

May 23, 2022

Via JZIS

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

Re: Response to Party Opponent - BZA Case No. 20380 – 4457-4459 MacArthur Blvd., NW

Dear Chairperson Hill and Members of the Board:

It is not apparent that the record remained open for the party opponent's request to the Board to include their requested conditions. However, since the request was made, the Applicant is compelled to respond. The requested conditions relate specifically to the use of the easement, which is not directly before the Board. Furthermore, the contemplated increase in the use of the easement is minimal, while the conditions demanded by the party opponent would be burdensome, and, in our opinion, would have no effect on the criteria under which the Board evaluates the Application. The Applicant will continue to work with the party opponent to resolve easement concerns between the parties, but respectfully requests that the Board not adopt the party opponent's suggested conditions in any approval.

Respectfully Submitted,

Martin P Sullivan

Martin P. Sullivan, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2022, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

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