

To: The Office of Zoning  
Government of the District of Columbia  
Suite 210 South  
441 4<sup>th</sup> Street, NW  
Washington, DC 20003

From: Parties in Opposition and  
Portner and Blount, LLC  
<https://portnerandblount.com>

Date: July 13, 2021

Subject: Parties in Opposition Updated Corrections to Applicant's 3D SketchUp  
Drawings Exhibits 90A and 92A- BZA Case No. 20382- 308 11th Street NE

Dear Board of Zoning Adjustment,

Below are corrections to Applicant's 3D SketchUp drawings from Exhibits 90A and 92A, which are shown side by side with the graphical overlay photos submitted by the Parties in Opposition in Exhibit 83, upon which the Applicant bases its 3D drawings. See Exhibit 91A for additional explanations.

- **The Applicant's building height proportions are incorrect and are too short by more than a foot.** To show adjacent garage heights, the Applicant appears to be using height of proposed first floor (~10 ft. 4 in.) rather than surveyed heights and heights in Applicant's architectural drawings (8 ft. 11 in. and 7 ft.), resulting in proportions that make the proposed height of the garage appear almost 1.5 ft. shorter.
- **To correct the scale of the building height proportions, we used the Applicant's height dimensions provided in the Applicant's architectural drawings in Exhibit 70.** Based on Applicant's dimensions in Exhibit 70, the existing height of the garages is approximately 7 ft. on the yard-side, with a proposed height of 20 ft. The increase in height will be approximately 2.9 times (286%). From the alley-side, the existing height of the garage at the party wall is 8 ft. 11 in., with a proposed height is approximately 20 ft. 10 in. The increase in height is more than 2.3x (234%).
- **The Applicant's Unknown Wide-Angled Field of View Creates Unrealistic Representations.** The Applicant does not identify the field of view and uses a wide-angled field of view resulting in wide-angled perspectives that are not realistically possible on site when viewed as the human eye sees.
- Notwithstanding the Applicant's apparent errors in height, the Applicant's 3D images show that the proposed structure will be close to 2.3 times – 2.8 times higher than the existing and adjacent garages, will substantially visually intrude on the existing character, scale, and style of the existing garages, and will be unprecedented as the first of its kind along the side of the alley.

Sincerely,

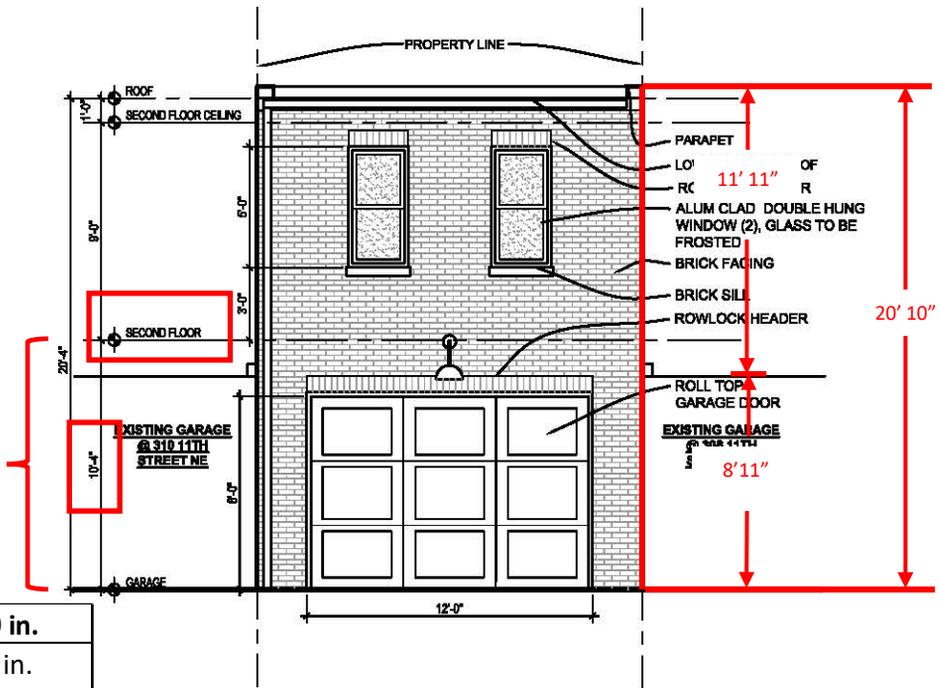
Parties in Opposition,  
Darrin Howell & MaryJoy Ballantyne  
Winfield Wilson & Veena Srinivasa  
Theresa Harrison & Thomas Sheeran  
Randi Spivak & Andy Kerr



