

BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA

FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A
FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.: 18708

Motion of:

☒ Applicant

☐ Petitioner

☐ Appellant

☐ Party

☐ Intervenor

☐ Other _____

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

Waive the 14-day filing limit to file a response to a letter from the party opponents filed the day before the originally scheduled hearing.

Points and Authorities:

Please state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form.

Filing of the attached is necessary to respond to a letter filed by the Opponent's engineering consultant. It will not prejudice either party, as this letter would be submitted in rebuttal anyway as part of the hearing process.

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18708

EXHIBIT NO. 61

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CERTIFICATE OF SERVICE

I hereby certify that on this

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day of

November

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I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning

in the above-referenced ZC or BZA case via:

☐ Mailed letter

☐ Hand delivery

☒ E-Mail

☐ Other _____

Signature:



Print Name:

Martin P. Sullivan; Sullivan & Barros, LLP

Address:

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Board of Zoning Adjustment
District of Columbia
CASE NO. 18708
EXHIBIT NO. 61

October 31, 2014

Mr. Lloyd Jordan, Chairman
Board of Zoning Adjustment
441 4th Street, NW
Suite 210S
Washington, DC 20001

Re: Application No. 18708 - 4509 Foxhall Crescents

Dear Chairman Jordan and the Honorable Members of the Board

As the consulting engineer to the referenced property owner, Mr. Amir Motlagh, I am responding to the letter to the Board by Axiom Engineering Design dated October 27, 2014 regarding Foxhall Crescents steep terrains and the storm sewer collection system in the development

It is our understanding that Axiom Engineering Design performed a site visit to the referenced property on October 23, 2014. Based on their visual observation, they noticed, due to steepness of roadway grades and spacing of drainage inlets along the roadway, the storm sewer system was found inadequate.

Although, steepness of roadway grades play a significant role in spacing of drainage inlets along a given path, it is the incoming drainage area that determines the required spacing based on the "spread" that is formed at the inlet for a given storm frequency. Tuesday, October 23, 2014 was a partly sunny and dry day in Washington, DC. In our opinion, making a determination on inefficiency of a storm sewer system on a dry day it is unlikely to result in an accurate finding. Moreover, Foxhall Crescents was constructed in conformance with a master/construction plan that was reviewed and approved by the authority in 1979.

Furthermore, in regards to overland drainage onto downstream properties, a drainage study of the area proves the following:


- Grades along the common property line between 4507 and 4509 Foxhall Crescents, in conjunction with the existing 2-tier retaining wall near the common boundary line on 4507, prevents offsite drainage from entering 4507 from the east. This is true currently, and under the proposed condition.

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- Currently, 7,390 sf (0.17 ac.) of land drains onto 4513 Foxhall Crescents. With the proposed improvements, 4,704 sf (0.11 ac.) of offsite area will drain to 4513 Foxhall Crescents, actually resulting in a reduction of 2,686 sf (0.06 ac.) in drainage area, and further reducing runoff to that parcel

Therefore, the proposed house construction at 4509 Foxhall Crescents has no adverse impact on downstream properties, as it results in reducing the drainage burden on 4507 and 4513 Foxhall Crescents

Respectfully submitted,
KJ & Associates

A handwritten signature in black ink, appearing to read 'Kayvan Jaboori', with a stylized, cursive script.

Kayvan Jaboori, P.E.
Founder/Principal