

**DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT
441-4th Street N.W.
Washington, DC 20001**

BZA CASE No. 18991

Appeal of Permit for 1521 Varnum Street, NW

PRE-HEARING STATEMENT BY JOHN STOKES

INTRODUCTION

This matter comes before the District of Columbia's Board of Zoning Adjustment (BZA) on an appeal filed against the Zoning Administrator's decision to issue permit no. B1503050 on December 31, 2014 to convert 1521 Varnum St. NW into a seven-unit apartment building. On February 27, 2015, I filed an appeal of the Zoning Administrator's decision. As an adjoining property owner at 1519 Varnum St. NW, I am an aggrieved party. This appeal is timely filed.

The Department of Consumer and Regulatory Affairs' ("DCRA") decision to grant permit no. B1503050 to convert the lot and single-family dwelling at 1521 Varnum St. to a two-building apartment house consisting of seven units was gross error based on a number of violations, misinterpretations and misrepresentations including:

- 1. BY GRANTING THE MINOR FLEXIBILITY FROM THE MINIMUM LOT DIMENSIONS, THE ZA ERRED AS HE DID NOT CONSIDER THE NEIGHBORHOOD**

Section 407.1 allows for minor flexibility to the minimum lot dimensions requirements of section 401 if "the deviation or deviations shall be deemed by the Zoning Administrator not to impair the purpose of the otherwise applicable regulations."¹ The lot at 1521 Varnum St. is 6,277.5 square feet and smaller than the 6,300 square feet required to support seven apartment units.² Although the difference is small enough to permit a deviation by the Zoning Administrator under section 407.1, he erred in his analysis of the impact of an additional unit on the purpose of the R-4 zoning regulations, the compliance of the project with other applicable regulations and impact of the two apartment buildings in relation to adjacent lots.³ His conclusion is not well-founded for the following reasons.

¹ 11 DCMR § 407.1.

² Note that 11 DCMR § 401.3 requires a minimum lot area of 900 square feet per apartment unit.

³ See, Exhibit 24, Memo written to Mr. Sullivan by Mr. LeGrant (Aug. 11, 2014) (granting minor flexibility for a seventh unit under section 407.1).

NOTE: Portions of this Pre-hearing Statement were authored by Cecelia Waldeck who submitted a statement in support of my appeal. She graciously permits their usage in this Statement.

In his memorandum describing the basis for his decision, the ZA mentions factors unrelated to the zoning regulations or nearby lots which reflect his personal biases in favor of development. These include a preference favoring smaller apartment units over larger units and a preference for sub-dividing lots to promote development. These preferences or factors are not part of the zoning regulations and should not be considerations in the decision to grant a variance to the requirements of section 401.3(c).

The ZA relies on a past BZA decision, BZA No. 18108, which involved minor flexibility under section 407.1, and he argues that adding another apartment unit at 1521 Varnum Street, NW has much less impact than the subdivision of a single-family lot to create two single-family residences in an R-1 neighborhood. However, the Zoning Administrator does not provide any retrospective evidence that the decision made in BZA No. 18101 was in fact a good decision, in accordance with the applicable zoning regulation, and did not lead to disruptions in the usage of nearby lots or negative impacts on the neighborhood. Moreover, even if the decision in BZA No. 18101 led to a good outcome, it is very dependent on the specific facts of the project and the local neighborhood. These facts differ substantially from the specific facts of 1521 Varnum Street, NW and its neighboring residences because the matter did not involve high density housing in an R-4 district. Consequently, the Zoning Administrator's logic is in error and the decision as a precedent is not persuasive.

In his decision to grant the minor flexibility, the ZA relies on one specific fact related to 1521 Varnum Street, namely the unique, longer shape of the lot relative to the adjacent lots. The lot is longer than nearby lots, due to a former owner buying adjacent land from the Church on 16th Street NW. The lot size is a historical anomaly not anticipated by drafters of 11-401. This transaction occurred many years after the neighborhood was developed.

The ZA cited the size of the lot as the deepest on the block and an irregular corner, which if straight would likely provide the missing 21 SF. (EXHIBIT 24, Memo written to Mr. Sullivan by Mr. LeGrant, Aug. 11, 2014) However, neither of these purported justifications warrants an apartment complex that is grossly out of character with the neighborhood and surrounding homes.

