3311 P Street NW

BZA Case 21483

Party in Opposition: "3311 P 200-footers"

Matthew Tyler (3309 P)

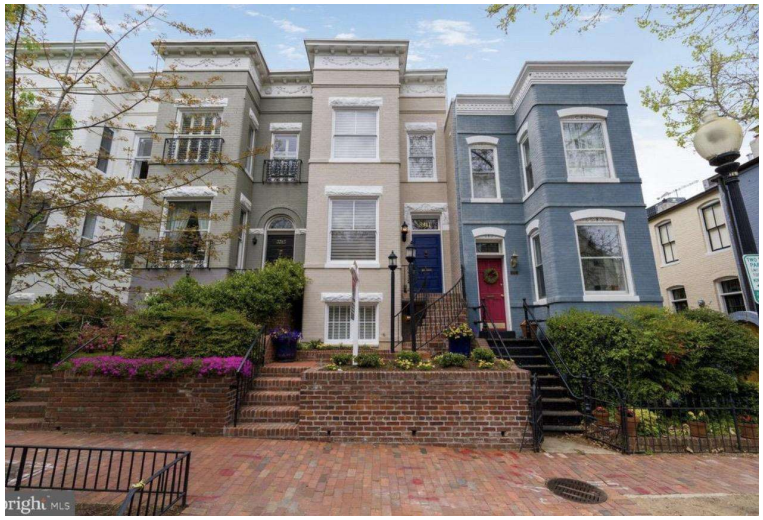
Elizabeth Evans (3313 P)

Grace Bateman (1508 33rd)

Gregory Doolan (1512 33rd)

Board of Zoning Adjustment
District of Columbia
CASE NO. 21483
EXHIBIT NO. 43

3311 P St. NW Setting





What makes this case unique?

1. Site located near the end of the block
   - Major impact on adjacent neighbors + four abutting properties

2. Grade change; properties to east are 5-10 ft lower
   - Addition towers up to 33ft above neighboring yards

3. Applicant already exceeds the 10 ft rule
   - Zoning relief would allow a total 26.9 ft projection, or 270% of the rule

