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December 2, 2008

Zoning Commission of the District of Columbia
One Judiciary Square, Suite 210-South
441 4th Street, NW
Washington, DC 20004

Re: Comments on Proposed Rulemaking in Z.C. Case No. 08-09
Proposed Expansion of Sixteenth Streets Heights Overlay District

Dear Commissioners:

Introduction

Pursuant to your request for comments on the above-referenced proposed rulemaking,¹ we wish to bring to your attention a significant error in the statistical data relied upon to support expansion of the Sixteenth Street Heights ("SSH") Overlay. While it was suggested at the Commission's October 20, 2008, meeting that the rate of conversion of residences to non-residential uses was at approximately 10 percent, in fact, only 5.6 percent of residences in the proposed expansion area have been converted to non-residential uses over the past 80-100 years. Because this rate falls far short of the 10 percent "tipping point" established under section 1551.4(a) of the Zoning Regulations, there is no basis for expanding the SSH Overlay and the proposed rulemaking should be denied.

Standard of Review

At the outset of the September 22 hearing on the proposed expansion, and during its deliberations on October 20, the Zoning Commission clearly articulated the standard of review for the petition. The chairman stated that "[w]hat is relevant are the three key findings made by the Commission when it created the overlay, as are stated in section 1551.4 of the Regulations."² The Commission focused specifically on section 1551.4(a), which provides "that approximately one in every ten (10) houses in the neighborhood has been converted to a nonresidential use, a much higher ratio than has been identified for any other R-1 zoned neighborhood in the District of Columbia." After receiving all testimony and evidence into the record, the Commission

¹ See Notice of Proposed Rulemaking, 55 D.C. Reg. 11546 (November 7, 2008), establishing 30-day comment period ending December 8, 2008.

² Transcript of Zoning Commission Hearing in Case No. 08-09, September 22, 2008 ("Sept. Tr.") at 7; see also Sept. Tr. at 60-61, 97, 113, and 115.

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determined that its decision turned on this one key provision: whether ten percent of the properties in the proposed expansion area had been *converted* from residential to nonresidential uses.³ If so, and the other conditions of section 1551 were met, the Commission could conclude that the map amendment should be adopted. Conversely, if the conversion rate were not at or near ten percent, there would be no basis to expand the overlay.

Errors in the Statistical Analysis

Proponents of the proposed rulemaking and the Office of Planning provided information to the record on the number of residential and nonresidential properties in the proposed expansion area. However, neither tally quantified the number of residential properties that had been *converted* to other uses, thus failing to address the most critical standard under section 1551.4(a). By simply totaling the number of non-residential uses, their evidence unwittingly resulted in a "false positive," suggesting that the 10 percent tipping point under section 1551.4(a) had been reached. For example, the list attached to the Office of Planning ("OP") report showed that 38.96% of the land area in the expansion area was devoted to non-residential uses – but it didn't show which properties were formerly residential. Without that data, OP's report created the false impression that the threshold conversion rate had been exceeded.⁴ Later, at the October 20, 2008 decisional meeting, OP again mistakenly confused the total number of nonresidential properties with a conversion rate when responding to a discussion among the Commissioners on whether the tipping point had been reached. OP suggested that the conversion rate has gone from 8.5 percent to 9.9 percent.⁵

³ As Commissioner May also explained at the October 20, 2008, Zoning Commission meeting, "I think the one [condition of section 1551.4] that's the source of significant debate and discussion is the issue of exactly how much of this *conversion to non-residential use* has been occurring within that area.... [T]he original basis of [the overlay] ... was that over a period of years, one in ten houses in the neighborhood had been *converted* to non-residential use...." Zoning Commission Transcript, Case No. 08-09, October 20, 2008 ("Oct. Tr."), at 33-35 (emphasis added); see also comments from Vice Chairman Jeffries: "The first point I'd make is that the way the findings read from the initial overlay refers to the fact that over a period of years, approximately one in 10 houses in the neighborhood has been *converted*." Oct Tr. at 39 (emphasis added).