The size of the footprint of this project was already huge and out of order with the neighborhood. Forget the seventh unit, the footprint for this project whether 2 or 7 units is grossly out of balance.

It is a given that the large number of families that would live at 1521 Varnum Street, NW would add to more: noise, light pollution, congestion in the front and back of the buildings, on-street parking, and demands for sanitation. What would be lost is privacy, infrastructure, light, clean air, and loss of infrastructure.

Additionally, the Zoning Administrator's factual finding that "his decision does not allow for any increase in the overall density or bulk of the proposed project"⁴ has no basis and is not logical. Adding more units equals more people. The BZA should reject this permit for all of these reasons.

2. THE ZA ERRED WHEN NOT TAKING INTO ACCOUNT 330 OF THE ZONING REGULATIONS WHEN EVALUATING THE PERMIT APPLICATION

By obtaining a building permit for 1519 Varnum Street, NW under section 330.5(e), the developer went against the zoning regulations that protect residents and neighborhood infrastructure from projects that substantially increase population density. Due to its large size, 1521 Varnum Street, NW was unsuitable for the limited regulatory oversight of section 330.5(e) and the project should be located on a lot subject to R-5 regulations. Section 330.5(e) was an old zoning provision permitting the matter-of-right conversion of an existing pre-1958 residence to a multi-unit apartment, subject to few zoning regulations, because the projects were generally small. A drive through the 16th Street Heights neighborhood shows that this long-existing zoning provision was not used to build large apartment buildings with designs dramatically out-of-conformity with the neighboring pre-1958 residences. The Zoning Administrator erred in permitting minor flexibility because it is a large project that involves the construction of a two new apartment building that total seven units, comprised of two bedroom units with dens, outdoor decks and many large windows facing nearby row homes.

a) THE PLANS FOR DEMOLITION AND THE NEW BUILDINGS THAT WILL REPLACE THE EXISTING ROW HOUSE SHOW THAT THE PROJECT CONSISTS OF TWO BUILDINGS

The distinction between "a conversion of the usage of an existing residence" under past section 330.5(e) and "new construction" is not clear in the zoning regulations. However, this apparent regulatory gap (*i.e.*, lack of a definition in the zoning code) should not mean that there is no reasonable difference between a conversion and new construction. Section 330.5(e) was part of a zoning regulation that described "uses" permitted "as a matter of right" in R-4 Districts.

The demolition plans for 1521 Varnum Street, NW show that the existing residence and garage, will be taken down and permanently removed (apparently without a raze permit) and will no longer exist after the demolition. Specifically, the plans show that the following structures on the current property will be removed:⁵

- Garage near the service alley;
- Foundation slab of the residence;
- Steel column supporting the residence;

⁴ *Id.*

⁵ Exhibit 43A (Demolition Plan).

- Stairs and interior floors of the residence;
- All windows and doors in the residence;
- Front porch and back deck;
- North exterior wall and large portions of the west and south exterior walls; and
- All electrical and plumbing infra-structure.

The footprint of the existing structures (less than 25% of the lot) is substantially smaller than the size of this excavation. Prior to construction, a large excavated hole in the ground will replace the existing structures on the lot.

The firewall from the existing building will remain intact but its removal would cause structural damage to my house at 1519 Varum Street. Although some portions of the exterior walls on the west and south sides of the building will be retained, they are subject to substantial re-construction from the installation of a new foundation slab and new windows and doors that substantially differ in design from those in the existing building.

Apparently, the developer's position is that the retention of these partial walls and the firewall qualifies the project for regulation under section 330.5(e) and exempts it from the R-5 zoning regulations, which are designed for regulating apartment projects of this size. The Zoning Administrator erred when he accepted this position. Regulation of this project under section 330.5(e) and the R-4 zoning regulations will put me and the nearby neighbors and future residents of 1521 Varum Street, NW at risk because these regulations are simply inadequate for such a large project.

b) R-4 ZONING REGULATIONS AND PURPOSE IGNORED AND IN DIRECT CONFLICT WITH THE SIZE AND SCOPE OF 1521 VARNUM STREET, NW, - 3 STORIES, 7 UNITS EACH WITH TWO BEDROOMS AND DEN. PURPOSE OF REGULATIONS IS TO STABILIZE THE REMAINING ONE-FAMILY DWELLINGS IN THE DISTRICT (11 DCMR § 330.2).

