



BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT FOR THE DISTRICT OF COLUMBIA



FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD

THIS FORM IS FOR NON-PARTIES ONLY. IF YOU ARE A PARTY, PLEASE FILE A FORM 150 – MOTION.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.: 21333

I, Lyle Blanchard on behalf of Frank Snellings hereby request the following relief:

☒ Accept an untimely filing of Photos and Plans Exhibits

☐ To reopen the record to accept _____

Points and Authorities:

Accept an untimely filing: Please state each and every reason you believe the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your request to accept an untimely filing, including relevant references to the Zoning Regulations or Map. If you require more space, please use a separate piece of paper.

Reopen the Record: Please state each and every reason you believe the ZC or BZA should grant your request to reopen the record, including relevant references to the Zoning Regulations or Map. **The document(s) that you are requesting the record to be reopened for must be submitted separately from this form (see instructions). No substantive information is to be included on this form.**

The photos and illustrated plans are intended to supplement the Party Status
filing made on 8/26/25.

I/We certify that the above information is true and correct to the best of my/our knowledge, information and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of not more than \$1,000 or 180 days imprisonment or both. (D.C. Official Code § 22-2405)

Date: September 9, 2025

Signature:

Name: Lyle Blanchard, Esq.

Address: 801 17th Street, NW, Suite 1000, Washington, DC 20006

Phone No(s): (202) 452-1400

E-Mail: lmb@gdlaw.com

Board of Zoning Adjustment
District of Columbia
CASE NO. 21333
EXHIBIT NO. 34

ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THE BACK OF THIS FORM WILL NOT BE ACCEPTED.









Extent of
"overage"

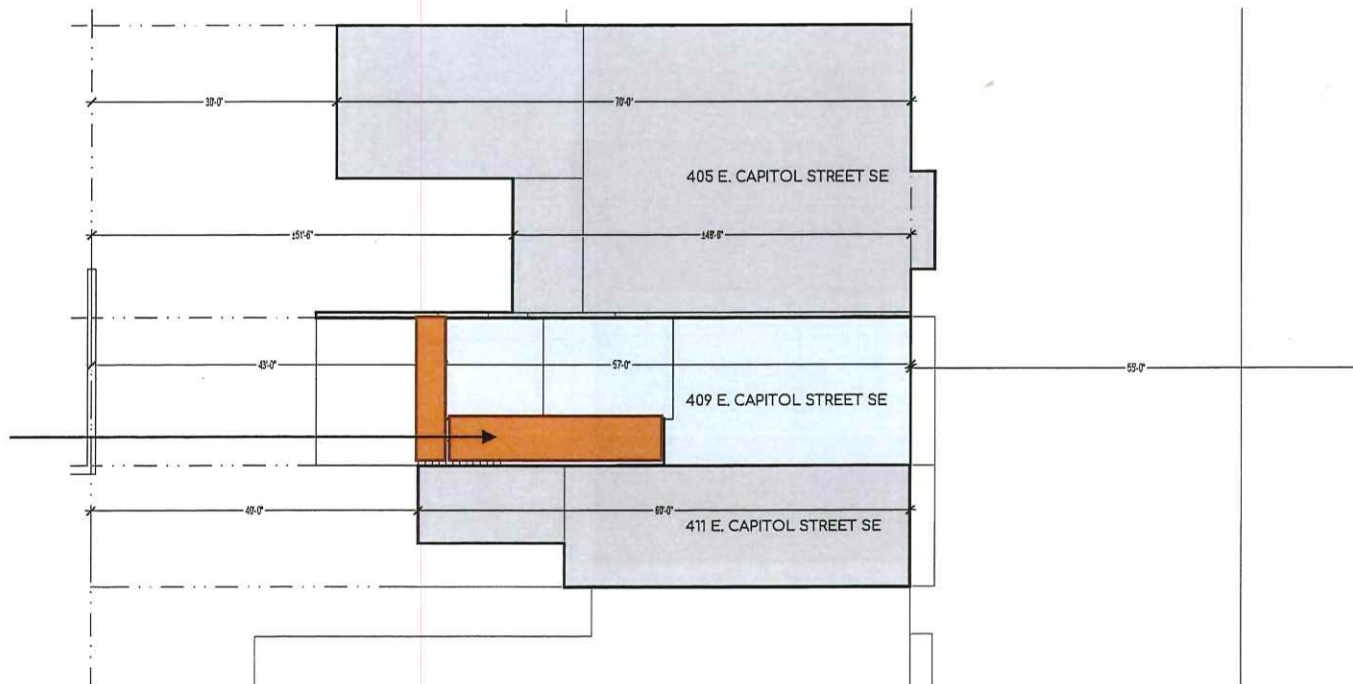


6 May 2025

$$\frac{3}{32}'' = 1'-0''$$

What does 60% vs 70% look like?

