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September 17, 2013

HAND DELIVERY

Lloyd Jordan, Chairperson
D.C. Board of Zoning Adjustment
Office of Zoning
441 4th Street, NW, Suite 200 South
Washington, DC 20001

Re: Case No. 18621: Pre-Hearing Statement for Variance and Special Exception
Relief for Property Located at 901 16th Street, NW (Square 199, Lots 824 and 61)

Dear Chairperson Jordan:

Enclosed please find the pre-hearing statement in the above-referenced case. In addition to the areas of relief sought in the initial application, LiUNA also seeks relief from Section 2001.3 of the Zoning Regulations, as it is proposing additional density to an existing non-conforming building. LiUNA looks forward to presenting this application to the Board at its public hearing scheduled on October 1, 2013.

Sincerely,



Allison C. Prince



Christine A. Roddy

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BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18621

EXHIBIT NO. 23

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

Pre-Hearing Statement of the Laborers International
Union of North America
ANC 2B05

BZA Application No. 18621
Hearing Date: October 1, 2013

PRE-HEARING STATEMENT OF THE APPLICANT

This is the pre-hearing statement of the Laborers International Union of North America (“LiUNA” or “Applicant”) for special exception and variance relief to construct an addition to an existing office building at 901 16th Street, NW (Square 199, Lots 61, 824) (“Property”). The Property is split-zoned and is located in the SP-2 and C-4 Zone Districts within the Sixteenth Street Historic District. It is a corner lot with frontage on both 16th Street and I Street. It is improved with an eight-story office building that is owned and occupied by the Laborers International Union of North America. There is a vacant lot to the east of the LiUNA building that is currently used as a surface parking lot. LiUNA would like to construct a nine-story addition to the existing office building on the parking lot site and to convert a portion of the penthouse space on the existing building to conference and event space. The buildings would be fully integrated on each floor and would be occupied by LiUNA and other office tenants. The proposed design has been approved in concept by the Historic Preservation Review Board.

LiUNA now applies to the Board of Zoning Adjustment for approval of the proposed project. While there are multiple areas of relief, many are technical and minor in nature. Specifically, the Applicant requires relief from the height requirements of Section 530.1, the FAR requirements of Section 531.1 and the rear yard requirements of Section 774.2. In addition, the Applicant seeks permission to modify a zone boundary line per Section 2514.2. Finally, relief is needed from the roof structure requirements of Section 537.1 and 777.1, for the addition

of office space in the SP Zone District per Section 508.1, and for the addition of density to a non-conforming building pursuant to Section 2001.3.

I. NATURE OF RELIEF SOUGHT

The Applicant requests that the Board of Zoning Adjustment (the "BZA" or the "Board") approve special exception and variance relief pursuant to Sections 508.1, 530.1, 531.1, 537.1, 774.9(c), 777.1, 2001.3, 2514.2, 3103.1, and 3104.1 of Title 11 of the District of Columbia Municipal Regulations.

II. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the relief requested pursuant to Sections 3103.1 and 3104.1 of the Zoning Regulations (11 DCMR § 3104.1).

III. BACKGROUND AND PROJECT DESCRIPTION

LiUNA is the most progressive, aggressive and fastest-growing union of construction workers, and one of the most diverse and effective unions representing public service employees. LiUNA members are on the forefront of the construction industry – a sector that is a powerhouse of 12 million workers producing 5 percent of the country's economic output.

The existing building was constructed for LiUNA in 1959 and has served as its headquarters ever since. LiUNA has grown over the last fifty years and needs to expand its facilities. It owns the property immediately east of the office building and would like to use it for the addition to the existing office building. The property to the east is currently used as a surface parking lot.

The existing building, which fronts on 16th Street, is considered a "contributing building" in the Sixteenth Street Historic District. It is located in the SP-2 Zone District. The property to the east, which will be used for the addition, is located in the C-4 Zone District. The zone

boundary traverses the Property in a north-south direction. Approximately 10,400 square feet of property is located in the SP-2 Zone District, while 5,421 square feet of property is located in the C-4 Zone District.

