

September 30, 2025

Via IZIS

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

Re: Applicants Response to the Postponement Request from Peter Courtois - BZA Case No. 21326

Dear Chairperson Hill and Members of the Board:

While the Applicant is willing to agree to a short postponement of one to two weeks, a delay of several months would be unfair and disproportionate to the small and straightforward changes recently made. These changes arose out of late-breaking negotiations with the only neighbor for whom 10-foot rule relief is required.

The most recent revisions consist only of reductions in massing, which directly benefit Mr. Courtois. They were made specifically in response to discussions with Ms. Collen on the other side. At one point, discussions with Mr. Courtois waned because his position was that we should simply pursue a matter-of-right addition. That was not acceptable, but contrary to his claim, outreach has not been limited. In fact, there has been continuous communication with Mr. Courtois over many months, including:

- May 24, 2025 – In-person visit to the Applicant’s home to discuss plans.
- June 2, 2025 – Applicant emailed the initial plan to Mr. Courtois.
- June 16 & 17, 2025 – Further communication by email.
- June 26, 2025 – Zoom call with the project architect and Applicant, joined by Mr. Courtois and Mr. Huffman.
- July 1, 2025 – Phone call with Mr. Courtois before the first scheduled ANC meeting.
- August 11, 2025 – Revision plans sent to Mr. Courtois.
- August 28 & 29, 2025 – Additional correspondence by email.
- September 5, 2025 – Phone call to discuss the latest plan.

This record of communication makes clear that Mr. Courtois has been given every opportunity to review and discuss the project. The changes now at issue are limited reductions in size and massing, which do not require weeks of further study.

Respectfully Submitted,

Martin P Sullivan

Martin P. Sullivan, Esq.
Sullivan & Barros, LLP

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2025, an electronic copy of this submission was served to the following:

D.C. Office of Planning
Joshua Mitchum
joshua.mitchum@dc.gov

Advisory Neighborhood Commission 2E

ANC Office
2E@anc.dc.gov

Gwendolyn Lohse, Chairperson
2E06@anc.dc.gov

Kishan Putta, SMD
2E01@anc.dc.gov

Advisory Neighborhood Commission 3B (across the street)

ANC Office
3B@anc.dc.gov

Brian Turmail, Chairperson & SMD
3B02@anc.dc.gov

Party Opponents
Amy Collen, represented by Andrea Ferster, Esq.
amycollen@gmail.com
andreaferster@gmail.com

Peter N. Courtois
peterncourtois@gmail.com

Robert Winthrop Huffman
winhuffman@gmail.com

Respectfully Submitted,

Sarah Harkcom

Sarah Harkcom, Case Manager
Sullivan & Barros, LLP