

April 6, 2026

**Via JZIS**

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

**Re: Prehearing Submission - BZA Case No. 21430 – 710 Taylor Street, NW**

Dear Chairperson Blake and Members of the Board:

On behalf of the Applicant in the above-referenced case, we are submitting an updated plat, revised plans, and additional photographs to the record. The plans now include shadow studies demonstrating that the impact of the proposed Addition, as compared to a by-right addition, does not rise to the level of undue. This is supported by the depth of the rear yards, the limited duration of any shadowing (affecting each adjacent property for only a few hours), as well as the presence of existing adjoining accessory buildings and foliage.

As requested by the Office of Planning, the Applicant provides additional information regarding the request for relief for the penthouse stair. While a penthouse stair is permitted by right if it complies with the building height limit, the Applicant seeks relief pursuant to Subtitle C §1501.1(c), which allows penthouse space partially above the matter-of-right height if approved by the Board as a special exception.

The penthouse stair is compact, designed to minimize visibility from public spaces and neighboring properties, and preserves the architectural character of the building. Its limited size ensures that it will not adversely affect neighboring properties, and the request otherwise satisfies the general special exception standards and aligns with the intent of the zoning regulations.

Respectfully Submitted,

*Alexandra Wilson*

Alexandra Wilson  
Sullivan & Barros, LLP

**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2026, an electronic copy of this submission was served to the following:

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Respectfully Submitted,

*Sarah Harkcom*  

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