

May 25, 2026

Chairperson Blake and Members of the Board
Board of Zoning Adjustment
District of Columbia Office of Zoning
441 4th Street NW, Suite 200-S
Washington, DC 20001

Also submitted to:

Christien Boas Hayes, SMD 4C06 — 4C06@anc.dc.gov
Mike Warburton, ANC 4C Chairperson — 4C03@anc.dc.gov
Crystal Myers, DC Office of Planning — crystal.myers@dc.gov

Re: Written Testimony in Opposition to Special Exception Request — BZA Case No. 21430, 710 Taylor Street NW, Square 3134, Lot 0053

Dear Chairperson Blake and Members of the Board:

We are immediate neighbors directly affected by the Special Exception request currently before the Board for the property at 710 Taylor Street NW. We reside at 708 Taylor Street NW (east) and 712 Taylor Street NW (west) — the two properties most immediately impacted by the proposed rear addition. We submit this written testimony in strong opposition and respectfully urge the Board to deny the relief sought.

I. This Application Stacks Four Separate Special Exceptions on a Minimally Qualifying Lot

Before addressing each issue in turn, the Board should consider the cumulative nature of what is being requested. This application does not seek a single, narrow variance. It seeks four separate Special Exceptions simultaneously:

1. The 10-Foot Rule: A rear addition extending 29 feet 1 inch beyond the adjoining wall on the east and 21 feet 1 inch on the west — nearly three times the permitted 10-foot limit.
2. Architectural Elements: Alteration of original rooftop elements including the mansard roof and dormers, prohibited under Subtitle E-204.1 in the RF-1 zone.
3. Penthouse Stair: A penthouse structure exceeding the matter-of-right 35-foot height limit.
4. Unit Conversion: Conversion from a single-family home to three residential units. The maximum permitted by right in the RF-1 zone is two units. Three units requires a Special Exception — and the applicant's own statement acknowledges that the subject lot, at 2,725 square feet, clears the 2,700 square foot minimum threshold for this conversion by just 25 square feet.

Each of these requests is extraordinary on its own. Together, they represent a wholesale transformation of a modest two-story single-family rowhouse into a

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maximum-density three-unit development, extracting every possible concession from the zoning code on a narrow 19-foot-wide lot that barely qualifies for the conversion it is seeking. The Board should weigh the cumulative impact of this package, not each element in isolation.

II. The Proposed Rear Addition Vastly Exceeds the Permitted Limit

The maximum permitted distance beyond the rear wall of adjoining buildings in an RF-1 zone is 10 feet. The applicant's own Notes and Computations confirm that the proposed construction would extend 29 feet 1 inch beyond the adjoining rear wall on our side (708 Taylor Street NW) and 21 feet 1 inch on the other side (712 Taylor Street NW). The deviation is nearly 19 feet on the east — almost three times the permitted limit. On a lot only 19 feet wide, this addition would span the full width of the property for its entire depth. The applicant argues the rear addition will not be visible from the front street. But the zoning standard (E-5201.4(c)) also addresses views from the alley, and the side elevation drawings submitted by the applicant confirm that the three-story addition will tower visibly above everything around it when viewed from the public alley.

III. The Shadow Studies Understate the Harm

The applicant's prehearing submission asserts that the shadow impact "does not rise to the level of undue," citing the limited daily duration of shadowing and the presence of existing accessory buildings and foliage. We ask the Board to scrutinize these studies carefully.

First, the shadow studies compare the proposed addition to a by-right addition, not to current conditions. This baseline understates the true impact. The relevant comparison for neighboring property owners is between life as it is today and life as it would be under the proposal.

Second, even on the applicant's own terms, the studies show meaningful harm. At the Vernal Equinox (March 20) and Autumnal Equinox (September 23) — the primary outdoor seasons — the proposed addition casts additional shadow directly onto the yard at 712 Taylor Street NW at 9:00 AM. At the Winter Solstice, additional shadow falls at both 9:00 AM and 3:00 PM, significantly reducing available daylight in the season when it is already most limited.

