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April 22, 2002

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BY HAND

Mr. Geoffrey Griffis
Chairperson
Board of Zoning Adjustment
441 Fourth Street, N.W., Room 201
Washington, D.C. 20001

Re: BZA Application No. 16854; 315 East Capitol Street, S.E. (the "Property")
Our File No. 092207.0000

Dear Mr. Griffis and members of the Board of Zoning Adjustment:

As requested at the conclusion of the April 9, 2002 hearing in the above referenced matter, enclosed you will find the 1954 and 1960 Baist Maps for the Property. Also enclosed is the 1985 Sanborn Atlas Map for the Property.

The 1954 and 1960 Baist Maps illustrate that the Property originally contained three structures. The structure which fronts East Capitol appears to be consistent in depth with the structure outlined on Exhibit C1, of the Request for Party Status submitted by Mr. and Mrs. Jones and Mr. Warlick. The next structure was stepped away from 313 East Capitol Street. Additionally, this second structure does not appear to have extended the entire length of 313 East Capitol Street. As such, the second structure created less of an invasion of the light and air available to that Property as would be created by the Applicant's proposed construction. Finally, the 1985 Sanborn Atlas Map indicates that this second structure was two stories and then stepped down to a single story.[1] Again,

[1] There appears to be four inconsistencies with the Sanborn Atlas Maps. First, its erroneously depicts the depth of the improvements at 315 East Capitol Street to be equal to that at 313 East Capitol Street. Second, it depicts a single structure at 315 East Capitol, rather than two structures. Third, as was testified to at the hearing, the structure(s) at 315 East Capitol

BZA
Case No. 16854
Exhibit No. 56

Board of Zoning Adjustment
District of Columbia
CASE NO.16854
EXHIBIT NO.56

this configurations allowed ample light and air to reach 313 East Capitol Street.

We appreciate your consideration.

