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FILE NO: 69234.000002

May 4, 2007

By Hand

Zoning Commission
for the District of Columbia
441 4th Street, N.W., 2nd Floor
Washington, D.C. 20001

Attention: Sharon Schellin

Re: ZC Case No. 07-06
(Naun Segovia, 1327 Euclid Street, N.W., sua sponte review, BZA App. No. 17553)

Dear Members of the Commission:

At its April 9, 2007 public meeting, the Commission indicated that it was disposed to reverse the BZA's decision in this case. The applicant was given until May 7, 2007 to respond to the Commission's concerns. For the reasons that follow, on behalf of the applicant, we respectfully request that the Commission defer its decision in this case while the applicant seeks an expedited map amendment for approximately one-half of Square 2861, where the subject property is located, from R-4 to R-5-B, most probably through the affected ANC:

1. It appears that from both the land use element of the current Comp Plan and proposed Comp Plan that the subject property and approximately one half of Square 2861 is appropriate for medium density residential. See Exhibit A. The medium density "burnt-orange" color permits multiple unit housing and mid rise apartment buildings as the predominant uses, including low and moderate density housing, consistent with what is proposed for the subject property by the applicant.
2. In fact, from the plat, photos and land use maps, it appears that the subject property and half of Square 2861 should have been rezoned R-5-B. See Exhibit B. Accordingly, we respectfully dissent from the Commission's views that the BZA's decision does harm to the R-4 zone since hypothetically and practically, but not technically, the subject property and surrounding properties are all multi-family and not row house dwellings in a medium (not moderate) density residential setting.

ZONING COMMISSION
District of Columbia



Zoning Commission
Attention: Sharon Schellin
May 4, 2007
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3. The applicant's counsel has met informally with OP staff regarding the proposed amendment, noting that the Commission has not asked OP to brief this sua sponte review. OP will support the proposed map amendment as an "appropriate solution" so long as it is not inconsistent with the Comp Plan and does not constitute spot zoning.
4. The Chair of ANC 1B, Dee Hunter, has been contacted and has advised the applicant that the ANC will consider an expedited map amendment for approximately one-half of the block where subject property is located at its June 7, 2007 meeting.

For these reasons, we respectfully request the Commission defer a ruling on this case while the applicant per the ANC seeks an expedited map amendment for approximately one-half of Square 2861 including the subject property. Assuming that the map amendment is in place, the applicant will then ask the Commission to approve a modified version of the design plans for the subject property including any requested minor variances consistent with the R-5-B zone district, as permitted by the Commission's rules of procedure.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Aguglia".

Richard L. Aguglia

cc: Naun Segovia
Fred Greene
Jennifer Steingasser
ANC 1B c/o Dee Hunter

List of Exhibits

Current Land Use Map.....	A1
Future Land Use Map 4.....	A2
Enlarged Future Land Use Map 4 of Subject Square.....	A3
Vicinity Map with Zoning.....	B1
Photo of Site with Estimate of Dividing Line Between Medium Density and Moderate Density Residential Per Comp Plan Maps.....	B2

