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January 11, 2022

VIA IZIS

Board of Zoning Adjustment
of the District of Columbia
441 4th Street, NW, Suite 210S
Washington, DC 20001

**Re: BZA Case No. 20593 – Applicant’s Supplemental Prehearing Submission
Continued Recreational Playing Field Use
3637 Patterson Street, NW (Square 1863, Lots 824, 825, and 826)**

Dear Members of the Board:

On behalf of Archdiocese of Washington and the Shrine of the Most Blessed Sacrament (the “Applicant”), we hereby submit this Supplemental Prehearing Submission. Please find the following materials enclosed:

- the Applicant’s updated PowerPoint presentation (**Tab A**);
- the Applicant’s proposed revisions to the conditions of BZA Order No. 18236 (**Tab B**); and
- the Applicant’s updated site plan, which supersedes that site plan included in the case record at **Ex. 6 (Tab C)**.

The Applicant respectfully requests that the Board exercise its waiver authority pursuant to Subtitle Y § 101.9 of the Zoning Regulations to accept this filing less than twenty-one days prior to the public hearing on this application. This provision states, in relevant part, that “the Board may, for good cause shown, waive any provisions of [Subtitle Y] if, in the judgement of the Board, the waiver will not prejudice the rights of any party and is not otherwise prohibited by law.”

The materials filed with this Supplemental Prehearing Submission are provided in response to the written testimony provided by Clay and Edna Wellborn, both of whom are seeking opponent party status. *See* Ex. 23 – 23C, Ex. 30. Accordingly there is good cause for the Board to waive the time limitation for supplemental filings in Subtitle Y § 300.15, as the Applicant has updated its application to address the issues and concerns raised by the Wellborns. Thus, the waiver will not prejudice the rights of any party in support or opposition to the application.

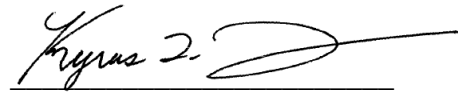
Board of Zoning Adjustment
District of Columbia
CASE NO.20593
EXHIBIT NO.39

We look forward to the Board's consideration of this application at the public hearing scheduled for Wednesday, January 12, 2022. Should you have any questions, please do not hesitate to have staff contact us.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By:



Kyrus L. Freeman
Christopher S. Cohen

Encl.

cc: Certificate of Service
Jonathan D. Rogers (w/ encl.; via e-mail)

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2022, a copy of the foregoing Supplemental Prehearing Submission in support of BZA Application No. 20593 as served by electronic mail on the following at the addresses stated below.

D.C. Office of Planning VIA EMAIL
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