



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.:

Motion of:

☐ Applicant

☐ Petitioner

☐ Appellant

☒ Party

☐ Intervenor

☐ Other _____

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

Waiver for Time Requirement

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.

Opponents' motion for a Waiver for Time Requirement should be granted because upon notice from Applicant that exhibits in the initially Shadow Study contained an unintentional error, Opponent corrected the errors and resubmitted an Amended Shadow Study.

CERTIFICATE OF SERVICE

I hereby certify that on this

4th

D

day of

May

Month

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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:

Paul A. Cunningham

Address:

1700 K Street, NW Washington, DC 20006

Phone No.:

202-415-4026

E-Mail:

pac@harkinscunningham.com

Board of Zoning Adjustment
District of Columbia
CASE NO. 18899
EXHIBIT NO. 74

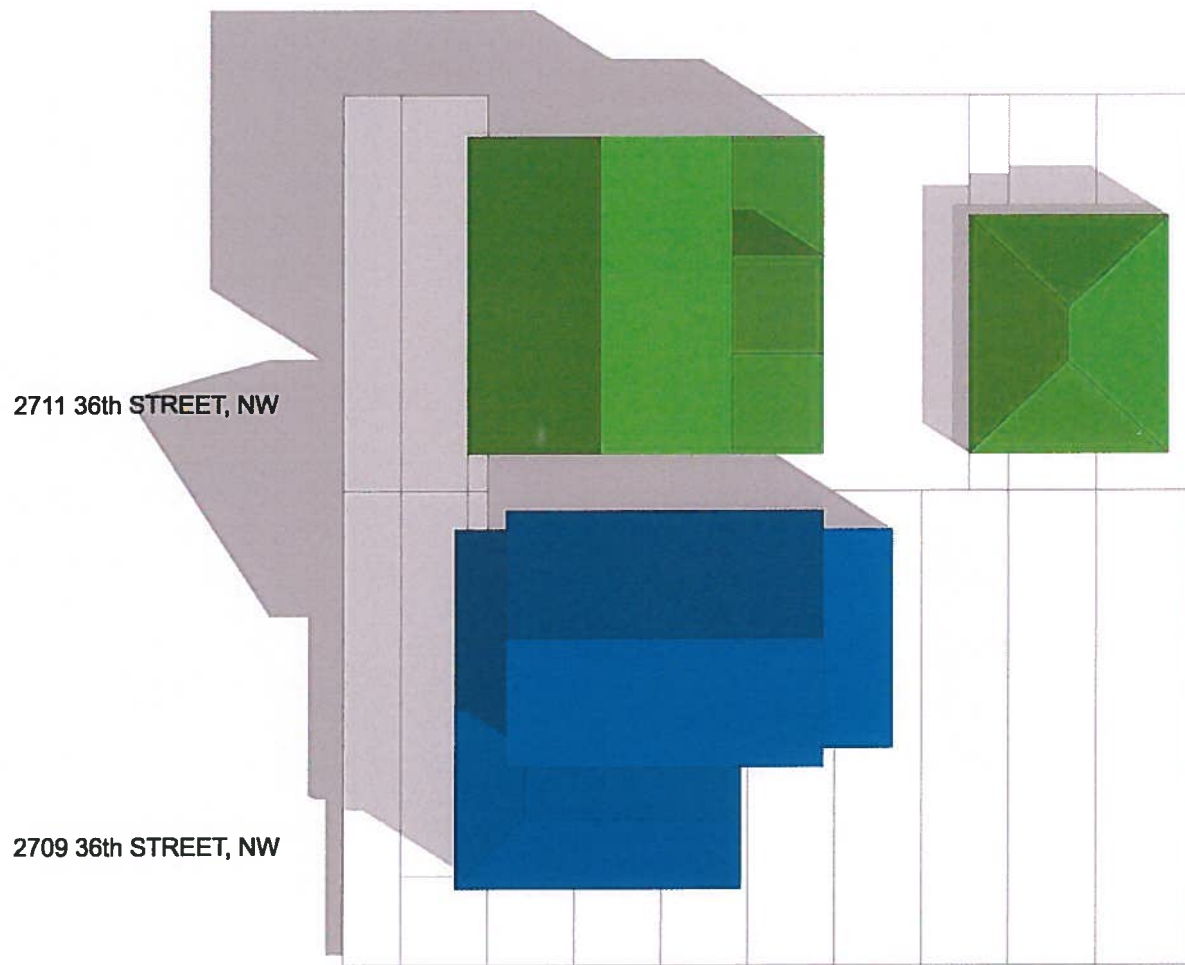
Amended Sun Study Submitted by the Party Opponents to BZA Application No. 18886

The following sun study diagrams have corrected pre-addition diagrams from those submitted on April 27, 2015. They illustrate the difference in sunlight to the property located at 2711 36th Street, NW following the addition to the building at 2709 36th Street, NW.

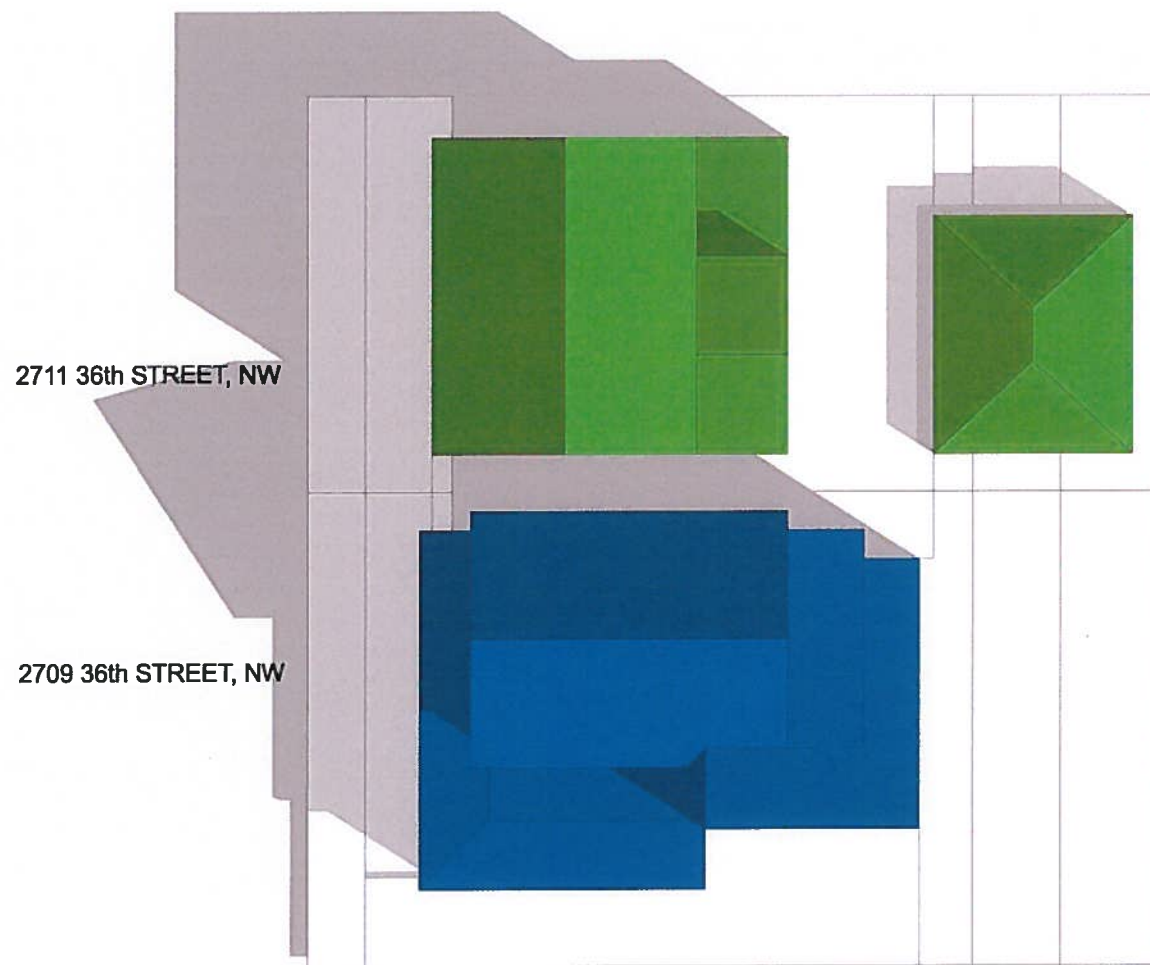
What these studies show is that there is a slight relative difference in the shadow represented pre-addition, but that the additional shadow still has a substantially adverse effect on Ms. McKee's property, including both the rear patio and the rear windows of that building.

