

# Holland & Knight

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April 28, 2022

## **VIA IZIS**

Board of Zoning Adjustment  
for the District of Columbia  
441 4th Street, NW, Suite 210S  
Washington, DC 20001

**Re: BZA Case No. 20705 / Atlas Doghouse  
1350 E Street, SE (Lot 7006 in Square 1042)  
Applicant's Supplemental Prehearing Submission**

Dear Chairman Hill and Members of the Board:

On behalf of Atlas Doghouse (the "Applicant"), we hereby submit this Supplemental Prehearing Submission in response to the Office of Planning's ("OP") report regarding the above-referenced case. *See* Ex. 28. OP is recommending approval subject to two conditions intended to minimize potential impacts, and ensure the Applicant's proposal adequately addresses the relevant review criteria. Please find the Applicant's responses to each condition below.

- 1. Identify the storage room on the proposed floor plan for the animal waste disposal containers; and*

The Applicant has identified the designated waste storage room on the updated preliminary floor plan attached hereto under Tab A (the "Updated Floor Plan"). As detailed in the Applicant's Prehearing Statement, the Applicant will implement extensive waste management protocols to counter any potential adverse impacts resulting from unpleasant odors. *See* Ex. 25 at pg. 2. Consistent with the criteria of 11-U DCMR § 513.1(b)(5), animal waste will be placed in closed disposal containers and will be promptly removed from the designated trash area for collection by a privately contracted trash company.

- 2. Document that the doors in the space from E Street that face a residential building would be consistent with the solid core door requirement of the regulations.*

Pursuant to 11-U DCMR § 513.1(b)(3), all doors for an animal boarding facility that face a residential use must be solid core. In this case, the front entrance to the dog day care center faces The Lockwood apartment building, which is approximately 90 feet away on the opposite side of E Street, SE.

Board of Zoning Adjustment  
District of Columbia  
CASE NO.20705  
EXHIBIT NO.30

The Applicant submits that the "solid core" door requirement is primarily intended to mitigate potential impacts resulting from excessive noise. Accordingly, the construction of the front entrance door will not be of a hollow construction and will be designed to absorb sound to the greatest extent possible. Per industry standard, a solid core wood has a Sound Transmission Class (STC) of 30. Typical glass thermally broken storefront doors have an STC of 35 and above. The Applicant intends to install a door similar to the prototype shown under Tab B, which measures at an STC of 37. Therefore, the composition of the front entrance door will satisfy the intent of the "solid core" requirement. Moreover, the Applicant points to the internal vestibule shown on the Updated Floor Plan, which includes a second door that will drastically reduce the sound transmission at the front door location.

In light of the foregoing, the Applicant believes that it has provided sufficient information in response to the above-listed conditions. The Applicant is prepared to provide additional information at the public hearing, as may be necessary.

### **Waiver Request**


So that this filing may be accepted less than 21 days prior to public hearing, the Applicant respectfully requests that the Board exercise its waiver authority pursuant to 11-Y DCMR § 101.9. The supplemental information provided responds to specific requests from OP, and the enclosed floor plan will enable the Board to evaluate the most current iteration of the proposed use. Moreover, acceptance of this filing would not prejudice the rights of any party. To date, the public notice requirements have been satisfied (*see* BZA Attestation/PHN at Ex. 18, Affidavit of Posting at Ex. 27) and the relief requested remains the same.

We look forward to the Board's consideration of this application at the public hearing scheduled for May 4, 2022. Should you have any questions, please do not hesitate to have staff contact us.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By:



Leila Jackson Batties  
Christopher S. Cohen

Enclosures

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2022, a copy of the foregoing Supplemental Prehearing Submission in support of BZA Application No. 20705 was served by electronic mail on the following at the addresses stated below.

**District of Columbia Office of Planning**

Ms. Jennifer Steingasser  
Mr. Joel Lawson  
Mr. Stephen Mordfin  
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**Advisory Neighborhood Commission 6B**

c/o Barbara Flemming, Executive Director  
[6B@anc.dc.gov](mailto:6B@anc.dc.gov)

**Commissioner Corey Holman, ANC 6B Chair**

Single-Member District Representative, ANC 6B-06  
[6B06@anc.dc.gov](mailto:6B06@anc.dc.gov)

