

INFORMATION

A motion is a procedural device requested by a party to the case to bring a limited, contested issue before the Zoning Commission (ZC) or the Board of Zoning Adjustment (BZA) for decision. A party may submit a motion at any point; however it is recommended that motions be submitted ahead of time for consideration by the ZC or BZA.

Use this form if you are a party to a case and you would like to request that the Zoning Commission or Board of Zoning Adjustment entertain your motion. For example:

- a). Motion to continue or dismiss; or
- b). Motion to reopen a closed record to accept a document.

A motion will be entertained by the Commission or Board at a meeting or as a preliminary matter at a hearing. At that time a decision will be rendered. Please note, in the case of a request to reopen the record, pursuant to 11 DCMR §§3024.1 and 3121.9, the request will be presented to the Chair for consideration. The request must demonstrate good cause and the lack of prejudice to any party. If granted, the materials shall be entered into the record.

INSTRUCTIONS

Any Motion as provided by the District of Columbia Zoning Regulations (11 DCMR) that is not completed in accordance with the following instructions shall not be accepted:

1. Forms must be completely filled out and must be typewritten or printed. All information shall be furnished by the Maker of the Motion or Request. If additional space is necessary, use separate sheets of 8 ½" x 11" paper to complete the form (drawings and plans may be no larger than 11" x 17").
2. On this sheet and/or on a separate sheet of 8 ½" x 11" paper, state:
 - o Case Number;
 - o Name of Movant;
 - o The relief you are requesting;
 - o Each and every reason you believe you are entitled to relief and why the ZC or BZA should grant your motion, including relevant references to the Zoning Regulations or Map;
 - o Certificate of Service;
 - o Signature and Date; and
 - o Contact Information.
3. Submit the required forms and accompanying documents to the Office of Zoning using:
 - o The Interactive Zoning Information System at www.dcoz.dc.gov for electronically filed cases;
 - o In person or by US mail at 441 4th Street, N.W., Suite 200-S, Washington, D.C. 20001; or
 - o By email to zcsubmissions@dc.gov for the ZC or bzasubmissions@dc.gov for the BZA.
4. At the time of filing, Makers of Motions or Requests are required to serve all Applicants, Petitioners, Appellants, Parties, and/or Intervenors, and the Office of Planning in the above-referenced ZC or BZA case via either mailed letter, hand-delivery, or electronic mail.



If you need a reasonable accommodation for a disability under the Americans with Disabilities Act (ADA) or Fair Housing Act, please complete Form 155 - Request for Reasonable Accommodation.

Board of Zoning Adjustment

District of Columbia Office of Zoning
441 4th Street, N.W., Ste. 200 S, Washington, D.C. 20001
(202) 727 6311 * (202) 727 6072 fax * www.dcoz.dc.gov * dcoz@dc.gov

District of Columbia
CASE NO.18980
EXHIBIT NO.02



BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA



FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A
FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.:

Motion of:

☐ Applicant

☐ Petitioner

☐ Appellant

☐ Party

☐ Intervenor

☐ Other _____

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

Points and Authorities:

Please state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form.

CERTIFICATE OF SERVICE

I hereby certify that on this

D

D

day of

Month

,

Y

Y

Y

Y

I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning

in the above-referenced ZC or BZA case via:

☐ Mailed letter

☐ Hand delivery

☐ E-Mail

☐ Other _____

Signature:

Print Name:

Address:

Phone No.:

E-Mail:

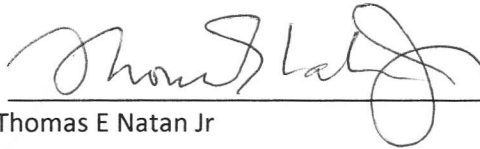
September 8, 2015

To: Board of Zoning Adjustment

Fr: Thomas Natan, 1642 Argonne Place NW

Re: 1636 Argonne Place NW – Lower Level

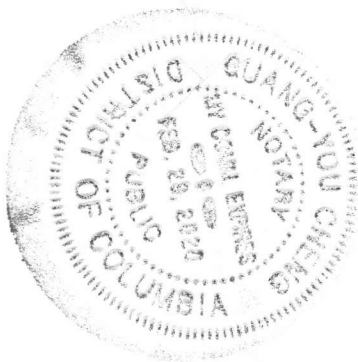
This statement is to document that I have lived three houses away from 1636 Argonne Place NW since 2000. I can attest that 1636 Argonne had a single car garage on the lower level in the rear of the building and that this garage was enclosed in 2014 by the current owner to become part of the renovation the building.



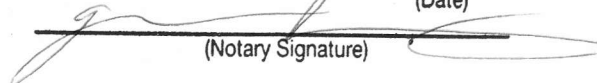
Thomas E Natan Jr

9/8/2015

Date



State of Washington, DC County of _____
Subscribed and sworn before me on 9/8/2015
(Date)



(Notary Signature)

September 7, 2015

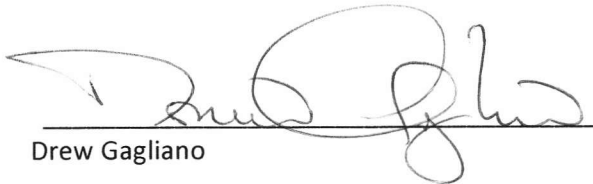
To: Board of Zoning Adjustment

Fr: Drew Gagliano

Re: 1636 Argonne Place NW – Garage, Rear Yard, Front Entryway

This statement is to document that we owned 1636 Argonne Place NW up until 2007 and, in 2002, completed a renovation of the lower level. Features of that renovation are as follows:

- The single car garage was kept intact.
- The concrete driveway leading to the garage, formerly about 10' wide, was widened to create a concrete pad across most of the back of the property to remedy mud and rodent issues.
- The area under the front porch was excavated to create a new front entryway to the newly built basement unit. This entryway is defined by a locked gate at the front, which then leads to the building façade and the entry door to the basement unit. The space of this entryway is 7' from the face of the main building to the width of the property (20').



Drew Gagliano

9/7/15
Date

September 6, 2015

To: Board of Zoning Adjustment

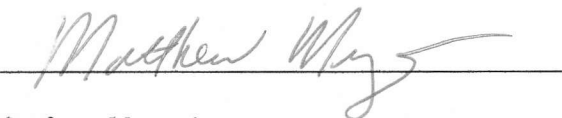
Fr: Matthew Murguia

Re: Call to Realtor Cynthia Keats regarding 1636 Argonne Place, Washington, D.C.

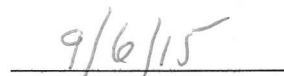
On 8/27/15, I placed a call to Cynthia Keats to request sales information about 1636 Argonne Place, NW. I was told the following during our conversation:
There were three units for sale in the building

- 1st floor: 1 bedroom, 1 bath; approximately 1000 SF;
\$500-\$600,000
- 2nd floor: 2 bedroom, 2 bath; approximately 1000 SF;
\$550-\$600,000
- 3rd level: actually was two levels, with 1 BR 1 BA on each level, a walk out balcony with great views, and an outdoor shower ;
\$900,000

I asked if there was a website or tear sheet she could send me and she said not yet. She also said that this most likely would be the last condo conversion in the neighborhood since it was "grandfathered" in and that zoning regulations would be changing.



Matthew Murguia
11408 Cam Court
Kensington, MD 20895
301-946-5506



Date