Merrill C. Ballantyne, AIA,  
Portner and Blount, LLC.  
424.245.5448

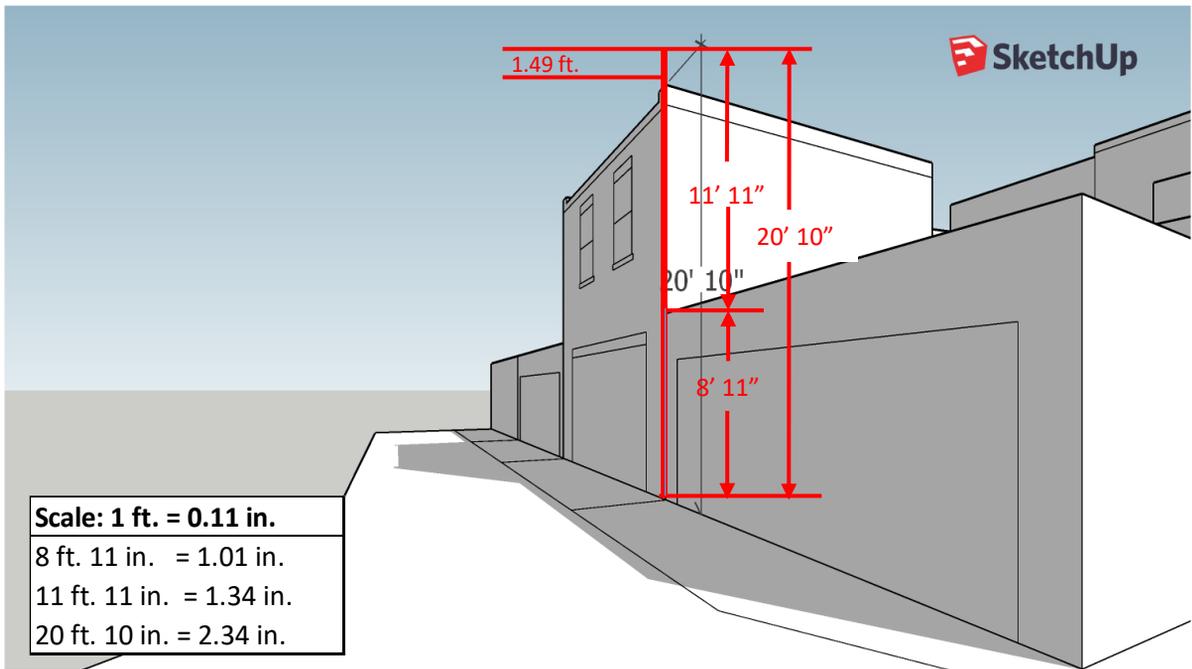
**Exhibit 70: 4/A-3 CORRECT building height proportions**

3D drawings appear to use **10 ft. 4 in.** height (second floor), not **8 ft. 11 in.** height of adjacent garage (survey attached below)



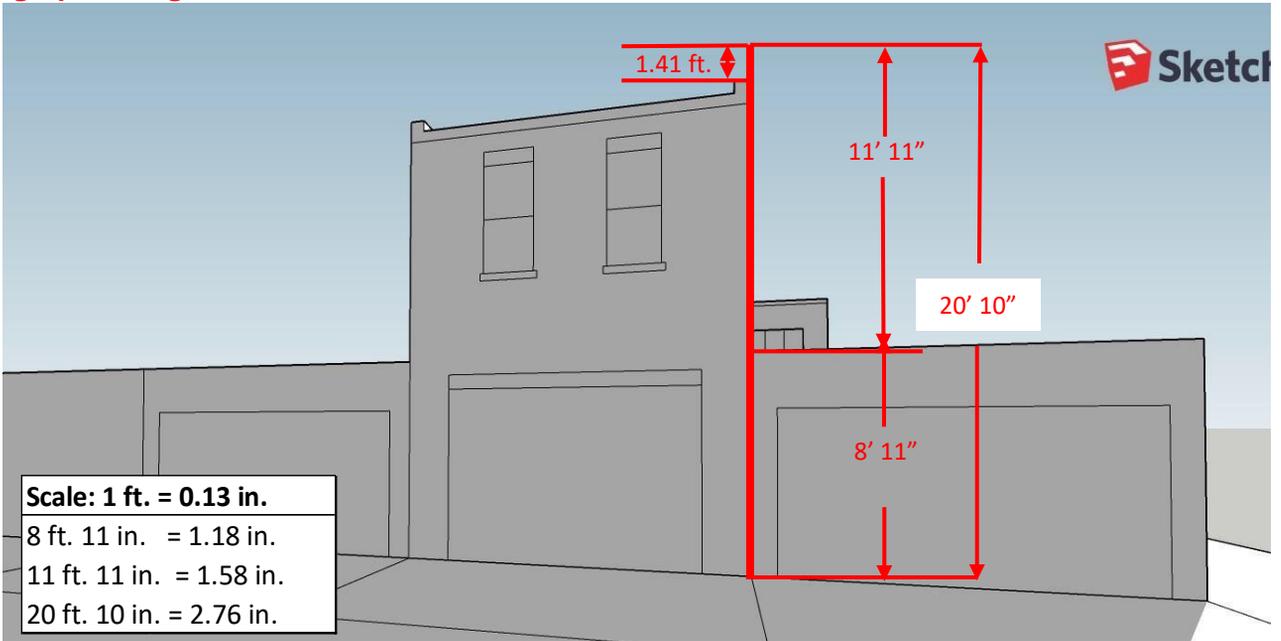
<b>Scale: 1 ft. = 0.129 in.</b>
8 ft. 11 in. = 1.15 in.
11 ft. 11 in. = 1.54 in.
20 ft. 10 in. = 2.69 in.

**Exhibit 92A: Slide 3, July 9, 2021 INCORRECT height proportions. Short by 1.49 ft. Also, portrays only small section of alley without surrounding structures.**



<b>Scale: 1 ft. = 0.11 in.</b>
8 ft. 11 in. = 1.01 in.
11 ft. 11 in. = 1.34 in.
20 ft. 10 in. = 2.34 in.

**Exhibit 90A, Exhibit A, June 30, 2021: INCORRECT height proportions. 1.41 ft. too short. Substantially visually intrudes on existing scale of garage along alley side. When corrected, graphic height is same as below.**

