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June 1, 2001

BY HAND

Ms. Sheila Cross-Reid
Chairperson
Board of Zoning Adjustment
441 4th Street, NW, Room 210
Washington, DC 20001

Re: BZA Case No. 16702; Georgetown Incinerator; 3100 South Street, N.W.; Square 1189, Lot 88

Dear Ms. Reid and members of the Board:

In accordance with the Board's request at the conclusion of its May 15, 2001 meeting regarding the above-referenced matter, enclosed you will find the studies of the viewsheds along 31st Street and Wisconsin Avenue, N.W. from M Street, N.W. to K Street, N.W. As requested, these studies show the building as is, the proposed building with the additional floor and setbacks provided at 31st Street and Wisconsin Avenue, N.W. as a result of the original suggestion of Citizen's Association of Georgetown, and the proposed building with additional setbacks pulled back ten feet (10') at the request of the Board. Please note that the enclosed studies are shown in fifty foot (50'), rather than twenty foot (20') increments from M Street to K Street, N.W. This measurement was used due to (1) the massive volume of pictures required to show twenty foot (20') increments for each scenario along both 31st and Wisconsin Avenue, N.W., which made it impractical to both produce and review, as well as (2) the fact that little to no change would be depicted at twenty (20') foot increments. However, to assist the Board in visualizing the minimal impact of the proposed sixth floor addition, the Applicant will present a computerized animation of the viewsheds at the hearing. These animations will show the views as a person walks from M Street to K Street, N.W., down both 31st Street, and Wisconsin Avenue, N.W.

Based on the foregoing, the evidence previously submitted and the evidence to be submitted at the June 19, 2001 hearing, the Applicant respectfully requests that the Board find that the Applicant has met its burden of proof with regard to the third and final prong of the test

BZA
Case No. 16702
Exhibit No. 78

Board of Zoning Adjustment
District of Columbia
CASE NO.16702
EXHIBIT NO.78A1

for the requested area variances – that is, that the addition of the sixth floor and the resulting area variances do not impair the intent, purpose, or integrity of the Zoning Regulations and Map or result in an adverse impact on the community – and grant the area variances with respect to the sixth floor.

If the Board would like to see additional still pictures at any points between M and N Streets, please let us know.

Thank you for your consideration.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Richard B. Nettler
Jeannine Rustad Zigner

cc: Mr. Andrew Altman, Office of Planning (By Hand)
Ms. Barbara Downs, Citizens Association of Georgetown (By Hand)
Advisory Neighborhood Commission 2E (By Hand)
Mr. Anthony Lanier (By Hand)

ANIMATION & EXHIBIT GUIDE

Street views of Georgetown Incinerator

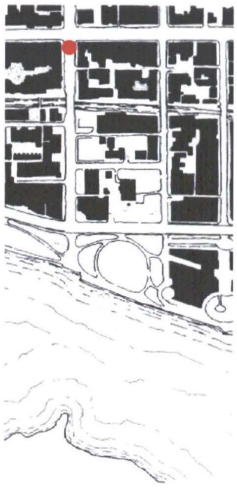
The enclosed prints comprise our response to your request for additional information regarding the proposed additional height to the Georgetown Incinerator Project. We've shown three different scenarios: The project as approved (labeled 'A'-this is the project as approved by CFA and OGB without the additional floor), the proposed design ('B'-with the additional floor on the residential portion of the project), and the proposed design with an additional 10' setback (labeled 'C', this is scheme 'B' with an additional 10' setback on Wisconsin and 31st streets). As requested, we've rendered the project as a pedestrian walking down Wisconsin Avenue and 31st Street from M Street to K Street would see it. In both cases, we've maximized views of the top of the building from the street by walking on the west side of Wisconsin Avenue and the east side of 31st street. For purposes of clarity we have "turned off" the numerous trees which line both streets. These trees can be shown in the actual animation presented at the hearing. In reality, the trees themselves form a screen which masks the visibility of the building.

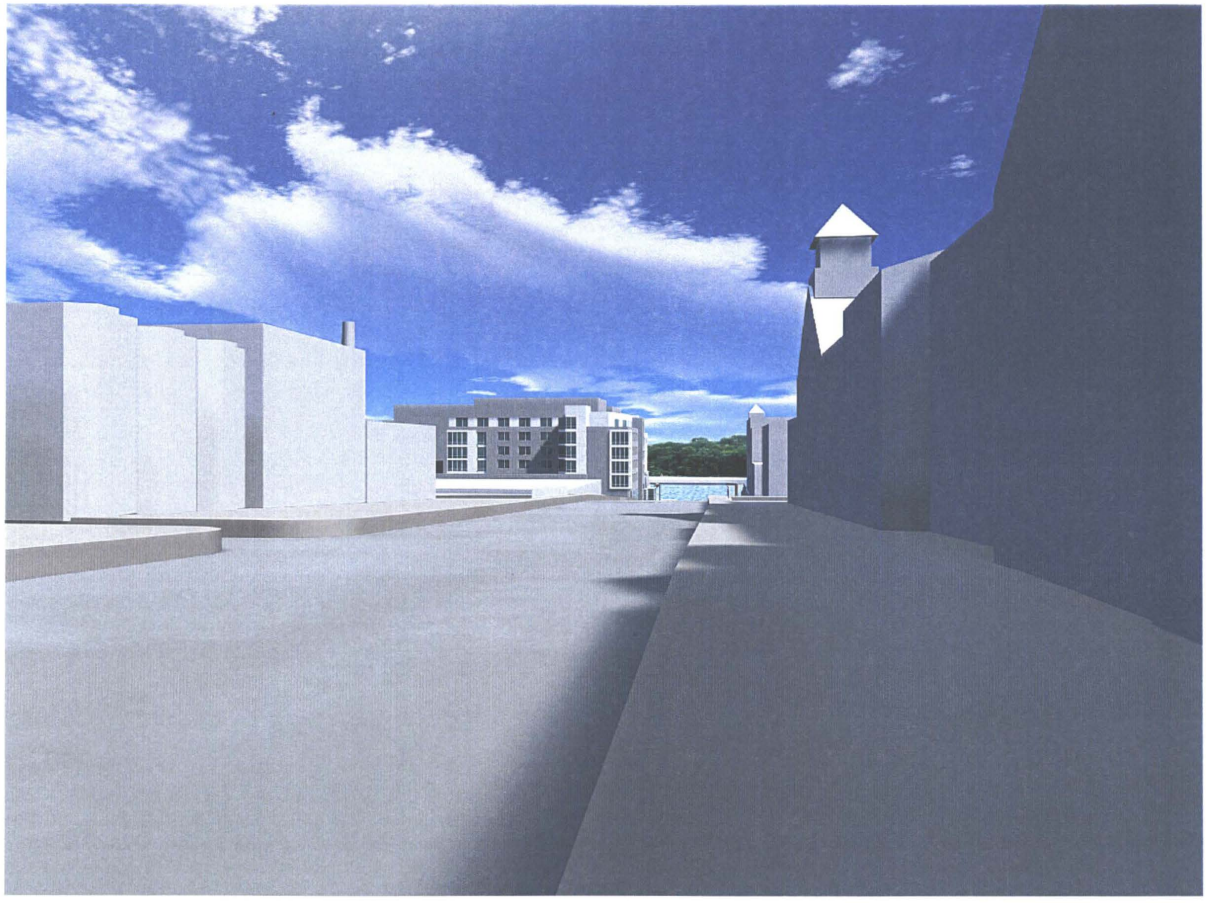
Please note that these prints or 'stills' are printed from the actual continuous animations, which has been produced. At the hearing, we will provide a projector to present these virtual walks down the street for all three schemes. These animations can be stopped at any point from M to K streets, and at any interval desired. For the preliminary submission, we've included a key plan with a red dot that shows the location for each view. Each frame, labeled 1 through 10 is the same location in all three scenarios (A, B, and C) to allow direct comparison.