LiUNA is proposing a nine-story addition on the portion of the Property located in the C-4 Zone District. It will have a floor area ratio of 8.2 and a maximum height of 110 feet. It will connect with the existing building at every level, including the roof level, where the ninth story of the addition will connect with the existing lower penthouse on the LiUNA building. LiUNA also intends to convert that lower penthouse to occupiable amenity space to use during meetings and events as an accessory to the rooftop deck proposed as a part of the renovation. The conversion of the penthouse to habitable space triggers a need for both FAR, height and SP office use relief despite the fact the use will take place within the existing envelope of the building. The connection to the penthouse is located within 35 feet of the zone boundary line and is thus permitted with special exception relief pursuant to Section 2514. Nevertheless, because of historic preservation concerns, the connection will have reduced height, which requires relief from the requirements that the roof structures be of uniform height.

The proposed project does not provide any side yards and, again, in order to address historic preservation concerns regarding the relationship and connections between the existing and new structures, it is not providing a rear yard. The building provides a modest garage that is accessed from the existing building garage entry curb cut on I Street. While no changes to the garage access are proposed, the garage will be expanded to include a total of 67 parking spaces.

IV. DESCRIPTION OF THE PROPERTY AND SURROUNDING AREA

The Property is located on the east side of Sixteenth Street in the northeast corner of the intersection of 16th and Eye Streets. It is located to the south of the St. Regis Hotel and two blocks north of the White House. Its neighbors consist of office, hotel and institutional users, and a modest amount of retail use; there are no residential uses within the immediate vicinity of the Property. The existing building is used solely for office use.

V. THE APPLICATION MEETS THE REQUIREMENTS FOR SPECIAL EXCEPTION RELIEF UNDER SECTION 3104.1 OF THE ZONING REGULATIONS

The Applicant is seeking special exception relief pursuant to Sections 3104.1 and 2514.2 to allow the extension of the height, density, and office uses permitted by the C-4 zoning requirements thirty-five feet into the portion of the lot located in the SP-2 Zone District. In order to obtain the requested relief, the special exception must be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and must not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Maps (11 DCMR Section 3104.1). Pursuant to Section 2514, the Applicant must also demonstrate that the extension is (1) limited to that portion of the lot in the more restrictive use zone district but not exceeding thirty-five feet (35 ft.); (2) that the extension complies with the density restrictions of Section 2514.1(d); (3) the extension shall not have an adverse effect on the present or future character of the neighborhood; and (4) the Board may impose requirements pertaining to design, appearance, screening, location of structures, lighting, or any other requirements it deems necessary to protect adjacent or nearby property.

LiUNA also seeks special exception relief from Section 508.1 of the Zoning Regulations, as required for an addition to an office building in the SP-2 zone. Relief is appropriate so long as the use, height, bulk and design of the building is in harmony with existing uses and structures on neighboring properties, the use shall not create dangerous or objectionable traffic conditions and the Board may require special treatments, as necessary.

LiUNA seeks special exception relief from the rear yard requirements of Section 774. Section 774.2 allows the Board of Zoning Adjustment to waive the rear yard requirements pursuant to the special exception standard so long as the windows on the proposed building are separated from the neighboring buildings a sufficient distance to allow light and air and so long as sufficient service functions are provided, such as parking and loading areas.

Finally, LiUNA seeks special exception relief for the unequal height of its roof structures pursuant to Sections 537 and 777.

A. The Requested Relief is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps

The general purpose and intent of the Zoning Regulations and Zoning Maps is to promote the public health, safety, morals, convenience, order, prosperity, and general welfare. 11 DCMR Section 101.1. Specifically, the requested relief must take into consideration the character of the respective districts as well as the suitability of each district for the uses permitted; and must be designed to encourage the stability of districts and land values. Id. at Section 101.2. The relevant sections of the Zoning Regulations provide guidelines by which to evaluate whether a special exception should be granted.

In this case, the Applicant seeks relief pursuant to Section 2514.2 to allow additional density, height, and office use on a portion of the Property located in the SP-2 Zone District. The Applicant is proposing a connection between the addition constructed on the C-4 property and the existing penthouse on the SP-2 property. The SP-2 property currently maximizes the permitted height and density on the SP-2 property; as such, the Applicant seeks relief pursuant to Section 2514.2 to shift the height and density allowed by the C-4 Zone District to the west in order to connect the existing penthouse with the proposed addition. The connection is minimal and non-invasive and has been approved, in concept, by the Historic Preservation Review Board. The connection is consistent with the Zoning Regulations in that it provides a sense of cohesion between the buildings and promotes efficiency between the two structures. Without the connection, the converted penthouse space would have no connection with the ninth floor of the addition; which would undermine the functionality of the addition at that level.

