

October 30, 2025

Via JZIS

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

Re: Prehearing Submission - BZA Case No. 21373 – 438 Park Road, NW

Dear Chairperson Hill and Members of the Board:

On behalf of the Applicant in the above-referenced case, updated architectural plans, shadow studies, a community update, and additional photographs of the block illustrating the project's appearance are being submitted to the record. The proposed building mirrors the building located next-door, at 436 Park; therefore, the Applicant is providing additional photos to demonstrate that the proposed plans for the subject property will not substantially alter the character, scale, and pattern of houses along the row if approved.

With respect to the plan updates, there are only minor changes and the requests for relief remain the same. After review, the Applicant has reduced the proposed number of second-story windows from 4 to 3 in order to match the adjacent property (436 Park). The location of the trash has been moved to the front based on discussions with the ANC who agreed it was a more practical location as trash is removed from the front given the alley width.

The submitted shadow studies demonstrate that the proposed addition results in only minimal additional shadow relative to both the existing condition and a by-right 10-foot addition. The requested 10-foot relief pertains only to the adjoining property at 440 Park Road. Even with the proposed 19-foot rear addition, the incremental increase in shadow does not rise to the level of undue. There is no additional shadow impact during the winter solstice. During the summer and fall/spring equinoxes, the incremental shadow is limited to the early morning hours and dissipates by approximately 12:00 PM during the fall and spring equinox, and by 1:00 PM in the summer. These studies are conservative, as they do not account for existing foliage and accessory structures on the adjacent property that further mitigate shadow impacts.

In summary, the proposed addition maintains architectural consistency and visual cohesion

with adjacent structures, replaces a nonconforming front addition with an improved design, and results in no undue impact to light, air, or privacy of neighboring properties.

Respectfully Submitted,

Alexandra Wilson

Alexandra Wilson
Sullivan & Barros, LLP

CERTIFICATE OF SERVICE

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

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Respectfully Submitted,

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