

Lyle M. Blanchard, Esq.
lmb@gdllaw.com

February 26, 2020

BY IZIS AND FIRST-CLASS MAIL

Mr. Frederick L. Hill
Chairperson
Board of Zoning Adjustment
One Judiciary Square
441 4th Street, N.W.
Suite 210 - South
Washington, D.C. 20001

Re: BZA Appeal No. 20221

Dear Chairperson Hill and Members of the Board:

In preparation for the March 18, 2020 public hearing in the above-referenced Appeal, the Appellant, the Chain Bridge Road/University Terrace Preservation Committee (“Preservation Committee”) submits the following additional information:

I. Assessment and Taxation Plat (“A&T Plat”): Attached is a more legible copy of the A&T Plat obtained from the official records of the Office of the Surveyor of the District of Columbia within the Department of Consumer and Regulatory Affairs. Exhibit A.

II. Witnesses: At the public hearing, the Preservation Committee will present the following witnesses and testimony:

- A. Representative of the Preservation Committee
 - 1. History and Role of Preservation Committee
 - 2. CBUT Overlay
 - 3. Impact of Proposed Seven Lot Development Plan on Overlay and Chain Bridge Road



Mr. Frederick L. Hill
February 26, 2020
Page 2 of 3

Exhibit B) B. Mr. Olutoye Bello, Expert Witness in Zoning (Expect Resume attached as

1. Lot Frontage Requirement
2. Lot Width Requirement
3. Irregularly-shaped Lots
4. Definition of Lot Width
5. Average Lot Width Calculation Required
6. Pipe Stem Lots Disfavored since 1980s
7. Special Exception for Theoretical Lots Required

Thank you for your assistance.

Sincerely,

GREENSTEIN DELORME & LUCHS, P.C.

By: 
Lyle M. Blanchard

Enclosures

cc: Esther Yong McGraw, Esq., DCRA
Hugh Green, Esq., DCRA
Mr. Matthew Le Grant, DCRA
Mr. Chuck Elkins, Chair, ANC 3D (chuck.elkins@anc.dc.gov)
Mr. Alan Karnofsky, ANC 3D05 (3D05@anc.dc.gov)
Meridith Moldenhauer, Esq., Cozen O'Connor, LLC

Mr. Frederick L. Hill
February 26, 2020
Page 3 of 3

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Pre-hearing Statement letter and its enclosures was filed electronically with the Office of Zoning and was served by electronic mail, this 26th day of February 2020, upon the following:

Mr. Matthew Le Grant
Zoning Administrator
Department of Consumer and Regulatory Affairs
1100 4th Street S.W.
5th Floor
Washington, D.C. 20024
matthew.legrant@dc.gov

Esther Yong McGraw, Esq.
General Counsel
Department of Consumer and Regulatory Affairs
1101 4th Street, S.W.
Room E-500
Washington, D.C. 20024
esther.mcgraw2@dc.gov

Hugh Green, Esq.
Assistant General Counsel
Department of Consumer and Regulatory Affairs
1101 4th Street, S.W.
Room E-500
Washington, D.C. 20024
hugh.green@dc.gov

Mr. Chuck Elkins, Chairperson
ANC 3D
chuck.elkins@anc.dc.gov

Mr. Alan Karnofsky
ANC 3D05
3D05@anc.dc.gov

Meridith H. Moldenhauer, Esq.
Cozen O'Connor
1200 19th Street, NW
Washington, D.C. 20036
mmoldenhauer@cozen.com



