

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE ZONING ADMINISTRATOR**

August 23, 2013

Christopher H. Collins
Holland & Knight LLP
800 17th Street, NW, Suite 1100
Washington, DC 20006



Re: 1728 14th Street, NW

Dear Mr. Collins:

This letter is to confirm the matters discussed in our recent meeting concerning the proposed connection of a new building at the above-referenced address (the "1728 Building") to the two existing adjacent townhouse buildings to the north, known as 1734 and 1736 14th Street, NW. The 1728 Building will be located on Record Lot 120 in Square 207, and the two existing adjacent townhouse buildings (the "1734/1736 Building") are located on Record Lot 121, and are joined internally through an entrance vestibule that opens into both buildings. The attached BZA Order No. 18453 grants parking and loading variance relief and roof structure special exception relief for the construction of the new mixed-use 1728 Building. I understand that this site, and the 1734/1736 Building, are all located within the boundaries of the Greater 14th Street Historic District. I understand that the existing two-story building at 1728 14th has been deemed a "noncontributing" building, and that is the basis for the HPRB's approval to remove the existing façade of that two story building and add two additional floors, with a new four-story façade, to create the 1728 Building. I also understand that the 1734/1736 Building is considered by the Historic Preservation Office ("HPO") as "contributing to the character of the historic district", and would therefore qualify as a "historic resource" under Sections 2120 and 2200.5 of the Zoning Regulations. I also understand that the above-referenced properties are all owned by the same entity, and that the owner proposes to connect the 1728 Building and the 1734/1736 Building at the first floor level in order to accommodate a single retail use. The owner also proposes to expand one of the two townhouse buildings. The question is whether this expansion of one of the two townhouse buildings, and connection of all three of the buildings, will generate an additional parking and/or loading requirement.

Based on the facts that the two townhouses at 1734 and 1736 are 1) joined together internally to constitute one single building for zoning purposes; 2) currently located on the same Record Lot 121; and 3) considered by the Historic Preservation Office as historic resources, then as long as the gross floor area of the combined townhouses is not expanded by 50% or more, then neither the change of use of those buildings, nor the increase in the gross floor area, will trigger a requirement for additional parking or loading. Additionally, because the 1728 Building has already received parking and loading variance relief, then the mere internal connection of the 1728 Building with the 1734/1736 Building will not create a new additional parking or loading requirement. Under the description above, the 1728 Building and the 1734/1736 Building could each be built or expanded on their own Record Lot as described herein, without the need for parking or loading relief. Therefore the internal connection of the 1728 Building with the

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1734/1736 Building (with or without a combination of Lots 120 and 121 into a single Record Lot) will not, in my view, cause a need to recalculate or otherwise impose a new or different parking or loading requirement.

Please let me know if you have any questions.

Sincerely,



Matthew Le Grant
Zoning Administrator