January 17, 2018



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Frederick L. Hill, Chairperson Board of Zoning Adjustment 441 4th Street, NW, Suite 200S Washington, DC 20010

Re: BZA Case No. 19666 Applicant's Prehearing Statement

Chairperson Hill and Honorable Members of the Board:

On behalf of the Applicant, Caryn Schenewerk, please find enclosed the Prehearing Statement for the above-referenced case. The application is scheduled to be heard before the Board of Zoning Adjustment on February 7, 2018.

Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

Alyssa L. Bigley

Meridith H. Moldenhauer

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Board of Zoning Adjustment District of Columbia CASE NO.19666 EXHIBIT NO.49

BEFORE THE DISTRICT OF COLUMBIA BOARD OF ZONING ADJUSTMENT

APPLICATION OF CARYN SCHENEWERK

BZA CASE NO. 19666 HEARING DATE: FEBRUARY 7, 2018

APPLICANT'S PREHEARING STATEMENT

I. <u>EXECUTIVE SUMMARY AND RELIEF SOUGHT</u>

This Prehearing Statement is submitted on behalf of Caryn Schenewerk (the "Applicant"), the owner of the property located at 1209 Park Road NW (Square 2839, Lot 0119) (the "Property") in support of her application for special exception relief, pursuant to Subtitle X § 901.2 and Subtitles E §§ 5003.1 and 5004.1 for lot occupancy and rear yard setback, respectively (pursuant to Subtitle E § 5007.1), and Subtitle U § 301.1(c)(2) for expansion of an accessory building for residential purposes and access to an accessory structure from a 15-foot wide alley (pursuant to U § 301.1(g)) in the RF-1 Zone (the "Project").

II. PROCEDURAL BACKGROUND

The Applicant's initial application only requested special exception relief for accessory structure lot occupancy and rear yard and did not include relief from (1) the access alley width or (2) building height. Subtitle U § 301.1(c) requires permanent access to the dwelling unit by an 8-foot easement to the public street, an improved public alley no less than 24 feet in width, or a 15-foot wide alley that is within a 300-foot linear distance to the public street. The Applicant asserted in their initial application that the Project complied with the access requirement because the existing accessory building ("Carriage House") faces the alley, which is S-shaped and 15 feet wide directly behind the Property, and the Carriage House is approximately 159 feet from 13th Street NW. However, the alley narrows to 10 feet in width where it meets 11th and 13th Streets NW and

questions have been raised as to whether relief from this requirement is needed. As stated above, this special exception relief has been added to the underlying case.¹

As for the height, the initial Application asserted that the Project complies with Subtitle E § 5002.1, the height rules for accessory structures in the RF Zone: "The maximum permitted height for an accessory building in an RF zone shall be twenty feet (20 ft.) and two (2) stories, including the penthouse." The general rules of measurement for a building with "a roof that is not a flat roof" mandate that height be measured from the building height measuring point "to the average level between the highest eave, not including the eave of a dormer and the highest point of the roof." Subtitle B § 308.4(a). Therefore, the height of the proposed Project if calculated in this manner would be 20 feet. *See* Architectural Plans at BZA Ex. No. 6.

It should be noted, however, that the specific regulations for height in the lower R Zones include the following additional language: "The maximum height of an accessory building in an R zone shall be two (2) stories and twenty feet (20 ft.), including the penthouse. The height of an accessory building permitted by this section shall be measured from the finished grade at the middle of the side of the accessory building that faces the main building to the highest point of the roof of the building." Subtitle D § 5002.1. Despite this discrepancy, the Applicant maintains that the Project meets the height requirement as stated in the RF Zone and no additional relief is necessary. However, at the hearing, should the Board find that the accessory structure should be measured in the manner set forth in the lower R Zone at D § 5002.1, the Applicant requests that the Board grant special exception relief from this provision.

Since filing the initial application, the Applicant has been working with the Office of Planning to address their concerns regarding the adequacy of the requested relief. The Applicant's counsel sought clarification from the Zoning Administrator ("ZA") at a meeting on December 14,

¹ See Revised Self-Certification Form at Exhibit A.

2017. At that meeting, memorialized in an email dated December 15, 2017, see **Exhibit B**, the ZA indicated that BZA Application 19666 required no additional relief for the Project than that which was requested in the initial application. Following that meeting, the ZA issued a retraction via email on December 22, 2017 of his initial opinion and stated that additional relief is necessary from the requirements of permanent alley access to the Carriage House because the alley narrows to 10 feet at the point of access to 13th Street NW. *See* Email Retraction at **Exhibit C**. Pursuant to that determination, the Applicant conducted research on the Zoning Commission's and Office of Planning's intent when enacting the 2016 Zoning Regulations. The Applicant presented this information to the Office of Planning and the ZA at a follow-up meeting on January 4, 2018. *See* Section III., below. As of this filing, the ZA has not issued an updated decision on this matter.

Therefore, the Applicant maintains its case as a special exception with the addition of relief for alley access width, and argues that they meet the standard as outlined below. However, if the Board determines that the application requires an area variance from Subtitle U 301.1(c)(4)(C), the Applicant states, in the alternative, that they satisfy the burden for an area variance.