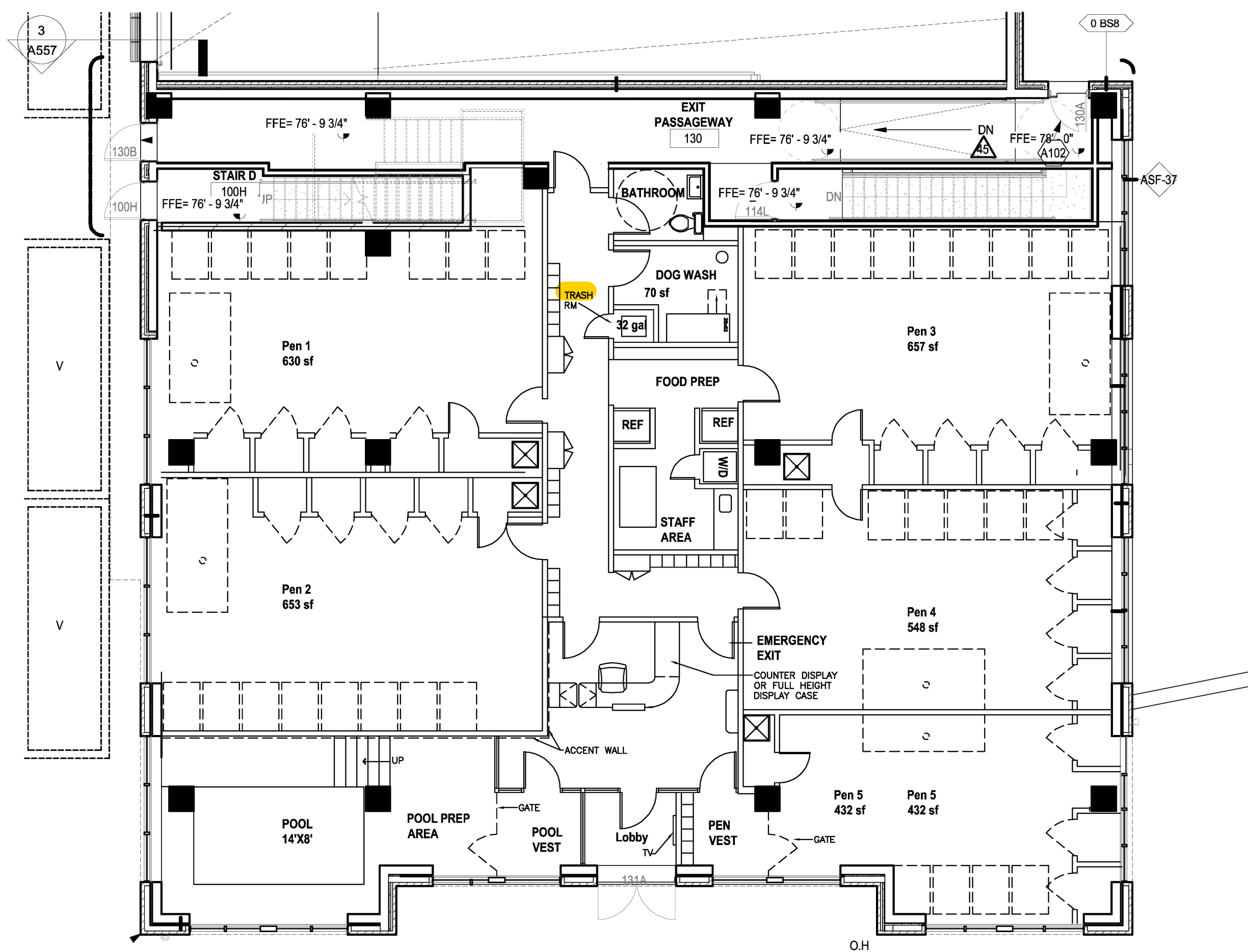
**District Department of Transportation**

Mr. Jonathan D. Rogers  
Mr. Aaron Zimmerman  
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Christopher S. Cohen  
Holland & Knight LLP

# TAB A



**UPDATED PRELIMINARY FLOOR  
 PLAN OPTION 2.2  
 ADH - CAPITOL HILL  
 APRIL 27, 2022**

# **TAB B**

# Redefining Thermal Entrances with IsoPour™ Technology



Ask more from your door, and get it all with Kawneer's new Insulpour® Thermal Entrances, featuring IsoPour™ technology. This innovative product offering gives architects, developers, owners, and glazing contractors the ability to create a true thermally broken entrance system. It's an ideal solution for high-end commercial and multifamily facilities looking to improve thermal control in common areas with moderate to high traffic.

