay because he is required by HPRB to make certain design refinements. Finally, the public interest favors granting of the stay, because denying it could result in the loss of vegetation, historic resources and a historic setting that benefit the general public as well as the neighborhood.

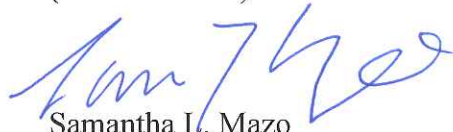
For these reasons, the Cooperative asks the Board to stay the issuance of any and all permits for the pendency of this Appeal.

Respectfully submitted,

LINOWES AND BLOCHER LLP



Emily J. Vaia
(DC Bar #441832)
Linowes and Blocher LLP
7200 Wisconsin Avenue, Suite 800
Bethesda, MD 20814
(301-961-5174)



Samantha L. Mazo
(DC Bar #487649)
Linowes and Blocher LLP
7200 Wisconsin Avenue, Suite 800
Bethesda, MD 20814
(301-961-5261)

February 4, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 4th of February, 2013, a copy of the foregoing was mailed, first class postage prepaid to:

Cary R. Kadlecek, Esq.
Goulston & Storrs LLP
1999 K Street, NW
Suite 500
Washington, DC 20006

David Gorman
Patrick Conway
Lock 7 Development
3204 Stephenson PL NW
Washington, DC 20015-2422

James C Courtovich
2012 Kalorama Road N.W.
Washington, DC 20009

Chairperson
Advisory Neighborhood Commission 1C
P.O. Box 21009
Kalorama Station
Washington, D.C. 20009

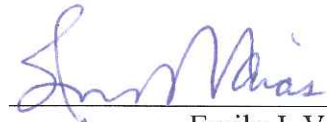
Martis Davis
Single Member District Commissioner 1C – SM02
2032 Belmont Road N.W. Apt. 607
Washington, DC 20009

Matthew LeGrant, Zoning Administrator
Department of Consumer and Regulatory Affairs
Office of the Zoning Administrator
1100 4th Street SW
3rd Floor
Washington, DC 20024

Harriet Tregoning, Director
Office of Planning
1100 4th Street SW
Suite E650
Washington, DC 20024

Alan Bergstein, Esq.
Office of the Attorney General
Chief, Land Use, Public Works
441 4th Street, NW
Washington, DC 20001

General Counsel
Department of Consumer and Regulatory Affairs
1100 4th Street SW
Washington, DC 20024


Emily J. Vaia

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**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE ZONING ADMINISTRATOR**



December 5, 2012

VIA EMAILED PDF AND FIRST CLASS US MAIL

Ronald Schneck Jr., AIA
Square 134 Architects, PLLC
1410 Q Street, NW
Washington, D.C. 20009

Re: Zoning PDRM – 2012 Kalorama Road, NW – Subject Property

Dear Mr. Schneck:

Please allow this letter (and attached graphic Zoning Analysis) to serve as a confirmation of our conversation on Thursday, October 11th, 2012 regarding the proposed development at the subject property. The conclusions that we discussed are summarized below:

- 1 - The building is a matter-of-right conversion from a single-family dwelling into an eight unit apartment building in an R-5-B zone.
- 2 – The building height shall be established by measuring from the top of the top of the curb surface opposite the middle of the front of the building, to the top of the roofing surface or the top of the highest parapet, whichever distance is greater.
- 3 – The lowest level of the building shall be determined to be a basement or a cellar based on the difference between the top of the adjacent grade and the surface of the ceiling at that level. If this dimension is less than 4', or the 2'-5" that is proposed, it will be deemed to be a cellar. In the case of a limited areaway to access the level, the top of the grade adjacent to the areaway shall be used.
- 4 – The FAR calculation for the building exempts a cellar from the calculation; The cellar will not be counted towards the F.A.R. of the building.
- 5 – The existing parking spaces of the building will be maintained and will be grand-fathered into the proposed building. Proposed parking will maintain the existing three parking spaces at the rear of the building and off of the public alleyway and will provide a total of three parking spaces for the entire building and are to be maintained at their current location and configuration. The dimensions of these spaces shall maintain the minimum dimensions in both directions.
- 6 – The open courtyard which is surrounded by walls on three sides will extend from the lowest level up thru the roof and will be open to the sky. The courtyard is to be a minimum of 10'-0" in either direction and will be considered a legal open court.

1100 4th Street, SW 3rd Floor Washington, D.C. 20024
Phone: (202) 442-4576 Fax: (202) 442-4871

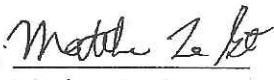
Exhibit "A"

7 – The existing non-conforming side yard will be eliminated through the introduction of a conforming open court at the termination of the side yard.

