

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

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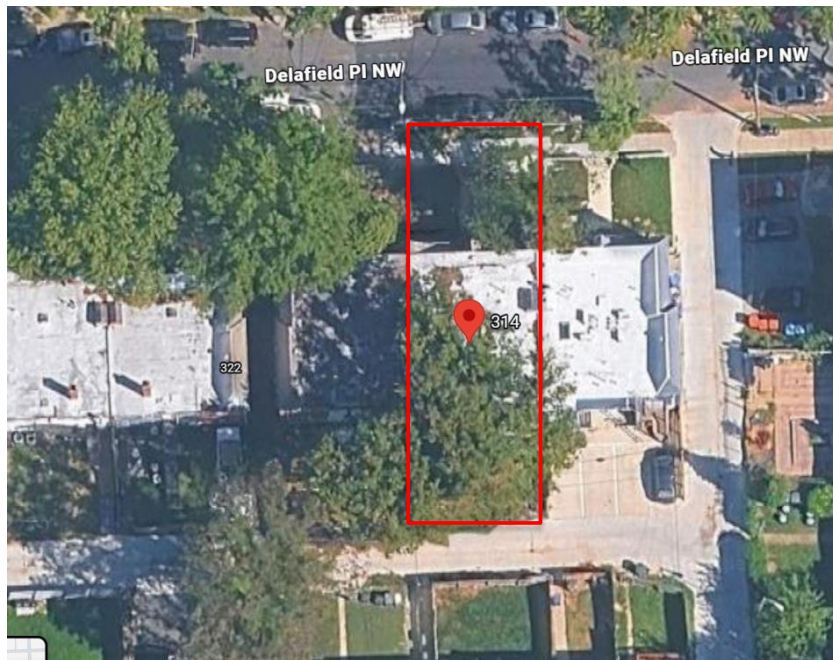
**APPLICATION OF:**

**MARIA DEL CARMEN CABIESES**

**Property Address: 314 Delafield Pl NW, Washington, DC 20011**

**Square 3304, Lot 59**

**Zone: RA-1**



**EXHIBIT 8**

**BURDEN OF PROOF STATEMENT**

**IN SUPPORT OF SPECIAL EXCEPTION AND VARIANCE RELIEF**

## **I. INTRODUCTION AND NATURE OF RELIEF SOUGHT**

This statement is submitted on behalf of the Applicant, Maria Del Carmen Cabieses (“Applicant”), in support of an application to the Board of Zoning Adjustment (“BZA” or “Board”) for special exception and variance relief necessary to construct a third-floor addition, modest rear extension, and reconfiguration of units within an existing multifamily residential structure at 314 Delafield Pl NW (“Property”). The proposal increases the number of dwelling units from four (4) to six (6), consistent with the purposes of the RA-1 zone.

Based on review comments from the Office of Zoning and applicable regulations, the Applicant requests:

### **Special Exception Relief:**

1. Residential Development Review – Subtitle U § 421
2. Lot Occupancy – Subtitle F § 210 (40% permitted; 43.6% proposed)
3. Parking Requirements – Subtitle C § 701.5 (1 required; 0 provided)
4. General Special Exception Standards – Subtitle X § 901.2
5. Design and Impact Standards – Subtitle F § 5201.4 (a–d)

### **Variance Relief:**

6. Floor Area Ratio (FAR) – Subtitle F § 201 (1.08 permitted with IZ; 1.31 proposed), pursuant to Subtitle X § 1002

As demonstrated below, the Property satisfies all required standards for approval.

## **II. JURISDICTION OF THE BOARD**

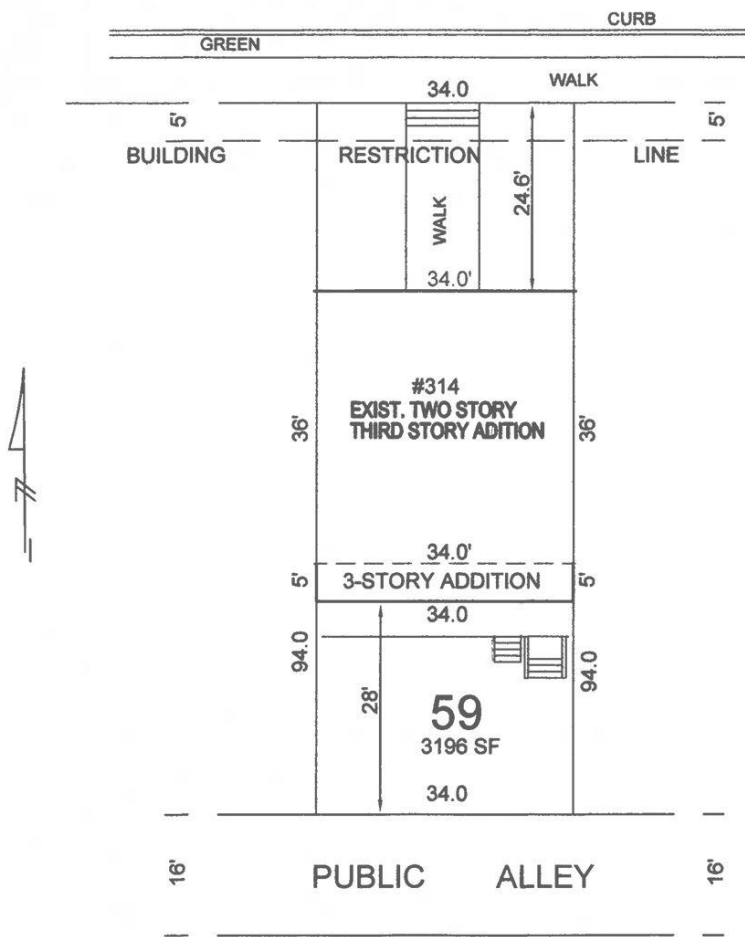
The Board has jurisdiction to grant special exception relief under Subtitle X § 901.2 and area variance relief under Subtitle X § 1000.1. The Board is authorized to grant such relief where an applicant demonstrates compliance with the applicable statutory tests.

