

# SULLIVAN & BARROS, LLP

Real Estate | Zoning | Land Use | Litigation

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**Via IZIS**

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

**Re: Prehearing Submission - BZA Case No. 21392 – 1610 32nd Street, NW**

Dear Chairperson Hill and Members of the Board:

On behalf of the Applicant in the above-referenced case, a revised plat and revised plans are being submitted to the record. The overall design has not changed; however, these revisions clarify several of the questions raised and now include a shadow study as well as a breakdown of lot occupancy by floor level: lower level at 64.81%, main level at 58.4%, and upper level at 40.68%. The relief requested pertains only to lot occupancy on the lowest level, and to rear yard setback relief for the terrace landing and a small portion of the second-story addition on the south side of the property. In addition, the Applicant is filing an updated self-certification to more accurately reflect the lot occupancy and rear yard relief being requested.

As demonstrated in the shadow study, the proposed project results in minimal light and air impacts on the neighboring property to the north, and any such impact arises only from the open landing impacting the lot occupancy relief on the lowest level. The proposed main level building addition does not require lot occupancy relief and, in fact, improves the existing privacy conditions by replacing open viewing space with enclosed building area.

Also included in this submission are photographs showing the current and prospective views of the neighbor's property from the Applicant's property. These demonstrate that the matter-of-right addition at the main level will improve privacy over the existing condition. Aside from these photographs, the location of the additional lot occupancy does not affect the Applicant's ability to view the neighbor's property or vice versa. Therefore, the modest 4.8% increase in lot occupancy does not unduly compromise privacy.

Respectfully Submitted,

*Martin P Sullivan*

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Board of Zoning Adjustment  
District of Columbia

**CERTIFICATE OF SERVICE**

I hereby certify that on December 11, 2025, an electronic copy of this submission was served to the following:

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