Lyle M. Blanchard

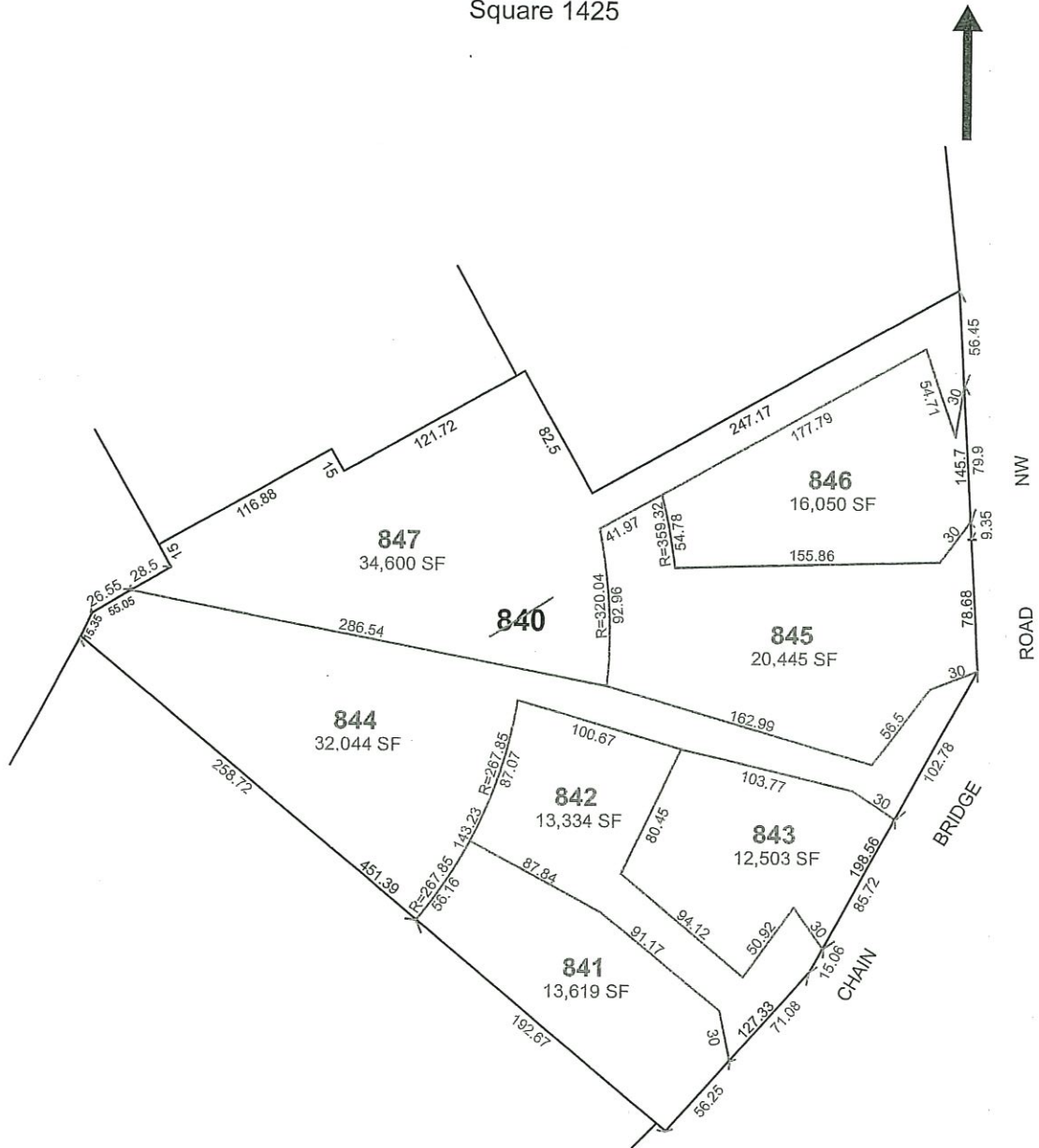
EXHIBIT A

OFFICE OF TAX AND REVENUE
ASSESSMENT DIVISION

3884-2



ASSESSMENT AND TAXATION PLAT
Square 1425



David Smith A073383 10-22-19
Draftsman Reference Date

Scale, 1 inch 80 ft.

The Office of Surveyor of the District of Columbia shall admit this plat to record under the provisions of Chapter 7 of Title 47, District of Columbia Code, Designation of Real Property for Assessment and Taxation, and for other purposes.

Thomas Smith 10/23/19
Chief Assessor, Office of Tax and Revenue

EXHIBIT B



Bello, Bello & Associates, LLC

2009 Saint Georges Way
Bowie Maryland 20721

Phone: 240-350-7199

E-mail: toyebello@bandbllc.com

Olutoye Bello

Experience

August 2005 to Date Bello, Bello & Associates LLC

Operating Manager/Principal

Manage day to day operations of Bello, Bello & Associates LLC, a zoning consulting and code compliance plans review and inspection third-party certified company.

Duties include new business development and provision of zoning compliance overview for all third-party code compliance review plans.

Coordinate third-party plans review disciplines in Structural, Electrical, Mechanical, plumbing, Fire and Life safety

Provide pre-design/development analysis for compliance with the District of Columbia Zoning Regulations.

