

February 8, 2021

VIA IZIS

Chairperson Frederick L. Hill
Board of Zoning Adjustment
441 4th Street, NW
Suite 210S
Washington, DC 20001

RE: Application No. 20382 (Haider Haimus and Jessica Bachay (the “Applicants”) Regarding 308th 11th Street, N.E. (the “Applicant’s Structure”). Party Status Application in Opposition from Vanessa Cieslak and Garland Kevin Holloway, (Cieslak-Holloway Residence) the owners home at 318 11th Street, N.E.

Chairperson Hill and Honorable Members of the Board:

Vanessa Cieslak and Garland Kevin Holloway, the owners and residents of 318 11th Street, N.E., respectfully request party opposition status in the above-referenced case, originally scheduled for a hearing on February 24, 2021.

As part of a much larger building project, the Applicants seek special exception relief to allow: a 4th-level addition and roof deck to an existing 3-level rowhouse (the “Applicant’s Structure”) located in the Capitol Hill Historic District; and a second-story addition to an existing detached garage, in RF-1 Zone.

Party Witness Information

1. A list of witnesses who will testify on the party’s behalf;

Vanessa Cieslak will/may testify individually, and reserves the right to add witnesses at the time of the public hearing.

2. A summary of the testimony of each witness;

All witness(es) will testify, collectively or individually, that the Applicant’s proposed additions will substantially and adversely impact the privacy, airflow, openness, noise levels, and light available residences on the even side of the block, rear of houses along alley of the 1100 block of C St NE, that the use and enjoyment of the residences including the rear yards, will be unduly compromised, and that the proposed additions are out of character with the neighborhood, and in particular with the seven adjacent rowhouses.

3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts; and

Vanessa Cieslak reserves the right to supplement the record and provide information pertaining to witnesses or expert witnesses at a future date before the hearing.

4. The total amount of time being requested to present your case.

Vanessa Cieslak anticipates presenting their case-in-chief in approximately 10 minutes.

Party Status Criteria

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?

As will be addressed more fully at the hearing, the requested special exception will unduly impact the light, air, privacy, and quiet enjoyment available to Cieslak-Holloway Residence and rear residences along the alley of the 1100 block of C St NE.. The proposed 4th-level addition with its wet bar and roof deck will unduly increasing noise disturbances throughout the neighborhood.

2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)

Vanessa Cieslak and Garland Kevin Holloway are the owners and residents of record of 318 11th St NE.

3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.)

The Cieslak-Holloway Residence is within 200 feet of the Applicant's Structure (the subject of the BZA application).

4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?

If the requested relief is approved, the Cieslak-Holloway will be subject to numerous environmental, economic and/or social impacts, including but not limited to, unduly adverse impacts, air-flow, openness, sunlight, and quiet.

5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.

At the ANC 6A Economic Development& Zoning Space Committee Meeting, July 15, 2020, (HPA Case#20-390): Request for historic approval for a new third floor addition and roof deck over an existing house in the Capitol Hill Historic District was discussed. The Commissioners requested a new site survey/plan. Commissioner Greenfield requested a mock-up and sight survey to ensure that the project would not be visible from the street. Also the garage project with 2nd story addition was not part of the then stated proposal. Commissioners questioned this omission and tabled the approval until all proper documentation was submitted.

This project will disrupt the historic nature of the neighborhood and this would be the first project in the neighborhood or on the street that would have a roof deck. Opposition to the proposed project was expressed by neighbors attending the ANC 6A Economic Development& Zoning Space Committee meeting.

Vanessa Cieslak and Kevin Holloway reserve the right to supplement the record to include additional evidence on this matter.

6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Because the Cieslak Holloway Residence is within 200 feet to the Applicant's Structure, Vanessa Cieslak and Garland Kevin Holloway's interest will be affected more than others in the general public. The proposed additions will result in significant and irreparable reductions of airflow, openness, and quiet to the Cieslak-Holloway Residence. In conclusion, Vanessa Cieslak and Kevin Holloway respectfully request that the Board grant their request for party status in opposition. Thank you for your attention to this matter.

Vanessa Cieslak *Garland Kevin Holloway*

By: Vanessa Cieslak and Kevin Holloway