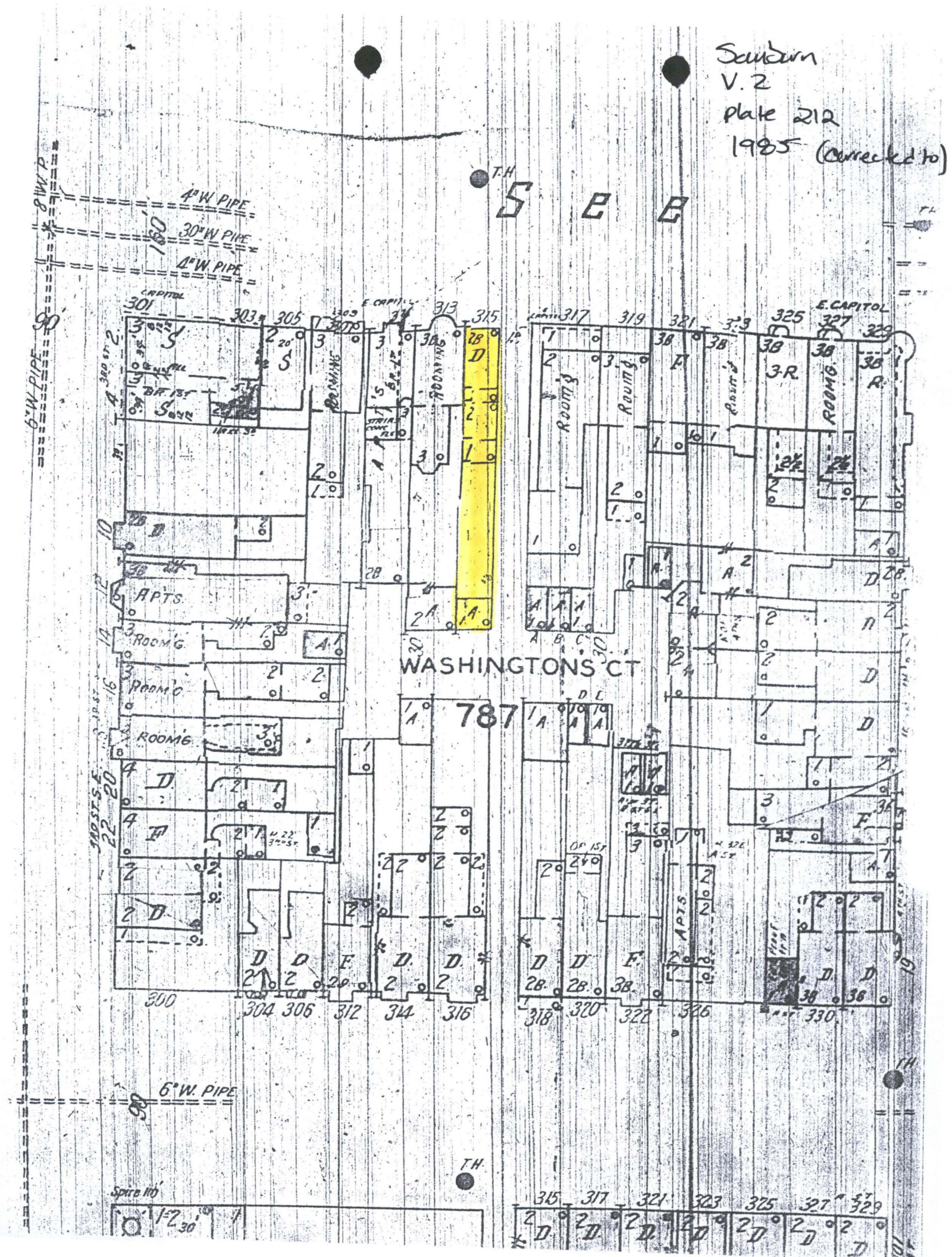
Sincerely,

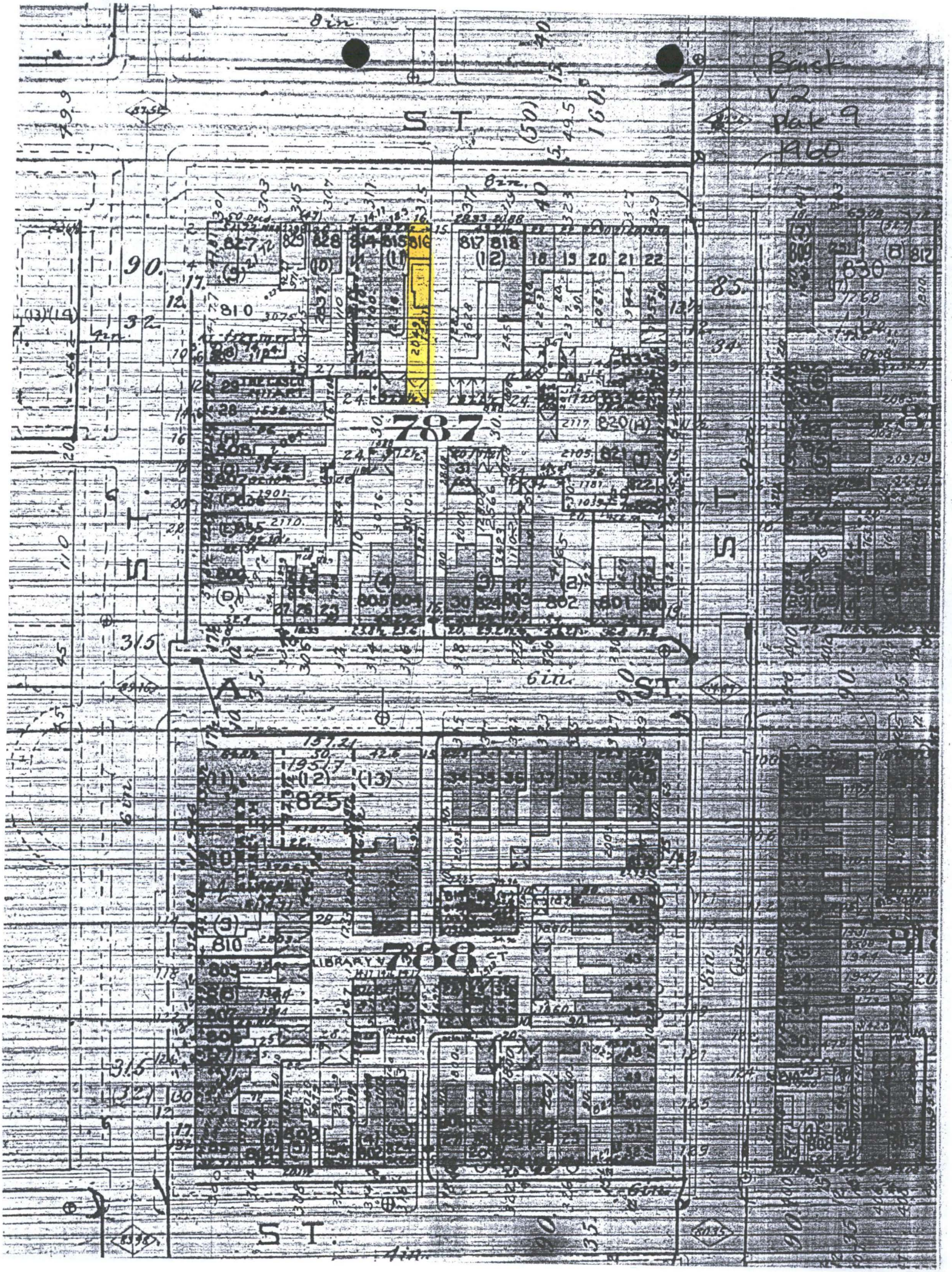
ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