Exhibit A1

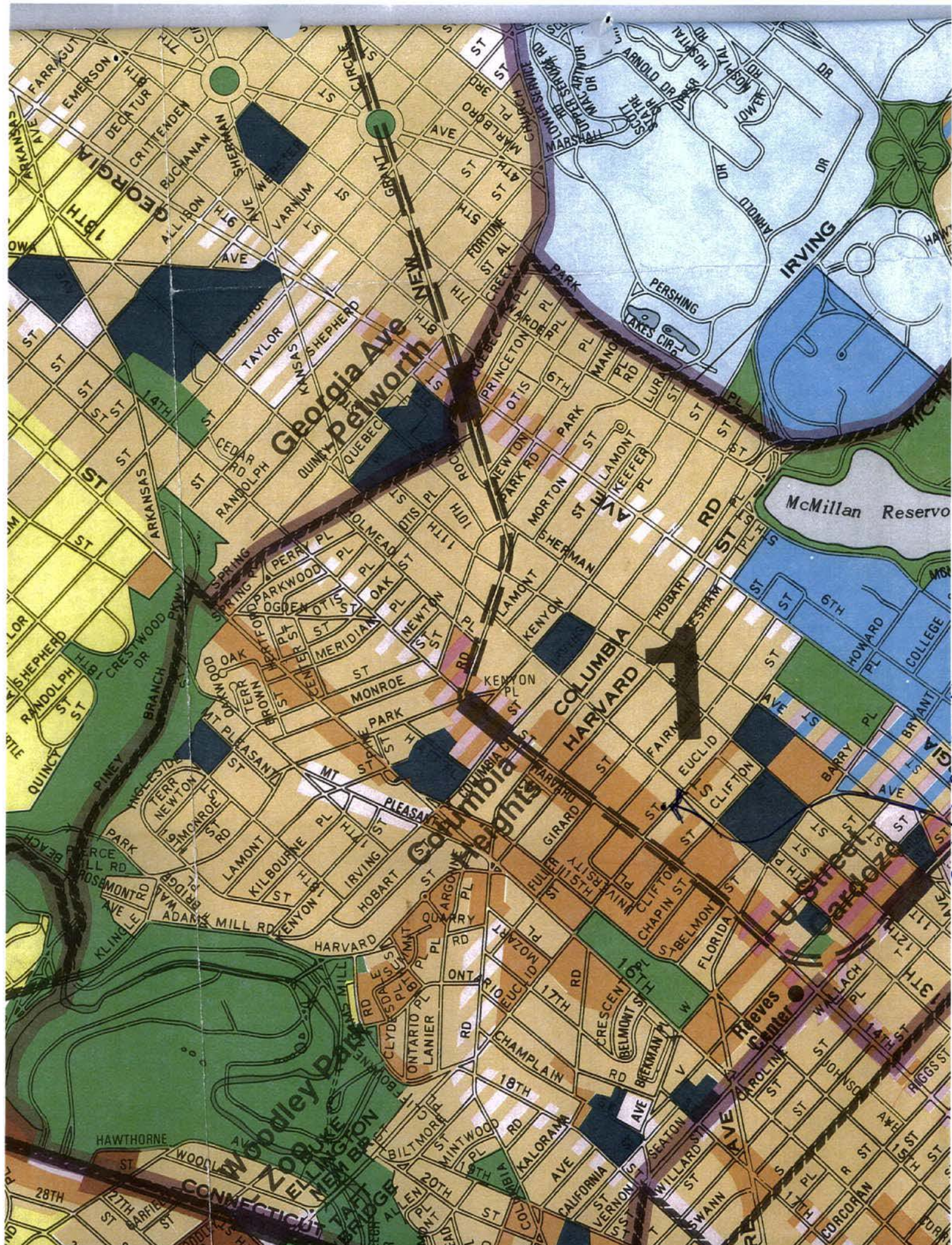
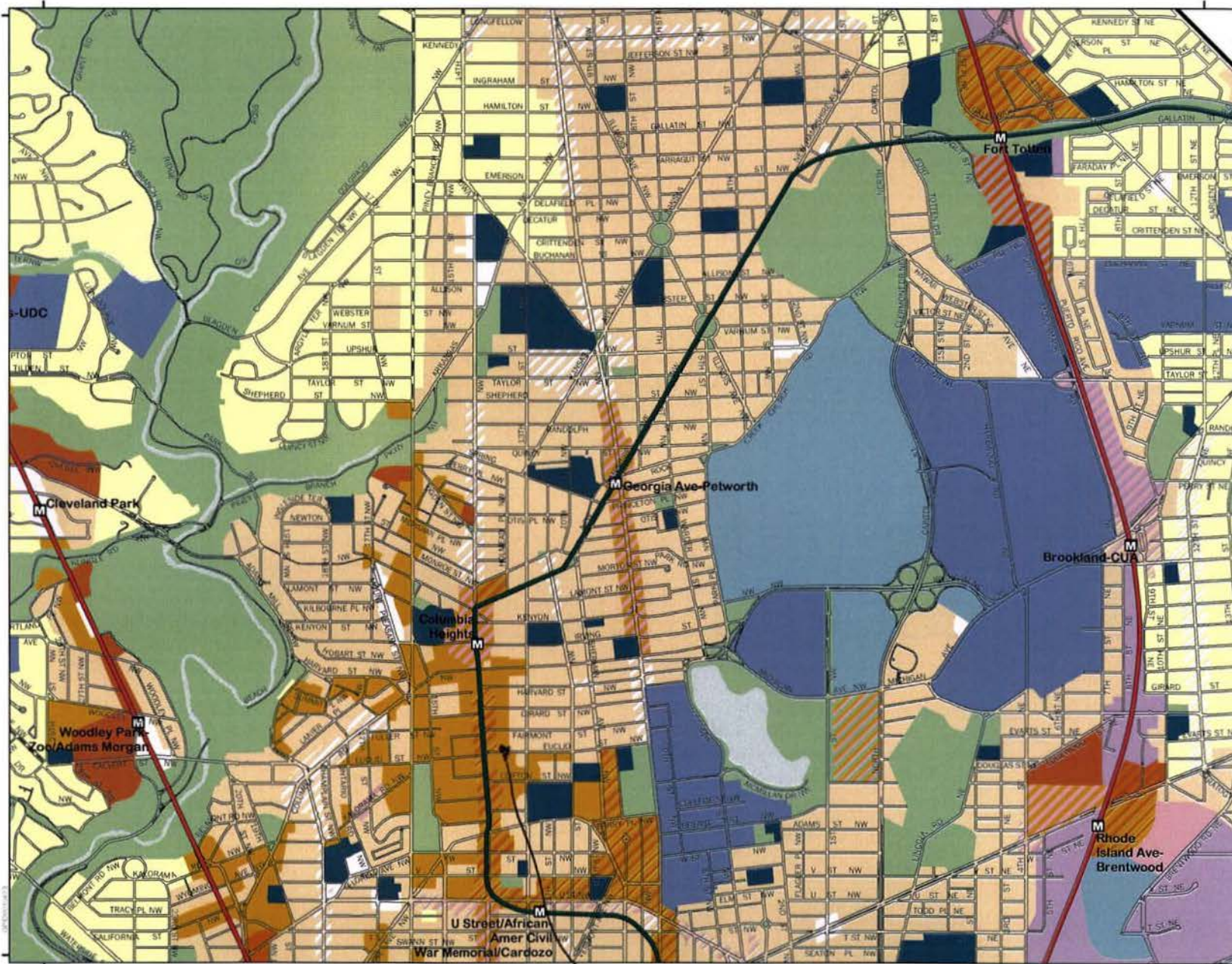
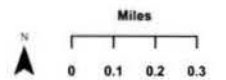
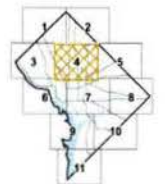