At noon in December, the impact is greatest, completely covering the rear portion of the building and all of the patio area at 2711. This impact begins in or around September, and does not go away until at least March.

Additional photographs are included showing the McKee porch with the addition, and other photos showing the condition of the Subject Property prior to the addition.



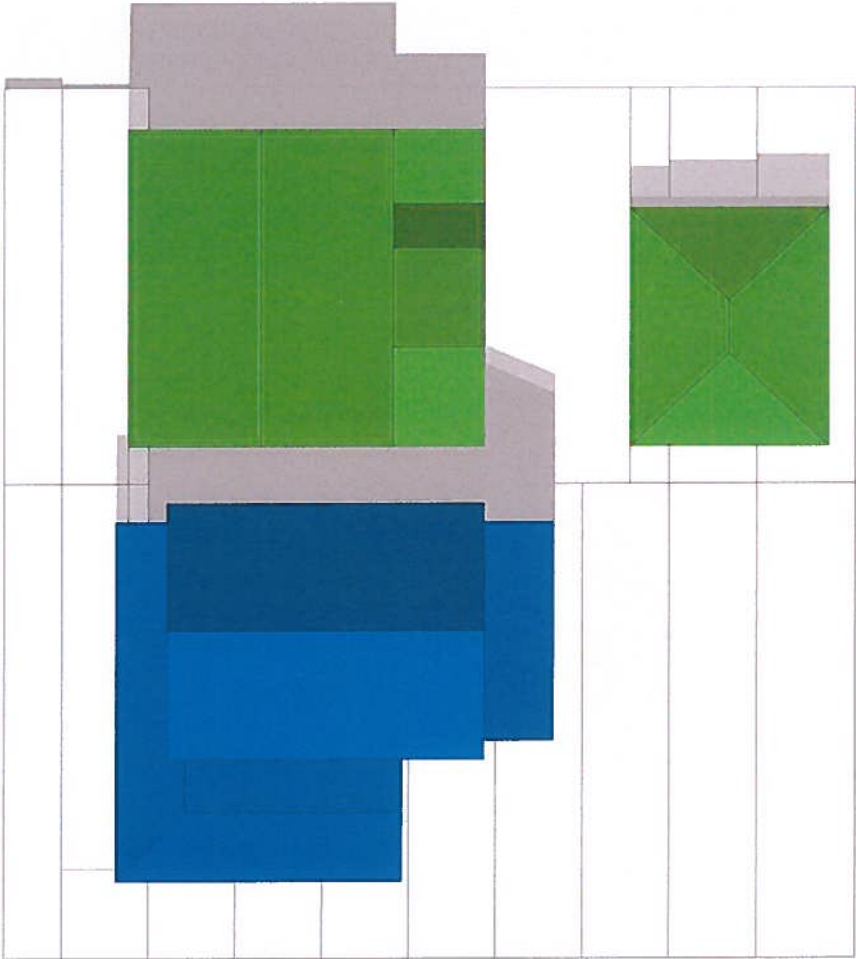
SEPTEMBER 9:00AM - PRE-ADDITION



SEPTEMBER 9:00 AM - ADDITION

