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November 13, 2000

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VIA FACSIMILE and FIRST CLASS MAIL

Ms. Sherri Pruitt
Secretariat
Board of Zoning Adjustment
441 Fourth Street, N.W., Room 210
Washington, D.C. 20001

RE: BZA Application No. 16611; 2969 Upton Street, N.W., 4101 and 4103 Connecticut Avenue, N.W. – Request for Continuance

Dear Ms. Pruitt:

This firm is counsel for the Van Ness South Tenants' Association, ("VNSTA"), a non-profit community organization representing approximately 1,000 tenants residing in 625 units at 3003 Van Ness Street, N.W. By letter dated November 6, 2000, we requested party status on behalf of VNSTA. Today, we are joining Advisory Neighborhood Commission ("ANC") 3F in requesting a continuance of the Board's hearing on the above-referenced application for the following reasons.

On November 3, 2000, eleven days prior to the hearing, the Burke School, through their attorney Mr. Phil Feola, responded with Updated Plans for the project proposed in Application 16611. Mr. Feola stated that the School intends to ask the Board of Zoning Adjustment to amend Application 16611 at the November 14 public hearing to accommodate the Updated Plans. However, it was not until the evening of Friday, November 10, 2000, only three days prior to the hearing, that the traffic study accompanying the Updated Plans was made available to ANC 3F. Other interested parties, including VNSTA, and District of Columbia agencies also apparently have not have received the updated traffic plans in a timely manner. In a November 7, 2000, letter to the BZA, ANC 3F made clear that traffic issues are at the core of the neighborhood problems presented by Application 16611. Therefore, the updated traffic study is critical in evaluating and understanding the Updated Plans. We are very concerned that the updated traffic study was delivered to ANC 3F only three days prior to the hearing and has not been received by other District of Columbia agencies and interested parties in a timely manner.

VNSTA respectfully requests that the BZA grant a continuance on the referenced application in order to provide adequate time for receipt and review of the Updated Plans and traffic study by interested parties and District of Columbia agencies including ANC 3F, the Office of Planning, and the Department

BZA
Case No. 16611
Exhibit No. 61

Board of Zoning Adjustment
District of Columbia
CASE NO.16611
EXHIBIT NO.61

of Public Works. A continuance would provide sufficient time for VNSTA, ANC 3F, and other District of Columbia agencies to review and analyze the plans and submit their views to the Board and to the applicant. It would also provide sufficient time for VNSTA to review the Updated Plans and traffic study and prepare a complete and thorough response to the applicant and the BZA.

Discussion of traffic issues in the Updated Plans on the day of the hearing would deny the BZA the opportunity to receive a complete and thorough analysis of these plans by government agencies and interested parties. It would also provide an unfair advantage for the applicant since adequate time would not be available for parties and participants to understand the Updated Plans and traffic study and prepare their analysis. For these reasons, we respectfully join ANC 3F in requesting that the BZA grant the requested continuance.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact us.

Very truly yours,

GREENSTEIN DELORME &LUCHS, P.C.

By:_____
John Patrick Brown, Jr.

By:_____
Lyle M. Blanchard

147026

cc: Van Ness South Tenants Association
Advisory Neighborhood Commission 3F
Phil T. Feola, Esq. (via facsimile)