What
could be
built “by-
right”



409 E Capitol Street SE

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SITE PLAN - EXISTING
SCALE: 3/32" = 1'-0"

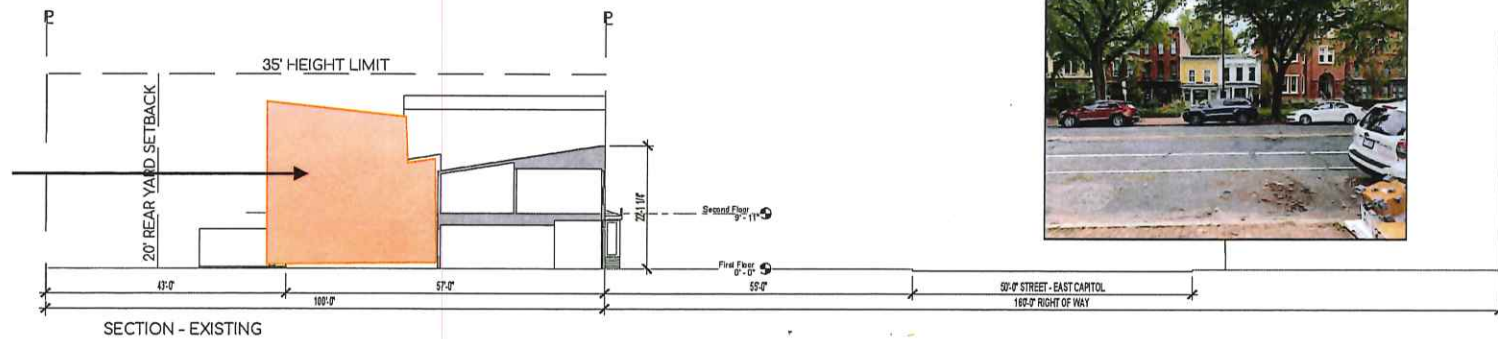


nth°
architecture + interiors

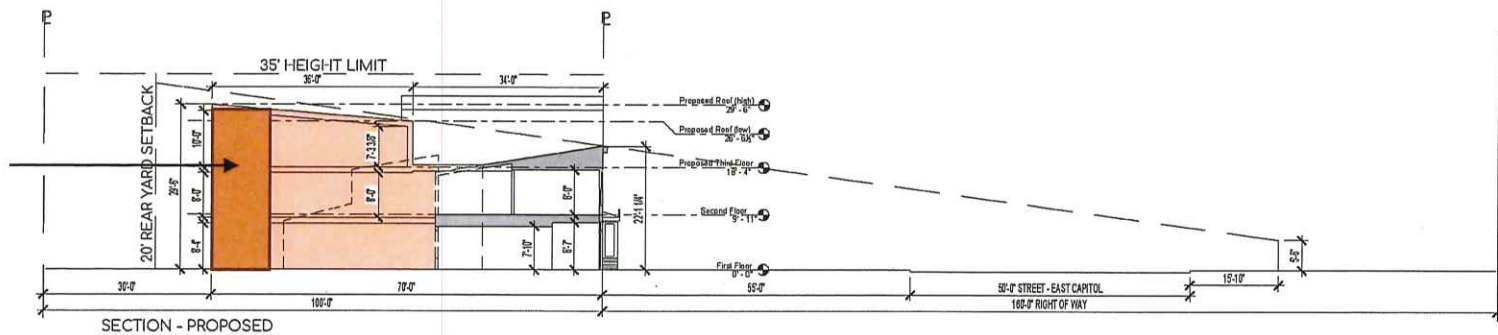
6 May 2025

What does 60% vs 70% look like?