2711 36th STREET, NW

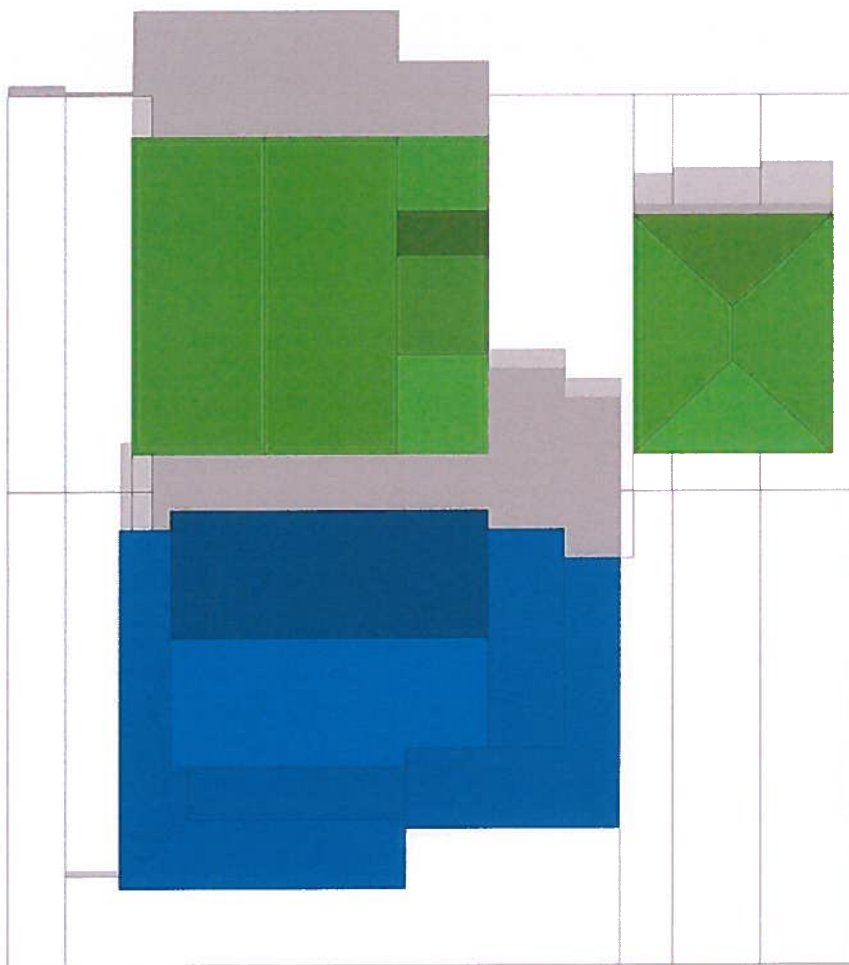
2709 36th STREET, NW



SEPTEMBER 12:00PM - PRE-ADDITION

2711 36th STREET, NW

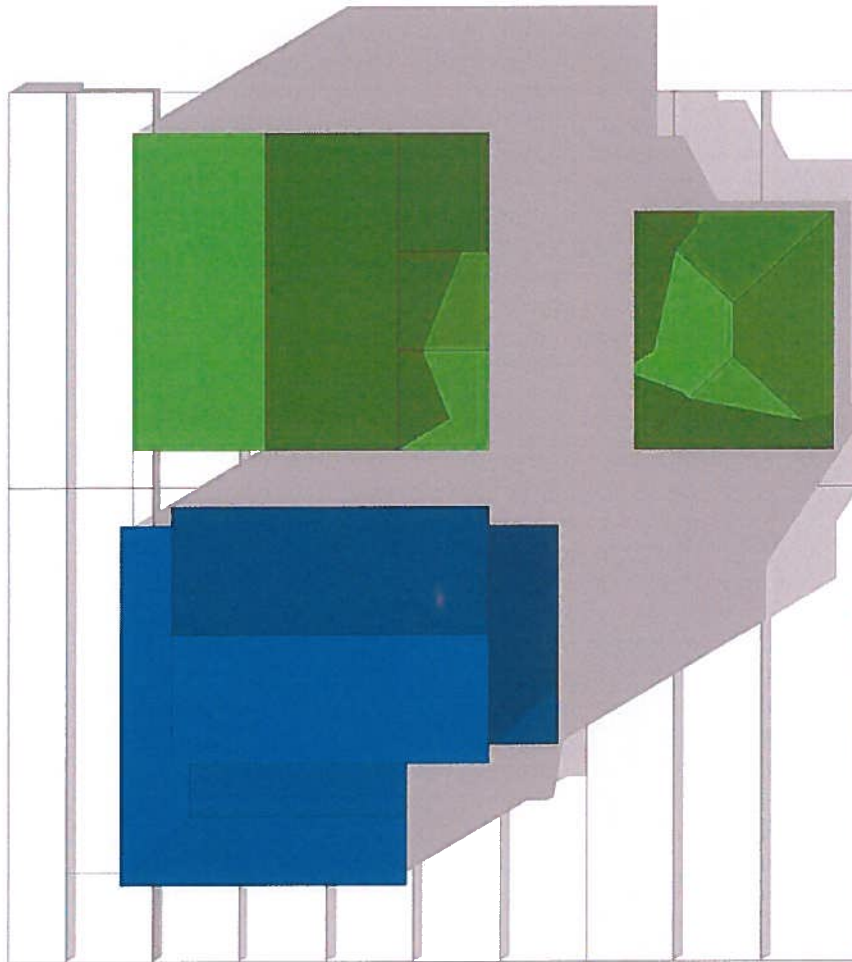
2709 36th STREET, NW



SEPTEMBER 12:00 PM - ADDITION

2711 36th STREET, NW

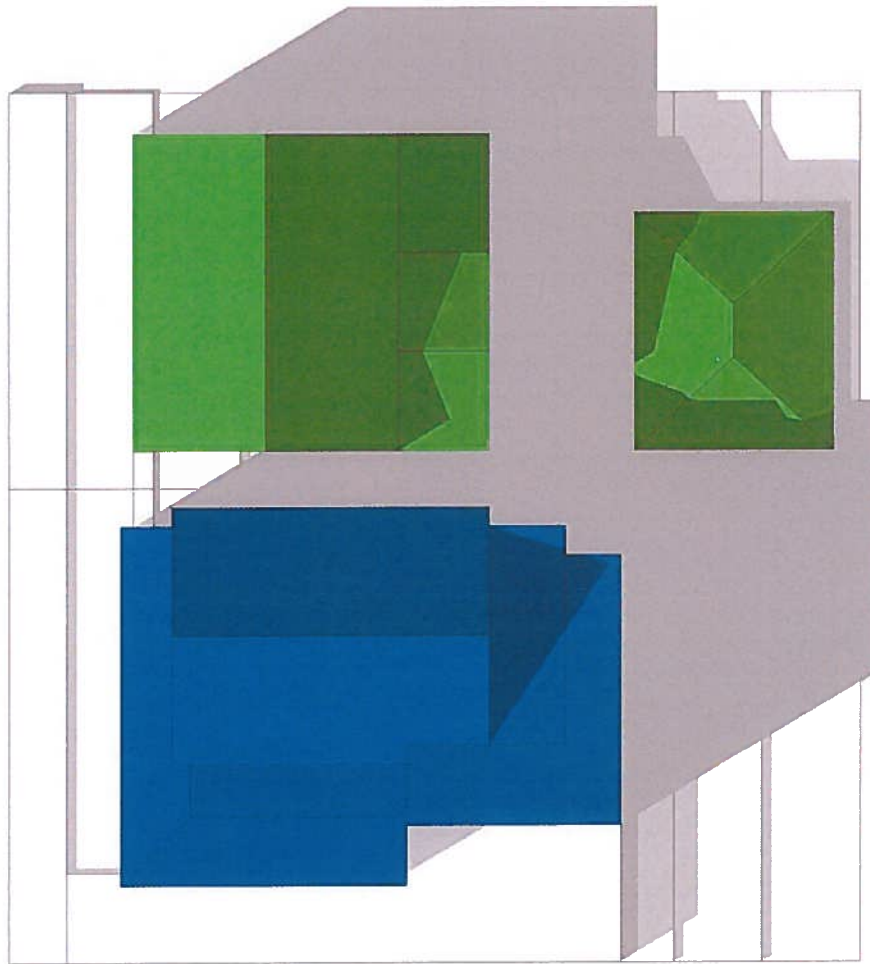
2709 36th STREET, NW



SEPTEMBER 3:00 PM - PRE-ADDITION

2711 36th STREET, NW

2709 36th STREET, NW



SEPTEMBER 3:00 PM - ADDITION

2711 36th STREET, NW

2709 36th STREET, NW