The requested relief is not an attempt to establish additional height and density for the purpose of increasing the building envelope, as the connection would be much larger if that were LiUNA's intent. The density LiUNA is proposing does not exceed what would be permitted on the neighboring lot; it is simply shifting some of that density to the west. If the shift was not permitted, LiUNA could still construct the density as a matter-of-right, albeit, it would be located entirely on the neighboring lot. Without the shift, LiUNA would be entitled to construct 54,210 square feet on the neighboring lot. By contrast, LiUNA is only proposing 49,551 square feet of density on that lot. The connection is comprised of approximately 927 square feet; accordingly, LiUNA is not proposing additional density by way of the requested relief. LiUNA is instead making an effort to create a unity between the buildings, which in turn enhances their functionality and ability to work in concert with each other. To address historic preservation

concerns and underscore the notion that the connection is only to be a functional connection, and not additional density, it is set back four feet on both sides from the face of the existing penthouse. It is not meant to be a focal point in and of itself, but was designed to respect the historic attributes of the existing building and to only serve its purpose of connecting the addition to the existing building and nothing more.

Shifting the height and density allowed by the C-4 zoning allows additional density and an additional 20 feet of height on the SP-2 property than would otherwise be allowed. When considered in the overall context of the existing building and the proposed addition, it is a modest amount. Further, the connection is necessary in order to fuse the existing building and the addition and provide efficient access to the penthouse. As such, the only way to accomplish such an objective would be with the requested relief.

While the connection between the existing building and addition requires special exception relief pursuant to Section 2514.2, converting the existing penthouse on the SP-2 property to habitable space requires special exception relief pursuant to Section 508.1. The addition of office space on the SP-2 property, although within the existing envelope of the building, triggers the need for special exception relief. The existing LiUNA building has a two-tiered penthouse. LiUNA is proposing to use the lower penthouse as habitable space and retain the upper penthouse to store mechanical equipment. Rather than allow the lower penthouse to remain vacant and underutilized, LiUNA is requesting relief to transform it into a functional component of the building and an active contribution to the 16th Street corridor. This conversion provides access to a rooftop terrace that LiUNA and its guests can enjoy all while providing a new plane of activity above the street level. The use of the rooftop space does not have an adverse effect on the existing community as it is surrounded exclusively by commercial users.

The conversion of this space from mechanical penthouse to habitable space is consistent with the Zoning Regulations and Maps in that it promotes high quality design and promotes the use of rooftop spaces, a means of energizing new building planes. The Zoning Regulations already allow the use of penthouses for habitable spaces in residential zones; the Applicant is requesting the same consideration for the SP-2 Zone District.

The conversion of the penthouse adds approximately 3,960 square feet of additional office space on the SP-2 portion of the property. This is 3% of the overall building density and is an extremely modest increase. Additionally, the increase is encapsulated entirely within an existing structure, which further mitigates any impact the increase may have on the surrounding community. The conversion of the penthouse and the modifications to the exterior of the penthouse have been approved in concept by the Historic Preservation Review Board.

LiUNA is not providing a rear yard for the addition. LiUNA's initial design proposed an addition with a height of 130 feet and included a compliant court in lieu of a rear yard, which is permitted in the C-4 Zone District. The Historic Preservation Office ("HPO") supported the reduction of the height to 110 feet and the shift of the density lost from the reduction in height into the area of the proposed courtyard in effect, eliminating the rear yard. LiUNA studied the two options and ultimately agreed the latter proposal was the favored approach. Not only did the latter approach win the favor of the Historic Preservation Review Board, but it also allowed LiUNA to preserve two levels of "at risk" windows of its neighbor. The property to the east of the addition includes a façade with 11 stories of "at risk" windows. By way of background, the Building Code prohibits windows on facades within ten feet of a lot line. Any property owner who puts windows on such a façade, does so at his own risk, knowing that at any time a neighboring property owner could rightfully construct a building to the lot line and cover his

windows, hence the name, “at risk” windows. This means that at the time the neighboring building was constructed, the neighboring property owner acknowledged that it was constructing those windows at his own risk. No zoning protections are afforded to “at risk” windows since it is a risk that a property owner knowingly assumed.