Conclusion

These renderings provide a clear and direct comparison of what the impact on the public streets would be with the proposed design as shown in scheme B, versus the approved original scheme A. As shown in these studies, the additional visible building mass is negligible from anywhere along the public street. Furthermore, views of the waterfront are not affected by the proposed additions, which have been suitably set back as to minimize their visibility.

GEORGETOWN INCINERATOR



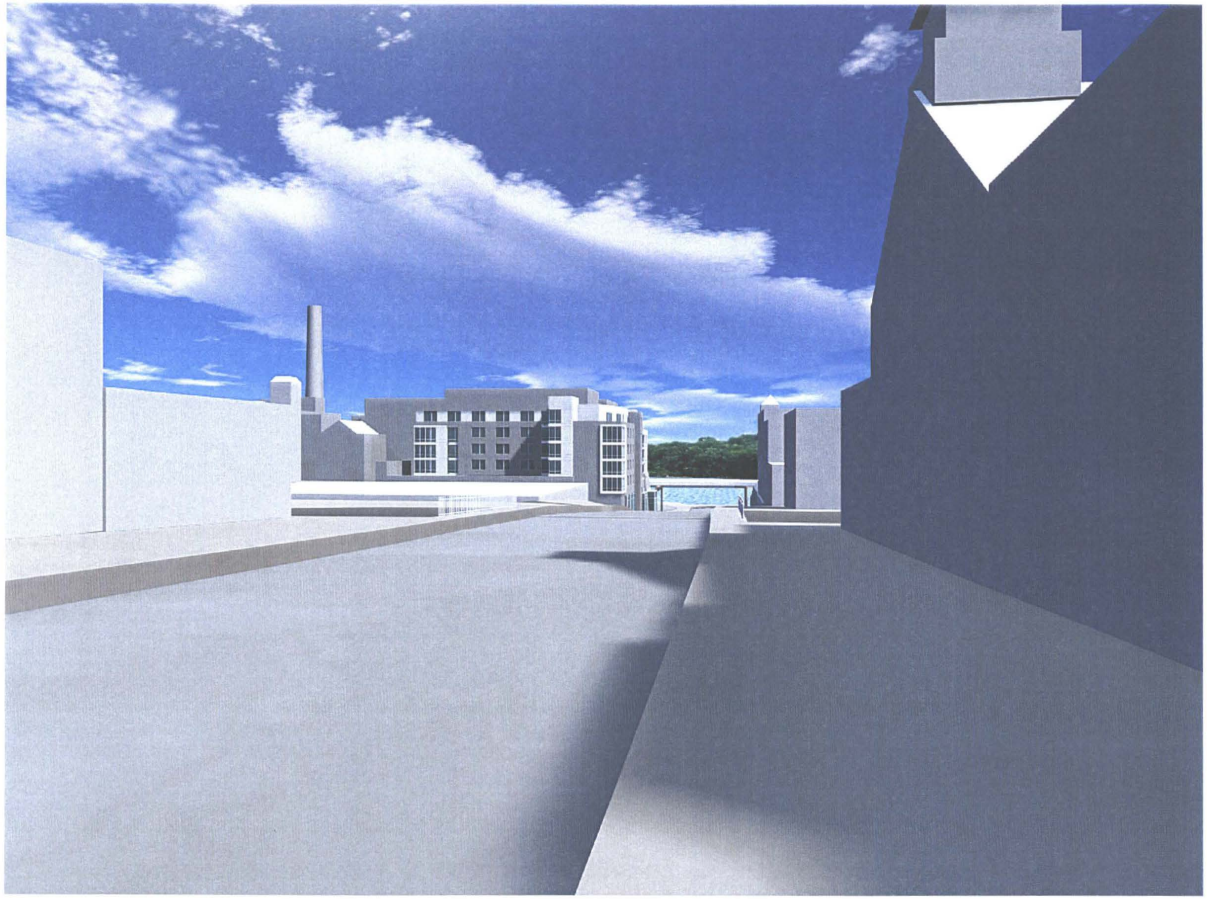