October 2004 - May 2005 Department Of Consumer & Regulatory Affairs Washington, DC

Zoning Administrator

- Administered all facets of the program function of the zoning division.
- Primarily responsible for the interpretation and enforcement of the Zoning Regulations.
- Supervise the review of building permits and certificate of occupancy applications for compliance with zoning regulations.
- Preparation of analytical reports and referrals for hearing before the Board of Zoning Adjustments and the Zoning Commission relating to Text and Map amendments of the zoning regulations.
- Defend the decisions of the Zoning Administrator in public hearings before the Board of Zoning Adjustments.



Bello, Bello & Associates, LLC

April 2004 - October 2004 District of Columbia Office of Zoning
Washington, DC

Compliance Review Program Manager

- Provide advice to property owners, neighborhood associations, advisory neighborhood commissions and all stakeholders as to matters pertaining to the interpretation of the zoning regulations, policies, procedures, and rules of compliance with conditions of Board of Zoning Adjustment and Zoning Commission orders of approval.
- Investigation of complaints of non-compliance with such orders and the formulation of reports thereto.
- Recommend pertinent amendments to the zoning regulations to the Zoning Commission and advice the Board, in the course of the conduct of its public hearings involving applications and appeals, on technical issues of interpretation of relevant sections of the Zoning Regulations.

July 2002 - April 2004 District of Columbia Office of Zoning
Washington, DC

Compliance Review Specialist

- Provide advice to property owners, neighborhood associations, advisory neighborhood commissions and all stakeholders as to matters pertaining to the interpretation of the zoning regulations, policies, procedures, and rules of compliance with conditions of Board of Zoning Adjustment and Zoning Commission orders of approval.
- Investigation of complaints of non-compliance with such orders and the formulation of reports thereto.
- Recommend pertinent amendments to the Zoning Regulations to the Zoning Commission and advice the Board, in the course of the conduct of its public hearings involving applications and appeals, on technical issues of interpretation of relevant sections of the Zoning Regulations.



Bello, Bello & Associates, LLC

August 2001 - July 2002 Department of Consumer & Regulatory Affairs
Washington, DC

Acting Program Manager/Supervisory Engineering Technician

- Administered all facets of the program function of the zoning division.
- Primarily responsible for the interpretation and enforcement of the zoning regulations.
- Supervise the review of building permits and certificate of occupancy applications for compliance with zoning regulations.
- Preparation of analytical reports and referrals for hearing before the Board of Zoning Adjustments.
- Defend the decisions of the Zoning Administrator in public hearings before the Board of Zoning Adjustments.
- Attend neighborhood meetings to provide interpretative zoning information and answer enquiries about zoning related issues.

May 1990 - August 2001.

Chief, Zoning Review Branch/Supervisory Engineering Technician.

- Supervise zoning review branch staff in discharge of duty of interpreting and enforcement the zoning regulations.
- Supervise the review of building permits and certificate of occupancy applications for compliance with zoning regulations.
- Answer public inquiries, written and oral, about the interpretation and enforcement of the zoning regulations.
- Liaise with governmental agencies and departments to ensure government projects compliance with the zoning regulations and advise on related matters.

1984-1990 American Interior Builders, Inc. Lanham, MD

Project Manager

Oversight responsibilities for construction projects, including permitting, plan review, cost estimation and project management.



Bello, Bello & Associates, LLC

Education

1984-1985
Masters of Urban & Regional Planning Program
University of the District of Columbia
30 Hours Credit (incomplete).

1979-1982
Bachelor of Science (BSc)
Urban and Regional Planning and Community Development
University of the District of Columbia

1978-1979
City Planning & Urban Geography
Kent State University, Kent Ohio

Professional Training

BOCA - Structural Plan Review 1996 Seminar

MSS - Management Training Series (District of Columbia Government)

Certificate in International Housing Finance
The Wharton Real Estate Center
University of Pennsylvania

Certificate in Workshop on Securitization
The Wharton Real Estate Center
University of Pennsylvania

Papers:

1. A comparative analysis of two Metro Rail Stations. The University of the District of Columbia and The Virginia Square Station.
November 4, 1985
2. The Impact of Federal Grant-in-Aid Programs on Local Planning Practice and Policy
Fall 1985