## **III. BACKGROUND AND NEIGHBORHOOD CONTEXT**

The Property is a rectangular lot located in the Brightwood Park / Northwest area of Ward 4. The lot measures approximately 94 feet by 36 feet, totaling 3,196 square feet. The surrounding area is composed of a mix of rowhouses, low-rise multifamily buildings, and small apartment houses, consistent with the purpose of the RA-1 zone.

Public transportation access is strong, with the Georgia Avenue–Petworth Metrorail Station located approximately 0.8 miles from the Property and multiple WMATA bus routes (including Routes 62, 64, 70, 79, E2, and E4) operating along Georgia Avenue NW and New Hampshire Avenue NW.

DELAFIELD PLACE, N.W.



#### **IV. ZONING OVERVIEW (RA-1 ZONE)**

The RA-1 zone permits low-density multifamily development. Key development standards applicable to this application include:

- Maximum FAR: 1.08 with Inclusionary Zoning (IZ)
- Maximum Height: 40 feet and 3 stories
- Lot Occupancy: 40%
- Rear Yard: 20 feet
- Parking: 1 space per 3 units above 4 (C § 701.5)

The existing building is a multifamily structure with two above-grade stories and a basement. The proposal maintains the residential use while modestly increasing density, consistent with zone intent.

#### **V. PROPOSED DEVELOPMENT**

The Applicant proposes:

- A third-floor addition
- A rear extension expanding the footprint from 34'×36' to 34'×41'
- Reconfiguration to create six (6) modernized units

Building Area Calculations:

Existing Above-Grade GFA (2 floors): 2,448 sq ft → FAR 0.77

Proposed Above-Grade GFA (3 floors): 4,182 sq ft → FAR 1.31

Lot Occupancy:

Existing: 1,224 sq ft (38.3%)

Proposed: 1,394 sq ft (43.6%)

## **VI. SPECIAL EXCEPTION – RESIDENTIAL DEVELOPMENT (SUBTITLE U § 421)**

Under U § 421, new or expanded multifamily development in RA zones requires Board review. The required findings are addressed below.

### **A. Subtitle U § 421.2 – Schools and Public Services**

The proposed increase of two additional units will not impose measurable impacts on local schools or public services. The project is modest in scale and consistent with the neighborhood's existing residential character.

### **B. Subtitle U § 421.3 – Office of Planning Review**

The Office of Planning will review the plans for adequacy of light, air, parking, grading, landscaping, and overall compatibility with the surrounding area.

### **C. Subtitle U § 421.4 – Required Plans**

The Applicant has submitted architectural plans, site plans, floor plans, elevations, and grading information demonstrating compliance.

## **VII. SPECIAL EXCEPTION – LOT OCCUPANCY (SUBTITLE F § 210)**

The permitted lot occupancy for apartment houses in RA-1 is 40%. The Applicant proposes 43.6%, an increase of just 3.6%.

The extension aligns with typical built conditions along the block and maintains adequate light, air, and privacy for neighboring homes.

## **VIII. SPECIAL EXCEPTION – PARKING (SUBTITLE C § 701.5)**

Parking required: 1 space

Parking provided: 0 spaces

The lot's size and geometry prevent feasible construction of a compliant parking space without significant demolition or loss of residential area. Transit accessibility reduces the need for on-site parking. Relief is appropriate.

#### **IX. SPECIAL EXCEPTION – DESIGN IMPACTS (SUBTITLE F § 5201.4)**

##### **A. Light and Air**

The modest rear extension does not unduly affect adjacent properties. Shadow impacts are minimal.

##### **B. Privacy**

Window placement maintains appropriate separation and sightlines typical for RA-1 blocks.

##### **C. Visual Intrusion**

The addition maintains the architectural rhythm of the street. The third floor is minimally visible from the public right-of-way.

##### **D. Graphical Representation**

Plans, elevations, and photos accurately depict the relationship to neighboring structures.

#### **X. GENERAL SPECIAL EXCEPTION STANDARD (SUBTITLE X § 901.2)**

The project is in harmony with the intent of the Zoning Regulations, maintains neighborhood character, and avoids adverse impacts on neighboring property. The proposal meets all special exception conditions.

#### **XI. AREA VARIANCE – FAR (SUBTITLE F § 201 & SUBTITLE X § 1002)**

##### **A. Exceptional Condition**

The Property's narrow width and existing multifamily configuration create a constrained layout that limits feasible expansion options.

**B. Practical Difficulty**

Strict adherence to FAR requirements would prevent creation of safe, functional units and appropriate internal circulation.

**C. No Harm to Public Good**

The proposed FAR increase is modest (from 1.08 allowed to 1.31). The resulting building is consistent with nearby structures and zone purpose.

**XII. CONCLUSION**

For the reasons stated herein, the Applicant respectfully requests approval of the following:

- Special Exception Relief: U § 421; F § 210; C § 701.5; X § 901.2; F § 5201.4
- Variance Relief: FAR under F § 201 pursuant to X § 1002

The proposed development is consistent with the purpose and intent of the RA-1 zone and will not adversely affect neighboring properties.

Respectfully submitted,

Maria Del Carmen Cabieses

(Applicant)

A handwritten signature in black ink, appearing to be 'MC Cabieses', with a long horizontal line extending to the right.