How much
could be
built “by-
right”



Extent of
"overage"



409 E Capitol Street SE

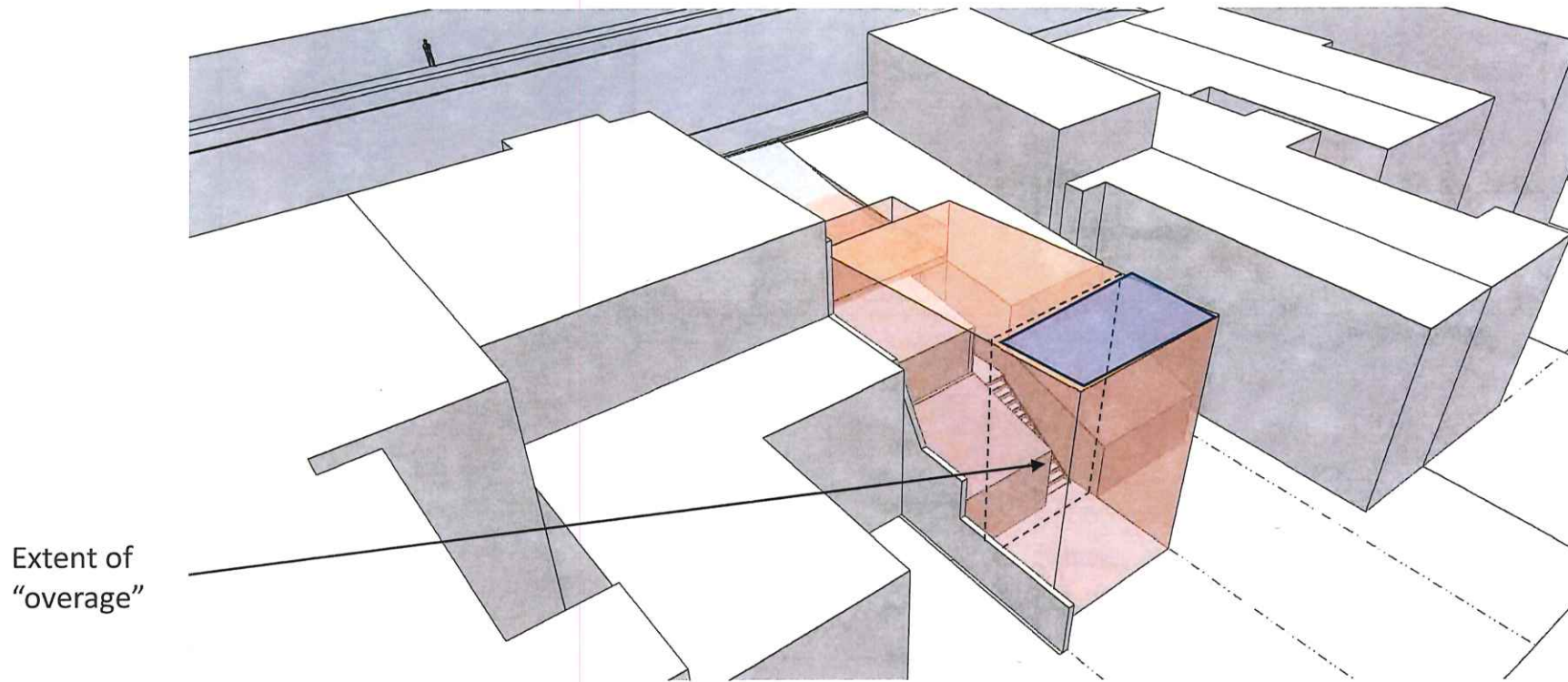
SECTION THROUGH SITE

$$\frac{1}{16''} = 1'-0''$$

nth^o
architecture + interiors

2 July 2025

What does 60% vs 70% look like?