A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

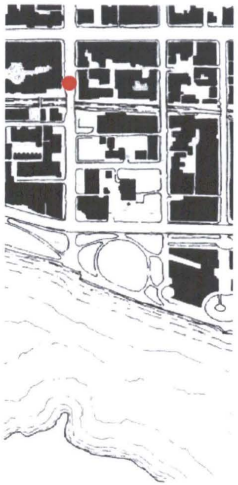


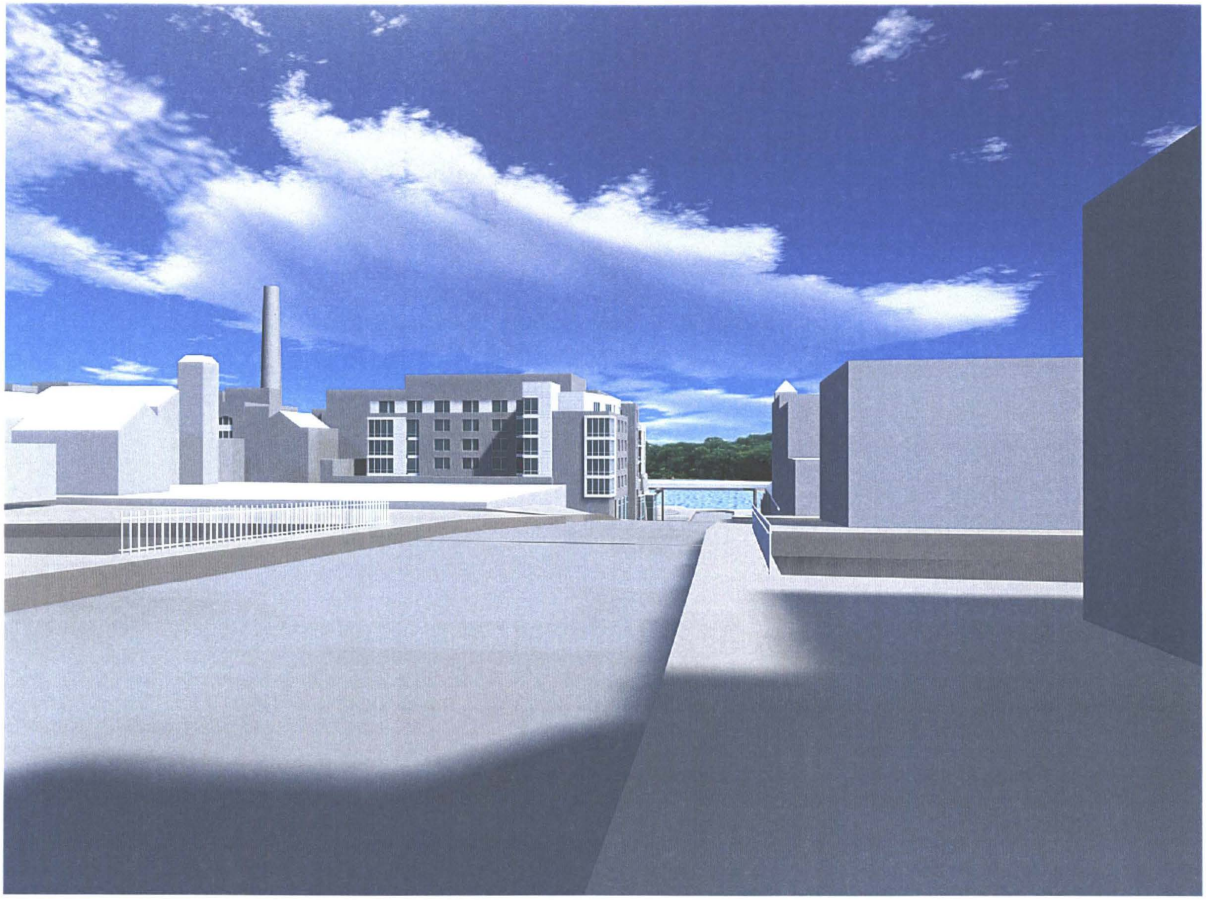


A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

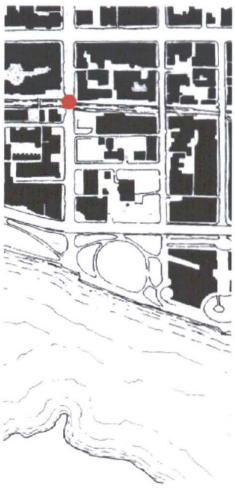




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

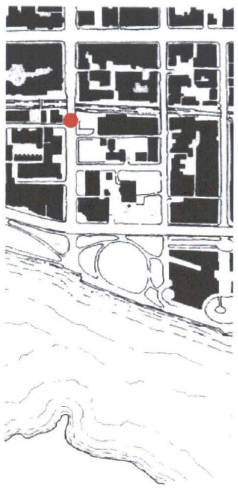




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

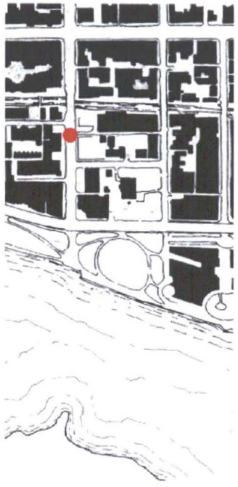




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

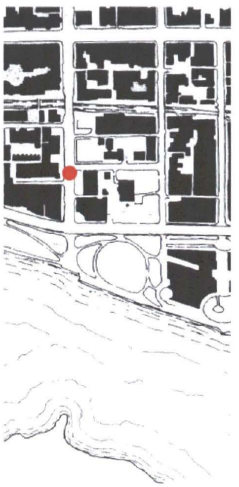