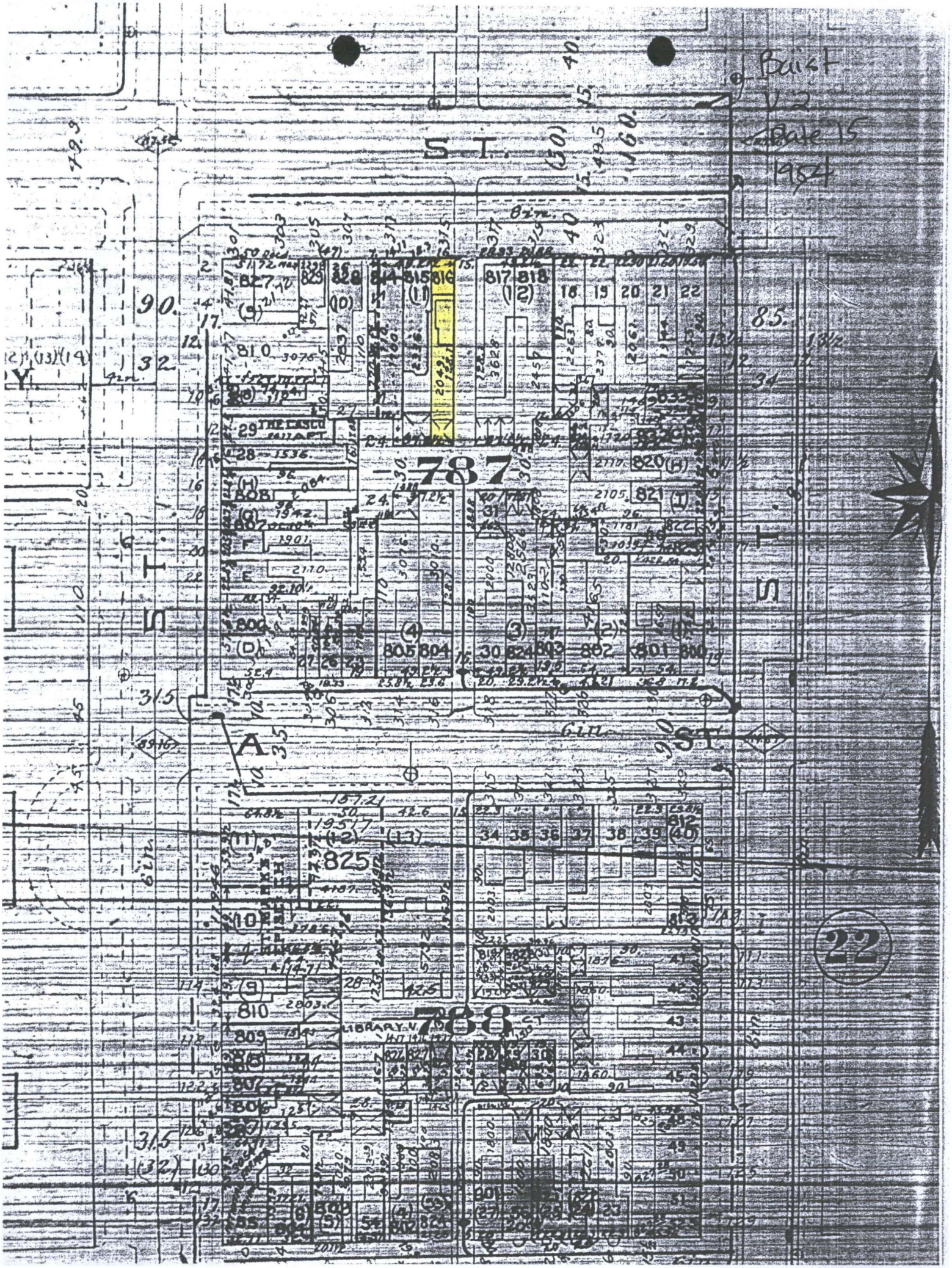
Richard B. Nettler
Jeannine Rustad Zigner

Enclosures (as stated)
cc: Jacques B. DePuy, Esquire (by hand)
Mr. Jim Warlick
Mr. and Mrs. James R. Jones
Ms. Sherri M. Pruitt, Board of Zoning Adjustment (by hand)
Kenan P. Jarboe, Chairperson, ANC 6B
Mr. John Moore, Office of Planning (by hand)

Street were demolished some time in the 1960s. Finally, the Sanborn Atlas Map indicates that the improvements at 315 East Capitol Street were constructed to the Property line adjoining 313 East Capitol Street. Not only is this conflict with the Baist Atlas Maps, it is inconsistent with outline of the building on the party wall to 313 East Capitol Street, as illustrated on Exhibit C1 to the Jones/Warlick Request for Party Status.


Southern
V. 2
Plate 212
1985 (Corrected to)
S E E
T.H
4" W. PIPE
30" W. PIPE
4" W. PIPE
6" W. PIPE
E. CAPITOL
301
303
305
307
309
313
315
317
319
321
323
325
327
329
APTS.
ROOMING
ROOMS
3-R.
ROOMS
WASHINGTONS CT
787
300
304
306
312
314
316
318
320
322
326
330
6" W. PIPE
T.H.


Bust
V2
Pl. 9
1960
787
788
830
ST
8 in.
6 in.
90.
85.
31.5
137.24
LIBRARY


Baist
1954
787
788
825
90 ST.
5 T.
22

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315 East Capitol Street, proposed new construction before BZA