

December 1, 2015

VIA IZIS

Chairperson Marnique Heath
D.C. Board of Zoning Adjustment
441 4th Street NW, Suite 210S
Washington, DC 20001

Re: BZA Case No. 19133 – Pre-Hearing Submission

Dear Chairperson Heath and Members of the Board:

This letter serves as the Applicant's pre-hearing submission in the above-referenced case scheduled for a public hearing on December 15, 2015. The Applicant is requesting a variance from the lot occupancy requirement to allow the construction of an addition for a new church and residential building.

1. Additional Evidence and Explanation in Support of Practical Difficulty

As proven in the original application materials (exhibits 6A – 6H of the record), the application satisfies the criteria for variance relief. Nevertheless, the Applicant wishes to supplement its evidence in support of the practical difficulty standard for the requested variance. As the original application thoroughly described, complying with the lot occupancy limit would create a practical difficulty for the Applicant because of the need to accommodate multiple functions on a single level. In addition to those difficulties already described, reducing the lot occupancy of the building to a conforming 80% would result in cascading effect of problems that would render completion of the building extremely difficult.

Theoretically, the only location to remove building footprint is at the rear (south) along the alley because the other façades must remain for design or historic preservation reasons. However, such a change would result in an impractical and largely infeasible building design.

First, at the ground floor, reducing building footprint would severely disrupt the back-of-house functions in the building. If building footprint were removed, then the secondary egress points, which must open onto the alley, would have to be relocated. This would result in a reduction of the area available for the trash room, bike room, and rear elevator access to the loading platform, thereby rendering these spaces largely useless. Also, reducing the ground floor

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District of Columbia

footprint would significantly compromise the utility of the provided loading platform.¹ The platform would become severely disconnected from the building interior, and the resulting circuitous corridor would leave the platform with little practical use. These practical difficulties for the theoretical ground floor reduction are illustrated on page A1.02 in the attached drawing in Exhibit A.

Second, reducing the footprint of floors 2 – 4, the only upper levels that exceed the lot occupancy limit, would leave the parking ramp uncovered and create highly inefficient units. An uncovered parking ramp would create multiple operational problems. If exposed to the sky, the ramp would be unsecured from grade to halfway down the ramp where the security door would be located. This unsecured area of the ramp would create an unsafe space where people could hide or otherwise loiter out of view of the street or alley. Also, an uncovered ramp would expose it to the elements where leaves, debris, snow, and trash could easily collect, thereby impeding safe and unobstructed use of the ramp.² In addition, removing floor area from these upper floors would compromise the south-facing residential units because they would be too small to accommodate all necessary functions. In order to accommodate south-facing residential units, it would be necessary to shift the core north. However, even with a shifted core, the unit layout would be very inefficient and access to the units would be highly restricted. These resulting practical difficulties from a reduction of lot occupancy at floors 2 – 4 are illustrated on pages A1.03 and A1.04 in the attached Exhibit A.

Finally, reducing building footprint in the upper floors would have an adverse effect on the underground garage and would render it significantly less efficient, as illustrated on page A1.05 in the attached drawing in Exhibit A. The shifted elevator core would create a drive aisle “pinch point” obstruction that would eliminate at least one parking space and maybe more, depending on the exact structural specifications necessary for the garage (thereby necessitating a different variance for parking).

¹ Although loading is not required, the Applicant will provide a loading platform in response to neighbor concerns about loading congestion in the alley.

² For this reason, parking ramps are almost always covered.

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2. Expert Resume

The Applicant will proffer one expert at the hearing: in architecture and planning. His resume is enclosed as Exhibit B.

Should you or your staff have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Allison Prince / CK".

Allison Prince

A handwritten signature in blue ink that reads "Cary Kadlecek".

Cary Kadlecek

Attachments

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