Nevertheless, the latter design afforded LiUNA an opportunity to save the highest floors some of the “at risk” windows of its neighbor and it chose to pursue that option as the best alternative for all parties. By contrast, the initial design LiUNA considered did not save any of the at-risk windows of the neighboring building. Accordingly, the combination of HPRB support for not providing a rear yard and the ability to save a significant number of the neighboring property’s “at risk” windows, made this design the favored approach for LiUNA. Unlike the initial design, however, it requires specific zoning relief.

The Zoning Regulations set forth a specific standard for determining whether rear yard relief is appropriate in this instance:

- Apartment and office windows shall be separated from other buildings that contain facing windows a distance sufficient to provide light and air and to protect the privacy of building occupants;
- In determining distances between windows in buildings facing each other, the angle of sight lines and the distance of penetration of sight lines into habitable rooms shall be sufficient to provide adequate light and privacy to the rooms;
- The building plan shall include provisions for adequate off-street service functions, including parking and loading areas and access points;

- The application shall be referred to the Office of Planning and other relevant agencies for review.

To be clear, the protections afforded to the windows referenced in the above standard are for the LiUNA building *only*. No protections are afforded to the neighboring property building because those windows were constructed at the owner's risk. The Zoning Administrator has confirmed this interpretation and has confirmed that "at risk" windows are not protected by the Zoning Regulations, including this section.

The LiUNA addition satisfies the standard delineated in Sections 774.3 through 774.6. As depicted in the attached plans, the windows on the LiUNA building will have sufficient light and air. The windows along the northern façade face the end of the alley, which is more than sufficient to allow light and air to the LiUNA offices. LiUNA certainly wants to make its proposed addition attractive and functional space and is not willing to propose and construct a subpar building; thus, the proposed addition has been thoughtfully designed to provide adequate light, air, and privacy for the offices.

Similarly, LiUNA is providing sufficient parking in the below garage and it meets the zoning requirement for parking. With respect to loading, LiUNA is not required to provide formal loading since it is a historic resource. The building does not generate a significant amount of loading and it has traditionally been able to accommodate what loading needs it does have without a formal loading area. Nevertheless, LiUNA is proposing a loading area accessed via the alley to the rear of its building to serve its loading needs.

LiUNA also seeks special exception relief for the varying height of its roof structures. The height of the roof structures vary between 12 feet, 8 feet, and 18 feet. The height of the roof

structures, particularly the addition to the existing building, have been dictated in large part by historic preservation considerations. In light of those considerations, and working with HPO staff, LiUNA has worked to minimize the height of the roof structure so as not to intrude and overshadow the historic character of the building. The Applicant has taken great effort to minimize the presence of the roof structures and the primary method for doing so has been through the use of setbacks and the reduction in height; accordingly, the roof structures do not comply with the uniform height requirements of Section 411.

B. The Requested Relief Will Not Adversely Affect the Use of Neighboring Property

As noted above, the adjacent properties include offices, a hotel, and another labor union, the addition of 4,767 square feet of office space on the SP-2 property will not have an adverse effect on any of these properties. LiUNA is permitted much more density on the C-4 portion of its property than it is proposing. Allowing this modest addition of office use on the SP-2 portion of the property allows LiUNA to reduce height and density of the adjacent addition. This solution, while adding height and density on the SP-2 property, mitigates the impacts of a much larger matter-of-right building on the adjacent property. This proposal shifts height and density to the west and is along a major corridor. This shift energizes the rooftop plane of activity in a manner that benefits this entrance to the heart of the city. The additional height and density is not *in addition* to the height and density allowed on the C-4 property but is *instead* of additional height and density on the C-4 property. It is a conscious decision to focus activity along 16th Street, which maximizes the building's access to District resources, including views of the White House but also allows visitors to appreciate the historic attributes of the building. In short, this proposal is a means of maximizing the resources of and surrounding the existing building.