DECEMBER 9:00 AM - PRE-ADDITION

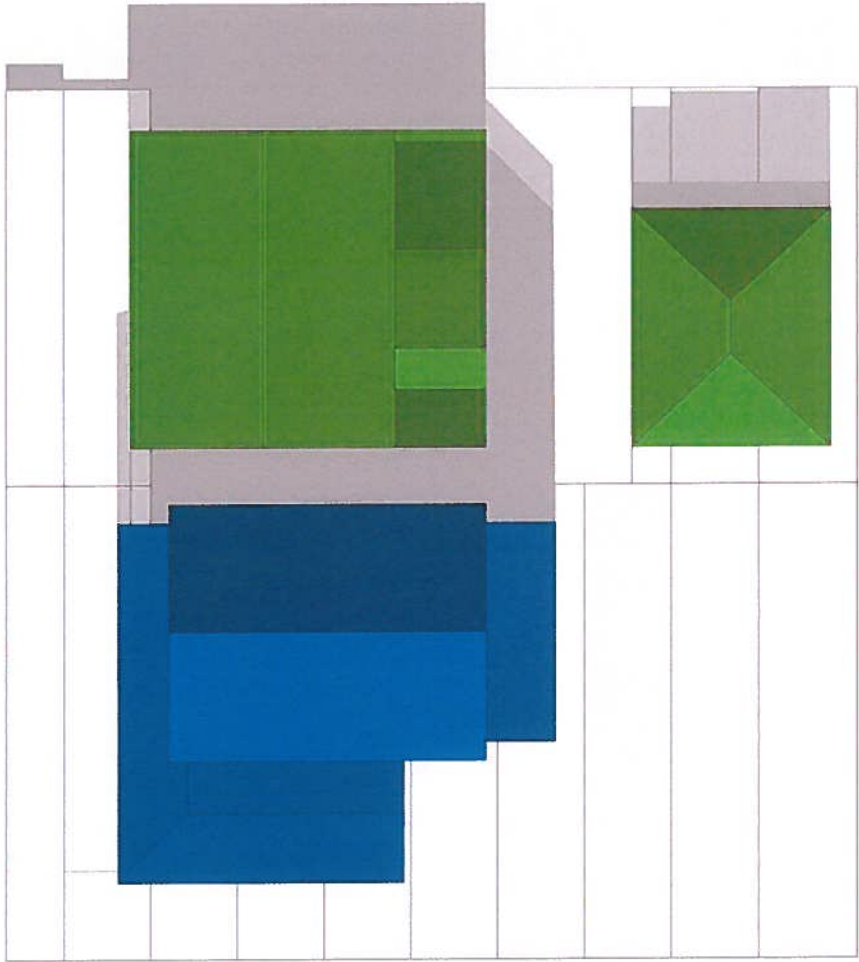
2711 36th STREET, NW

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DECEMBER 9:00 AM - ADDITION

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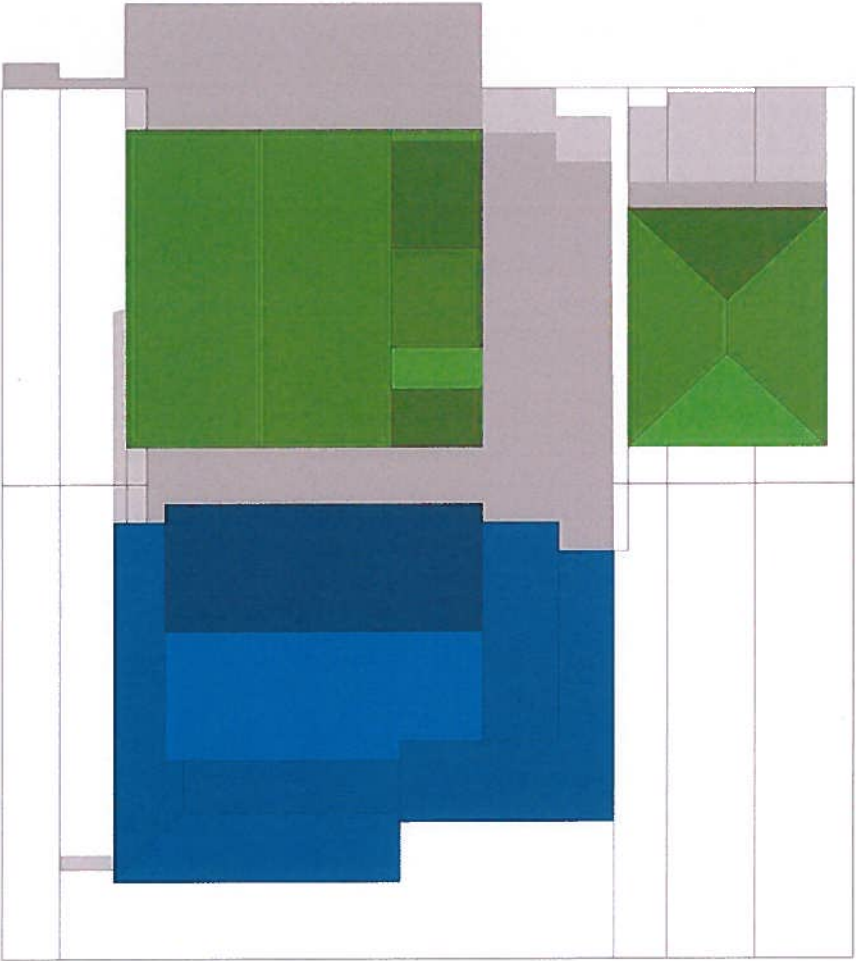
2709 36th STREET, NW



DECEMBER 12:00 PM - PRE-ADDITION

2711 36th STREET, NW

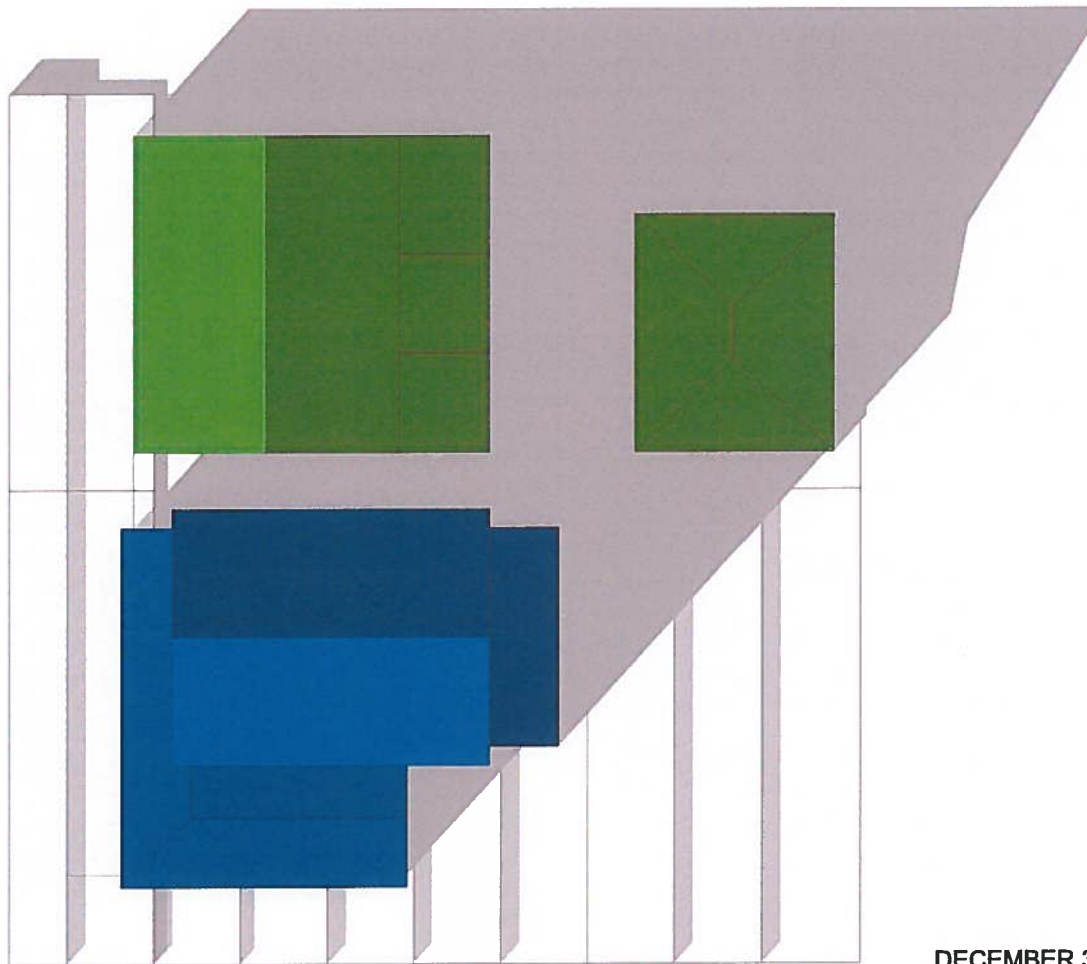
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DECEMBER 12:00 PM - ADDITION