409 E Capitol Street SE

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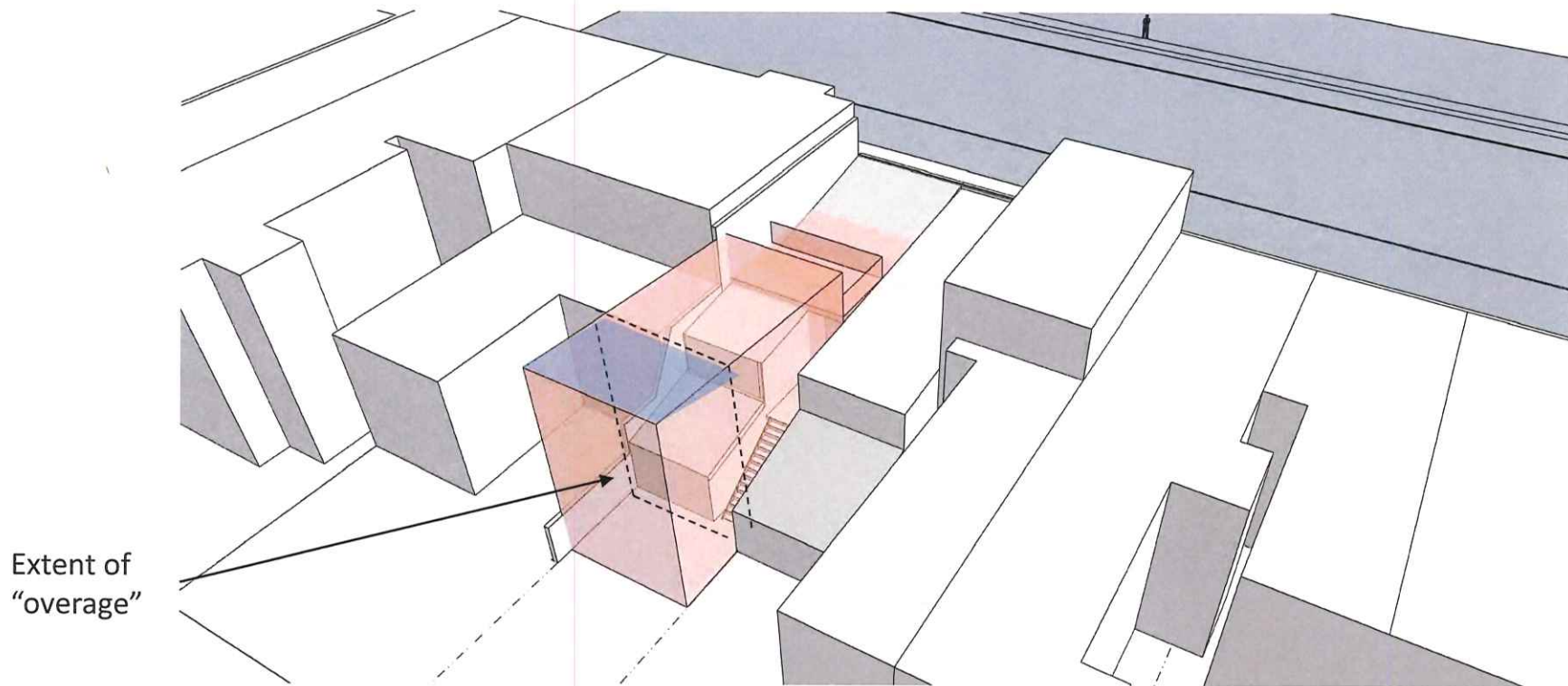
PROPOSED ADDITION + MASSING

BIRDSEYE VIEW AT REAR

nth°
architecture + interiors

16 April 2025

What does 60% vs 70% look like?



409 E Capitol Street SE

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PROPOSED ADDITION + MASSING

BIRDSEYE VIEW AT REAR

nth°
architecture + interiors

16 April 2025

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Form 153 Request to Accept Untimely Filing and Party in Opposition's Exhibits was served this 9th day of September, 2025, by email:

ANC 6B, its Chairperson, Edward Ryder, and also to:
Commissioner Gerald Sroufe, ANC 6B02

6B@anc.dc.gov

6B08@anc.dc.gov

6B02@anc.dc.gov

Office of Planning
1100 4th Street, SW
Washington, DC 20024

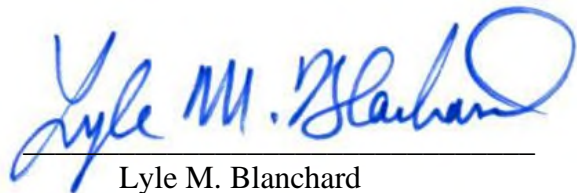
Planning@dc.gov

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c/o Martin Sullivan, Esq.
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Advisory Neighborhood Commission 6C (across the street)

ANC Office
6C@anc.dc.gov

Karen Wirt, Chairperson & SMD
6C02@anc.dc.gov



Lyle M. Blanchard