⁴ OP's list also erroneously included properties that even it identified as residential. See, for example, entries #3, 6, 7, 10, 12, 14, and 16 on list attached to OP Final Report dated September 12, 2008, and submitted as Exhibit No. 19 to the record. It also includes the Kingsbury Center, which is zoned D/R-1-B and should be excluded for the overlay expansion because of its diplomatic overlay. Only R-1-B properties are to be included in the SSH. Similarly, one proponent's list identified 48 nonresidential properties in the community as evidence of over-saturation, but 35 of the properties either fell *outside* the expansion area or were otherwise improperly included. The list included Carter Barron Park, Amphitheater and Tennis Courts (#1, 40 and 41), properties to the west of 16th Street bordering Rock Creek Park (#5, 9-10, 12-13, 25, and 40), buildings already included in the existing SSH Overlay(#2-4), properties east of the expansion area (#15-16, 18, 20, 22-24, 37, and 41), or counting multiple uses within a single property (#42-43). See "List of Institutions Located in or Directly Bordering Affected Community" included as Attachment A to Testimony of the Coalition of Residents Committed to Maintaining the Residential Integrity of the Community, Exhibit No. 48 in Z.C. Case No. 08-09; see also Sept. Tr. at 28.

⁵ Oct. Tr., 48-51.

Unfortunately, OP's analysis seems to have mixed and matched the statistical data, resulting in an erroneous conclusion that the 10 percent threshold had been met. First, the underlying conversion rate is not 8.5 percent. That figure simply represents the percentage of nonresidential uses in the expansion area. In order to determine the *conversion rate*, one must first identify which of those nonresidential properties were formerly residences. Based on the information in "Tab C," the conversion rate since 1994 is two out of 141 properties, or a 1.4 percent conversion rate from residential to nonresidential uses.⁶ It is mathematically impossible to determine the pre-1994 conversion rate from Tab C because the document does not indicate which other nonresidential uses were previously residences.

That statistic can only be gleaned from further research documenting the original uses of buildings in the proposed expansion area and comparing them to current uses. That information has now been compiled in Attachment A to this letter from a variety of public sources, including the D.C. Historic Preservation Office building permit database, Lusk Real Estate Directories, the Office of Tax and Revenue and the Recorder of Deeds. As the spreadsheet shows, the expansion area includes 143 properties or building lots, two of which have historically been vacant. Five of the 143 properties were originally used for nonresidential purposes: four religious uses (Square 2708, Lot 813; Square 2714, Lots 817 and 820; and Lot 2716, Lot 804) and one institutional use (Square 2711, Lot 802). Of the remaining 138 residential properties, only eight have been converted to nonresidential uses. That is, the overall conversion rate for properties in the expansion area is only 5.6 percent. As such, the petition fails to meet the first prong of the three-part test of section 1551.4 and should be denied on that basis alone.

Undefined Neighborhood Boundaries (Section 1551.4(b))

The petition also fails to meet the second prong of the test because the neighborhood boundaries of the expansion area are *not* well-established elements of the 16th Street Heights community. First, section 1551.2 of the Zoning Regulations clearly defines the neighborhood boundaries to be "the geographic area in northwest Washington generally bounded by 16th Street and Rock Creek Park on the west, Military Road and Missouri Avenue on the north, and 14th Street on the east, and Colorado Avenue on the southeast." Second, if the boundaries identified under section 1551.2 have since expanded, there was no evidence submitted to the record to document the scope of the expansion. There were no maps, real estate data or other information to show how, when or the extent to which these boundaries changed. In fact, according to the "List of Institutions Located in or Directly Bordering Affected Community" submitted by the Coalition of Residents Committed to Maintaining the Residential Integrity of the Community, the area purportedly affected by institutional uses includes properties outside the expansion area to the west, east and south. While the Office of Planning explains that the expansion area cannot capture the threatened properties to the south because they are not zoned R-1-B, it does not offer any explanation for excluding the areas to the east and west. It simply concluded that it was limited to addressing the boundaries as presented in the petition. Given the complete lack of

⁶ Tab C is found at Exhibit 22 in the record of Z.C. Case No. 08-09. Tab C only identifies 141 improved lots and does not account separately for two vacant lots.

evidence or critical analysis demonstrating compliance with this criterion, the proposed expansion cannot be justified.