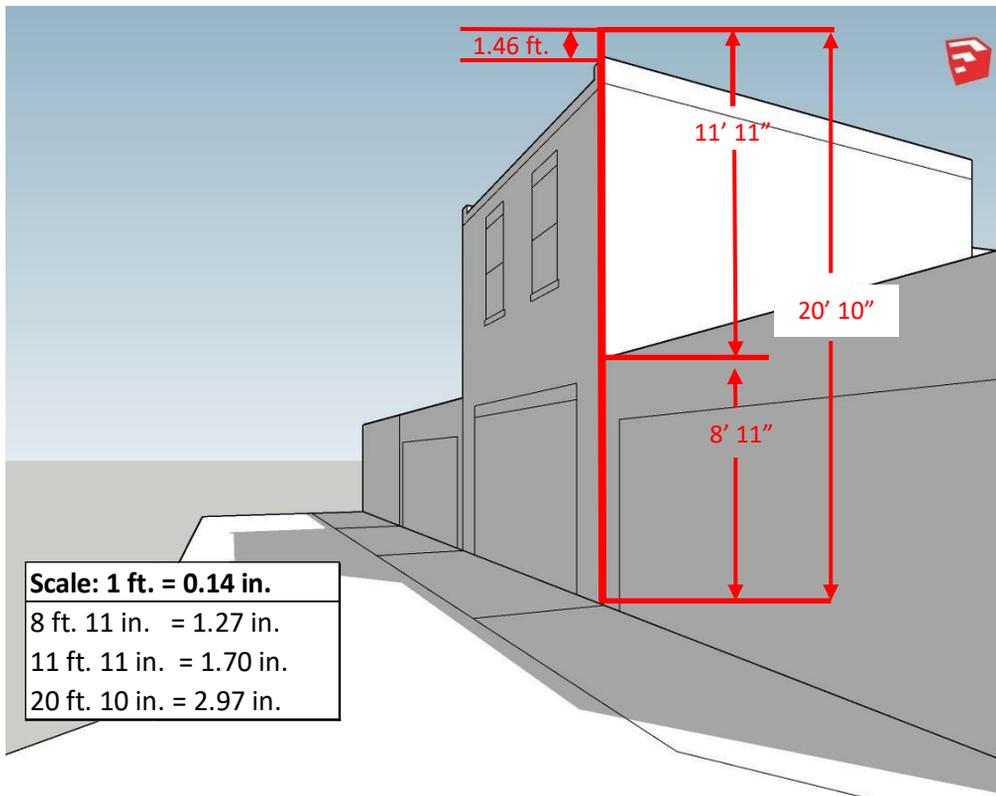


**Exhibit 83, Slide 15, height proportions are same as corrected height above.**



<b>Scale: 1 ft. = 0.14 in.</b>
8 ft. 11 in. = 1.26 in.
11 ft. 11 in. = 1.68 in.
20 ft. 10 in. = 2.94 in.

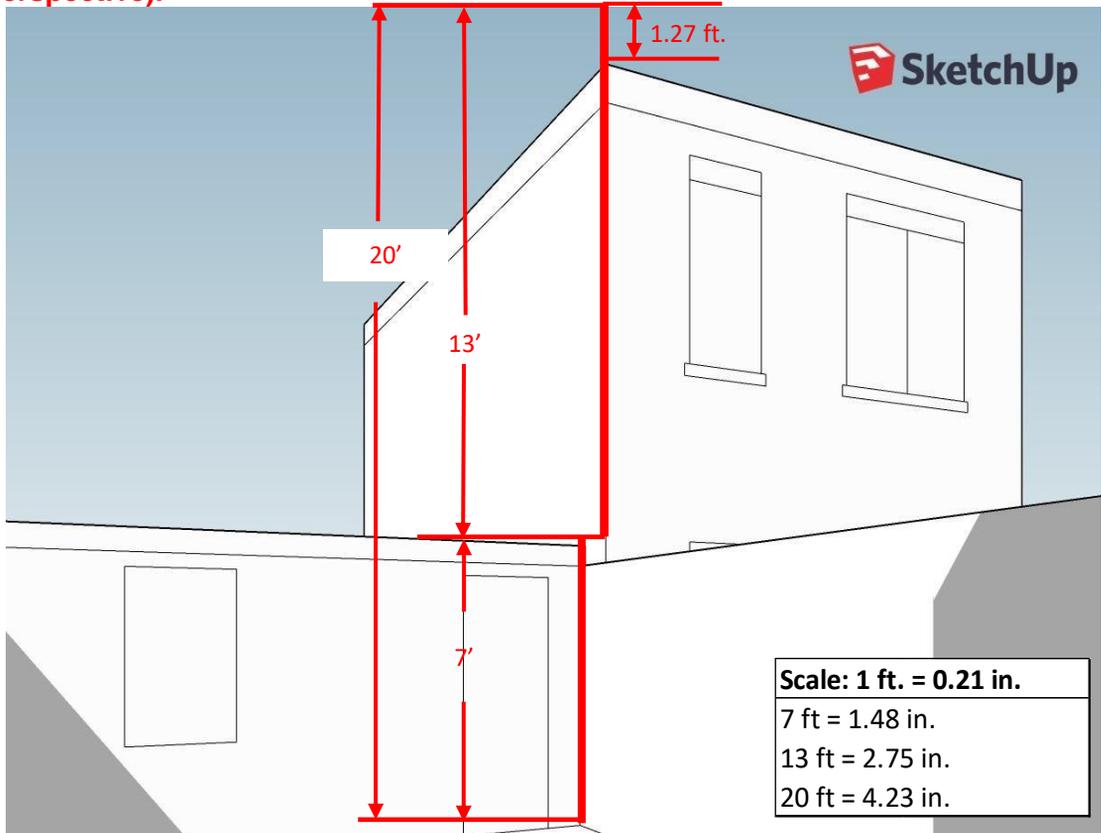
**Exhibit 90A, Exhibit B, June 30, 2021: INCORRECT height proportions. 1.46 ft. too short. Also, portrays only small section of alley without surrounding structures.**



