

# SULLIVAN & BARROS, LLP

Real Estate | Zoning | Land Use | Litigation

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August 12, 2024

**Via IZIS**

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

**Re: Applicant's Response to the Party Status Request - BZA Case No. 21101 – 245 Peabody Street, NW**

Dear Chairperson Hill and Members of the Board:

The Applicant in the above-referenced case is submitting this in opposition to the party status request by Ms. Anderson. The party status requestee does not meet the criteria for approval and the request is not timely given that the original hearing was scheduled for July 24, 2024. The complaints are related to general fire safety and therefore the requestor is not more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than those of other persons in the general public. The Applicant would also like to correct the assertion that there is another Child Development Center within 600 feet. Based on a review, the next closest one is approximately 1,200 feet.

Respectfully Submitted,

*Alexandra Wilson*

Alexandra Wilson  
Sullivan & Barros, LLP

Board of Zoning Adjustment

District of Columbia

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EXHIBIT NO.23

**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2024, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

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