

September 12, 2022

Via JZIS

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

Re: Prehearing Submission - BZA Case No. 20733 – 733 Euclid Street, NW

Dear Chairperson Hill and Members of the Board:

On behalf of the Applicant in the above-referenced case, revised plans and new shadow studies are being submitted to the record. The Applicant is also providing additional information regarding neighbor outreach.

No changes were made to the plans or design—the updated plans have two new sheets showing the relationship between the neighboring building at 727 Euclid and the proposed project at the subject Property. The Applicant has met with the condo owners of the 727 and 725 Euclid properties to discuss the project and answer questions. The primary concerns from those neighbors are related to construction and materials on the side facing their property. The Applicant is committed to working with the neighbors for the siding and materials.

The 727 and 725 buildings are quite deep and will continue to be further back than even the proposed east addition. With respect to the height relief, the adjacent building at 727 will continue to be taller than the subject building and additions. This is because the subject Building's building height measuring point is at a lower grade, resulting in what is technically an extra story and additional 1.5 feet of height, even though it is lower than adjacent buildings. This is because the adjacent buildings (727 and 725) were constructed before the zoning regulations concerning grade manipulation were enacted and as brand-new buildings. Whereas the Applicant has the only landmarked building in the area and must maintain the existing number of stories and height, including the existing BHMP. The added pages show the relationship more accurately and clearly demonstrate that the proposal will not have any adverse effects on the use of neighboring property, nor impacts on light, air, or privacy, given the relationship between the respective buildings.

With respect to the property on the other side, at 737, that owner signed a letter of support

which is in the file in Exhibit 18. The Applicant has kept that owner apprised of the changes from the original project, which also included the same 10-foot rule relief and the owner continues to support the project. Moreover, the shadow studies clearly demonstrate that there is extremely limited impact on the light and air available to the neighboring properties. This is due to the orientation of the properties. The shadow studies show that the shade difference between a west-wing at only 10 feet past the neighboring property and the proposed west-wing at 42 feet past, is limited to only a very small portion of the rear yard of 737 Euclid, and only at 9am during the summer, fall, and spring. The shadow is gone by 12pm. Accordingly, the shadow studies demonstrate that the proposed relief from the 10 ft. rule and from the 1.5 ft. of height relief will have no undue impact on the light and air available to the adjoining property to the west.

Respectfully Submitted,

Alexandra Wilson

Alexandra Wilson, Esq.
Sullivan & Barros, LLP

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2022, an electronic copy of this submission was served to the following:

D.C. Office of Planning
Stephen Mordfin
stephen.mordfin@dc.gov

Advisory Neighborhood Commission 1B

James A. Turner, Chairperson
1B09@anc.dc.gov

Muhsin Boe Umar, SMD
1B03@anc.dc.gov

ZPD Committee
zpd@anc1b.org

Respectfully Submitted,

Sarah Harkcom
Sarah Harkcom, Case Manager
Sullivan & Barros, LLP