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May 13, 2003

17016

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BY HAND

Ms. Jerrily R. Kress, FAIA
Director
Office of Zoning
441 4th Street, NW, Suite 210
Washington, DC 20001

Re: Application of the District of Columbia
65 Massachusetts Avenue, N.W., Square 625, Lot 806 (the "Property")
REQUEST FOR CONTINUANCE

Dear Ms. Kress:

On behalf of the District of Columbia through Safe Shores, The D.C. Children's Advocacy Center and the National Children's Alliance ("Applicant"), and for the reasons stated below, we request that the Board continue the hearing in the above-referenced matter, which is currently scheduled for the morning of May 20, 2003, for 120 days.

As indicated in the application packet, as well as in the Applicant's prehearing statement, the proposed use of the Property includes numerous District agencies, including United States Attorney's Office for the District of Columbia (Domestic Violence and Sex Offense Unit and the Victim/Witness Unit), the Office of the Corporation Counsel (Abuse and Neglect Section and the Juvenile Section), the Child and Family Services Agency (Intake Unit), and Children's National Medical Center (the Freddie Mac Child and Adolescent Protection Center). It was initially expected that the Applicant would be able to coordinate with these agencies in order to be prepared for the scheduled hearing on May 20, 2003. However, such task has proved to be more time consuming than allowed for.

The Applicant has contacted both the ANC, as well as the Office of Planning, to inform them of their intention to request a 120 day continuance. No objections were expressed by either the Office of Planning or the ANC. Moreover, because of the need for additional time, the Applicant postponed its presentation to the ANC.

BZA
Case No. 17016
Exhibit No. 21

Board of Zoning Adjustment
District of Columbia
CASE NO. 17016
EXHIBIT NO. 21

Section 3105.11 of the zoning regulations allows the Board to continue hearings for a period in excess of thirty days. Given the importance of the services the Applicant provides for the District's abused and neglected children, such a continuation is warranted to allow full preparation for both the presentation to the ANC, as well as the hearing before the Board.

In light of the foregoing, the Applicant respectfully requests that the hearing on the application be continued to late September or early October, 2003.

Your consideration of this request is appreciated.

Sincerely,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

Richard B. Nettler
Jeannine Rustad Zigner

cc: Advisory Neighborhood Commission 6C (Attention Robert Hall)
Office of Planning (by facsimile; c/o Arthur Jackson)
Jennifer L. Massengale, Esquire (by facsimile)
Nancy A. Chandler (by facsimile)
Hickok Warner Fox (by facsimile)