

July 11, 2018

VIA IZIS

Frederick Hill, Chairperson
D.C. Board of Zoning Adjustment
441 4th Street, NW, Suite 200S
Washington, D.C. 20001

Re: BZA Application No. 19722, Kline Operations, LLC

Dear Chairperson Hill and Members of the Board:

This is a response to the Applicant's final revised plan set filed on June 27, 2018, in the above-captioned case, on behalf of 450 K CAP LLC, a party opponent in the proceeding.

Nothing in the Applicant's June 27 filing changes 450 K CAP LLC's opposition. 450 K CAP LLC continues to oppose the requested special exception relief for the required rear yard because such relief will create an adverse impact on the residents of 450 K Street N.W. apartment building in contravention of the requirement in the Zoning Regulations that a special exception may be granted provided that it will not tend to create an adverse impact on neighboring properties; nor does it change 450 K CAP LLC's opposition to the proposed loading variances because, if granted, they will create enormous negative impact on the operations of the alley system in the Square. Further, the Applicant has not met the variance test required by the Zoning Regulations, in particular, demonstrating an exceptional condition or situation, unique to this property, which would give the Board of Zoning Adjustment the authority to grant these variances.

Respectfully submitted,


Phil Feola

Board of Zoning Adjustment
District of Columbia
CASE NO. 19722

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2018, I served a copy of this response via email as follows:

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