

March 12, 2021

Via JZIS

Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210S
Washington, DC 20001

Re: 2nd Prehearing Submission - BZA Case No. 20412 – 1515 Wisconsin Avenue, NW

Dear Members of the Board:

On behalf of the Applicant, please find enclosed updated plans and two shadow studies: (i) showing the difference in shadow between the existing and proposed Building and (ii) showing the difference in shadow between a matter of right (“MOR”) project at 60% lot occupancy compared to the proposed Project. The items are being revised or submitted for the following reasons:

1. **Updated Plans:** The Applicant attended the Old Georgetown Board (“OGB”) meeting on March 4, 2021 where they received feedback to lower the height of the proposed Addition. In response to this feedback, the Applicant has revised the plans to lower the height of the proposed Addition an additional eighteen inches (18 in.). This update has no impact on the zoning data stated in Form 135 (Exhibit 28) or the previously submitted Surveyor’s Plat (Exhibit 27). The ANC has already reviewed and voted to support the previous proposed plans which had the Addition at a greater height. OGB continues to conceptually approve the Project.
2. **Shadow Study (Existing vs. Proposed):** As demonstrated by the shadow study between the existing and proposed Building, while there is some additional shadow from the proposed Addition, it does not rise to the level of undue. During the Summer and Spring/Fall Equinox, the additional shadow is primarily limited to 3 PM and to the Subject Property’s own rear yard. During the Winter, there is some additional shadow at 10 AM, 12 PM, and 3 PM, but it does not rise to the level of undue.
3. **Shadow Study (MOR vs. Proposed):** As demonstrated by this shadow study, a matter of right project at sixty percent (60%) lot occupancy and fifty feet (50 ft.) in height would have a much greater impact to the light and air available to the neighboring properties than the proposed Project.

Respectfully Submitted,

Martin P Sullivan

Martin P. Sullivan, Esq.
Sullivan & Barros, LLP

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2021, an electronic copy of this Prehearing Submission was served on the following on behalf of the Applicant, 1515 Wisconsin Avenue LLC.

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