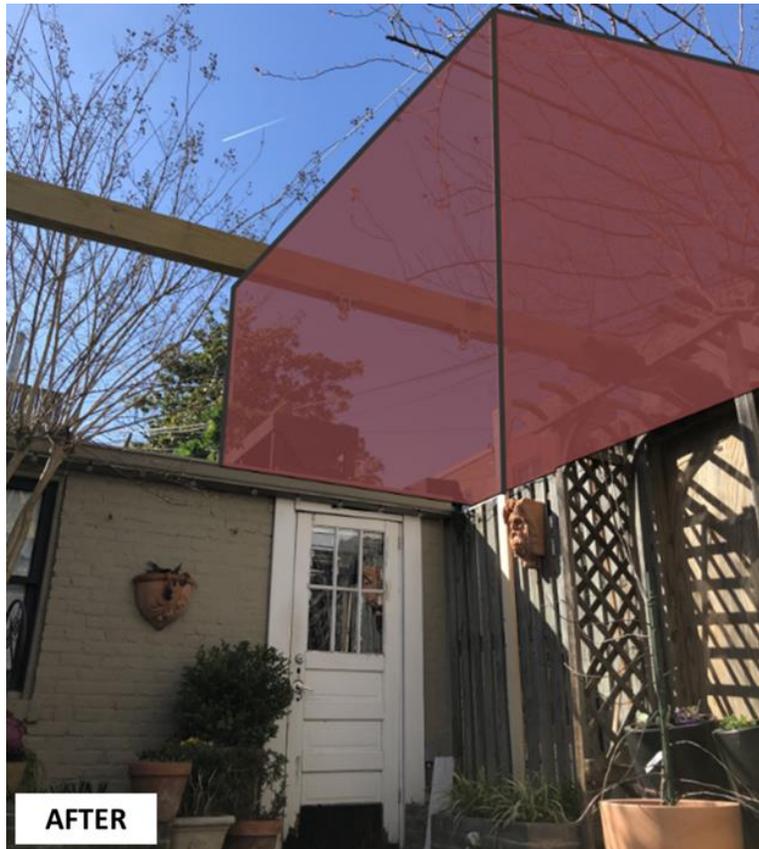
**Exhibit 83, Slide 17. Photo showing actual surrounding structures in alley.**



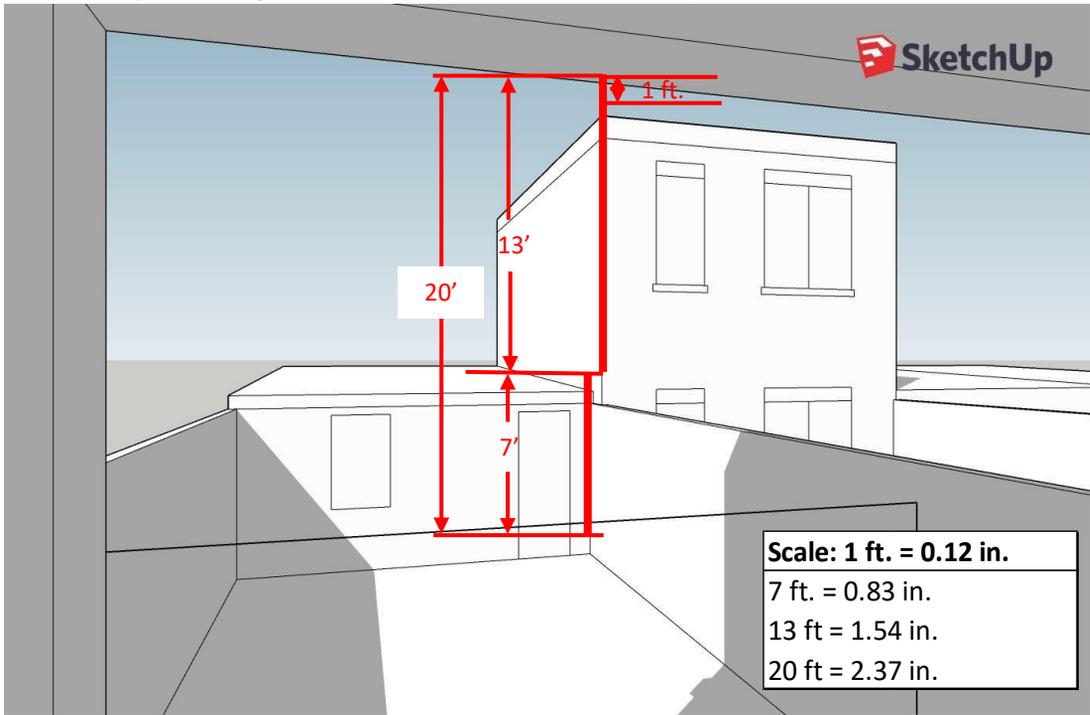
**Exhibit 90A, Exhibit C, June 30, 2021: INCORRECT height proportions. 1.27 ft. too short. Perspective is not possible from adjacent rear yard as human eye sees (photo below shows actual perspective).**



