



District of Columbia Government  
Advisory Neighborhood Commission 6A  
Box 75115  
Washington, DC 20013



February 13, 2007

Zoning Commission  
c/o Office of Zoning  
One Judiciary Square  
441 Fourth Street NW, Suite 210S  
Washington, DC 20001

Re: ZC Case No. 06-47 (Text Amendments for Minimum Lot Area and lot occupancy requirements for Apartment Houses in the R-4 Zone District)

Dear Zoning Commissioners:

At a regularly scheduled and properly noticed public meeting on February 8, 2007, our Commission voted 7-0 (with 5 Commissioners required for a quorum) to provide this letter of support for text amendments requested by the Office of Planning to clarify that the number of apartment units in existing apartment houses located in the R-4 Zone District may not be increased unless there is 900 square feet of lot area for each unit (whether new or existing). In addition, our Commission supports the imposition of a lot occupancy limit for buildings or structures converted to apartment houses in the R-4 Zone District.

This text amendment is important because the Board of Zoning adjustment in BZA Case #17468-A interpreted current regulations as allowing apartment buildings existing before March 18, 1958 to increase the number of units without being subject to the requirement for 900 sq. ft. of lot area for each unit. We believe that the BZA's interpretation of the zoning regulations was misguided because it allowed the matter-of-right expansion of a non-conforming use. In addition, the BZA interpretation arbitrarily created two classes of apartment buildings: apartment buildings created after 1958 could only add units by obtaining a variance, but apartment buildings created before 1958 could add units as a matter-of-right.

We strongly urge the Zoning Commission to adopt the proposed text amendments in order to close this loophole and restore the zoning code's intent to prevent over-intensification of land use in residentially zoned districts.

If you have any questions about this letter, please contact Drew Ronneberg, chair of ANC 6A's Economic Development and Zoning Committee at 431-4305 or [ronneberg6a02@gmail.com](mailto:ronneberg6a02@gmail.com).

On behalf of the Commission,

David Holmes  
Vice Chair