2711 36th STREET, NW

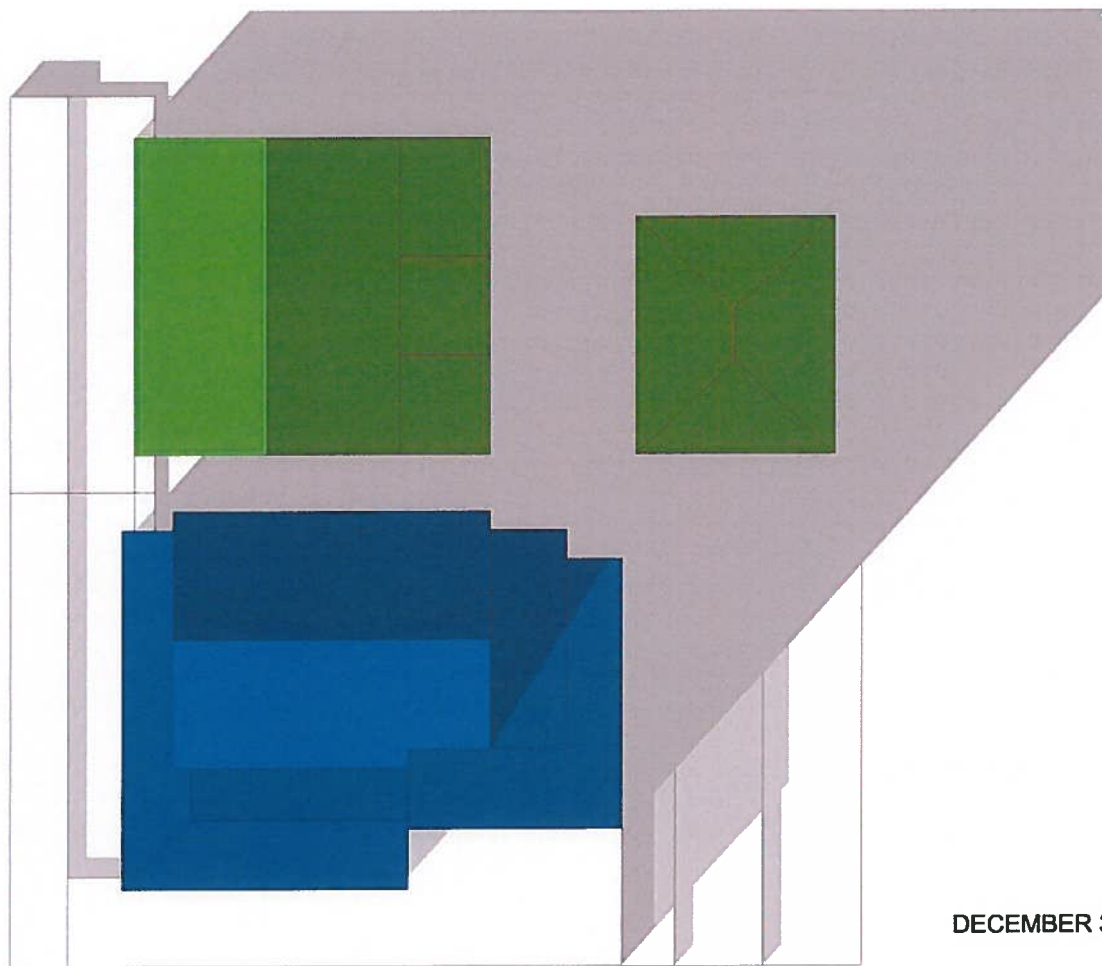
2709 36th STREET, NW



DECEMBER 3:00 PM - PRE-ADDITION

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DECEMBER 3:00 PM - ADDITION



2711 36th STREET, NW

2709 36th STREET, NW

MARCH 9:00AM - PRE-ADDITION

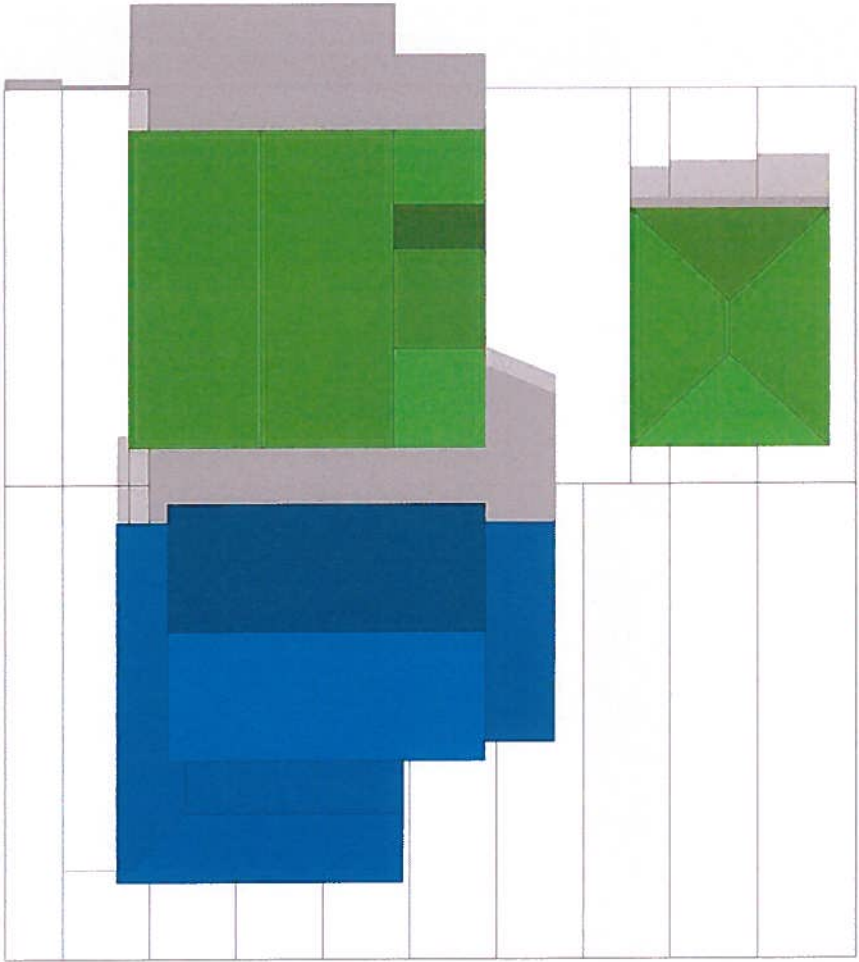
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2709 36th STREET, NW

MARCH 9:00 AM - ADDITION

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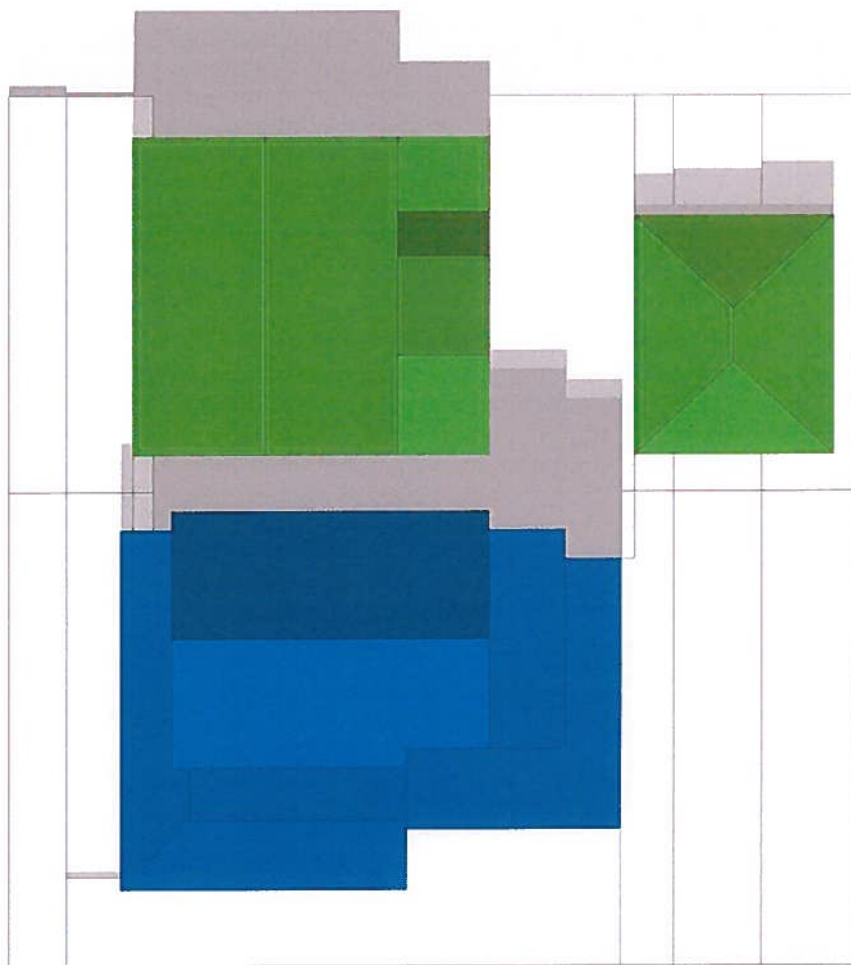
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MARCH 12:00 PM - PRE-ADDITION