Lack of Serious Planning and Enforcement Problems (Section 1551.4(c))

Finally, the District of Columbia executive branch and councilmembers have not identified a number of nonresidential uses and the conversion of houses to these uses in this neighborhood as a serious planning and enforcement problem for more than ten years. Thus, the proposed rulemaking also fails the third and final prong of the test. While the current Comprehensive Plan recognizes that *residents* of the Rock Creek East Planning Area have expressed concerns about the growth of institutional and other nonresidential uses in their community, neither the executive branch or Council adopted those concerns as their own. *See* 10 DCMR § 2207.2(a) (2006). In fact, the Comprehensive Plan does not include any policy or action to address this concern whatsoever. *See* 10 DCMR §§ 2207 – 2215. Moreover, the Comprehensive Plan makes no distinction between the larger Rock Creek East Planning Area and the boundaries of the 16th Street Heights neighborhood and expansion area.

In sharp contrast, the 1995 Comprehensive Plan, for example, specifically called for protections against adverse impacts from nonresidential uses, such as churches, day care centers, and other institutional uses, and recommends discrete actions to institute appropriate protections, including an overlay zone. *See* 10 DCMR § 1530.1(b)(1995). Absent such similar language in the current Comprehensive Plan, there is absolutely no evidence that both the executive and legislative branches – as opposed to the residents – have expressed serious planning concerns about the growth of institutional and other nonresidential uses in the 16th Street Heights community.⁷ Thus, the petition is unsupportable and should be denied.

Conclusion

The proposed rulemaking fails to meet the three-prong test under section 1551.4 of the Zoning Regulations. The conversion rate in the expansion area is well below the 10 percent tipping point of paragraph (a), and this alone warrants rejection of the expanded overlay. Additionally, there is no evidence that the neighborhood boundaries are well established as required under paragraph (b), and neither the executive or legislative branches have identified serious planning and enforcement problems as a result of the minimal number of conversions as set forth in paragraph (c). Accordingly, the proposed rulemaking should be denied.

⁷ In her testimony before the Commission, Councilmember Bowser did not identify any serious planning or enforcement problems created by the conversion of houses to nonresidential uses; rather, her testimony focused solely on the need for a formal process by which to review new nonresidential uses. *See* Sept. Tr., 78-82.

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Respectfully submitted,

HOLLAND & KNIGHT LLP

By: Mary Carolyn Brown
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cc: Jennifer Steingasser, OP
Joel Lawson, OP
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Carlton Hart, NCPC