The Zoning Regulations for the R-4 district were created for the primary purpose of stabilizing the remaining one-family dwellings, and the R-4 district is not intended to become an apartment house district. Both past and recent regulations relating to the usage conversion of pre-1958 residences are intended to limit the size of apartment buildings and prevent the R-4 district from becoming an apartment house district, as contemplated in the R-5 zoning regulations.⁶

The existing residence at 1521 Varum Street is a single-family residence with a footprint of 1,163.4 square feet on a lot, which is 6,277.5 square feet in size. It is attached to 1519 Varum Street and adjacent to another pair of row homes.⁷ The lot is three lots away from the corner at 16th Street NW. and has a large back yard that abuts neighboring back yards, which contain trees and plants.

⁶ 3545 – 13th Street LLC (BZA Appeal No. 18560) (2013) at 6. See, also, 11 DCMR § 330.2 (Very little vacant land shall be included within the R-4 District, since its primary purpose shall be the stabilization of remaining one-family dwellings.).

⁷ Exhibit 43A (architectural plans submitted by WestEnd LLC.)

Abutting the service alley behind 1521 Varnum Street are a series of attached garages for the nearby homes.

1521 Varnum Street, NW will dramatically transform the current quiet rows of single-family row homes on Varnum and Webster Streets into an apartment neighborhood, with substantial negative impacts on the neighbors, as described many years ago by the Supreme Court in The Village of Euclid et. al v. Amber Realty, 272 U.S. 365 (1926).⁸ The Supreme Court ruling is very valid today. This project cannot go forward because if it does, based on the new regulations, other apartments of similar scope can be built in the neighborhood.⁹ The lot at 1521 is the deepest lot on the block and will have the largest addition possible, extending to within 20 feet of the back service alley. Adjacent residences may be permitted to construct other large additions on their lots that extend to within 20 feet of the service alley. Over time, the entire block may redevelop into apartment buildings, which conflicts with the primary purpose of the R-4 regulations. The Zoning Administrator erred when issuing the permit because his review was short sighted and he did not carefully consider the important, underlying purpose of the R-4 zoning regulations.

3. TITLE 101 THE BASIS FOR ZONING REGULATIONS WAS IGNORED

It's not difficult to see that Title 101 was not really considered. A simple analysis of the neighborhood would have shown that this important regulation was ignored. The ZA must consider whether his decision "shall be held to be the minimum requirements adopted for the promotion of the public health, safety, morals, convenience, order, prosperity, and general welfare to:

- (a) Provide adequate light and air;
- (b) Prevent undue concentration of population and the overcrowding of land;
and
- (c) Provide distribution of population, business and industry, and use of land that will tend to create conditions favorable to transportation, protection of property, civic activity, and recreational, educational, and cultural

⁸ "... the coming of apartment houses, which has sometimes resulted in destroying the entire section for private house purposes; that in such sections very often the apartment house is a mere parasite, constructed in order to take advantage of the open spaces and attractive surroundings created by the residential character of the district. Moreover, the coming of one apartment house is followed by others, interfering by their height and bulk with the free circulation of air and monopolizing the rays of the sun which otherwise would fall upon the smaller homes, and bringing, as their necessary accompaniments, the disturbing noises incident to increased traffic and business, and the occupation, by means of moving and parked automobiles, of larger portions of the streets, thus detracting from their safety and depriving children of the privilege of quiet and open spaces for play, enjoyed by those in more favored localities, -- until finally, the residential character of the neighborhood and its desirability as a place of detached residences are utterly destroyed. 272 U.S. 365, 394.

⁹ 11 DCMR § 330.7(d) (2015) ("An addition shall not extend further than ten feet (10 ft.) past the furthest rear wall of any principal residential building or structure on an adjacent property;").

opportunities; and that will tend to further economy and efficiency in the supply of public services.”¹⁰

The ZA failed to take these factors into consideration when issuing the permit for 1521 Varnum Street, NW.