8 – The areaway leading to the open court and the open court itself shall not be used in the calculation of lot coverage.

9 – Inclusionary zoning shall not be required as a net increase of seven units are being proposed.

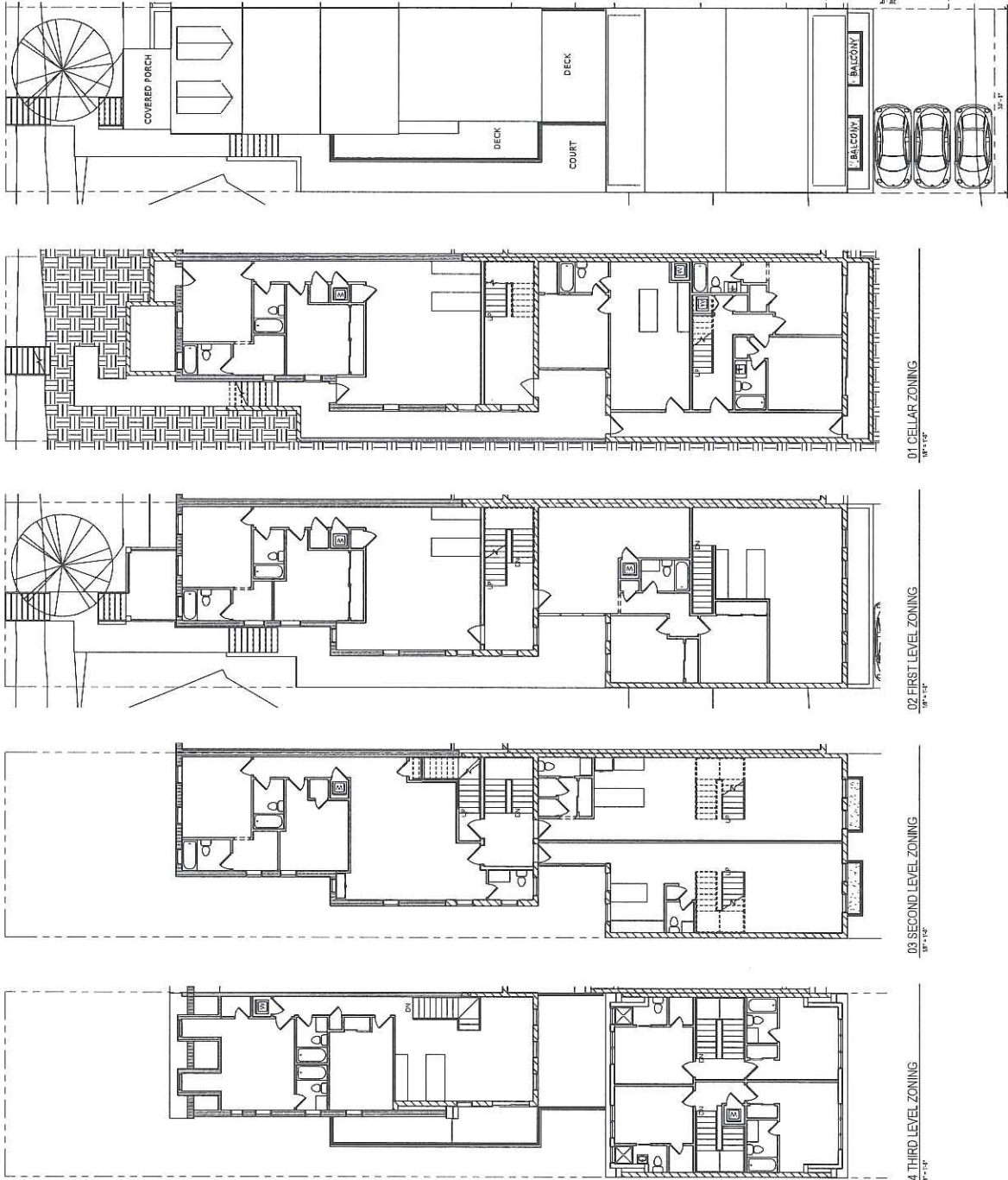
Accordingly, when you file the plans for a building permit, I will approve drawings that are consistent with the plans attached to this letter. Please let me know if you have any further questions.