<u>“Walling-in" of **four** neighboring properties</u>

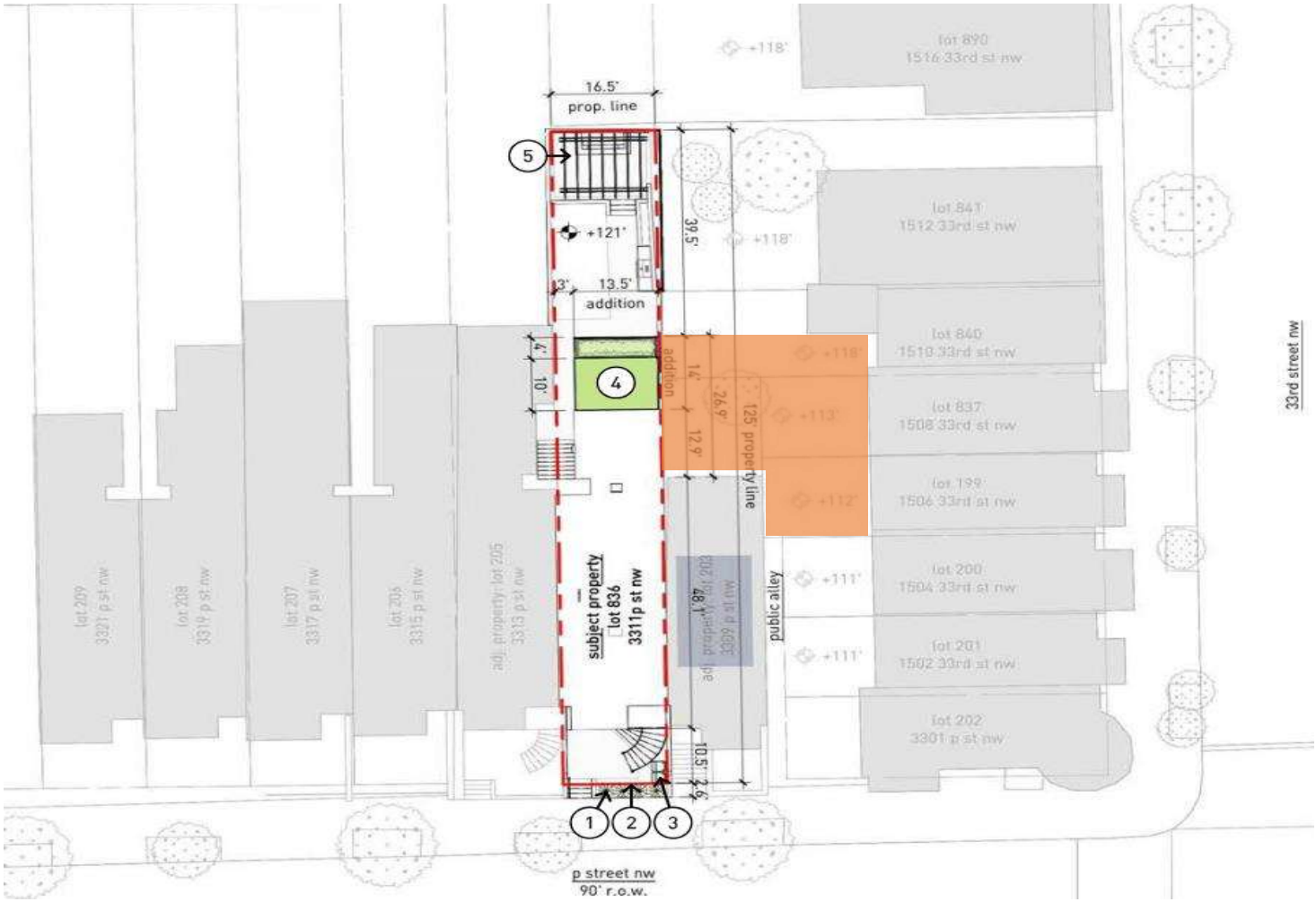

16.5'
prop. line
5
+121'
39.5'
13.5'
addition
3'
4'
10'
4
addition
14'
26.9'
12.9'
125' property line
subject property
lot 836
3311 p st nw
public alley
10.5'
2.6'
1
2
3
p street nw
90' r.o.w.
33rd street nw
lot 890
1516 33rd st nw
lot 841
1512 33rd st nw
lot 840
1510 33rd st nw
lot 837
1508 33rd st nw
lot 199
1506 33rd st nw
lot 200
1504 33rd st nw
lot 201
1502 33rd st nw
lot 202
3301 p st nw
lot 209
3321 p st nw
lot 208
3319 p st nw
lot 207
3317 p st nw
lot 205
3315 p st nw
adj. property: lot 205
3313 p st nw
+118'
+118'
+118'
+113'
+112'
+111'
+111'