2711 36th STREET, NW

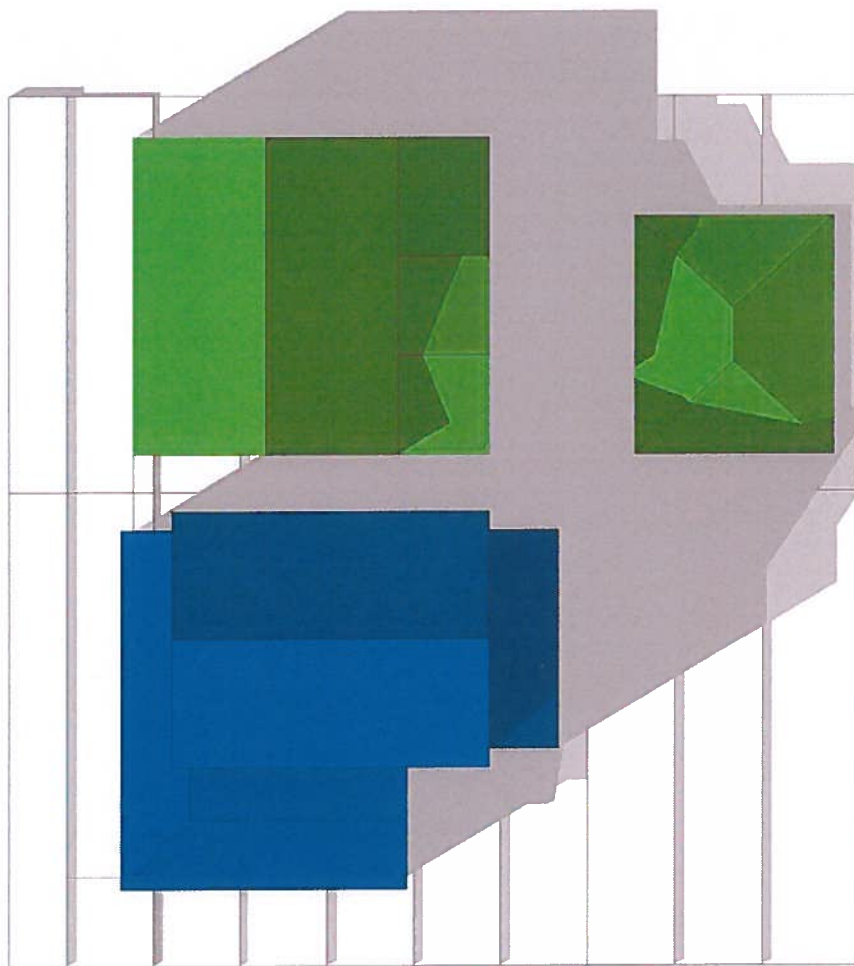
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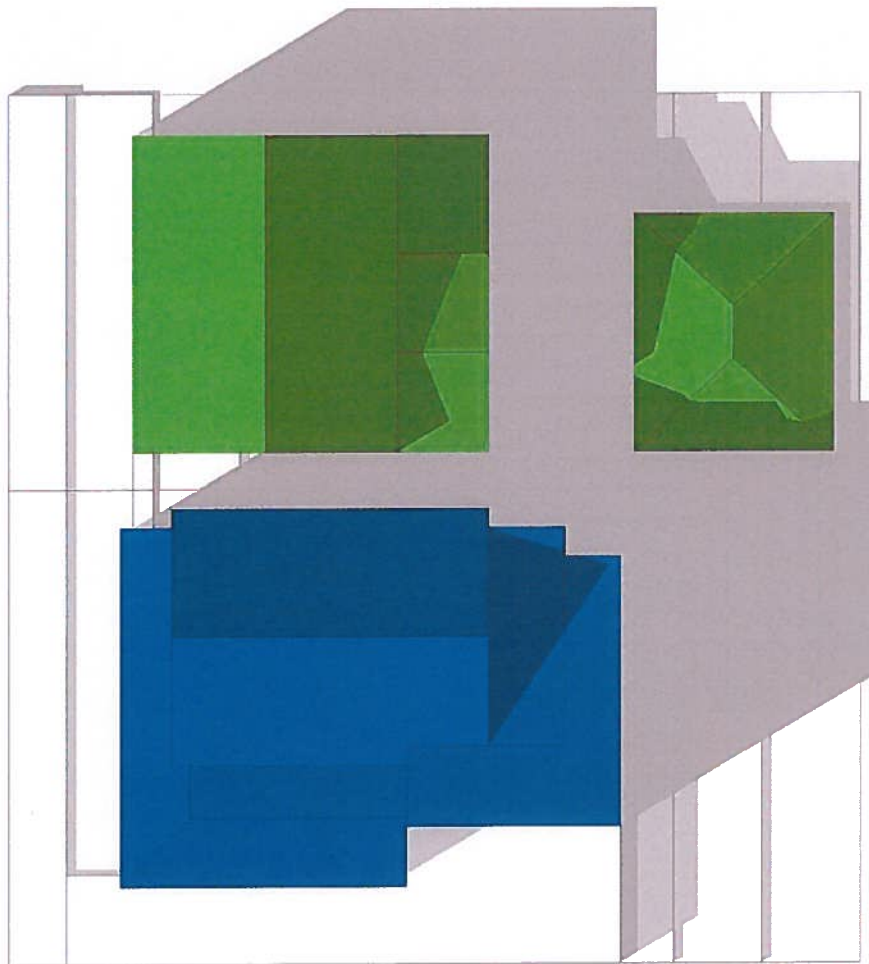
2709 36th STREET, NW



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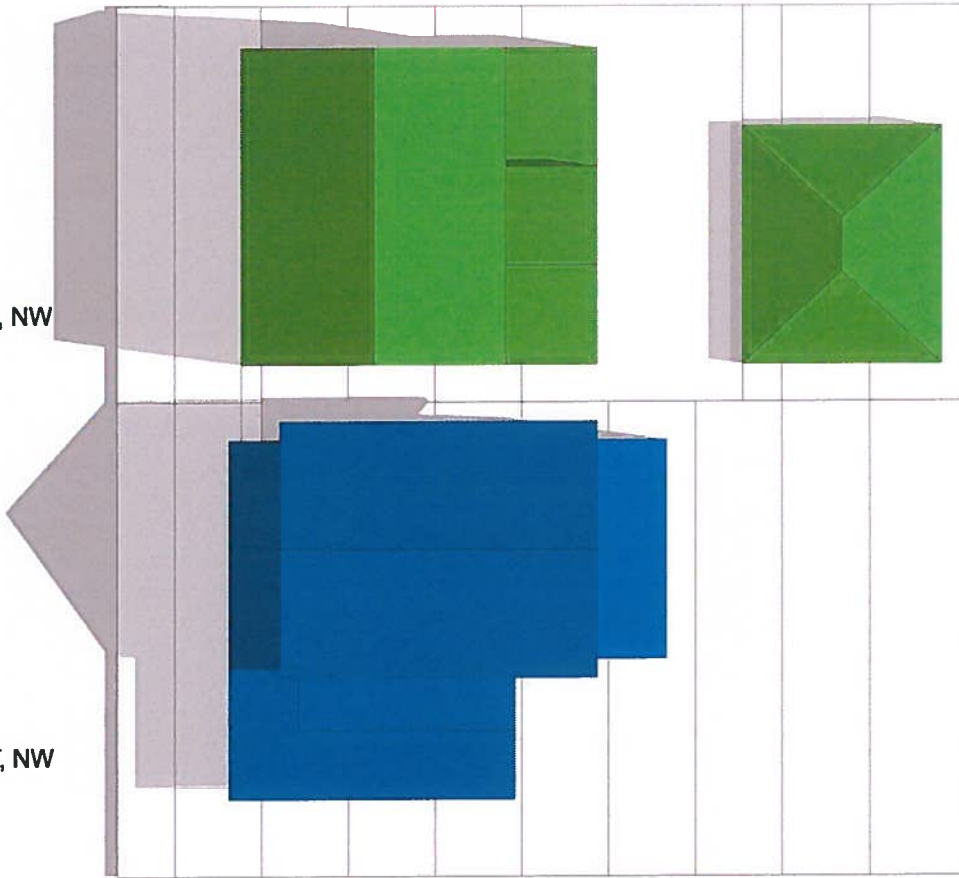
2711 36th STREET, NW