By merging industry-proven pour and debridge and polymer isolator technologies, Kawneer's IsoPour™ Thermal Break technology creates thermally broken assemblies for enhanced building energy efficiencies with higher structural performance. Insulpour® Thermal Entrances simultaneously provide additional design flexibility through multiple door cross-rail and bottom rail choices along with dual finish capabilities for the door and door frame.

## PERFORMANCE, STRENGTH & SECURITY

The door and frame both leverage IsoPour™ Thermal Break technology, enabling high thermal performance. Specifically aimed at quelling concerns about cold spots and thermal bridging from architects and specifiers, Insulpour® Thermal Entrances feature a true thermally broken door header, which significantly mitigates the formation of condensation when used with a concealed overhead closer. Insulating glass unit options of double pane 1" (25.4 mm) or triple pane 1-1/2" (38.1 mm) improve thermal and sound reduction performance.

For added strength, the 2-1/4" (57.2 mm) deep door has a stout 1/8" (3.2 mm) wall thickness, and the dual-welded corner construction of Insulpour® Thermal Entrances adds long-term performance. Each door corner comes with a limited lifetime warranty, good for the life of the door under normal use operation. It is transferable from building owner to owner and is provided in addition to the standard two-year warranty covering material and workmanship of each Kawneer door.

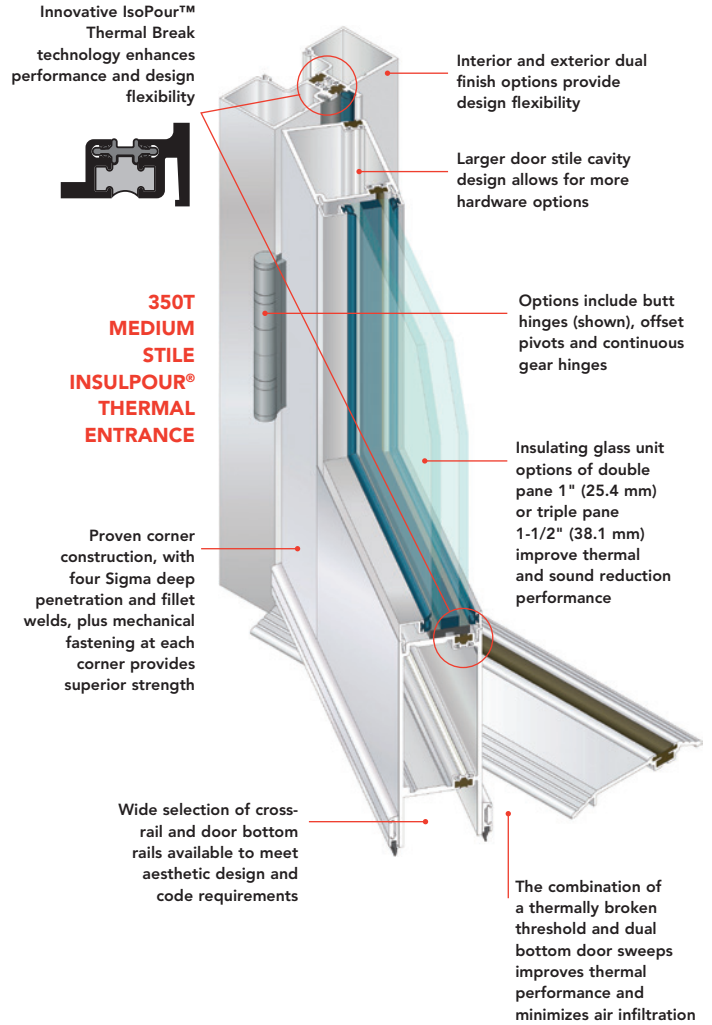
Insulpour® Thermal Entrances meet ASTM E1996 hurricane impact resistant requirements up to Zone 4 and Level D, and have undergone shock tube testing for blast mitigation. Contact your local Kawneer sales representative for limitations and specific application requirements.

## AESTHETICS & DESIGN FLEXIBILITY

With sightlines that match standard, non-thermally broken entrances, Insulpour® Thermal Entrances offer 250T narrow, 350T medium and 500T wide stile options.

	VERTICAL STILE	TOP	BOTTOM RAIL
250T Narrow Stile	2-1/2" (63.5 mm)	2-15/16" (74.6 mm)	3-7/8" (98.4 mm)
350T Medium Stile	3-1/2" (88.9 mm)	3-1/2" (88.9 mm)	6-1/2" (165.1 mm)
500T Wide Stile	5" (127 mm)	5" (127 mm)	6-1/2" (165.1 mm)

The unique thermal break design allows for a wider choice of locking option hardware than previous thermal entrance designs. Coupled with various cross-rail sizes and multiple bottom rail heights of 7-1/2" (190.5 mm), 10" (254 mm) and 12" (304.8 mm), Insulpour® Thermal Entrances give architects, designers and building owners more opportunities to bring their vision to life.



