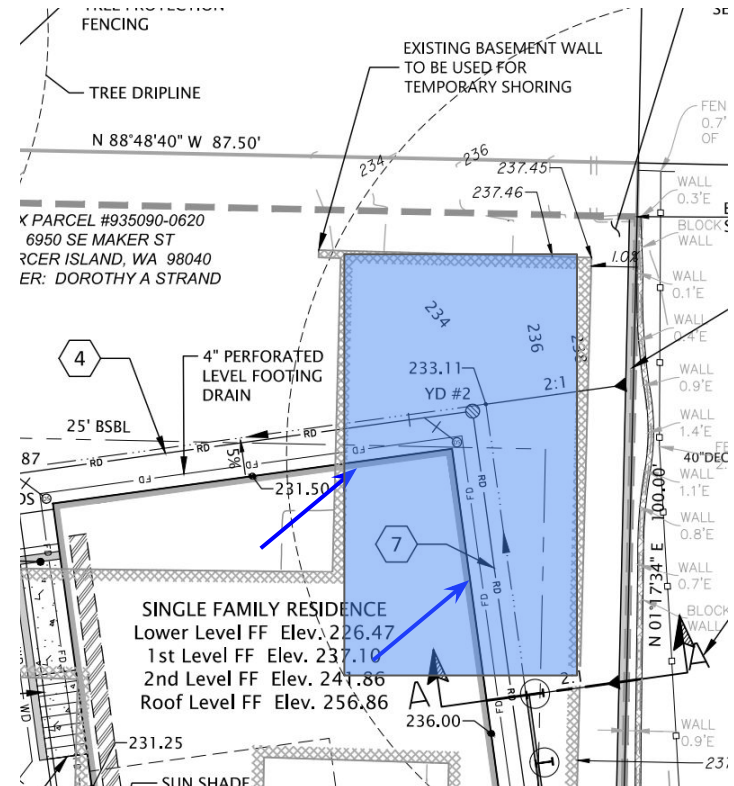


# Determining “Existing Grade Underlying the Existing Structure” per 12-04 Conclusion 1

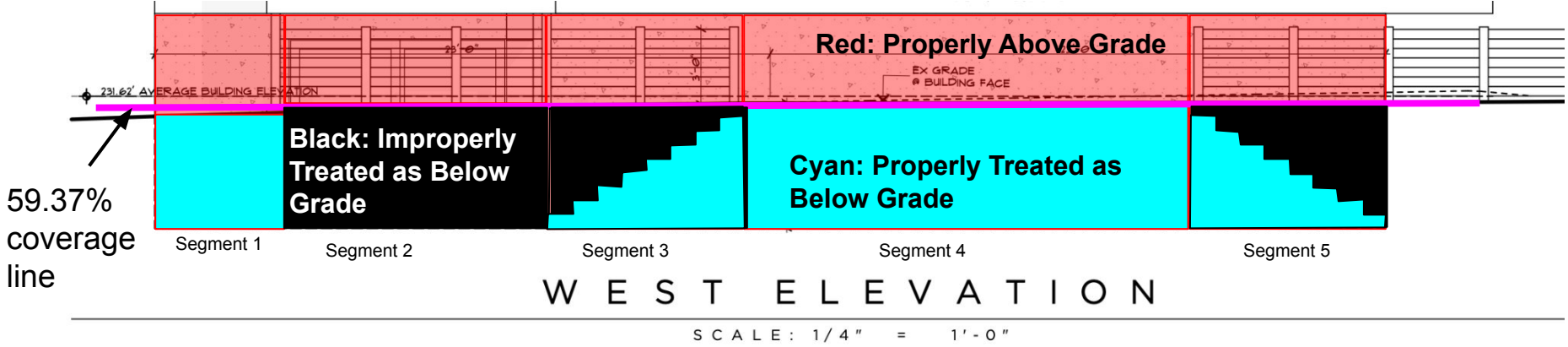
- 12-04: “existing grade underlying the existing structure will be used as the **elevation** for the proposed development...”
- Merriam-Webster “underlying”:
  - “lying beneath or below”
  - example: the *underlying* rock is shale
- Thus, elevation to be used is the existing grade underlying the blue portion of the existing structure: approximately 228’.

Drawing is an overlay of Exh. 2007 p. C-2.  
Blue area dimensions approximated due to incomplete record.



# Applicant Uses a Midpoint Finished Grade Elevation Rather Than Properly Following Statutory Requirements to Compute WSC