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ATTACHMENT

A

DE MINIMUS CONVERSION RATE OF RESIDENTIAL TO NONRESIDENTIAL USES IN AREA OF PROPOSED OVERLAY EXPANSION

<u>Square</u>	<u>Lot</u>	<u>Address</u>	<u>Date Constructed</u>	<u>Original Use</u>	<u>Current Use</u>	<u>Conversion from</u>	<u>Total</u>	<u>Total N-R</u>
						<u>Resid to</u> <u>NonResidential?</u>	<u>Properties</u>	
2708	26	4825 Piney Branch Rd NW	ca 1960	Detached SFD	Detached SFD		1	
	27	1502 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	28	1500 Emerson St NW	ca 1910	Detached SFD	Detached SFD		1	
	29	1501 Delafield PI NW	ca 1923	Detached SFD	Detached SFD		1	
	30	1503 Delafield PI NW	ca 1911	Detached SFD	Detached SFD		1	
	31	1505 Delafield PI NW	ca 1908	Detached SFD	Detached SFD		1	
	35	1501 Decatur St NW	ca 1909	Detached SFD	Detached SFD		1	
	36	1503 Decatur St NW	ca 1906	Detached SFD	Detached SFD		1	
	37	1505 Decatur St NW	ca 1906	Detached SFD	Detached SFD		1	
	38	1507 Decatur St NW	ca 1910	Detached SFD	Detached SFD		1	
	39	1504 Delafield PI NW	ca 1908	Detached SFD	Detached SFD		1	
	40	1500 Delafield PI NW	ca 1910	Detached SFD	Private Club	1	1	1
	42	1514 Emerson St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	43	1512 Emerson St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	44	1510 Emerson St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	45	4824 Piney Branch Rd NW	ca 1926	semidetached SFD	semidetached SFD		1	
	46	4822 Piney Branch Rd NW	ca 1926	semidetached SFD	semidetached SFD		1	
	47	4821 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	48	4823 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	49	4825 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	50	4827 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	51	4829 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	52	4831 16th St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	53	1516 Emerson St NW	ca 1926	semidetached SFD	semidetached SFD		1	
	813	4801 16th St NW	ca 1949	Church	Church		1	1
2709	1	1409 Decatur St NW	ca 1923	Detached SFD	Detached SFD		1	
	2	1411 Decatur St NW	ca 1908	Detached SFD	Detached SFD		1	
	3	1415 Decatur St NW	ca 1908	Detached SFD	Detached SFD		1	
	4	1419 Decatur St NW	ca 1910	Detached SFD	Detached SFD		1	
	5	1423 Decatur St NW	ca 1917	Detached SFD	Detached SFD		1	
	6	1427 Decatur St NW	ca 1907	Detached SFD	Detached SFD		1	
	7	1431 Decatur St NW	ca 1911	Detached SFD	Detached SFD		1	
	8	1433 Decatur St NW	ca 1913	Detached SFD	Detached SFD		1	
	9	1414 Delafield PI NW	ca 1929	Detached SFD	Detached SFD		1	
	10	1412 Delafield PI NW	ca 1906	Detached SFD	Detached SFD		1	
	11	1410 Delafield PI NW	ca 1906	Detached SFD	Detached SFD		1	
	12	1408 Delafield PI NW	ca 1908	Detached SFD	Detached SFD		1	
	13	1406 Delafield PI NW	ca 1911	Detached SFD	Detached SFD		1	
	14	1404 Delafield PI NW	ca 1919	Detached SFD	Detached SFD		1	
	15	1402 Delafield PI NW	ca 1910	Detached SFD	Detached SFD		1	
	16	4808 14th St NW	ca 1908	Detached SFD	Detached SFD		1	
	17	4806 14th St NW	ca 1908	Detached SFD	Detached SFD		1	