1521 Varnum Street, NW will be 3,131 square feet in size and substantially larger than the current residence (1,163 square feet) and the size of other nearby residences. It will cover 50% of the lot, in contrast to the current residence, which covers 19% of the lot.¹¹ 1521 Varnum Street NW will tower over nearby residences with a penthouse structure. The height of the current residence is 29 feet and 4 inches,¹² a height consistent with that of the other nearby residences. 1521 Varnum Street, NW will have an additional story as compared to the current residence and other nearby residences.

Additionally, 1521 Varnum Street, NW will have a very large new addition that wholly encloses three apartment units. This addition will extend to within 20 feet of the back service alley. The 20 feet of open space between the building and the service alley will be an open parking lot for four cars. In contrast, the current residence has a rear yard that is 109’ and 5” long and contains trees, grass and plants and an enclosed garage next to the service alley.¹³ Similarly, the adjacent properties have large yards and enclosed garages next to the back service alley.

The bulk and height of 1521 Varnum Street, NW will negatively impact the air and sunlight currently enjoyed by me and the neighboring properties. Its substantially greater height will cast shadows on neighboring properties during the day and limit the feasibility of installing a solar panel on the rooftops. Me and my neighbors will no longer enjoy the air coming from what is now a fantastic back yard that has gardens and plenty of oxygen from the shrubbery and trees. Exhaustion from cars in the uncovered parking lot will be taken in by the children and families. Instead, there will be a brick building.

The sunlight will be diminished for all of the houses in the path of big bad 1521 Varnum Street, NW. Towering over everything and everyone like a big bully.

1521 Varnum Street, NW will create an undue high density of residents and an overcrowding of land that is uncommon in the R-4 district and immediate neighborhood. There are no apartment buildings located in the middle of the block anywhere in the vicinity. The residences on the blocks immediately adjacent to 1521 Varnum Street, NW are single-family residences inhabited by 1-2 families.¹³ The substantially high population density at 1521

¹⁰ 11 DCMR § 101.1.

¹¹ Exhibit 43A (General Notes – Code Analysis).

¹² Exhibit 43A (Zoning Code Analysis).

¹³ Exhibit 43A (General Notes – Code Analysis)

Varnum Street, NW will dramatically transform the currently, quiet neighborhood with the following negative impacts:

- More congested on-street parking in a neighborhood that does not have parking accessible on nearby 16th Street NW on most days, and must support on-street parking for many nearby churches, which do not have sufficient parking infrastructure.
- More congested traffic on Varnum and nearby streets, as well as the narrow service alley. Such congestion can increase car accidents and property damage from vehicles.
- A substantial increase in noise from 1521 Varnum Street, NW due to its large number of residents and the many open decks and windows designed for the apartment units. Each unit has two bedrooms and one den and, except for a basement unit, each has an outdoor balcony. Several balconies are located on the rooftop. Currently, there are no roof decks on residences in the nearby neighborhood.
- An increase in light pollution from the lights planned for the roofdecks, walkways, and apartment unit windows. This light pollution can interfere with neighbor's enjoyment of their properties and impact their sleeping patterns and habits.
- The loss of privacy in the neighboring back yards and homes. The large decks and many windows designed for 1521 Varnum Street, NW will allow residents and their visitors to engage in voyeurism or otherwise spy on the activities and movements of nearby neighbors. While I would have a wall facing me, my neighbor at 1523 would have the lion's share of windows and balconies facing directly into their house.
- There has been a rise in criminal activity in our neighborhood. The apartment building may attract more burglaries and armed robberies due to the concentration of residents in an enclosed building. 1521 Varnum Street may increase these incidents because it creates an open side-yard at 1521 Varnum Street that will allow a quick walk or run from Varnum Street to Webster Street through the back service alley. Currently, gates, garages, and homes impede cutting through Varnum Street lots to the back service alley and Webster Street.

The proposed apartment buildings will overburden the public infrastructure in the neighborhood. When infrastructure is overburdened, neighbors suffer electrical outages, sewage backups, more rodents, garbage waste, property damage and health risks. The R-4 zoning regulations

are not suited for regulating this project and do not require city agencies and DCRA to consider its infrastructure impacts.