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

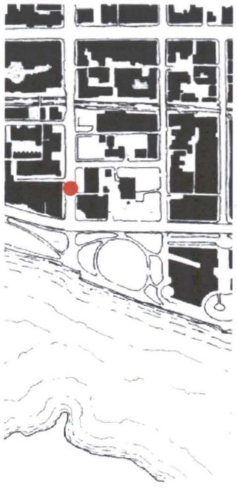




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

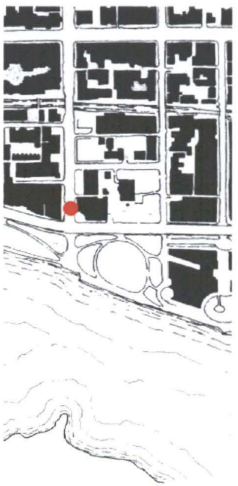




A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR



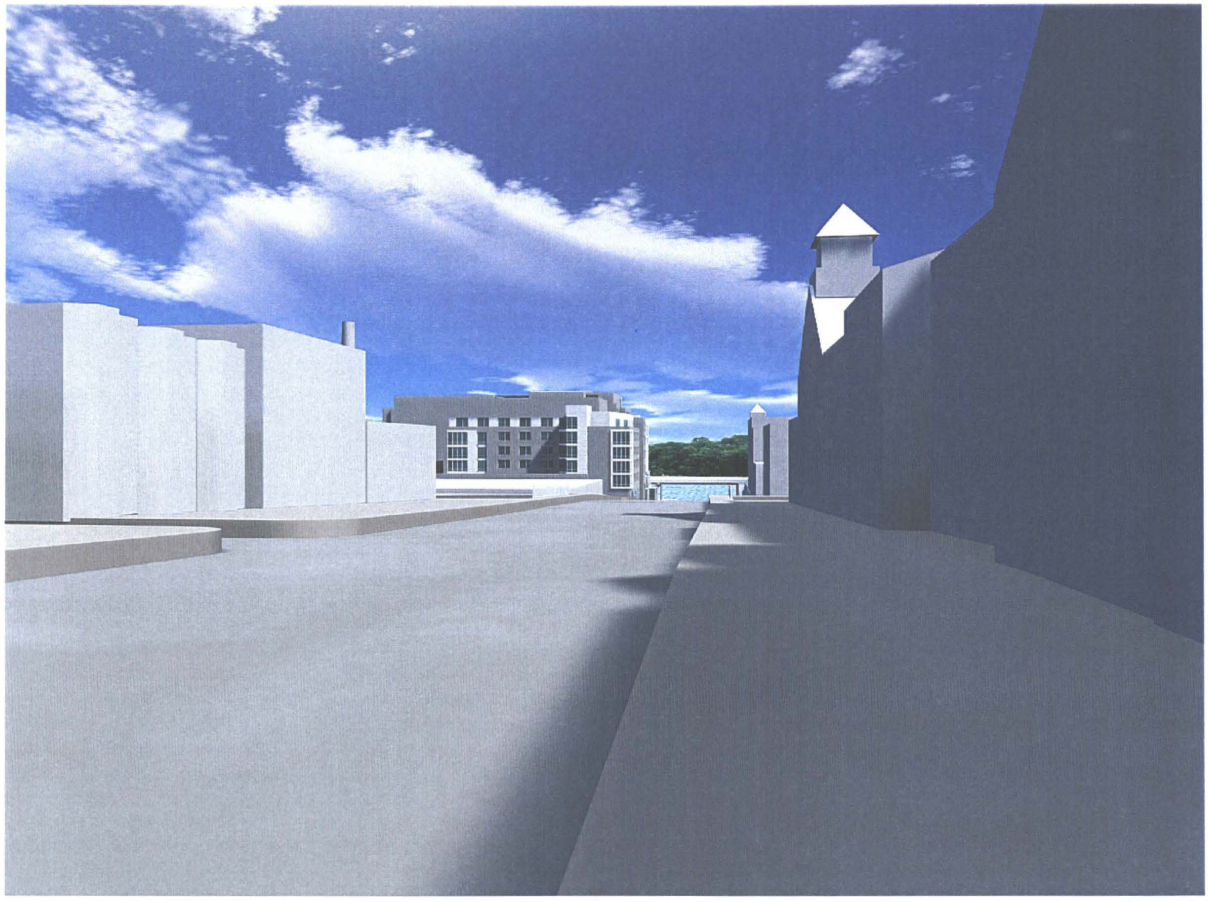


A

Approved design (as is)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR



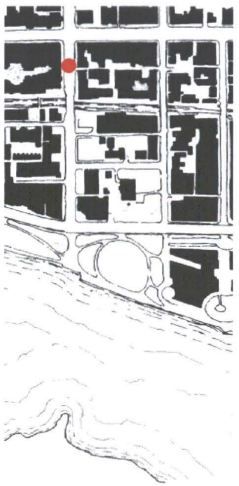


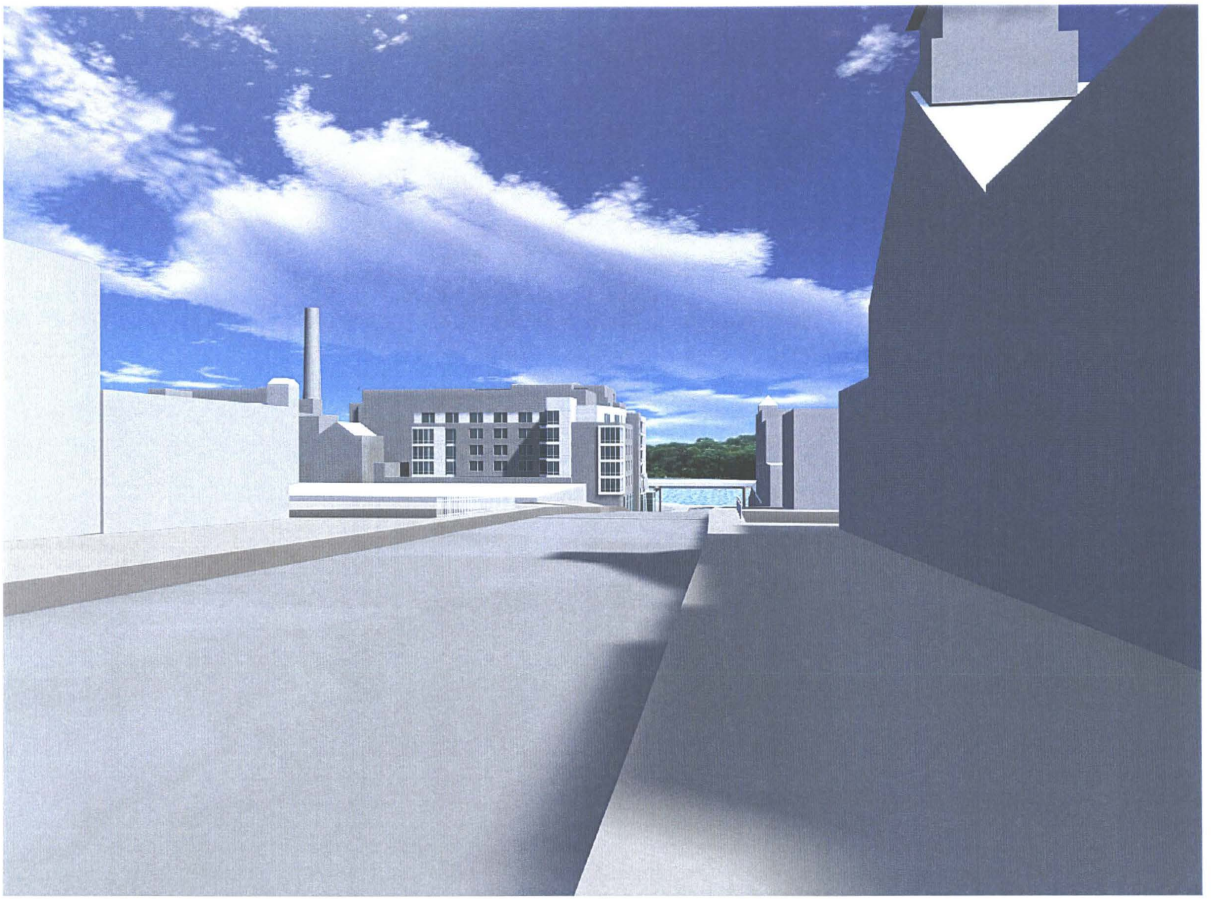
B

Proposed Design (with additional floor)
View from Wisconsin Avenue

Image 1 (of 10)