DE MINIMUS CONVERSION RATE OF RESIDENTIAL TO NONRESIDENTIAL USES IN AREA OF PROPOSED OVERLAY EXPANSION

	18	4804 14th St NW	ca 1912	Detached SFD	Detached SFD		1	
	19	1403 Delafield PI NW	ca 1907	Detached SFD	Detached SFD		1	
	20	1405 Delafield PI NW	ca 1906	Detached SFD	Detached SFD		1	
	21	1407 Delafield PI NW	ca 1917	Detached SFD	Detached SFD		1	
	22	1409 Delafield PI NW	ca 1906	Detached SFD	Detached SFD		1	
	23	1411 Delafield PI NW	ca 1906	Detached SFD	Detached SFD		1	
	24	1413 Delafield PI NW	ca 1911	Detached SFD	Detached SFD		1	
	25	1408 Emerson St NW	ca 1907	Detached SFD	Detached SFD		1	
	26	1406 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	27	1404 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	28	1402 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	29	1400 Emerson St NW	ca 1925	Detached SFD	Detached SFD		1	
	30	4820 Iowa Ave NW	ca 1907	Detached SFD	Detached SFD		1	
	31	4816 Iowa Ave NW	ca 1907	Detached SFD	Detached SFD		1	
	32	4812 Iowa Ave NW	ca 1907	Detached SFD	Detached SFD		1	
	33	1401 Delafield PI NW	ca 1908	Detached SFD	Detached SFD		1	
2710	1	1401 Emerson St NW	ca 1907	Detached SFD	Detached SFD		1	
	2	1403 Emerson St NW	ca 1909	Detached SFD	Detached SFD		1	
	3	1405 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	4	1407 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	5	1409 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	6	1501 Emerson St NW	ca 1906	Detached SFD	Detached SFD		1	
	7	1505 Emerson St NW	ca 1908	Detached SFD	Detached SFD		1	
	11	4915 16th St NW	ca 1936	Detached SFD	Detached SFD		1	
	12	4919 16th St NW	ca 1936	Detached SFD	Detached SFD		1	
	13	4923 16th St NW	ca 1936	Detached SFD	Detached SFD		1	
	14	1520 Farragut St NW	ca 1936	Detached SFD	Detached SFD		1	
	15	4901 16th St NW		Detached SFD	convent (demolished)	1	1	1
	806	1500 Farragut St NW	ca 1916	Detached SFD	Detached SFD		1	
2711	802	5000 14th St NW	ca 1911	Dickson Home for Aged	Kingbury Ctr/Inst Use*		1	1
2712	1	5006 Piney Branch Rd NW	ca 1912	Detached SFD	Detached SFD		1	
2713	1	1501 Farragut St NW	ca 1909	Detached SFD	Detached SFD		1	
	2	1501 Farragut St NW		vacant	vacant		1	
	7	5011 16th St NW	ca 1925	Detached SFD	Detached SFD		1	
	10	5022 Iowa Ave NW	ca 1926	Detached SFD	Detached SFD		1	
	11	5018 Iowa Ave NW	ca 1925	Detached SFD	Detached SFD		1	
	14	1527 Farragut St NW	ca 1910	Detached SFD	Detached SFD		1	
	19	1508 Gallatin St NW	ca 1922	Detached SFD	Detached SFD		1	
	20	5015 16th St NW	ca 1922	Detached SFD	Detached SFD		1	
	22	5019 16th St NW	ca 1922	Detached SFD	Detached SFD*		1	
	23	5001 16th St NW	ca 1926	Detached SFD	Detached SFD		1	
800		5011 16th St NW		vacant	vacant		1	