Sincerely, 
Matthew Le Grant
Zoning Administrator

Attachment – Plan Set and Zoning Analysis

File: Det Let re 1212 Kalorama Rd NW to Schneck 12-5-12

ZONING ANALYSIS 2012 KALORAMA RD, NW



SITE PLAN ZONING

PROPOSED LOT COVERAGE - 2,039 SF
 PROPOSED (Residential)
 Lot Occupancy - 86%
 F.A.S. - 1.4
 Building Height - 32.3 FT
 Rear Yard Setback -
 Parking - 3 spaces for 6 units

ZONING ANALYSIS

Square - 2537
 LOT - 0110
F.A.R. CALCULATIONS
 GARDEN LEVEL - 149 SF
 FIRST LEVEL - 2,182 SF
 SECOND LEVEL - 2,182 SF
 THIRD LEVEL - 1,557 SF
TOTAL - 6,070 SF

ZONING SUMMARY
 R-2-B
 SQUARE - 2537
 LOT - 0110
 REGULATIONS

Total Lot Size - 4,130 sf
 ALLOWABLE (Residential)
 Lot Occupancy - 86%
 F.A.S. - 1.4
 Building Height - 32.3 FT
 Rear Yard Setback -
 Parking - 1 per 1 dwelling unit

A-100

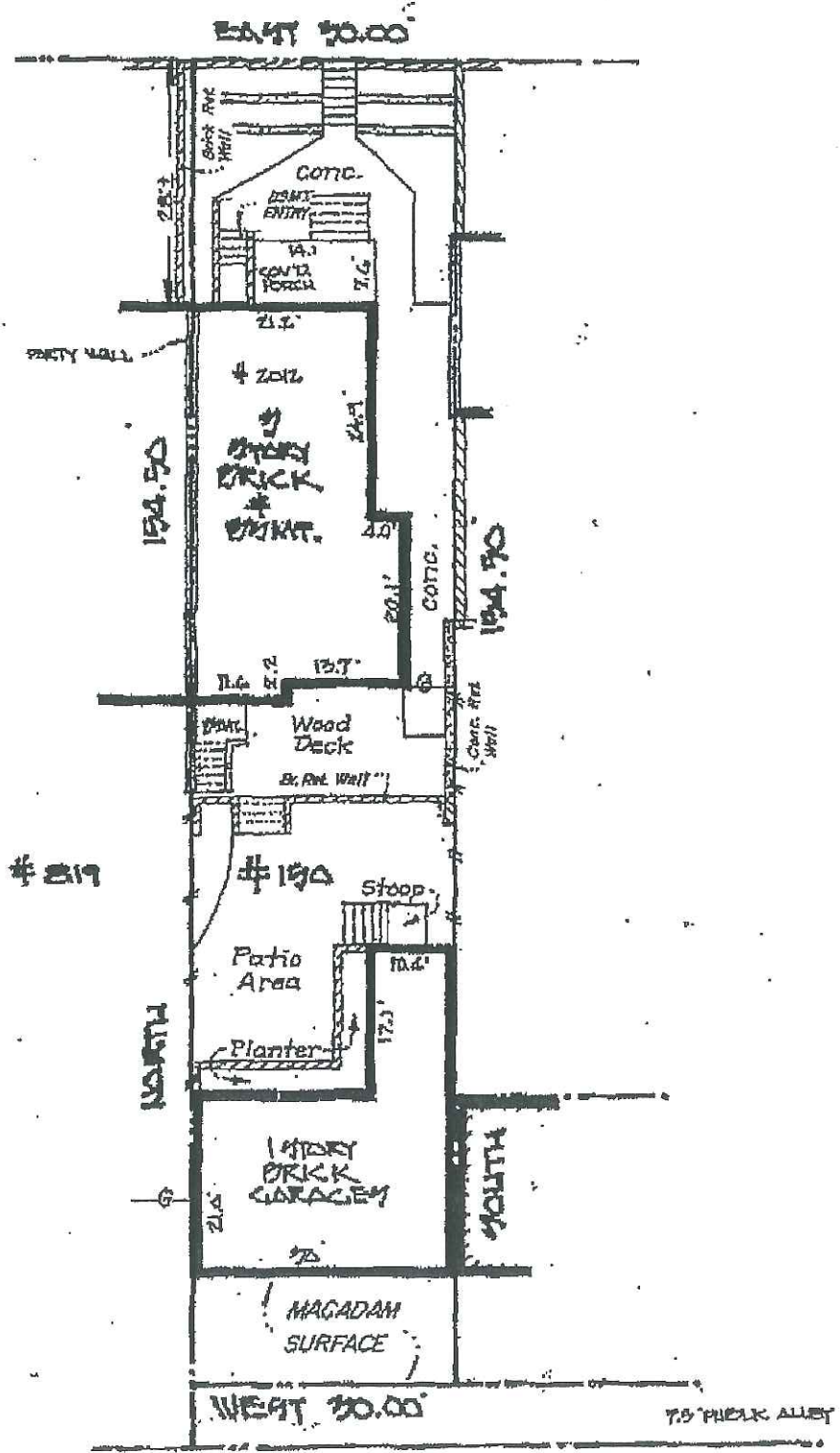
PROJECT NO.
 12031/12035
 DRAWN BY:
 Author
 SCALE:
 1/8" = 1'-0"
 DATE:
 2012-10-16
 DWG. NO.