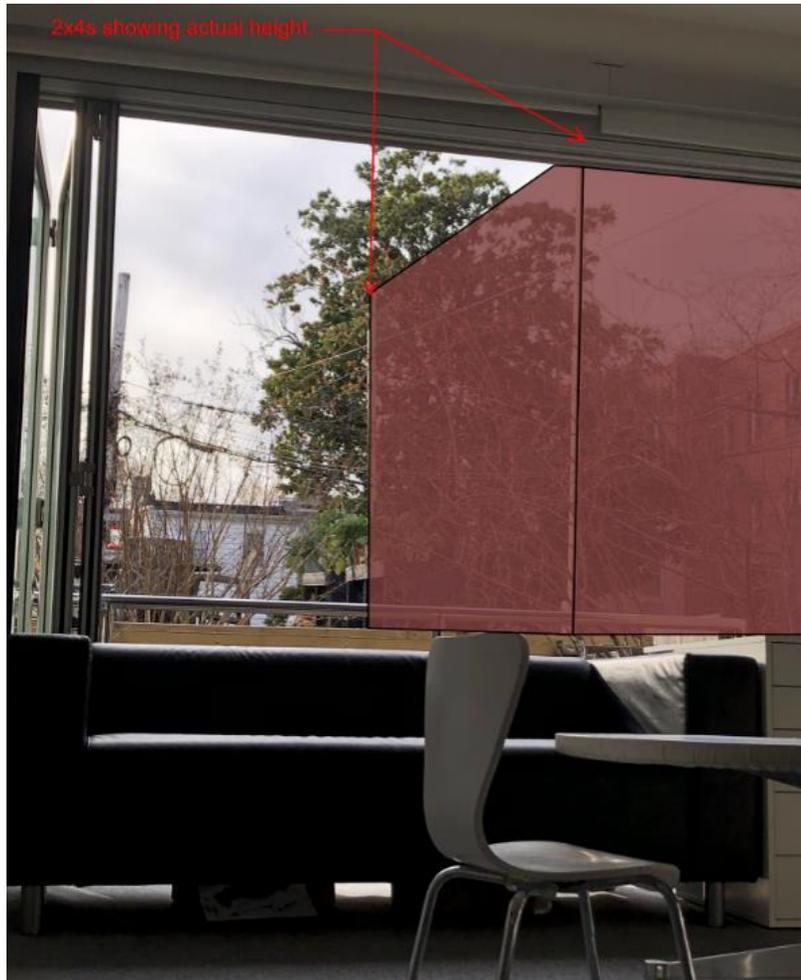
**Exhibit 83, Slide 22. Photo taken ~3 ft. above ground and as far back as possible in yard in order to capture 20 ft. height of proposed garage.**



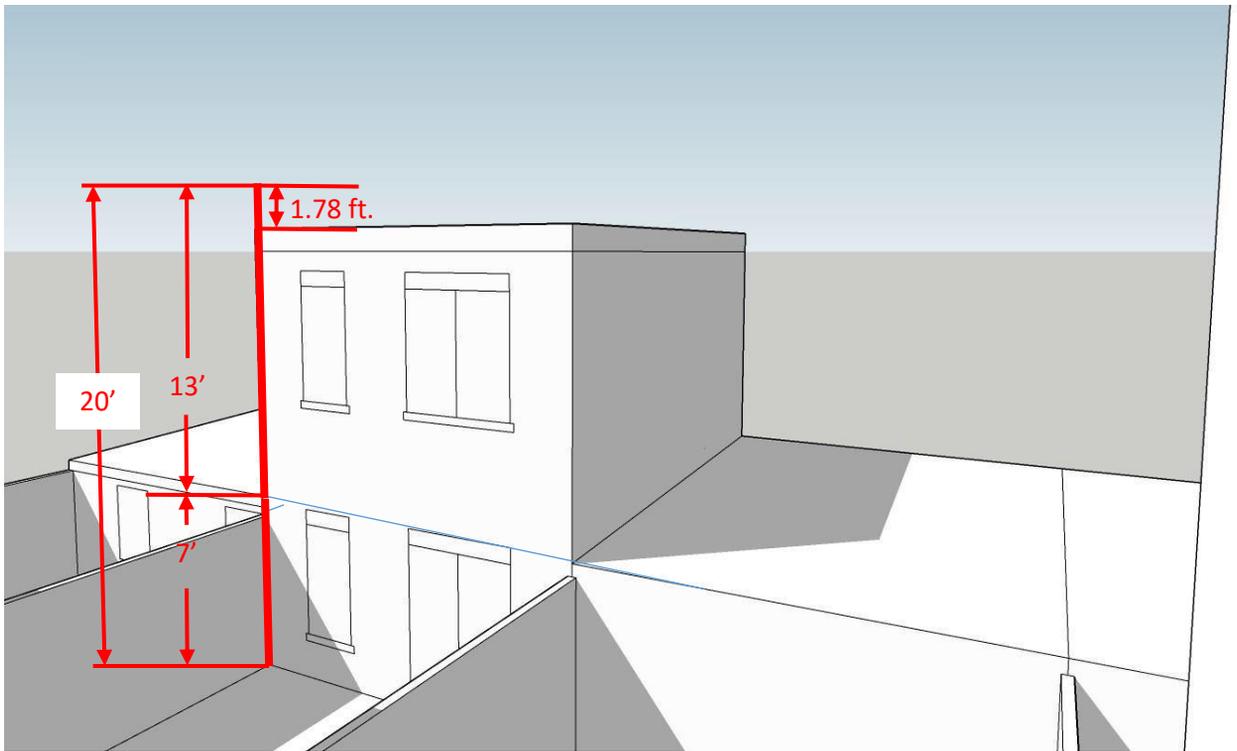
**Exhibit 90A, Exhibit D, June 30, 2021: INCORRECT height proportions. 1 ft. too short. Perspective is physically impossible because it omits existing structures and would be obstructed by existing sidewall, deck and door. See photo below.**