2709 36th STREET, NW



MARCH 3:00 PM - ADDITION

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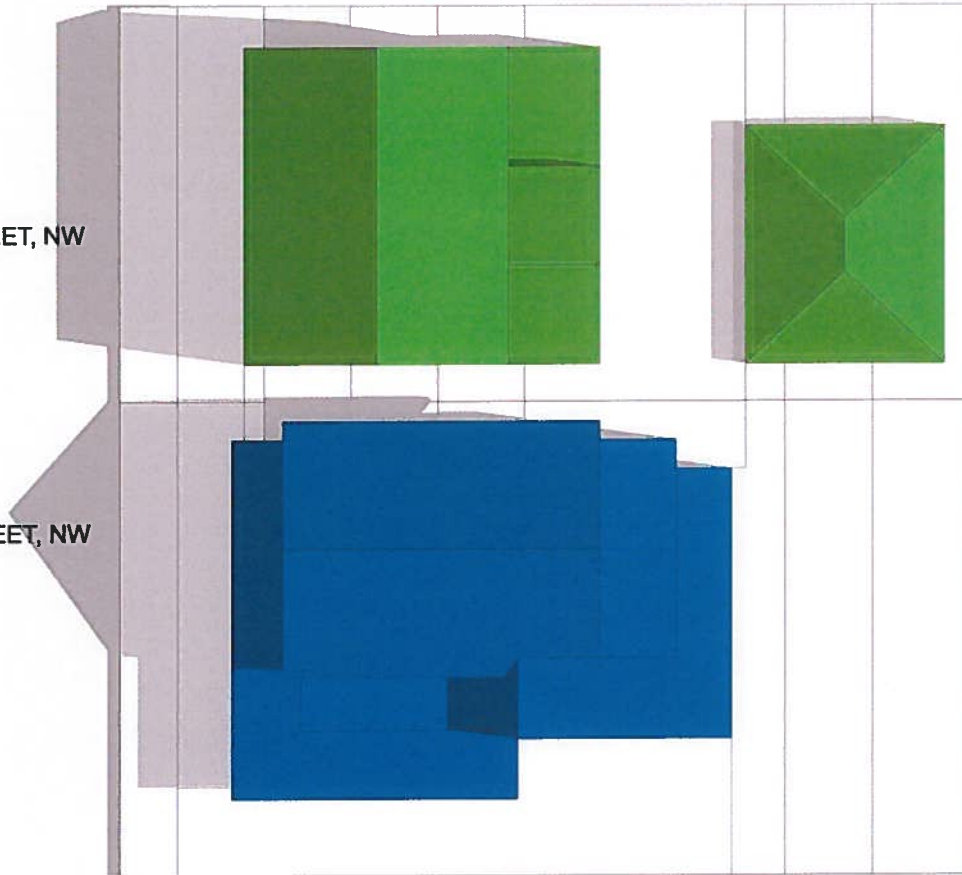


2709 36th STREET, NW

JUNE 9:00 AM - PRE-ADDITION

2711 36th STREET, NW

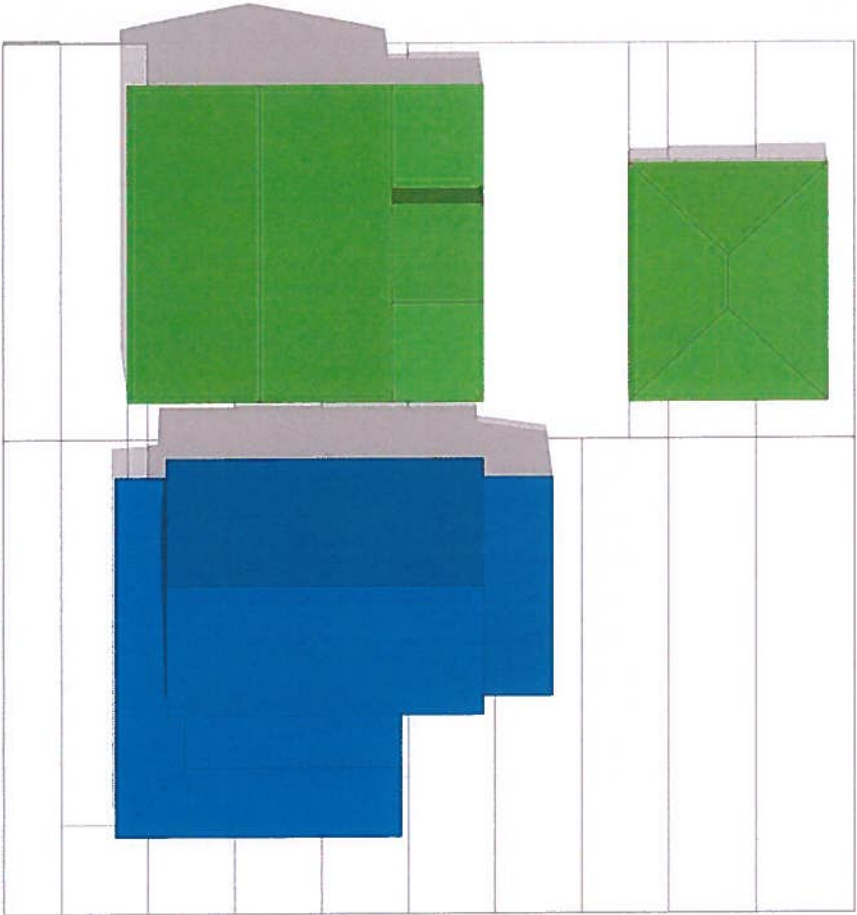
2709 36th STREET, NW



JUNE 9:00 AM - ADDITION

2711 36th STREET, NW

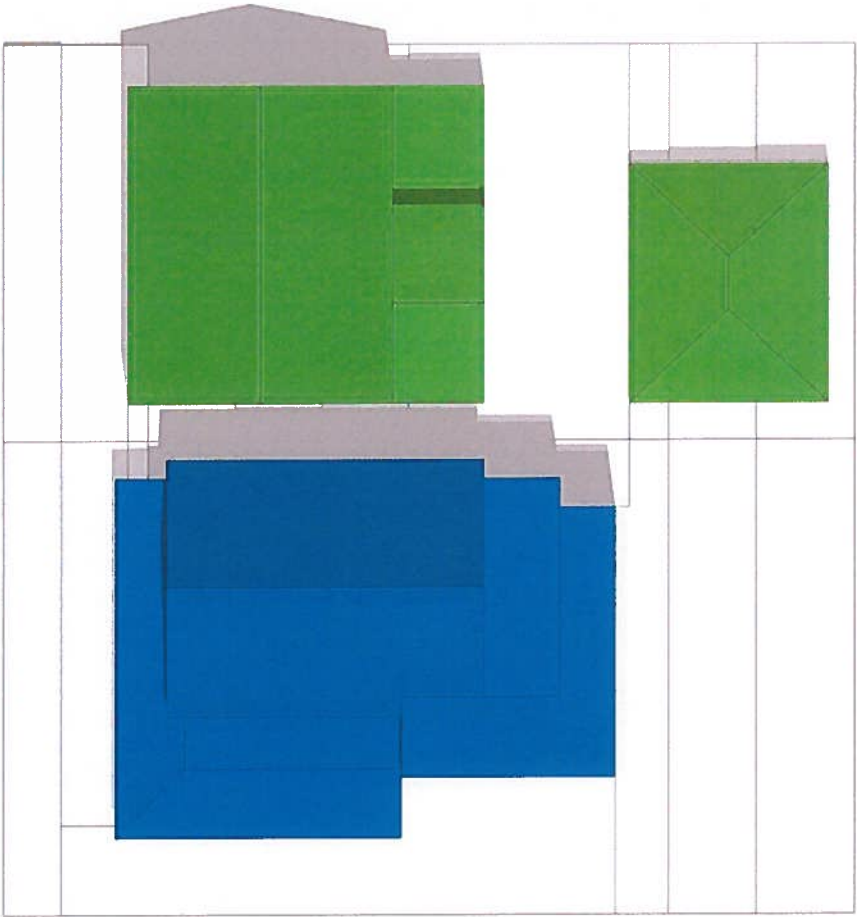
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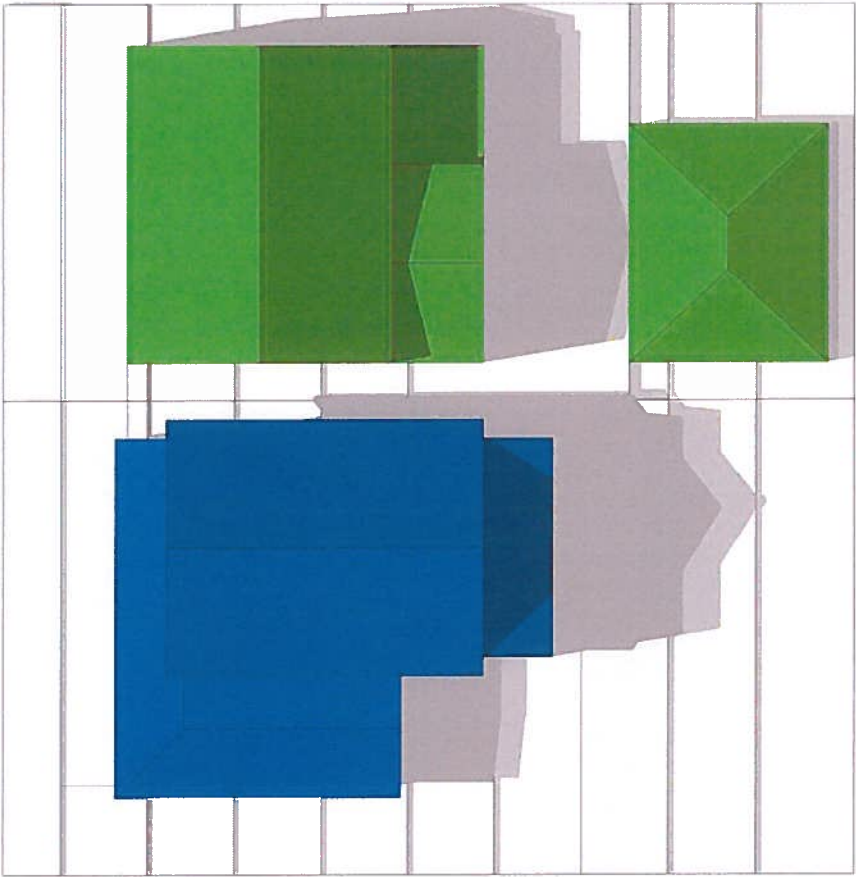
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JUNE 12:00 PM - ADDITION