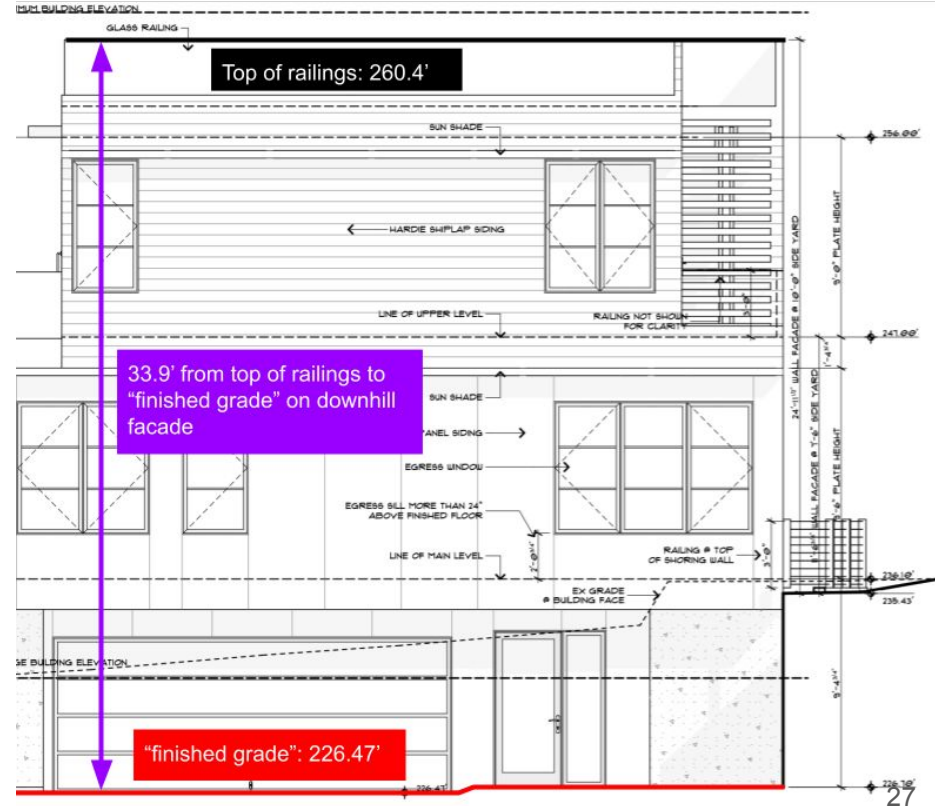
- MICC 19.B: “WALL SEGMENT COVERAGE is the portion of an exterior wall below existing or finished grade, whichever is lower. It is expressed as a percentage”
  - “In other cases where the existing or finished grade contours are complex, an averaging system shall be used.”



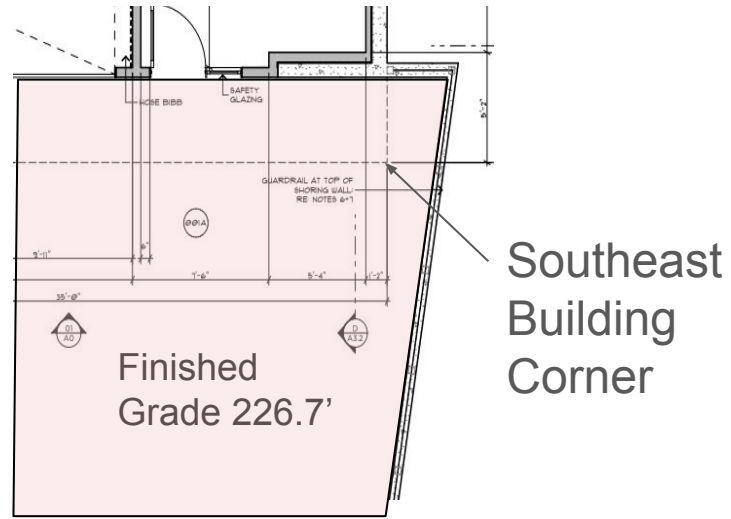
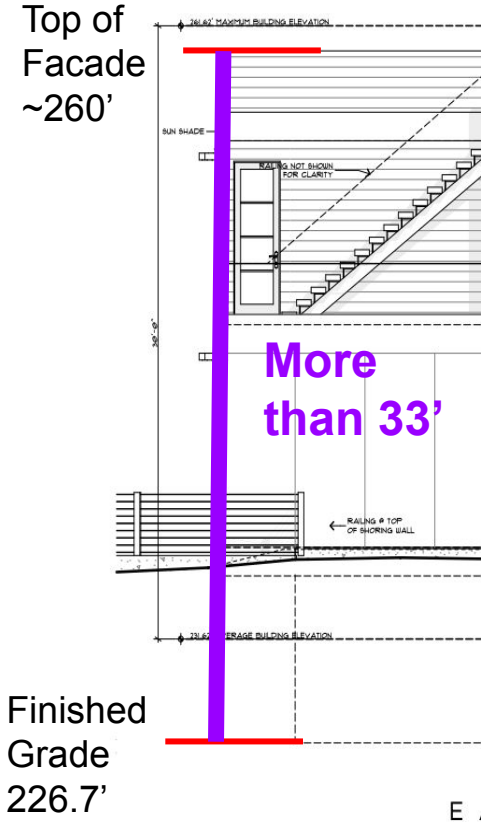
# Rooftop railings on the southern facade violate the 30' limit

1. The southern side of the house is the “furthest downhill extent of the proposed building”.
2. The rooftop railings attached to the southern exterior wall are part of the southern facade.
3. The distance from the finished grade to the rooftop railings is 33.9', which exceeds the 30' limit.

Derived from Exhibit 2007, p A3.1



# Facade at the Southeast corner of the building is 33' high



Source: Exh 2007, p A2.0, A3.1