**Exhibit 83, Slide 24**



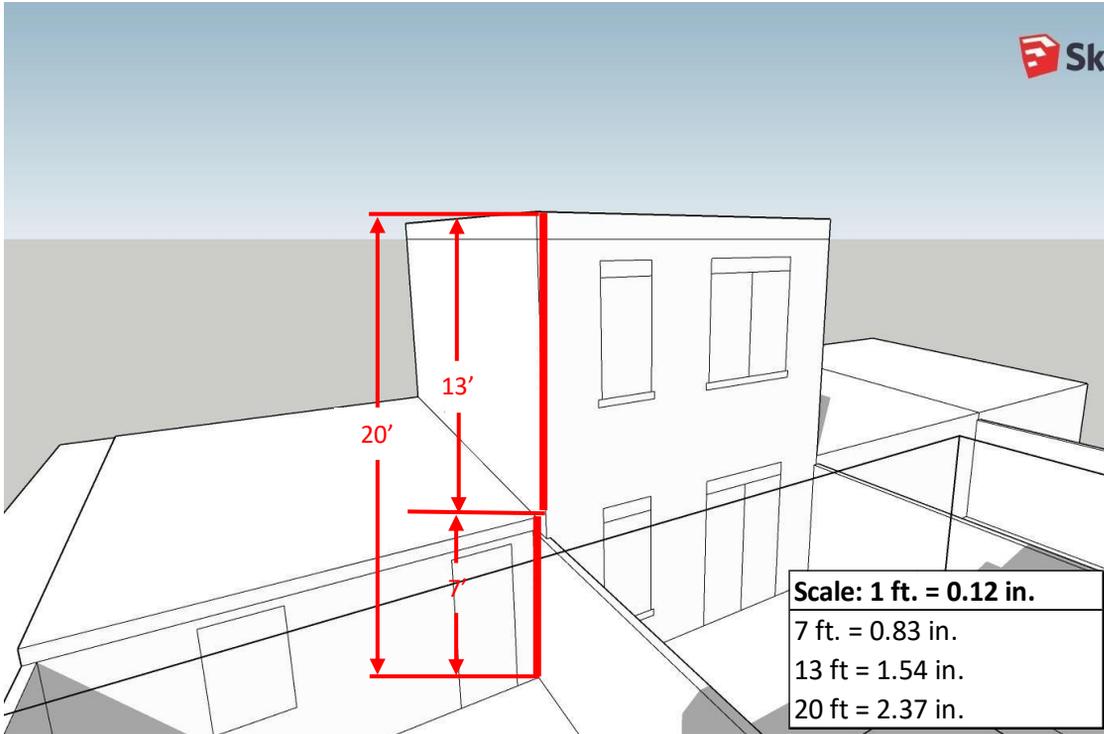
**Exhibit 90A, Exhibit F, June 30, 2021: INCORRECT. 1.78 ft. too short. Use of wide-angled perspective makes proposed garage appear farther away than human eye sees.**



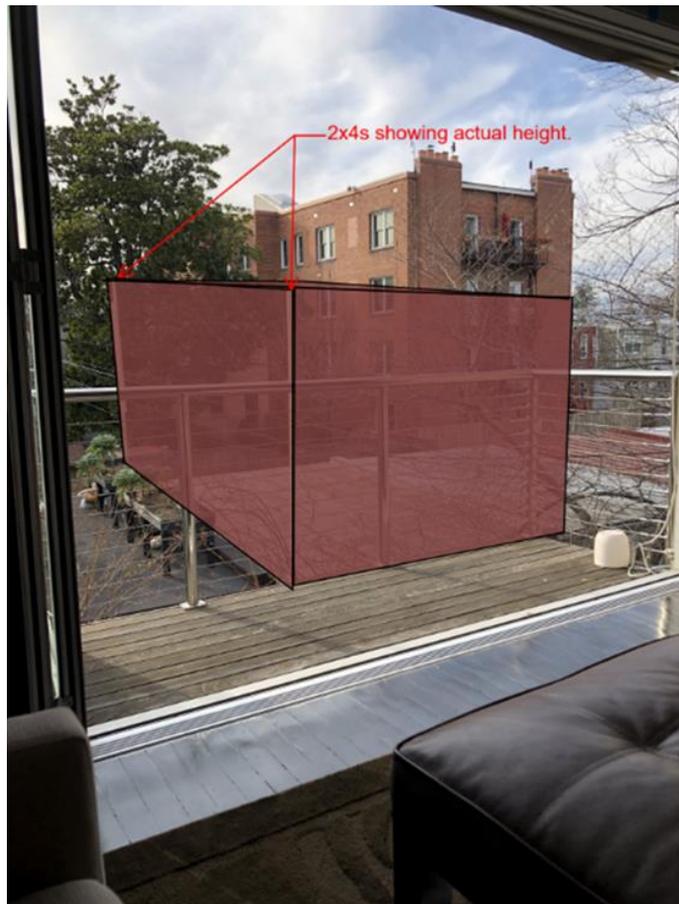
**Exhibit 83, Slide 27**



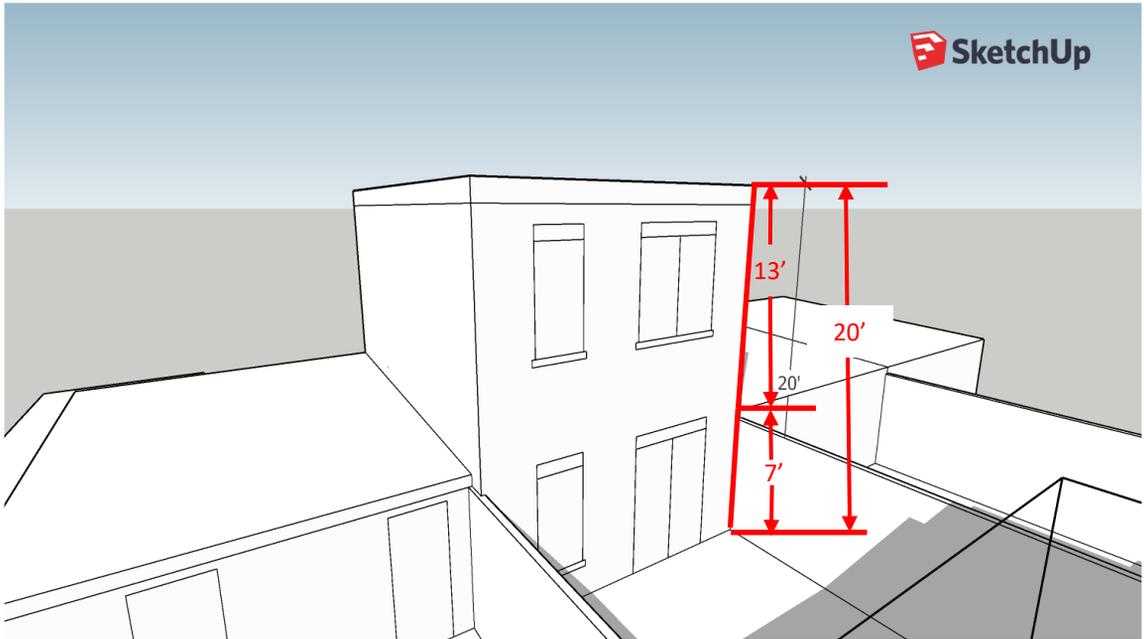
**Exhibit 90A, Exhibit E, June 30, 2021: CORRECT height proportions. But perspective is not physically possible form adjacent property. Viewer appears to be floating in air above rear yard. See photo below for actual perspective.**