2711 36th STREET, NW

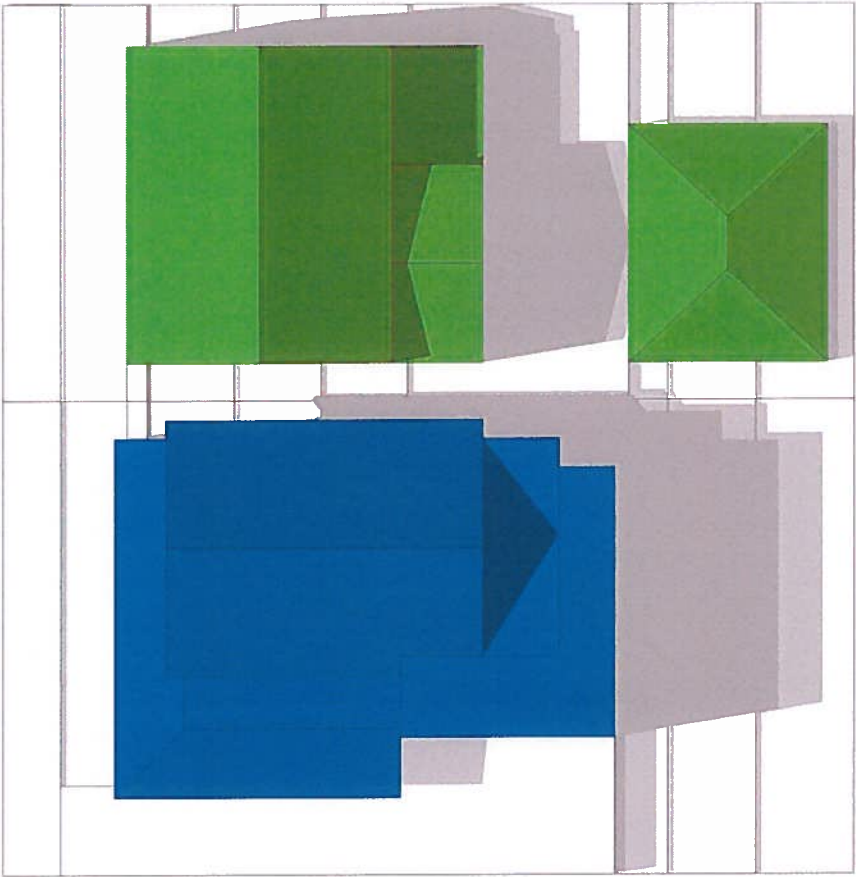
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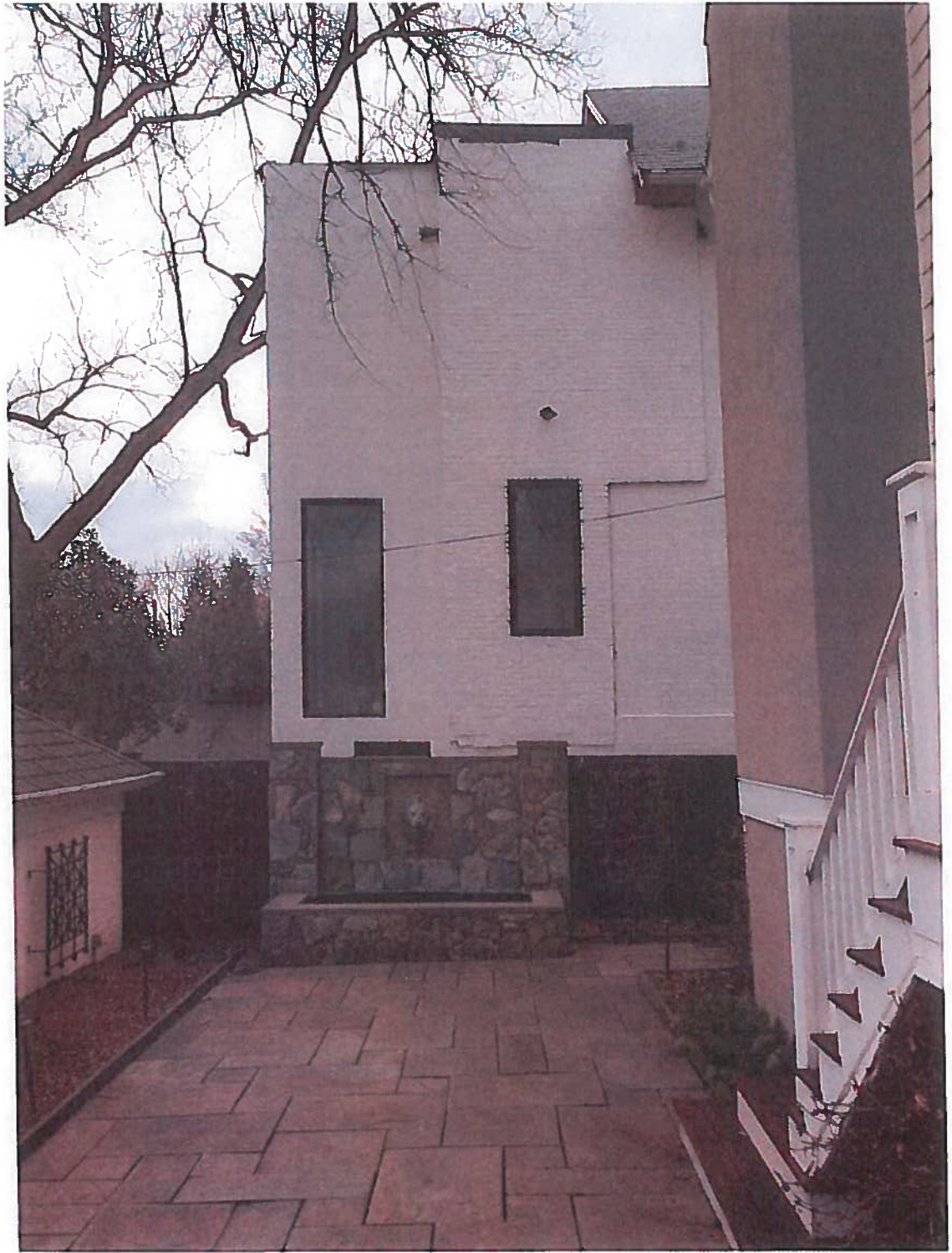
JUNE 3:00 PM - ADDITION













36th St NW

2709 36th St NW

This is an aerial photograph of a suburban neighborhood. The image shows a grid of streets with houses and trees. A red circle highlights a specific house located between 35th Pl NW and 36th St NW. The house is a two-story structure with a light-colored roof and some darker siding. The surrounding area is filled with other similar houses and lush green trees. The text '36th St NW' is overlaid in large white letters across the top of the image, and '35th Pl NW' is overlaid in large white letters across the bottom. A small black text label '2709 36th St NW' is placed directly above the circled house.

36th

35th Pl NW

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