GEORGETOWN INCINERATOR

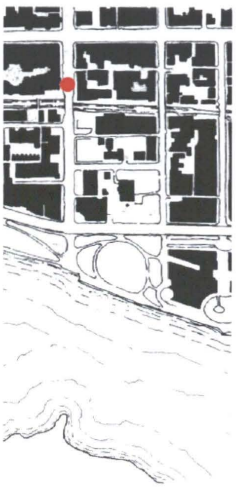


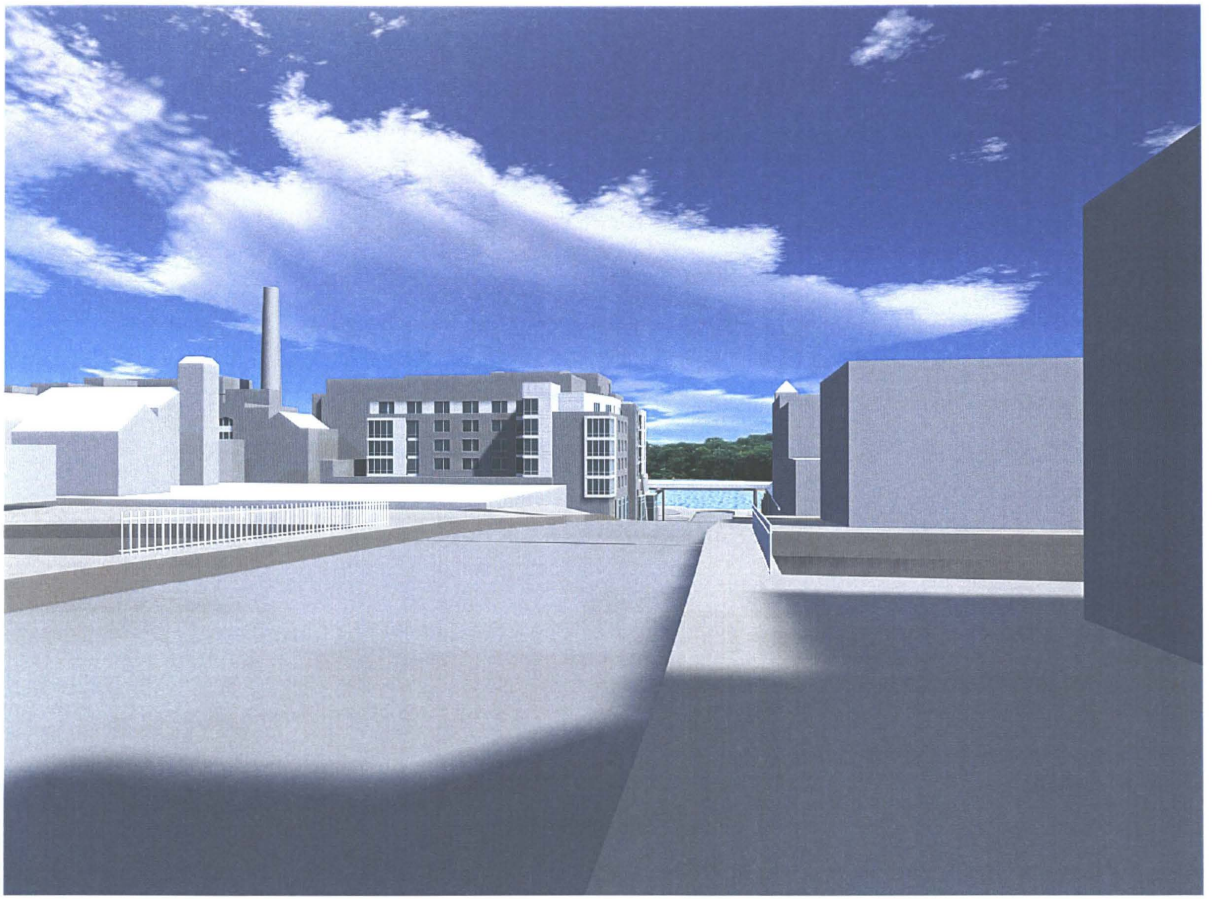


B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

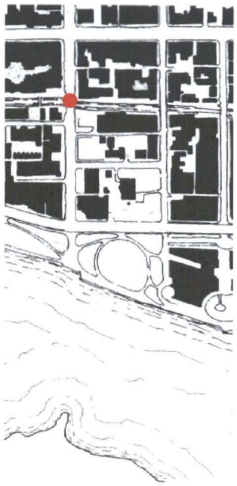




B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

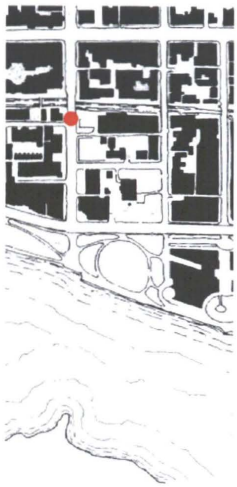




B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

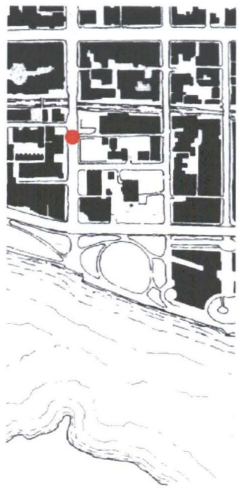




B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

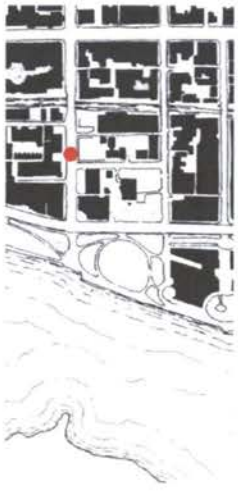




B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

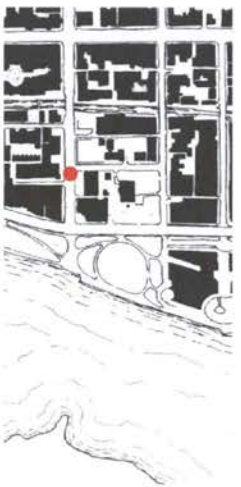




B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

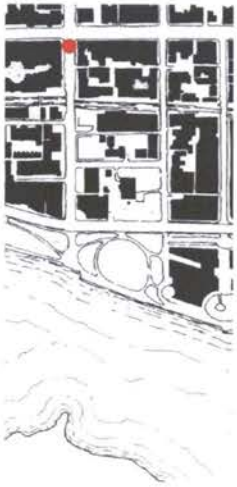


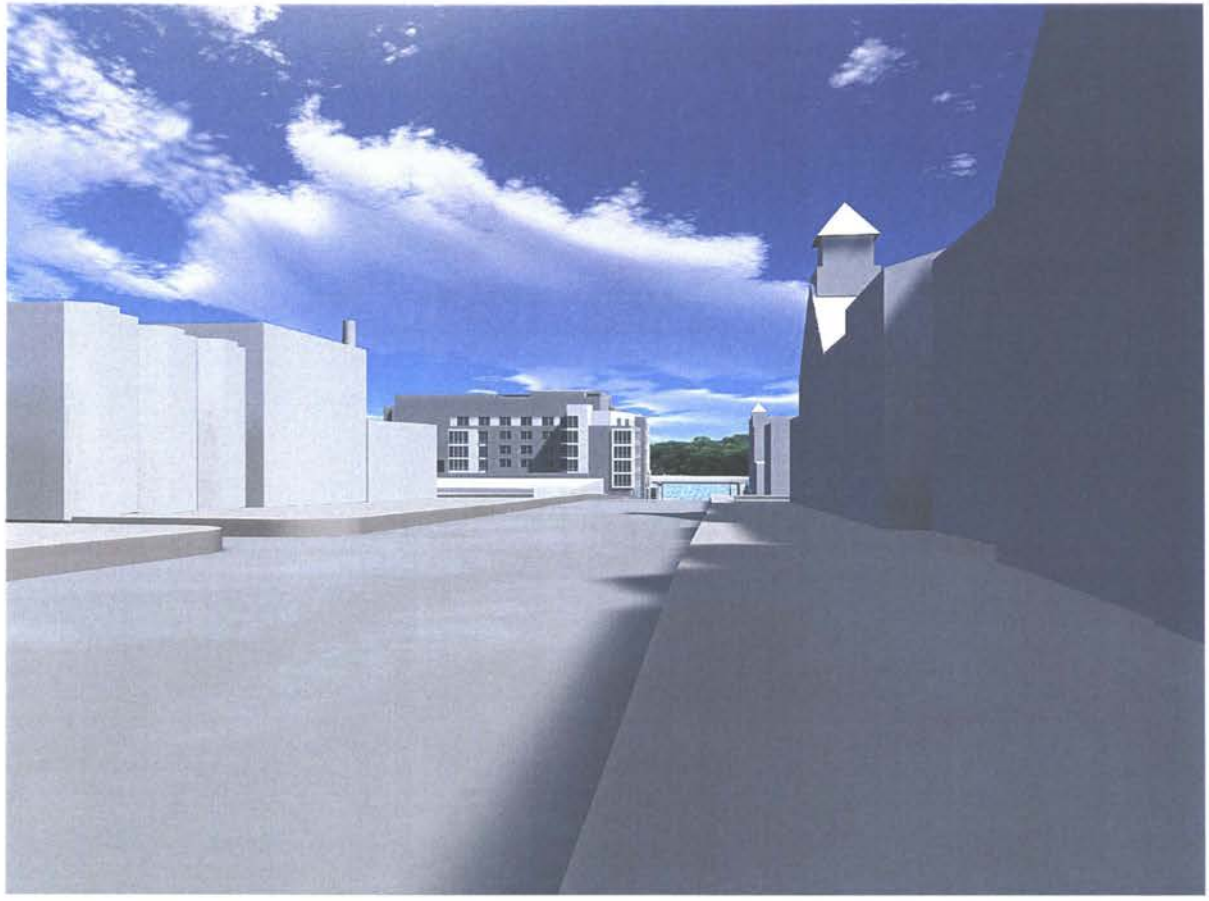


B

Proposed Design (with additional floor)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