As noted above, the noncompliant rear yard maximizes the number of windows, which can be preserved on the neighboring building by foregoing an additional twenty feet of building height. Each of those windows were constructed “at risk”, meaning that under the D.C. Building Code, the owner has to remove each window when an adjacent building is constructed. LiUNA is under no obligation to preserve the windows of the neighboring property owner and in fact, its initial design provided a compliant court in lieu of the rear yard, as permitted in the C-4 Zone, and did not preserve any of those windows. Thus, the existing proposal of a building with a reduced height and no rear yard has a very positive effect on the neighboring property owner. A rear yard, with a full building height, would result in the loss of all windows, whereas, the instant proposal preserves at least sixteen of those windows.

Reducing the height of the roof structures does not have an adverse effect on neighboring property owners. In fact, it reduces the presence of the roof structures, enhancing the historic resource and benefiting views and light and air of neighboring buildings.

VI. THE APPLICATION MEETS THE REQUIREMENTS FOR AREA VARIANCES UNDER SECTION 3103.2 OF THE ZONING REGULATIONS

The burden of proof for an area variance is well established. The applicant must demonstrate that (i) the property is affected by an exceptional or extraordinary situation or condition, (ii) that the strict application of the Zoning Regulations will result in a practical difficulty to the Applicant, and (iii) that the granting of the variance will not cause substantial detriment to the public good or substantially impair the intent, purpose or integrity of the zone plan. *See, e.g., Gilmartin v D.C. Board of Zoning Adjustment*, 579 A.2d 1164, 1167 (D.C. 1990). In examining the first two elements, the BZA may apply a more flexible standard for determining difficulty when a public service or nonprofit entity is the applicant, such as Holy Trinity. *See National Black Child Development Institute v D.C. Board of Zoning Adjustment*, 483

A.2d 687, 690 (D C 1984), *Monaco v D C Board of Zoning Adjustment*, 407 A 2d 1091, 1098 (D.C. 1979) The D C Court of Appeals has applied the more flexible standard to area variances as well as use variances See *Draude v D C Board of Zoning Adjustment*, 582 A 2d 949, 956 (D C 1990) As set forth below, the Applicant meets the three-part test for the requested height and FAR variances for a non-conforming structure The existing building is non-conforming with respect to FAR and LiUNA is proposing additional density and height, however, the lot occupancy of the building is zoning compliant

A. The Property is Affected by an Exceptional Situation or Condition

The D C Court of Appeals held in *Clerics of St Viator v D C Board of Zoning Adjustment*, 320 A 2d. 291 (D C 1974) that the exceptional situation or condition standard goes to the "property", not just the "land", and that "property generally includes the permanent structures existing on the land " *Id* at 293-294 Indeed, the Court repeatedly has rejected the idea that the exceptional situation and practical difficulty justifying a variance must arise from the physical aspects of the land See *National Black Child Development*, 483 A 2d at 690, *Monaco v D C Board of Zoning Adjustment*, 407 A 2d 1091, 1097 (D C 1979) Instead, the BZA may "weigh more fully the equities in an individual case " *National Black Child Development*, 483 A 2d at 690 Further, the characterization of the use as a public service is significant to the determination of uniqueness. In *Monaco*, the D C Court of Appeals held

While a commercial user before the BZA might not be able to establish uniqueness in a particular site's exceptional profit-making potential, we consider that the BZA may be more flexible when it assesses a non-profit organization As Professor Anderson has observed, public need for the use is an important factor in granting or denying a variance "

Monaco, 407 A 2d at 1098.

The Property is unique because it is improved with an existing building that includes an existing penthouse that in and of itself is considered a contributing feature of the Sixteenth Street Historic District. Penthouses are not traditionally regarded as historic resources, however, this penthouse was not constructed as a typical mechanical room. It was constructed with high quality materials and unique design features. The Historic Preservation Review Board agreed that the existing penthouse exhibits a number of wonderful historic attributes. The HPRB granted concept approval of the proposed project at its public meeting on May 23. The staff report noted that the penthouse is "treated with the same limestone cladding and [is] carefully integrated as part of the architectural composition." The report went on to say that the penthouse is "an integral part of the design of the entire building." It is not simply a penthouse used to store mechanical equipment, it is a feature in and of itself. Accordingly, LiUNA would like to retain the penthouse but use it in a way that utilizes its unique space and appreciates its significance.