ZONING ANALYSIS

PROJECT
 2012-2014 Kalorama RD
 Washington, DC, 20009

Square
 134
 Architects
 1410 G Street NW, Washington, DC, 20009
 P (202) 328 0134 F (202) 315 2615

Kalorama Road, N.W.



Parking

- Ingress/Egress impossible for vehicles and passengers.
- Will not conform to the Zoning Administrators requirements.
- Not legal spaces.

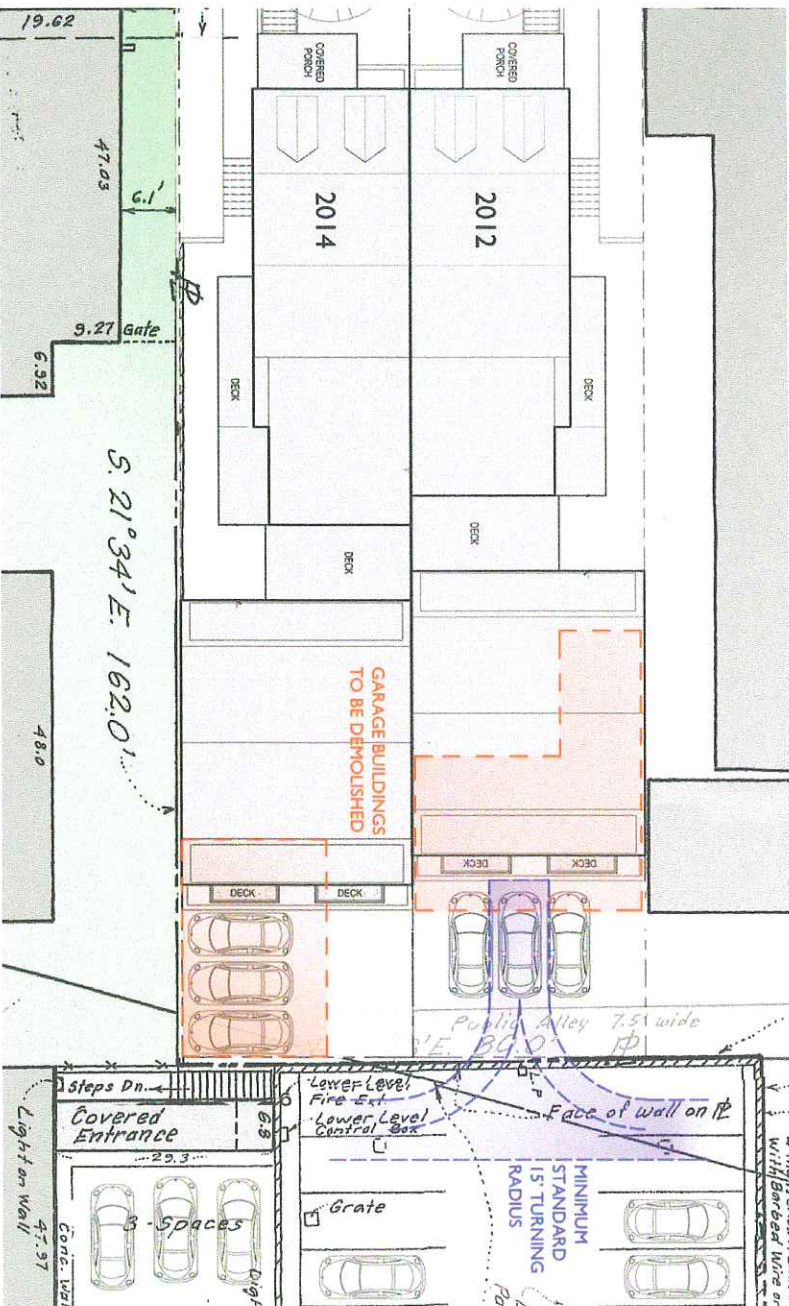


Exhibit "C"