Third, the shadow studies show only overhead plan-view shadow on yard surfaces. They do not address the impact on rear-facing windows and interior rooms, where residents depend on natural light throughout the year.

Fourth, the applicant's reliance on existing foliage as a mitigating factor cannot stand. Foliage is seasonal and impermanent. A three-story masonry wall is neither.

IV. Massing, Enclosure, and Privacy Are Additional Harms

Shadow impact, though real, is not the only concern. A three-story addition spanning the full width of a 19-foot lot and rising to nearly 40 feet would enclose adjacent yards,

eliminate sightlines, and permanently alter the spatial character of both neighboring properties in ways no shadow study can fully capture.

The applicant also claims that the absence of side windows on the rear addition protects neighbor privacy. But the proposed plans show rear decks at the second and third floor levels — elevated outdoor platforms that look directly down into the yards and rear-facing rooms of adjacent properties. Elevated decks are not the same as windows, and their omission from the privacy analysis is a significant gap in the applicant's submission.

V. The Project Is Incompatible with the Scale and Character of the Block

Taylor Street NW is a cohesive block of historic Victorian rowhouses with consistent setbacks, rear yard openness, and architectural character. The applicant argues that the proposed design avoids a discordant “pop-up” style addition. Yet the architectural renderings submitted with this application (Sheet 14) show a dark modern penthouse box rising prominently above the historic roofline — starkly at odds with the Victorian character of every neighboring property. The applicant's own drawings undercut their argument.

We also note that the applicant, 1365 Perry LLC, is a Virginia-based limited liability company seeking to convert a neighborhood rowhouse to a three-unit rental development. This is a commercial project, not an owner-occupant making reasonable improvements to a personal residence. The Special Exception standards require a showing that relief will not adversely affect neighboring properties. A four-part stack of extraordinary relief on a lot that barely meets the minimum threshold for the conversion it is seeking does not meet that standard.

VI. Our Request

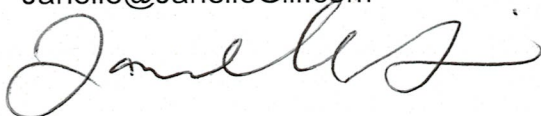
We respectfully ask the Board to deny the Special Exception request in its entirety, and in particular to deny the rear addition as proposed. If the Board is inclined to grant any relief, we ask that the rear addition be scaled back to conform with — or come substantially closer to — the 10-foot standard that exists to protect this and every neighboring property on the block.

We are prepared to appear and offer oral testimony at the hearing. We are also submitting this letter with signatures of additional neighbors on our block who share these concerns. Thank you for your careful consideration.

Respectfully submitted,

Janelle Gill

708 Taylor Street NW
Washington, DC 20011
Janelle@JanelleGill.com



Jeramias Lovos
712 Taylor Street NW
Washington, DC 20011

Additional Neighbor Signatures

We, the undersigned residents of the 700 block of Taylor Street NW, join in opposition to the Special Exception request for 710 Taylor Street NW (BZA Case No. 21430).

Name (print): JOSE J. LOVOS Signature: _____
Jeramias Lovos Address: 712 Taylor St., N.W DC. 20011

Name (print): MARISSA P. YEAKLEY Signature: _____
Marissa Yeakley Address: 716 Taylor St. NW 20011

Name (print): Charles Yeakley Signature: _____
Charles Yeakley Address: 716 Taylor St NW 20011

Name (print): Anna Purinton Signature: _____
Anna Purinton Address: 725 Taylor St. NW 20011

Name (print): David Hauger Signature: _____
David Hauger Address: 725 Taylor St NW 20011

Name (print): STEPHEN JONES Signature: _____
Stephen Jones Address: 714 TAYLOR ST NW 20011

Name (print): Dora Jones Signature: _____
Dora Jones Address: 714 Taylor St, NW 20011

Name (print): _____ Signature: _____
_____ Address: _____