Though the conversion technically exacerbates an existing non-conformity, it is density that already exists. The penthouse is an existing feature of the building, it is simply used for a different purpose than what is now being proposed. LiUNA is proposing to use the existing building envelope but to convert the use of the penthouse to habitable space. The "addition" to a non-conforming building is extremely modest when considered in this context.

B. Strict Application of the Zoning Regulations Would Result in a Practical Difficulty

To satisfy the second element for an area variance standard, the Applicant must demonstrate "practical difficulty." The D.C. Court of Appeals has established a two part test for determining whether an applicant has met its burden of proof. The applicant must demonstrate

that "compliance with the area restriction would be unnecessarily burdensome" and that the practical difficulty is "unique to the particular property " *Gilmartin*, 579 A.2d at 1170. The Court of Appeals has held that the "nature and extent of the burden which will warrant an area variance is best left to the facts and circumstances of each particular case." *Id.* at 1171. "Increased expense and inconvenience to applicants for a variance are among the proper factors for [the] BZA's consideration " *Id.* Some other factors that the BZA may consider are "the weight of the burden of strict compliance," "the severity of the variance(s) requested," and "the effect the proposed variance(s) would have on the overall zone plan " *Id.* The BZA also may consider the needs of a public service organization that "has inadequate facilities and applies for a variance to expand into an adjacent area in common ownership . " *Draude*, 582 A.2d at 956.

The BZA may grant a variance from the FAR and height requirements for a non-conforming building where it is practically difficult to comply with the regulations. In this instance, LiUNA is undertaking a comprehensive renovation of the existing building and proposing a new addition. Since the addition will include a new core, much of the space in the existing penthouse will be rendered unnecessary and will be included in the new penthouse proposed with the addition. In addition, LiUNA wishes to establish a roof deck on the existing building so its employees and visitors could enjoy the expansive and impressive views afforded by its location along the prestigious 16th Street corridor. The Historic Preservation Office, however, finds the existing penthouse a contributing feature to the Sixteenth Street Historic District and as such, LiUNA cannot remove or move it, making its use of the rooftop space more challenging. In an effort to address the HPO's comments but while also striving to serve its own needs, LiUNA is retaining the penthouse but adapting its use. In order to allow LiUNA to use the roof as conference and event space, the penthouse must be converted to provide habitable

space in order to provide access to the roof, which requires relief from the FAR and height requirements. Complying with these requirements would preclude the use of the roof top area as habitable space and would not enable a higher and better use of an underutilized penthouse space.

C. Relief Can Be Granted Without Substantial Detriment to the Public Good and Without Impairing the Intent, Purpose and Integrity of the Zone Plan

Finally, the Applicant must demonstrate that "granting the variance will do no harm to the public good or to the zone plan." *Gilmartin*, 579 A 2d at 1167. The requested height and density variances can be granted without causing any adverse impact on the neighboring properties. The height and density is provided entirely within an existing structure. There will be no perceived expansion of space since the penthouse is an existing structure. The neighboring properties, all of which are commercial users, will not be affected by the internal use of an existing space.

VII. COMMUNITY SUPPORT

The Applicant has the unanimous support of the Advisory Neighborhood Commission ("ANC"). ANC 2B voted unanimously in support of the application at its public meeting on September 11. No one spoke in opposition at the public meeting.

The Applicant also has the committed support of the St. Regis Hotel and the AFL-CIO, its immediate neighbors. This project also has the support of the District of Columbia Preservation League and Dupont Circle Conservancy.

VIII. HEARING PRESENTATION

The Applicant will require approximately 35 minutes for its presentation and will offer three witnesses to testify on its behalf a representative of LiUNA, Jeff Barber as an expert in architecture, and Jami Milanovich as an expert in traffic engineering. Outlines of witness testimony and expert resumes are attached as Exhibit B.

IX. EXHIBITS

- 1 EXHIBIT A Architectural Plans
2. EXHIBIT B Outlines of Witness Testimony and Expert Resumes
- 3 EXHIBIT C HPO Staff Report and Recommendation and HPRB Action
- 4 EXHIBIT D Traffic Analysis

X. CONCLUSION

For all of the above reasons, the Applicant is entitled to the requested special exception and variance relief in this case

Respectfully submitted,



Allison C Prince



Christine A Roddy

Certificate of Service

I hereby certify that I sent a copy of the foregoing document to the following addresses on September 17, 2013, by first class mail or hand delivery

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