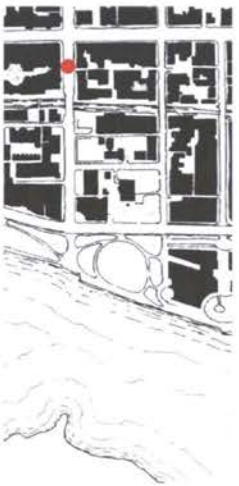


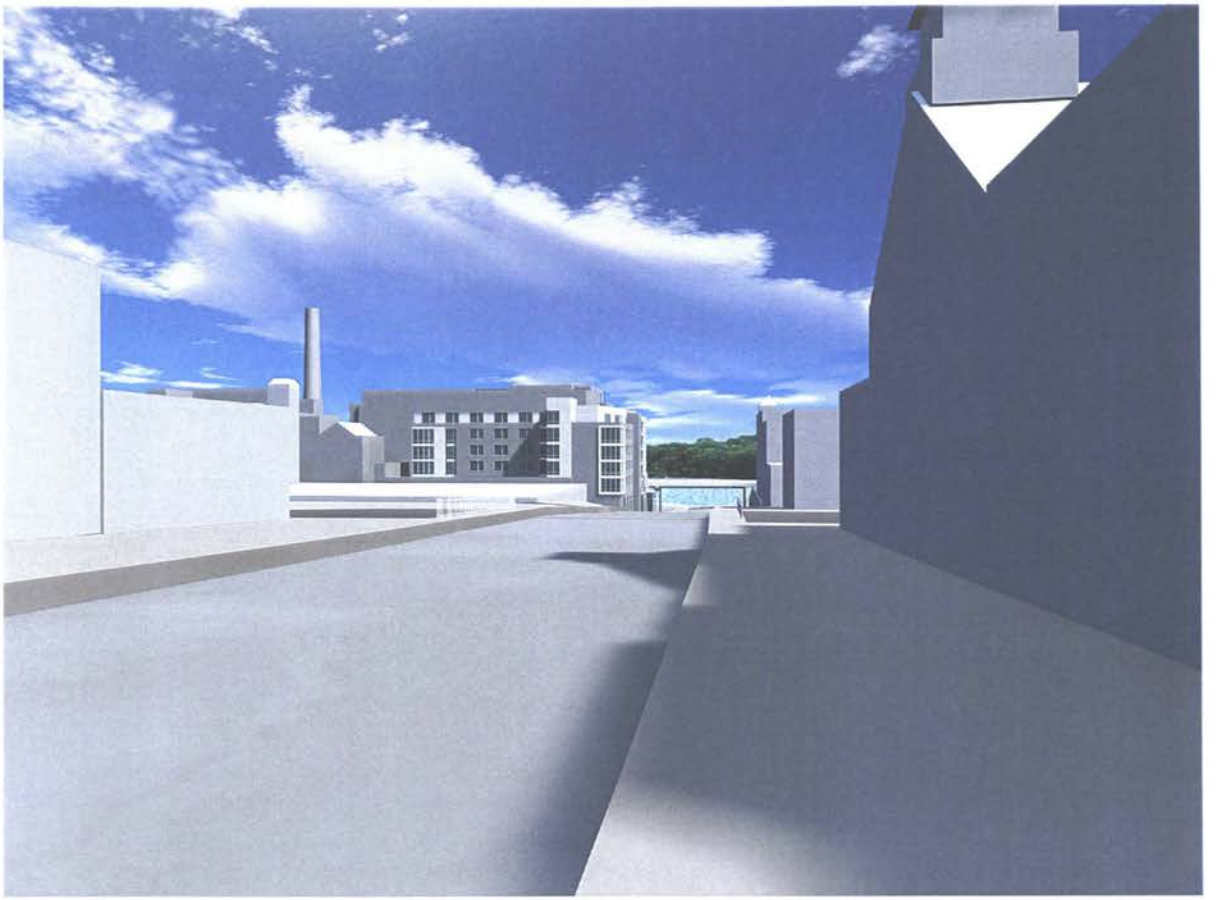


C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

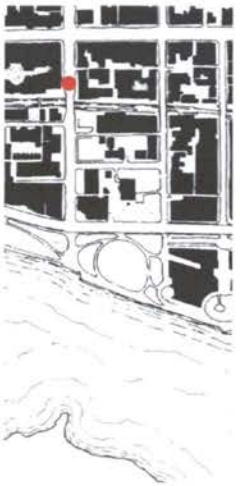




C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

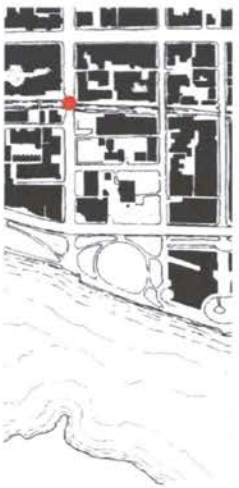




C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

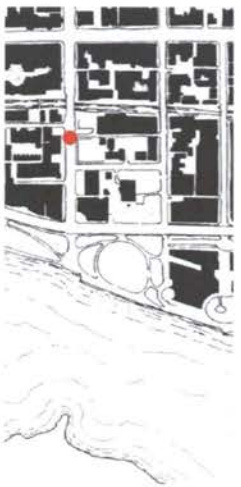




C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

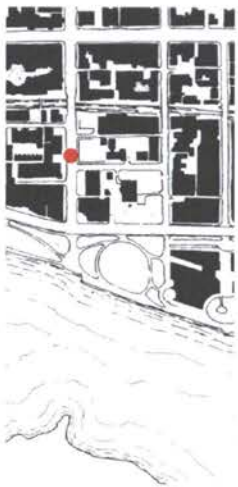




C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR





C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

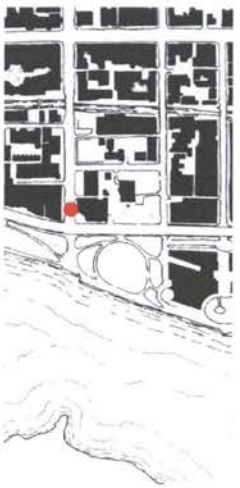




C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

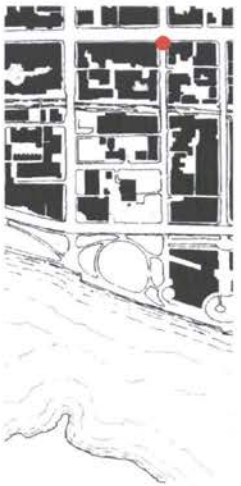


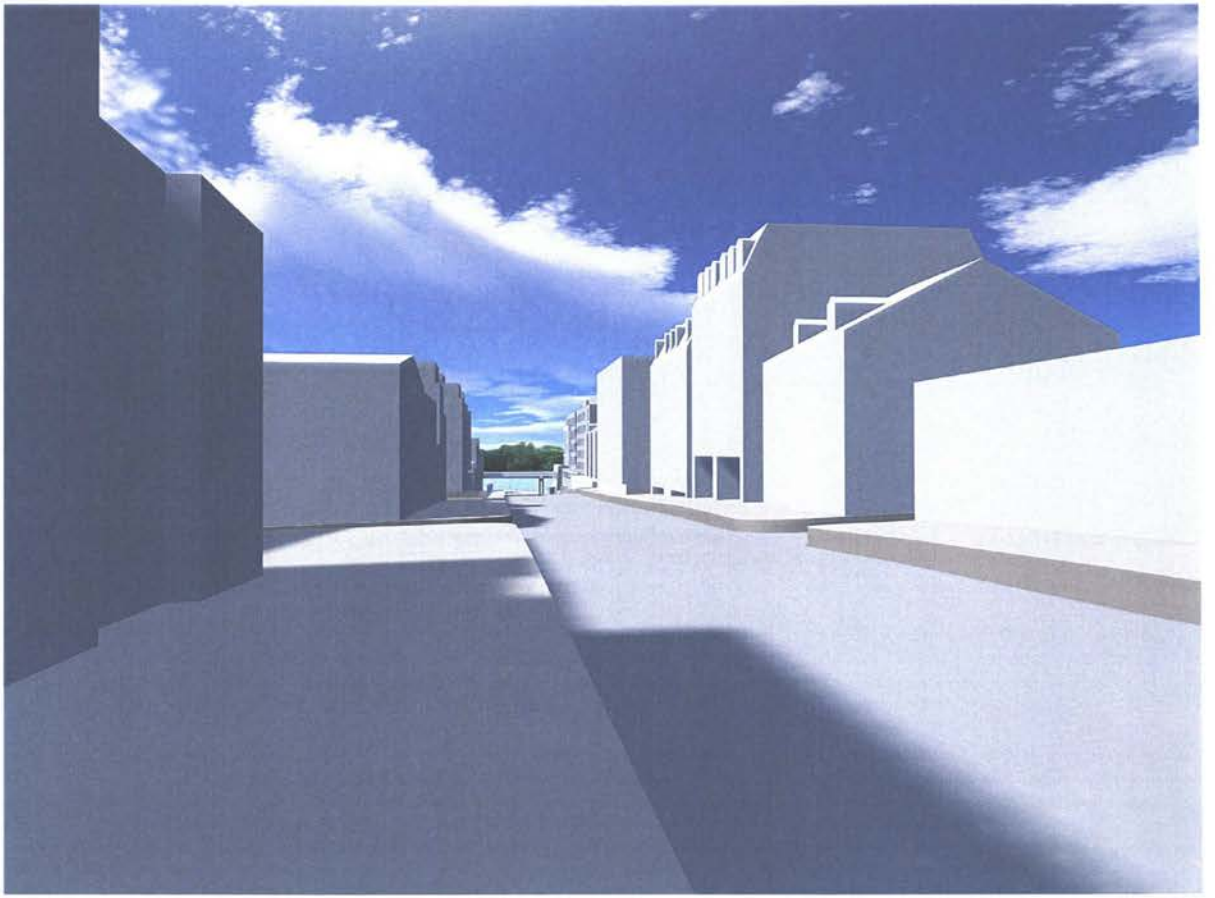