Fig. 1

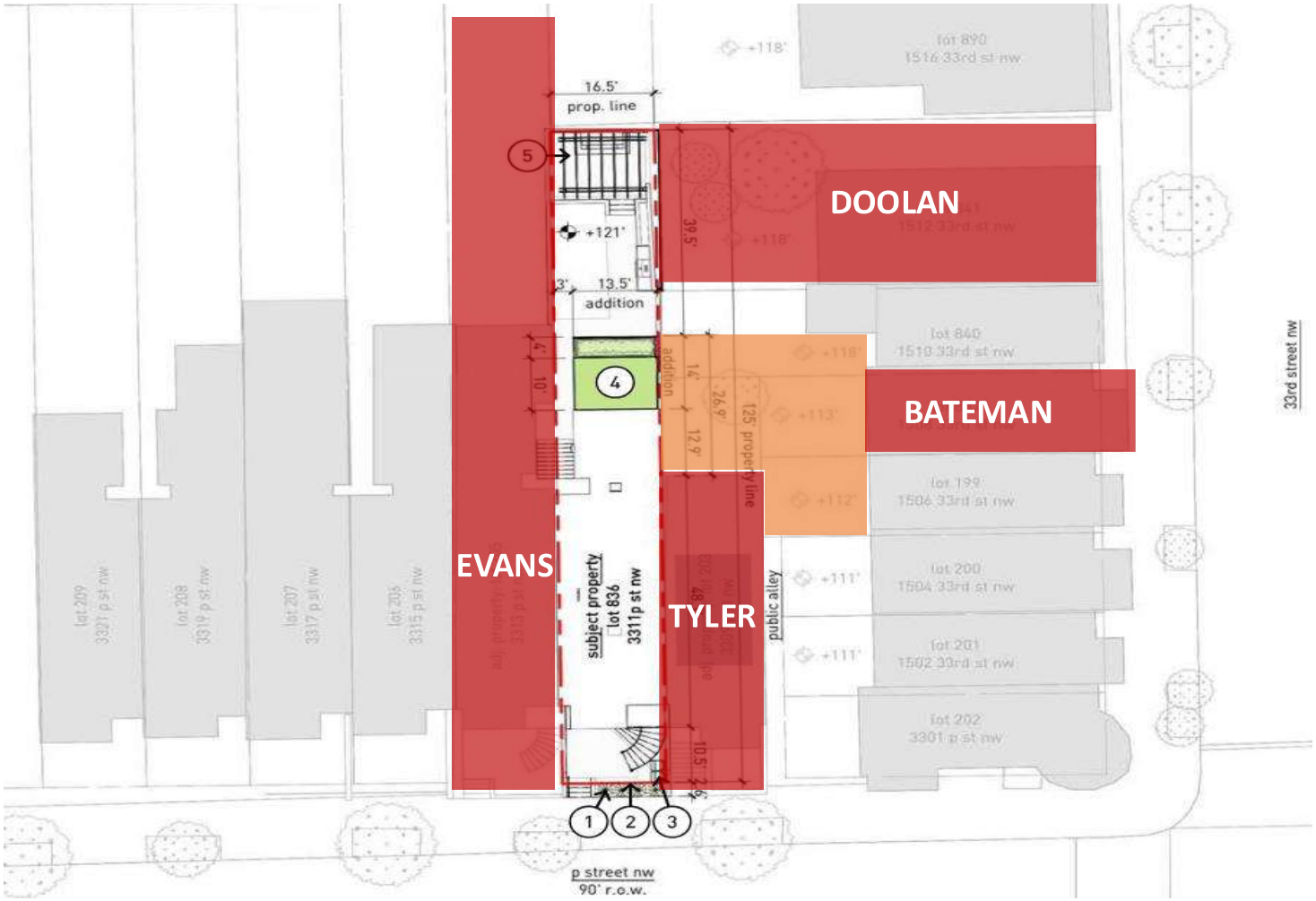

DOOLAN
BATEMAN
EVANS
TYLER
16.5'
prop. line
+121'
13.5'
addition
subject property
lot 836
3311p st nw
public alley
125' property line
lot 890
1516 33rd st nw
lot 840
1510 33rd st nw
lot 199
1506 33rd st nw
lot 200
1504 33rd st nw
lot 201
1502 33rd st nw
lot 202
3301 p st nw
33rd street nw
p street nw
90' r.o.w.