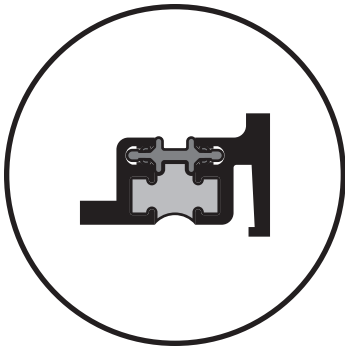
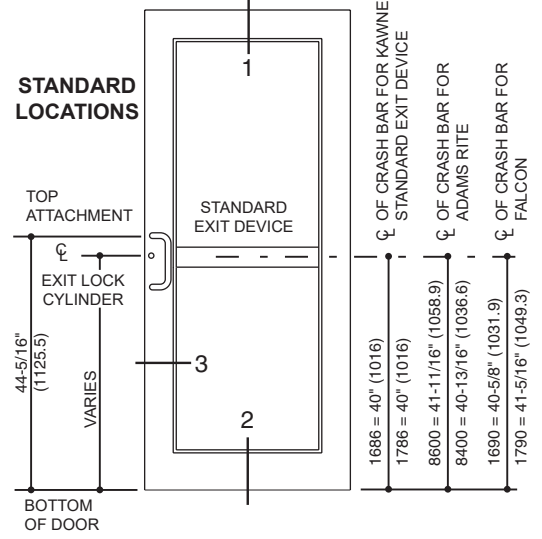
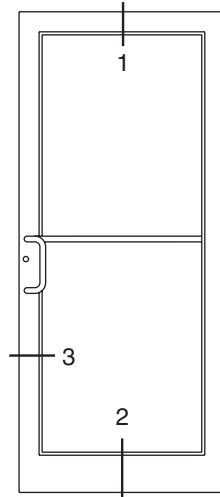
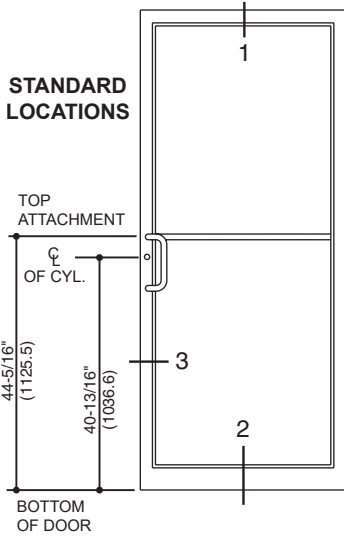


Additional information and CAD details are available at [www.kawneer.com](http://www.kawneer.com)

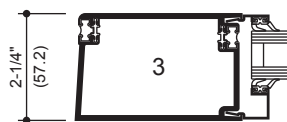
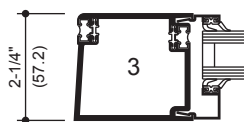
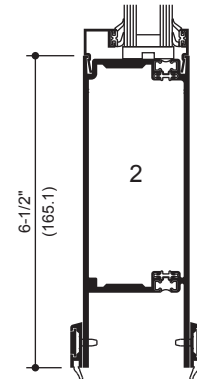
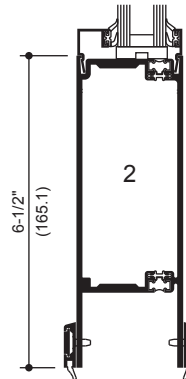
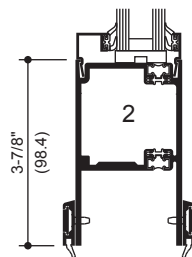
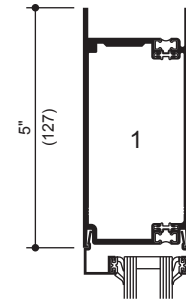
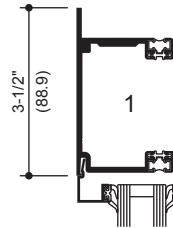
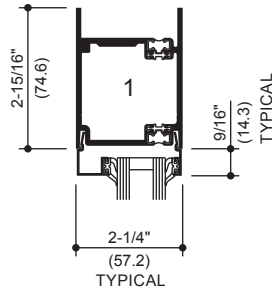
### 250T NARROW STILE