C

Proposed Design (with additional 10' set back)
View from Wisconsin Avenue

GEORGETOWN INCINERATOR

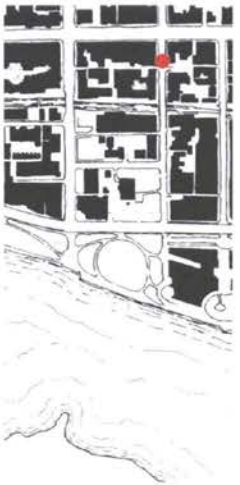




A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

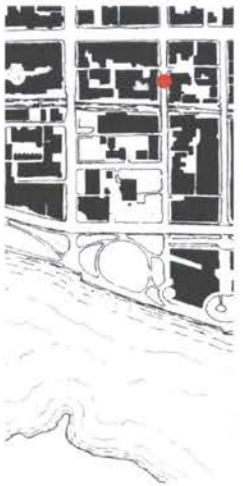




A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

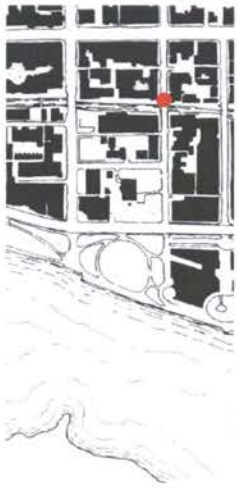


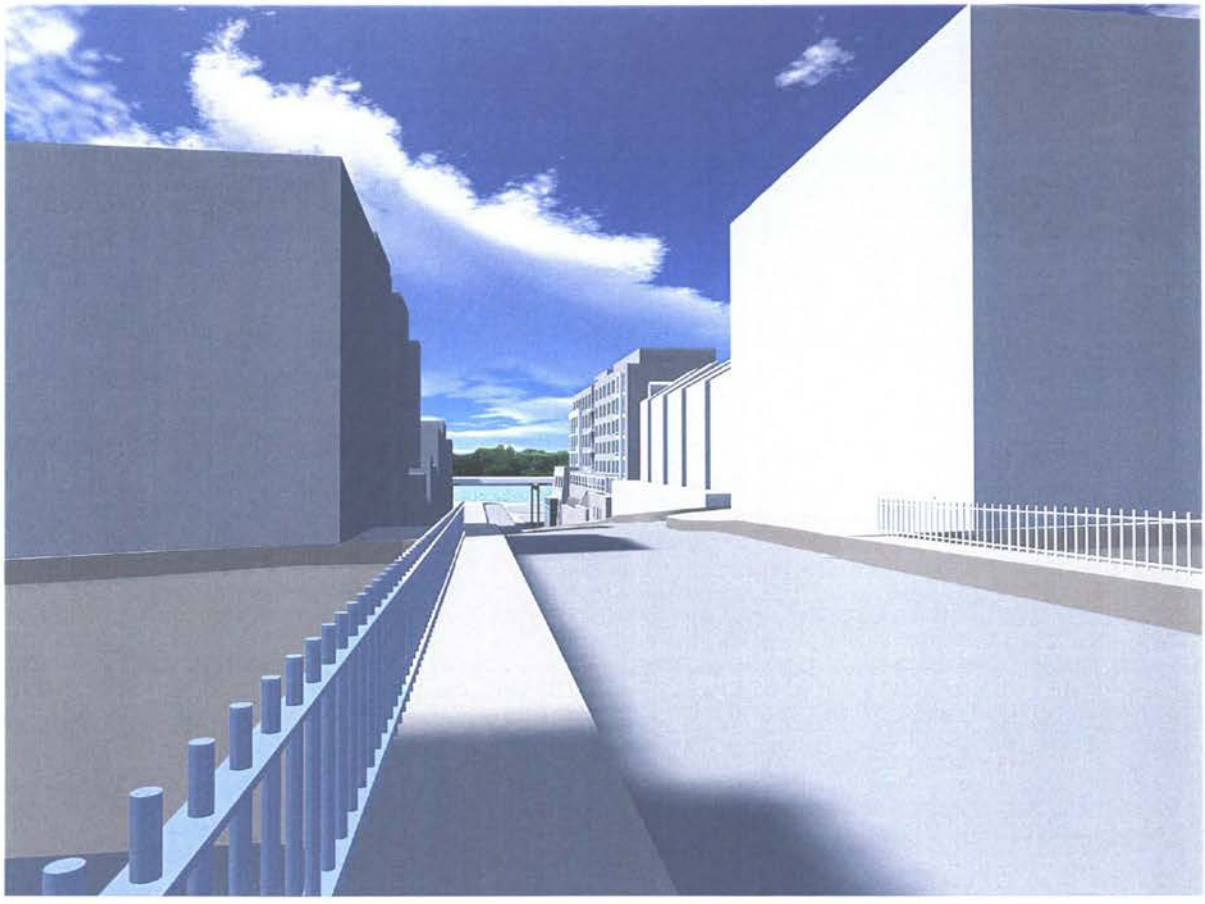


A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR





A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

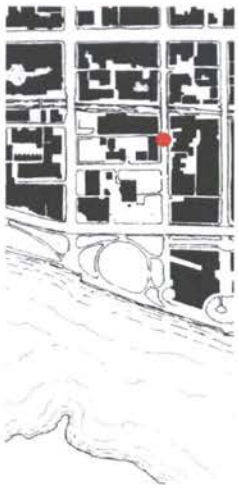


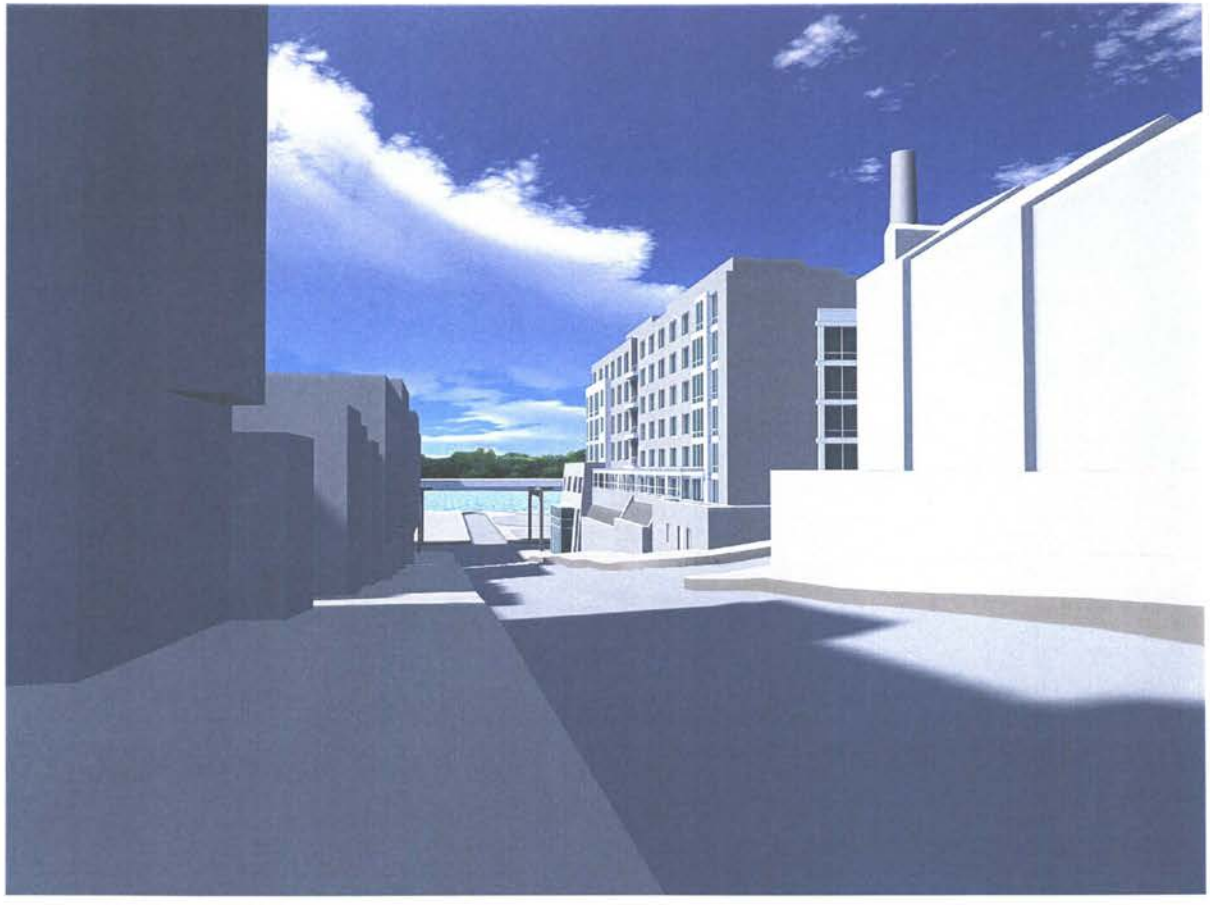


A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR





A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

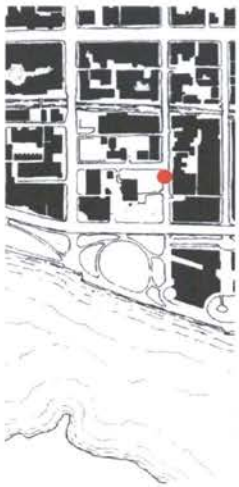