Fig. 2



Fig. 3

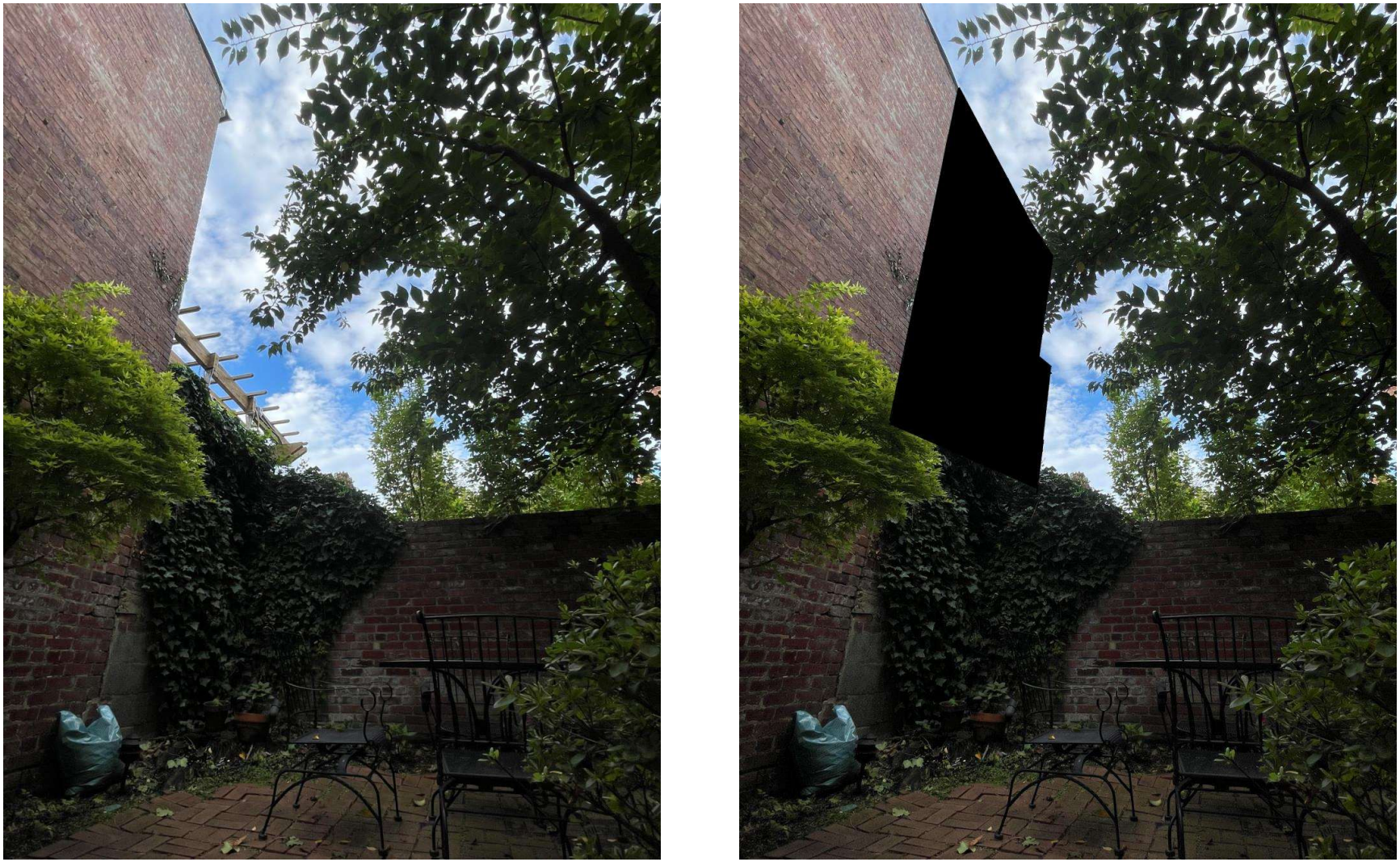


Fig. 4





Fig. 5

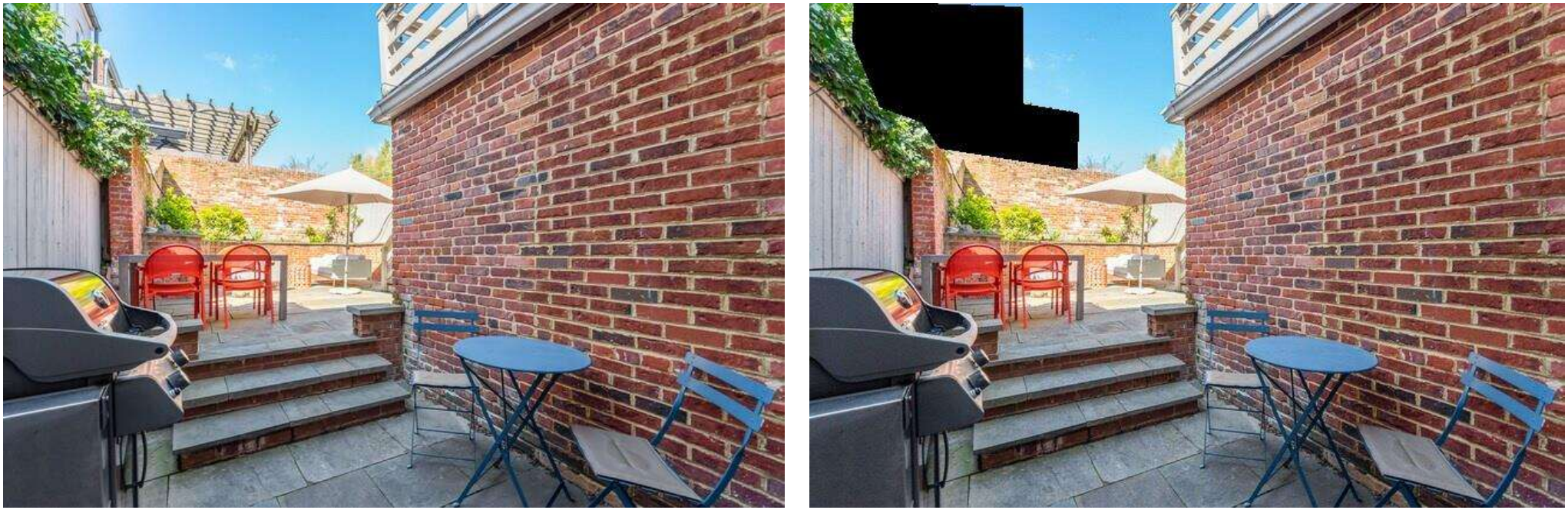


Fig. 6

Impact on neighbors' light

- Shade study shows little change in shadows because much of the area is already shaded by 3311 P
  - Reduction in ambient/indirect light will be significant
- "Walling-in" / "Canyon" effect will substantially impact light
- Addition will:
  - Shade the skylight at 3313 P
  - Block light at 3309 P St, 1508 33rd St, 1510 33rd St

Impact on neighbors' air

- Second floor of the addition will substantially block air flow from the west to neighboring & abutting homes

- Applicant has not presented any evidence to support its claim that the addition will not impact air flow to nearby properties

- OP has relied on the applicant's unsupported claim that the addition will not substantially impact air flow to nearby properties

Impact on neighbors' privacy

- The second-floor rear glass door (or any windows that replace it) will substantially impact privacy at neighboring & abutting properties

- OP has recognized the privacy impact of the door, but waved it away
  - Photos make the effect clear

Applicant has not met its burden

- Substantial impact on neighbors' light
  - Will block light from the west to four properties
  - Will shade skylight at 3313 P
- Substantial impact on neighbors' air flow
  - Walling-in of rear yard space at four properties
  - Blocking air flow from the west to 3309 P and to 1508 33rd
- Substantial impact on neighbors' privacy
  - 2nd floor glass doors look down directly into neighbors' gardens
- 3311 P is not entitled to a Special Exception

What are we seeking?

- Deny Special Exception
  - Unique site conditions (grade, end-of-block location, existing projection)
  - 2-story addition will substantially impact air, light, and privacy

- If Special Exception is granted, allow only **one-story** addition
  - Will mitigate most adverse impacts on neighboring properties
  - Will not deprive applicant of additional rooms; in the 2-story proposal, only room to be added is on the first floor