The project will create the following serious health and safety risks for nearby neighbors and building residents:

- The planned demolition and excavation may pollute neighboring properties and endanger the health of neighbors because lead paint, asbestos, and other toxic substances in the pre-1958 structures subject to removal can spread throughout the neighborhood. In a nearby demolition of a similar vintage building at 1424 Buchanan St. NW, despite complaint calls from neighbors, DCRA, the city's environmental agency, and OSHA did not enforce laws requiring the safe removal of these toxic substances. As in this matter, DCRA did not require a raze permit because the Zoning Administrator classified the project as a usage conversion under section 330.5(e). There is no evidence that the experience at 1424 Buchanan will not be repeated at 1521 Varnum Street.
- The original architectural plans for 1521 Varnum Street, NW located the east exterior wall of the third floor very close to my working chimney on my residence at 1519 Varnum Street. The close proximity of this stick frame wall to the nearby chimney violates the International Fire Codes. Although the developer has recently submitted a design fix for eliminating the chimney safety problem, BZA should consider this error by DCRA and the Zoning Administrator as more proof that the review of the 1521 Varnum Street project was inadequate and the resulting project may endanger the health and safety of future residents and nearby neighbors.

BZA should revoke the issued permit because the Zoning Administrator did not consider the factors outlined in section 101.1.

Finally, section 101.2 of the zoning regulations further requires that the Zoning Administrator consider the following factors when issuing a zoning permit:

- (a) Character of the respective districts;
- (b) Suitability of each district for the uses permitted in each district under this title; and
- (c) Encouragement of the stability of districts and of land values in those districts.

The Zoning Administrator failed to take the character of the nearby R-4 neighborhood into consideration when issuing the permit for this project. Due to its size and design, the 1521 Varnum Street, NW apartment buildings project is simply not suitable for placement on the lot at 1521 Varnum Street. The project belongs on an R-5 zoned lot on Georgia Avenue or 14th Street NW. As described above, the nearest apartment building is several blocks away on 14th Street NW. The planned building

towers over nearby buildings on Varnum Street, Webster Street and 16th Street. Its large addition will dwarf the adjacent residences. With its large windows and outdoor balconies, side entrances, stairwells, and penthouse, this project has a very modern design, not in character with the existing, early 20th century homes in the neighborhood.

My property value will surely decrease. Does anyone know who wants to buy a house next to two huge walled apartment buildings? The Zoning Administrator erred in not considering the factors in section 101.2 when issuing the permit, particularly the risk that the project may trigger the conversion of additional nearby adjacent homes into equally large, apartment buildings.

4. THE PERMITS ARE INVALID AND WERE ISSUED IN ERROR AND SHOULD BE REVOKED. THE SUBSTANTIAL NUMBER OF REVISIONS TO PLANS AFTER AN APPEAL IS FILED AND AFTER THE PERMITS ARE GRANTED CREATES SUBSTANTIAL CONFUSION FOR THE APPELLANTS, THE PUBLIC AND DCRA.

There were four Notice to Revoke Building Permit letters issued by DCRA on August 8. The permits that DCRA is seeking to revoke are B1411058, B1503050, B1506179 and B1500897 (EXHIBIT 78). DCRA can revoke a permit when there is a false statement or misrepresentation of fact, or other significant inaccuracy, in the application or on the plans on which a permit or approval was based, that substantively affected the approval, including but not limited to, inaccuracies with respect to pre-existing conditions. There was no mechanical, electrical or plumbing reviews done and there was a miscalculation of time granted among other issues.

I have personally identified two permits seem to be in conflict with one another. Permit B1411058 (EXHIBIT 81), filed on August 18th of 2014 was for the proposed development of seven residential units, an addition, including partial demolition and total reconfiguration of the existing dwelling at 1521 Varnum Street NW. However, on October 24th, while that application was still in review, a walk-through permit application B1500897 (EXHIBIT 82) was filed for the same property, asserting that an in-kind replacement of kitchen cabinets, and kitchen and bathroom plumbing fixtures, wall repairs and painting would be performed. That permit, issued on November 3rd, could not have been correctly described, since the proposed new seven unit development permit would be issued less than 60 days later on December 24th, and the in-kind replacement permit would become meaningless (also pay attention to how areas on the application were not signed or filled in). I have seen the development plans, and I know that none of the proposed kitchens and bathrooms were to be located in any existing locations, as asserted in the October permit application.

Permit B1506179 was found not to have any application in their Accela or any other record system at DCRA and does not have any accompanying plat. Also, there was no mechanical, electrical, or plumbing review.