### 350T MEDIUM STILE

### 500T WIDE STILE



IsoPour® THERMAL BREAK



**250T NARROW STILE SINGLE ACTING**

**350T MEDIUM STILE SINGLE ACTING**

**500T WIDE STILE SINGLE ACTING**

**Note:** 1-1/2" (38.1) Triple Insulating Glass Unit infill available.

3. Uniform Load Deflection: A static air design load of;
  - 250T:** 50.13 psf (2400 Pa) for single doors and 40.10 psf (1920 Pa) for pairs of doors.
  - 350T:** 60.15 psf (2880 Pa) for single doors and 50.13 psf (2400 Pa) for pairs of doors.
  - 500T:** 70.19 psf (3360 Pa) for single doors and 60.15 psf (2880 Pa) for pairs of doors.
 shall be applied in the positive and negative direction in accordance with ASTM E 330. There shall be no deflection in excess of L/175 for typical application or L/180 for Small-Missile and Large-Missile impact, of the span of any framing member. At a structural test load equal to 1.5 times the specified design load, no glass breakage or permanent set in the framing members in excess of 0.2% of their clear spans shall occur.
4. Windborne-Debris-Impact Resistance Performance: **350T** and **500T**, Shall be tested in accordance with ASTM E1886, information in ASTM E1996, and TAS 201/203.
  - a. Large-Missile Impact: For aluminum-framed systems located within 30 feet (9.1m) of grade.
  - b. Small-Missile Impact: For aluminum-framed systems located above 30 feet (9.1 m) of grade.
5. Blast Mitigation Performance: **350T** and **500T**, shall be tested or proven through analysis to meet ASTM F2927, GSA-TS01, and UFC 04-010.01 performance criteria.
 

To meet UFC 04-010-01, B-3.3 Standard 12 for exterior doors and Standard 10 for glazing and frame bite provisions, the following options are available:

  - a. Section B-3.1.1 Dynamic analysis
  - b. Section B-3.1.2 Testing
  - c. Section B-3.1.3 ASTM F2248 Design Approach
6. Forced Entry: Tested in accordance with AAMA 1304.

**EDITOR NOTE: THERMAL TRANSMITTANCE AND CONDENSATION RESISTANCE PERFORMANCE RESULTS ARE BASED UPON 1" CLEAR INSULATING GLASS (1/4" CLEAR WITH e= 0.035 LOW E COATING ON #2 SURFACE ,1/2" AS WITH WARM EDGE SPACER AND 90% ARGON GAS FILL, 1/4" CLEAR).**

7. Energy Efficiency:
    - a. Thermal Transmittance (U-factor): When tested to AAMA Specification 1503, the thermal transmittance (U-factor) shall not be more than:
      - 1) **250T:** Insulated Glass – 0.52 (low-e) or Project Specific (\_\_\_\_) BTU/hr/ft<sup>2</sup>/°F per AAMA 507 or (\_\_\_\_) BTU/hr/ft<sup>2</sup>/°F per AAMA 507 per NFRC 100.
    - b. Solar Heat-Gain Coefficient (SHGC) : Glazed thermally broken aluminum door and frame shall have a Solar Heat Gain Coefficient (SHGC) of no greater than (\_\_\_\_) <Insert value> as determined according to NFRC 200.
    - c. Visible Transmittance (VT): Glazed thermally broken aluminum door and frame shall have a Visible Transmittance (VT) of no greater than (\_\_\_\_) <Insert value> as determined according to NFRC 200.
  8. Condensation Resistance Factor (CRF): When tested to AAMA Specification 1503, the condensation resistance factor shall not be less than:
    - a. **250T:** Insulated Glass – 49<sub>frame</sub> and 68<sub>glass</sub> (low-e).
  9. Condensation Resistance Factor (I): When tested to CSA A440, the condensation resistance factor shall not be less than:
    - a. **250T:** Insulated Glass – 37<sub>frame</sub> and 66<sub>glass</sub> (low-e).
  10. Sound Transmission Class (STC) and Outdoor-Indoor Transmission Class (OITC): When tested in accordance with ASTM E 90, the STC and OITC ratings shall not be less than:
    - a. **250T:** 37 (STC) and 32 (OITC).
- C. Environmental Product Declarations (EPD): Shall have a Type III Product-Specific EPD.

Laws and building and safety codes governing the design and use of glazed entrance, window, and curtain wall products vary widely. Kawneer does not control the selection of product configurations, operating hardware, or glazing materials, and assumes no responsibility therefor.

Kawneer reserves the right to change configuration without prior notice when deemed necessary for product improvement.  
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