DE MINIMUS CONVERSION RATE OF RESIDENTIAL TO NONRESIDENTIAL USES IN AREA OF PROPOSED OVERLAY EXPANSION

	803	5017 16th St NW	ca 1922	Detached SFD	Buddhist Vihara	1	1	1
	804	5014 Iowa Ave NW	ca 1921	Detached SFD	Detached SFD		1	
2714	1	5100 14th St NW	ca 1910	Detached SFD	Detached SFD		1	
	6	1424 Hamilton St NW	ca 1923	Detached SFD	Detached SFD		1	
	7	1410 Hamilton St NW	ca 1922	Detached SFD	Detached SFD		1	
	10	1400 Hamilton St NW	ca 1948	Detached SFD	Detached SFD		1	
	13	5106 14th St NW	ca 1911	Detached SFD	Detached SFD		1	
	14	5104 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
	15	5102 14th St NW	ca 1911	Detached SFD	Detached SFD		1	
	22	1516 Hamilton St NW	ca 1915	Detached SFD	Religious	1	1	1
	23	1515 Gallatin St NW	ca 1925	Detached SFD	Detached SFD		1	
	26	1514 Hamilton St NW	ca 1923	Detached SFD	Detached SFD		1	
	804	1501 Gallatin St NW	ca 1916	Detached SFD	Educational	1	1	1
	805	1501 Gallatin St NW		Detached SFD	vacant/educational	1	1	1
	806	1505 Gallatin St NW	ca 1920	Detached SFD	Detached SFD		1	
	807	1507 Gallatin St NW	ca 1922	Detached SFD	Detached SFD		1	
	808	1509 Gallatin St NW	ca 1921	Detached SFD	Detached SFD		1	
	810	1510 Hamilton St NW	ca 1923	Detached SFD	Detached SFD		1	
	814	1406 Hamilton St NW	ca 1919	Detached SFD	Detached SFD		1	
	816	1408 Hamilton St NW	ca 1940	Detached SFD	Detached SFD		1	
	817	1409 Gallatin St NW	ca 1914	Parish Hall/church	St Lukes		1	1
	820	5101 16th St NW	ca 1915	Church	Christ Lutheran Church		1	1
	821	5111 16th St NW	ca 1941	Detached SFD	parsonage/residential		1	
	822	1506 Hamilton St NW	ca 1919	Detached SFD	Detached SFD		1	
	823	5110 14th St NW	ca 1912	Detached SFD	Detached SFD		1	
2715	1	1401 Hamilton St NW	ca 1911	Detached SFD	Detached SFD		1	
	14	1406 Ingraham St NW	ca 1923	Detached SFD	Detached SFD		1	
	15	1400 Ingraham St NW	ca 1913	Detached SFD	Detached SFD		1	
	16	1400 Ingraham St NW		vacant	vacant		1	
	17	5214 14th St NW	ca 1914	Detached SFD	Detached SFD		1	
	24	5210 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
	25	5208 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
	26	5206 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
	30	1501 Hamilton St NW	ca 1916	Detached SFD	Detached SFD		1	
	31	1503 Hamilton St NW	ca 1916	Detached SFD	Detached SFD		1	
	32	5201 Colorado Ave NW	ca 1919	Detached SFD	Detached SFD		1	
	33	5205 Colorado Ave NW	ca 1916	Detached SFD	Detached SFD		1	
	34	5207 Colorado Ave NW	ca 1916	Detached SFD	Detached SFD		1	
	35	1416 Ingraham St NW	ca 1922	Semidetached SFD	Semidetached SFD		1	
	36	1414 Ingraham St NW	ca 1922	Semidetached SFD	Semidetached SFD		1	
	37	1412 Ingraham St NW	ca 1922	Semidetached SFD	Semidetached SFD		1	
	38	1410 Ingraham St NW	ca 1922	Semidetached SFD	Semidetached SFD		1	
	39	1413 Hamilton St NW	ca 1922	Detached SFD	Detached SFD		1	
	40	1415 Hamilton St NW	ca 1922	Detached SFD	Detached SFD		1	

DE MINIMUS CONVERSION RATE OF RESIDENTIAL TO NONRESIDENTIAL USES IN AREA OF PROPOSED OVERLAY EXPANSION

	41	1420 Ingraham St NW	ca 1915	Detached SFD	Religious	1	1	1
	810	1407 Hamilton St NW	ca 1921	Detached SFD	Detached SFD		1	
	811	1411 Hamilton St NW	ca 1914	Detached SFD	Detached SFD		1	
	814	5204 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
2716	1	1401 Ingraham St NW	ca 1924	Detached SFD	Detached SFD		1	
	2	1407 Ingraham St NW	ca 1912	Detached SFD	Detached SFD		1	
	3	1409 Ingraham St NW	ca 1915	Detached SFD	Detached SFD		1	
	6	5309 Colorado Ave NW	ca 1922	Detached SFD	Detached SFD		1	
	7	5315 Colorado Ave NW	ca 1925	Detached SFD	Detached SFD		1	
	8	5321 Colorado Ave NW	ca 1919	Detached SFD	Detached SFD		1	
	13	5310 14th St NW	ca 1921	Detached SFD	Detached SFD		1	
	14	5306 14th St NW	ca 1936	Detached SFD	Detached SFD		1	
	15	5302 14th St NW	ca 1915	Detached SFD	Detached SFD		1	
	803	5303 Colorado Ave NW	ca 1910	Detached SFD	Chancery		1	1
	804	5331 Colorado Ave NW	ca 1924	Church	Church	1	1	1
						8	143	13

Total Properties: 143	Total Conversion: 9	Percentage of Conversion:	0.055944056
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*Converted from SFD to private club back to SFD.

Sources: D.C. Building Permit Database, D.C. Historic Preservation Office, 2008; D.C. Office of Tax and Revenue, Assessment and Taxation Database, 2008; Lusk Real Estate Directory, 1994-2008; D.C. Recorder of Deeds; D.C. GIS website; D.C. Office of Zoning website.