As the developer attempts to protect the ZA's flexibility decision, it is important that I point out such a misrepresentation like permit B1500897, and the shortcomings of permit B1506179 and hope

that such activities would not be disregarded when this body considers this zoning relief, no matter how minor.

I have submitted official DCRA permit records as evidence that the developer had misrepresented permit scoping to quickly advance the proposed demolition work, when intending to permanently remove all existing kitchens and bathrooms, associated plumbing and walls.

Since the appeal was filed, the developer has made multiple changes to his plans to conform them to the zoning regulations. To date, there have been: two Stop Work Orders (one for penthouse structure violations, one for failure to notify me as the adjoining neighbor and provide a complete set of building plans). Multiple changes of the plans, the developer has changed the location of the air-conditioning and heating units on the rooftop, increased the size of the parking lot abutting the service alley, changed the placement of the addition to avoid trespassing onto my property at 1519 Varnum and, recently, the developer may be changing the wall on the third floor that abuts the chimney at 1519 Varnum. This practice makes it difficult for me to prepare the appeal as the ball continues to move.

CONCLUSION

The DC Zoning Code is a land use policy enforcement regulation whose purpose includes stabilizing the R-4 Zoning District, as evidenced by recently enacted modifications intended to augment and strengthen its ability to protect the residents of R-4, against destabilizing developments.

I do not believe that the code was intended to be manipulated around purely economic interests of developers, when matter-of-right restrictions purposely limit development potential.

I cannot see a compelling reason for allowing even the minor flexibility that has been granted under the Zoning Administrator's authority. The flexibility allowed in Section 407 is a delegated "authority", not a duty. In this case, to use that authority to arbitrarily grant a deviation from the minimum lot dimensions when the benefit is entirely to the developer, without regard to the affected community, is a grave misuse of the intent of that authority, and violates the intent of the zoning regulations. By entrusting the minor flexibility authority under Section 407 to the Zoning Administrator, such decisions can be **only** as valid as the understanding and thoughtfulness of that individual. The "authority" can effectively limit needed opportunities for citizens such as me to raise our voices toward protecting our homes and lifestyles from the current, citywide onslaught of pocket development initiatives that are invading and overbuilding in our established neighborhoods. As well, the issue of "merit" seems to be missing from the Z.A.'s decision-making here. Certainly, matter-of-right is the preferred tool to abide by the limits established by a broad set of zoning criteria, carefully crafted to protect the rights of everyone, on a level playing field. Any modifications should be carefully considered, especially if there are broad implications to well-established, residential communities. On my neighborhood street, each new residential unit imposes an additional burden on everyone, by increasing the vehicular traffic from visitors, as well as residents, and imposes other impacts upon our city services.

Building Permit no. B1503050 must be invalidated and revoked. It is crystal clear that these two apartment buildings are not in keeping with the intent and purpose of the Zoning Regulations for the R-4 District. Section 101 has been totally ignored. But, it should be the basis on which all other all other provisions of Title 11 should be interpreted and applied.

The allowed deviation and this project will ruin the character of this neighborhood. It visually intrudes and ruins the character, scale and pattern of houses along the front, back and side of the street frontage. And, it impairs the purpose of the regulations.

While I am certainly not against development, indeed there are owners who respect the neighborhood by increasing their household size without popping up or popping back their properties. In fact, neighbors aren't looking to create large unsightly houses, only developers who are not part of the neighborhood are looking to do so.

The ZA granted the building permit on what he assumed was a proper representation of the work. Granting of any relief including minor flexibility should be based on at least proper representation of the projects taking place in the District.

DCRA should be tougher on permits like this one for 1521 Varnum Street, NW that contain multiple zoning code errors; ruin the character of the neighborhood; are granted arbitrarily; are in the process of being revoked by DCRA; do not encourage the stabilization of the R4 neighborhood; are in no way a "balance"; are purely economic to the developer without any human consideration; and are a burden on the infrastructure. Such permits result from a sloppy permitting process and many undetected problems from the inadequate review can put the public's safety and health at risk.

This is a project that is too big and too important for the major issues to be ignored.

This is a case where a matter of right went horribly wrong.

For the reasons stated above, I respectfully request that the BZA grant the appeal, invalidate this permit and save at least one neighborhood from destruction.

I am pleased to answer any questions.

Thank you,



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