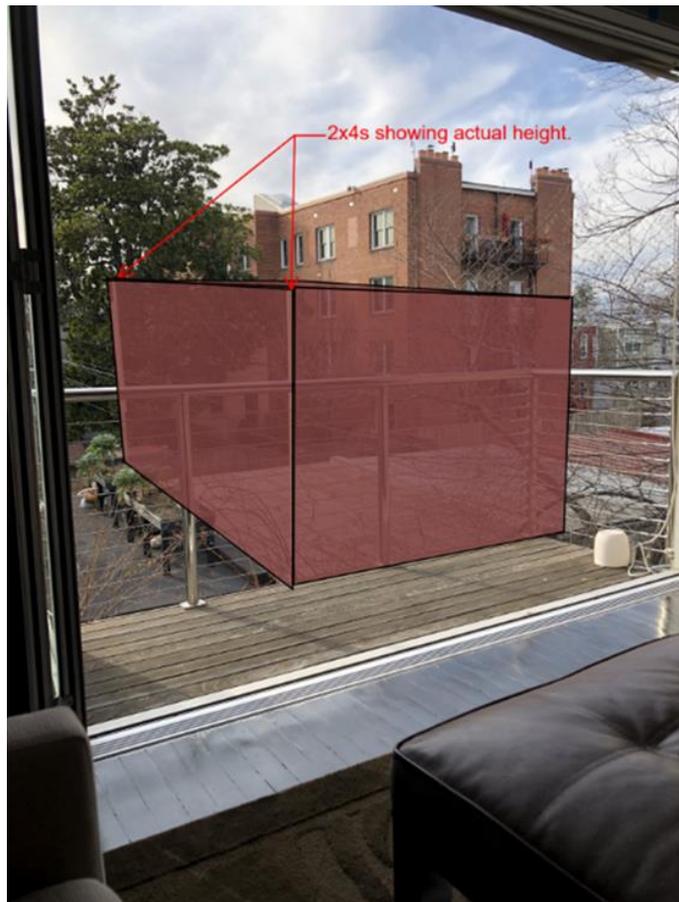
**Exhibit 83, Slide 26**



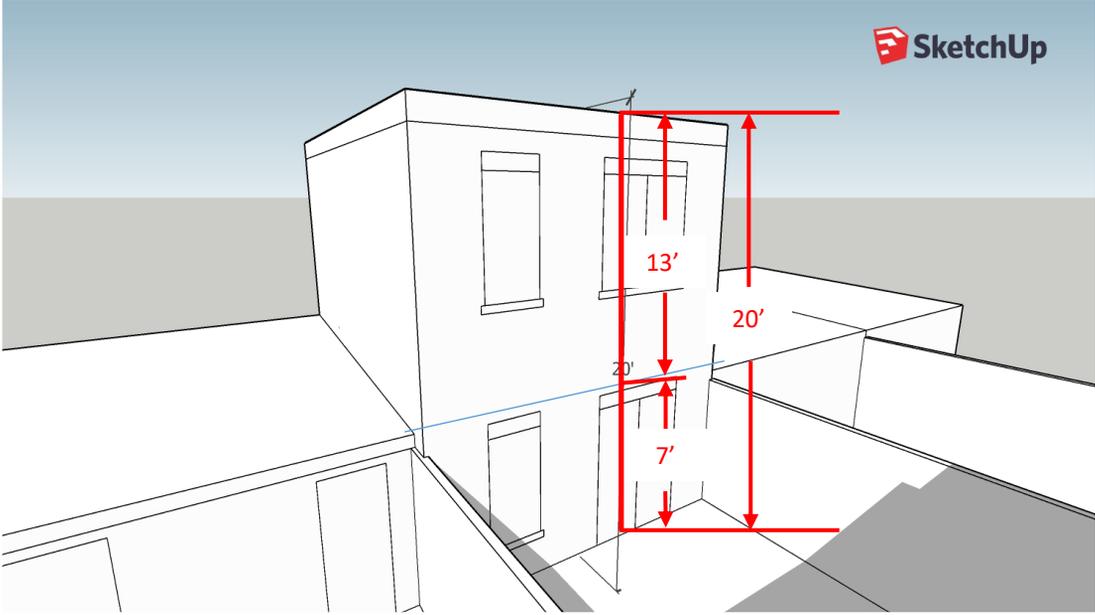
**Exhibit 93:** Slide 1, July 9, 2021: **CORRECT** height proportions. However, perspective is **not physically possible** form adjacent property. Viewer appears to be floating in air above rear yard. See photo below for actual perspective.