Exhibit A2

Comprehensive Plan Future Land Use Map 4



- Low Density Residential
- Moderate Density Residential
- Medium Density Residential
- High Density Residential
- Low Density Commercial
- Moderate Density Commercial
- Medium Density Commercial
- High Density Commercial
- Production, Distribution, and Repair
- Federal
- Local Public Facilities
- Institutional
- Parks, Recreation, and Open Space
- Mixed Land Use
- WATER

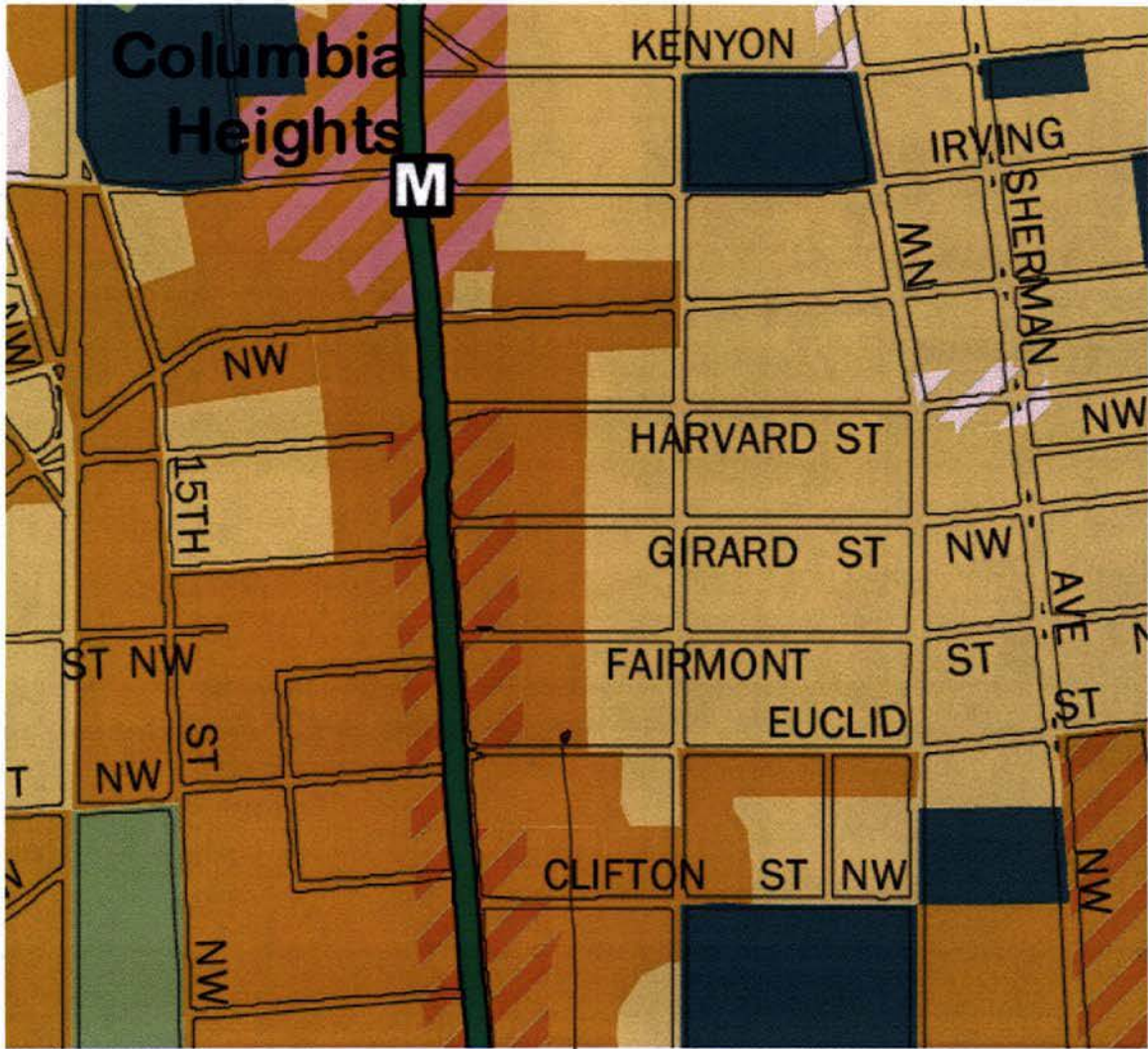


*** Government of the
District of Columbia
Anthony A. Williams, Mayor

Office of Planning ~ December 20, 2006
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Subject Property

Exhibit A3

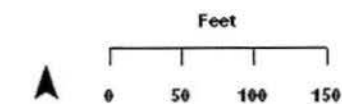


Subject Property

Exhibit B1



BZA Application No. 17553
1327 Euclid Street, N.W.
(Vicinity with Zoning)



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Office of Planning - December 13, 2006