A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

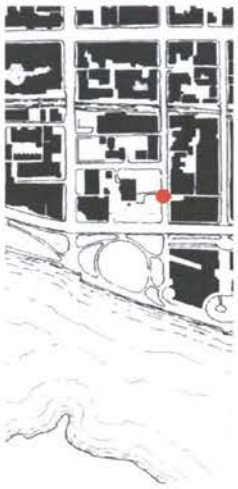




A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR

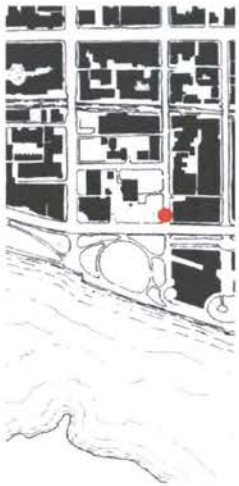




A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR





A

Approved design (as is)
View from 31st Street

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from 31st Street

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from 31st Street

GEORGETOWN INCINERATOR

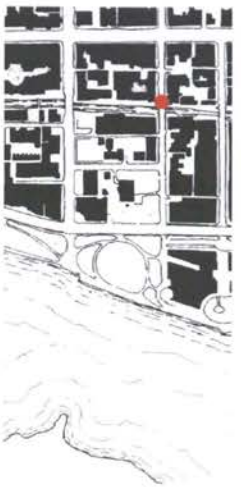


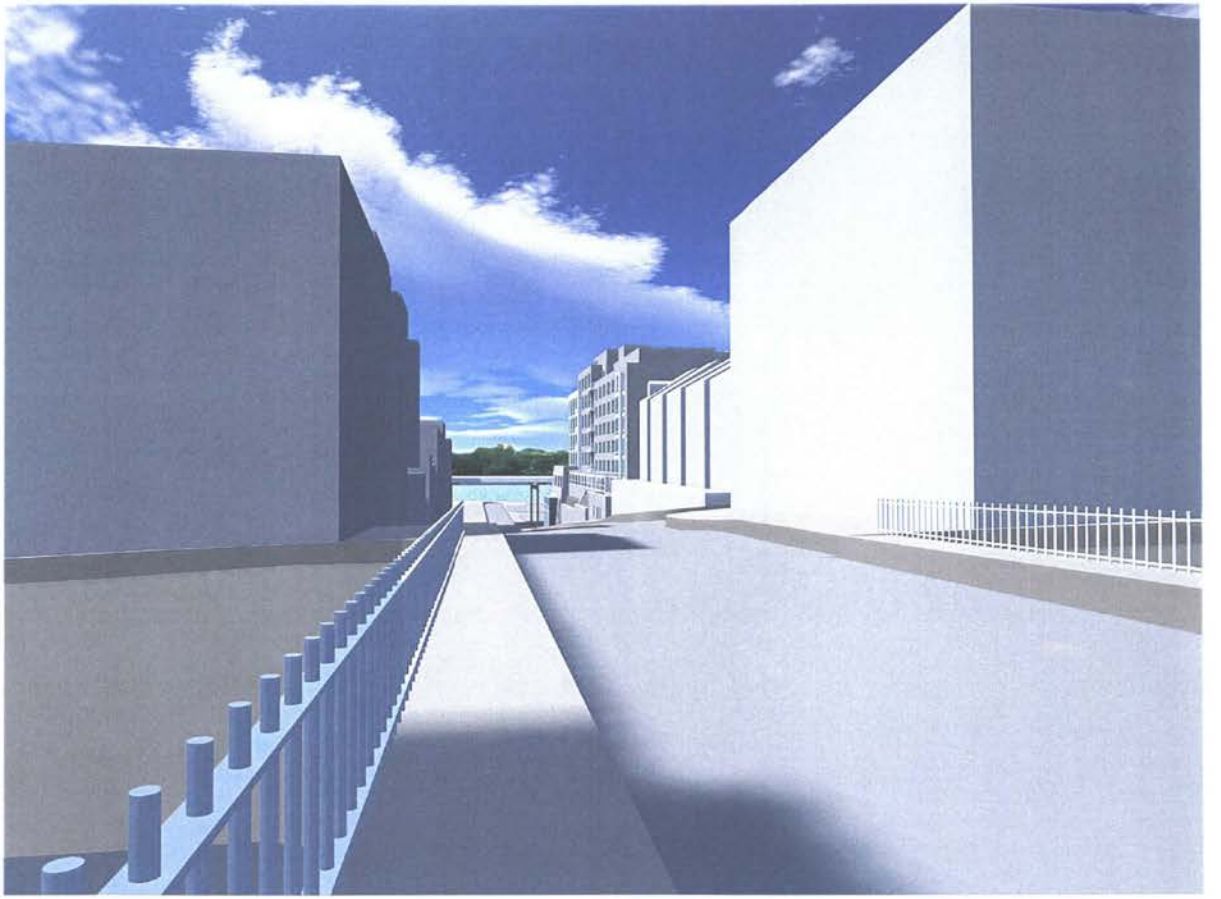


B

Proposed Design (with additional floor)
View from 31st Street

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from 31st Street

GEORGETOWN INCINERATOR





B

Proposed Design (with additional floor)
View from 31st Street