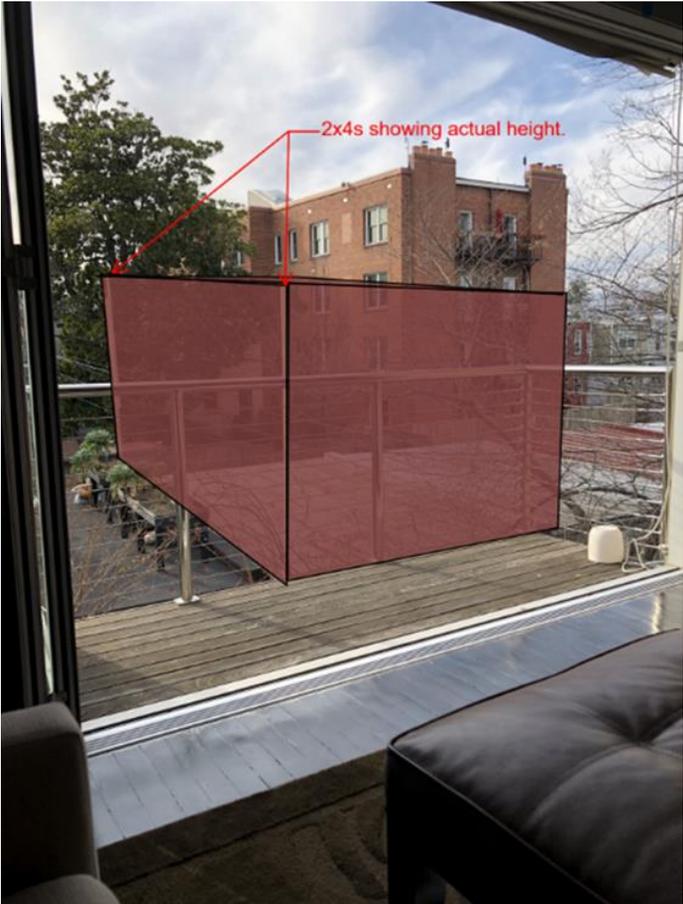
**Exhibit 83,** Slide 26



**Exhibit 93:** Slide 2, July 9, 2021: **CORRECT** building height proportions. However, perspective is not physically possible form adjacent property. Viewer appears to be floating in air above rear yard. See photo below for actual perspective.



**Exhibit 83,** Slide 26





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CAS ENGINEERING-DC, LLC
1001 connecticut avenue, nw, suite 401
washington, dc 20036
office 202.393.7200
info@cas-dc.com
www.cas-dc.com

civil • surveying • land planning

April 12, 2021

MaryJoy Ballantyne
Via email maryjoyb@gmail.com

Re: CAS Job No. 21-256-DC
308 11th Street, SE
Lot 0068, Square 0963
BZA Case 20382
Site Observations/Analysis

Dear Ms. Ballantyne,

Pursuant to our discussions, we met with you on-site to review survey markers/evidence and exhibits submitted under BZA Case 20382 for the property adjoining your home to the north at 308 11th Street, NW. During our time on-site we measured select features on and around your property to assist in your interpretation and understanding of documents submitted to the Board of Zoning Adjustment, and the corresponding impact to your property. The following represents our observations and analysis.

Exhibit 2: DC Surveyors Plat

- This plat shows the garage building 3.33' from the rear property line. DC Surveyor's Office Records show the garage building set back 5.1-feet. Two property corners (nails) presumably set by the Case 20382 Applicant's Surveyor confirms this based on our field measurement (5.05-feet measured on-site)
- The plat shows 21.42' between the garage and rear wall of the existing house with addition. This distance measures to 22.01-feet on-site. This dimension would be significantly less than the 21.42' shown with an extension to the garage rear wall (2'-10" shown in Exhibit 6), approximately 19'-2".

Exhibits 6 and 51A: Architectural Plans and Elevations

- Pages 5 and 9 show the garages aligning in the rear/west to north and south of 308 11th, and garage at 3'-4" off the alley line. This does not appear to match field conditions, see note under Exhibit 2.
- An addition of 2'-10" as shown on Page 5 reduced from the existing 22.01-feet between the garage and main building would result in approximately 19'-2", not 21'-5" as the drawings depict.
- Page 11 shows the height of adjacent garages as approximately 9'-6" from the alley and 8'-7" from the courtyard. These do not appear to match field conditions as the garage measures 8'-11" from the alley and 7'-4" from the inner courtyard.

It is my professional opinion that the documents presented do not accurately depict existing conditions for the properties, specifically the distance between the garage and the main buildings and the resulting rear yard following the garage addition, and the height of the existing/adjacent garages. It is also my professional opinion that the documents submitted under BZA Case 20382 should be updated to reflect an accurate field run survey of the properties so that the impacts and proposed project can be properly analyzed/reviewed, and the appropriate relief be obtained, if necessary/applicable.

If you have any questions or need any additional information, do not hesitate to call us.

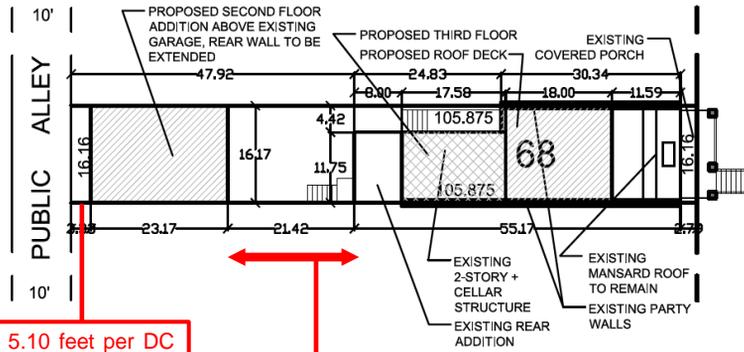
Sincerely,



David C. Landsman, PE, Prof. LS
Manager
District of Columbia, Registered Professional Land Surveyor No. LS909272
04/12/2021

21256-0101 (04/12/2021 (Site Observations/Analysis).docx

Annotated Portion of Exhibit 2



5.10 feet per DC Surveyor's Office Records

Existing garage to main building is 22.01 feet, subtracting 2'10" addition yields 19'-2", not 21.42'

11th STREET, N.E.



Annotated Portion of Exhibits 6 and 51A