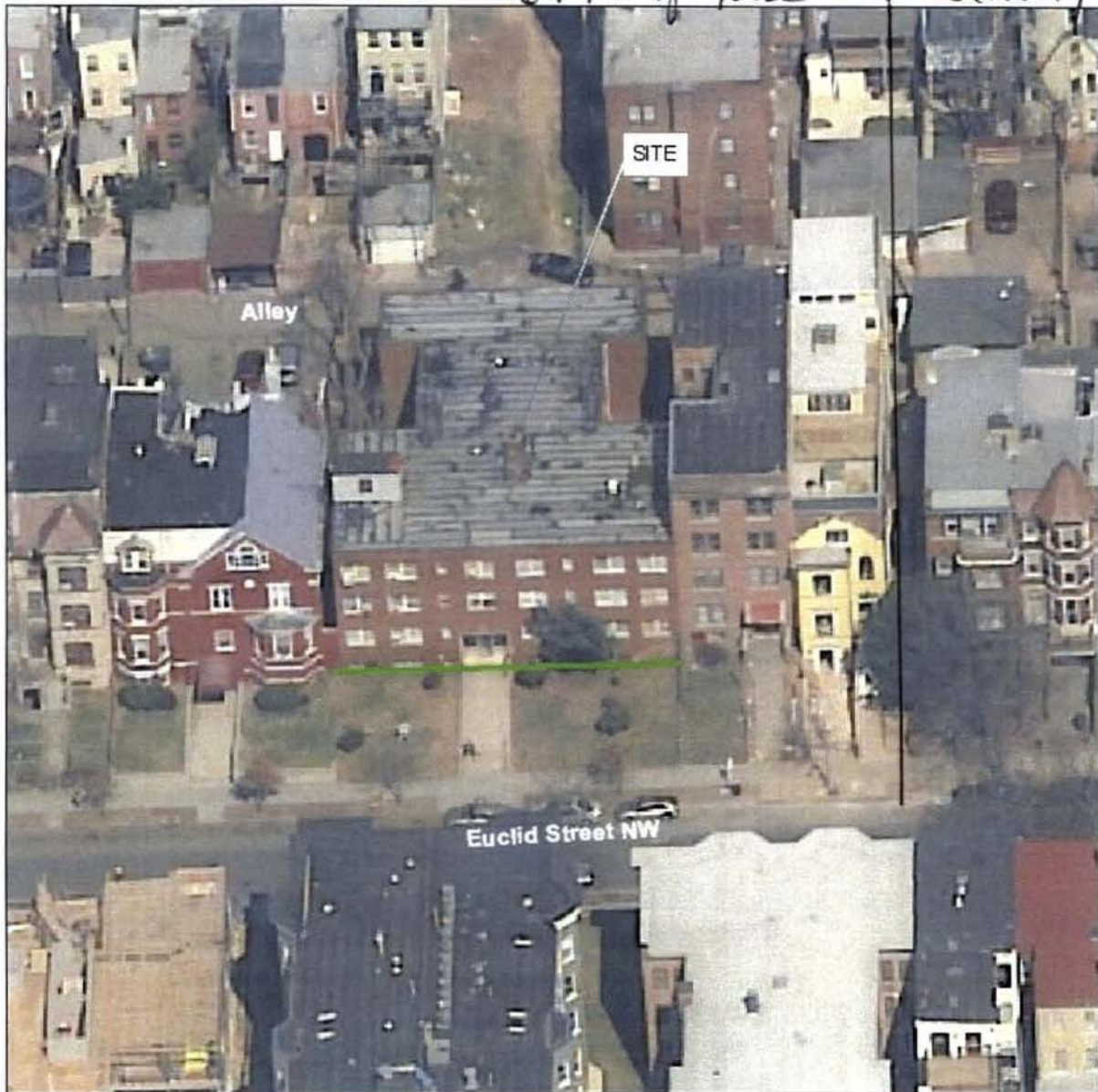
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- Zoning Districts
- Street Centerlines
- Water
- Property Squares
- Owner Points (Lite)
- Property Squares
- ◊ Residential (CAMA)
- ◊ Commercial (CAMA)

Exhibit B2

estimated Medium Density
Residential
6190 of Square

Moderate Density Estimated
3990
of
Square
2861



BZA Application No. 17553
1327 Euclid Street, N.W.
(View to the North)



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District of Columbia
Anthony A. Williams, Mayor

Office of Planning - November 21, 2006

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- Street Centerlines
- Water
- Property Squares
- Owner Points (Lite)
- Property Squares
- Residential (CAMA)
- Commercial (CAMA)
- Zoning Districts