III. <u>SPECIAL EXCEPTION IS THE APPROPRIATE STANDARD OF RELIEF</u>

The standard of review for relief from alley access width should be the special exception standard. We submit that U § 301.1(g) permits the Board to approve by special exception "any" expansion of an existing accessory building for residential purposes even if it is on an alley less than 15 feet wide. Here we are requesting special exception relief for an existing accessory building. Section U § 301.1(c)(2) permits an expansion or addition to an accessory building by special exception. Therefore, subsection (g) would be repetitive but for its meaning to allow special exception relief for existing accessory buildings not meeting the above (1) thorough (4) conditions. Subsection (g) requires the Board to consider the overall context of the accessory building conditions when evaluating the special exception standard. This reading of U § 301.1(g)

is consistent with the plain meanings², grammatical format, and intent of the Zoning Commission as outlined below.

A. The Section's Format and Structure

Subtitle U § 301 is titled "MATTER-OF-RIGHT USES." The purpose of the section is to list those uses that are permitted as a matter of right in the RF Zones. When viewed as a whole and in the context of previous and subsequent subsections in Subtitle U, the structure of § 301.1 should plainly enumerate the permitted uses individually with lowercase letters. However, subsections (d) through (g) appear to be mislabeled or misplaced. The subsections setting out singular uses begin as follows:

(a) Any use permitted in the R zones 3 ...

- (b) Residential flats ...
- (c) A permitted principal dwelling unit within an accessory building ...

But, after § 301.1(c), the four following provisions also pertain to accessory buildings and

are not new, matter-of-right permitted use categories:

(d) An accessory building that houses a principal dwelling unit shall not have a roof deck;

(e) An accessory building constructed as a matter-of-right after January 1, 2013, and that is located within a required setback shall not be used as, or converted to, a dwelling unit for a period of five (5) years after the approval of the building permit for the accessory building, unless approved as a special exception;

(f) An accessory building that houses a principal dwelling unit shall not be used simultaneously for any accessory use other than as a private vehicle garage for a dwelling unit on the lot, storage, or as an artist studio; and

(g) Any proposed expansion of an accessory building for residential purposes shall be permitted only as a special exception approval pursuant to Subtitle X, and shall be evaluated against the standards of this section.

² There is ample precedent from the District of Columbia Court of Appeals concerning statutory and regulatory interpretation. As noted in *Davis v. United States*, the first step of statutory interpretation is to "look at the language of the statute by itself to see if the language is plain and admits of no more than one meaning." *See Davis v. United States*, 397 A.2d 951, 956 (1979). To that end, "[t]he words of the statute should be construed according to their ordinary sense and with the meaning commonly attributed them." *See id.*

³ Section U § 301.1(a) incorporates the language pertaining to R Zones, which specifically permits accessory dwelling units on less than 15-foot wide alleys by special exception.

Therefore, because subsections (d) through (g) are ancillary provisions pertaining to principal dwellings within *accessory buildings*, these subsections would appropriately fit within Subtitle (c) as numbers (5) through (8). Instead, it would appear that the transcription of the Regulations mistakenly moved these subsections "up" one level too far (to a lettered subsection instead of continuing the numbered subsections). The numbered subsections all pertain to dwelling units within accessory structures, and so subsections (d) through (g) should be labeled and located within those numbered subsections accordingly.

Finally, the remaining lettered subsections after (g) each provide singular permitted uses:

(h) A boarding house subject to the following conditions ...
(i) A corner store use ...
(j) Any uses permitted within a District of Columbia former public school building ...
(k) Medical care uses;
(l) A multiple dwelling in Squares ...
(m) Child/elderly development center located in a building that was built as a place of worship ...
(n) Child/elderly development center or adult day treatment facility ...

This is the continuation of the pattern in subsections (a) through (c) listed above. Given this configuration, the Applicant contends that Subtitle U § 301.1 is incorrectly structured and that subsections (d)-(g) were intended to provide additional conditions and special exception language to (c). It is the Applicant's contention that the intended configuration of § 301.1 would allow the reading of U § 301.1(g) to permit a special exception for the alley width provision. "Statutory interpretation is a holistic endeavor; to the extent possible, we attempt to harmonize statutes, not read them in a way that makes them run headlong into one another." *District of Columbia v. Am. Univ.*, 2 A.3d 175, 187 (2010) (Citing *In re*, 945 A.2d 1193, 1198 (D.C. 2008); *M.M. & G., Inc. v. Jackson*, 612 A.2d 186, 192 (D.C. 1992); *Floyd E. Davis Mortg. Corp. v. District of Columbia*, 455 A.2d 910, 912 (D.C. 1983)). Courts can "correct an obvious and minor drafting error where necessary to effectuate the intent" of the regulation or statute. *People v. Florez*, 245 Cal. App. 4th

1176, 1203 (2016). Here, as the Board is a quasi-judicial branch, they have the same authority of interpretation. This standard of regulatory interpretation permits the Board to read logical meaning into the statute and grant special exception relief pursuant to § 301.1(g) from the accessory structure requirements for the Property, including the 15-foot wide alley provision outlined in § 301.1(c).

B. The ZC Intended to allow Special Exception Relief

Due to the identified drafting error above, as Justice Stevens opined, "[w]henever there is \dots a plausible basis for believing that a significant change in statutory law resulted from a scrivener's error, I believe we have a duty to examine legislative history." *Lamie v. United States Tr.*, 540 U.S. 526, 542-543 (2004). Thus, based on careful review of the transcripts and draft text filings, the Applicant contends that the Zoning Commission intended to provide relief from the provisions of Subtitle U § 301.1(c) under a special exception standard. The Commissioners engaged in extensive discussion of required alley width for access to dwelling units, and even discussed the feasibility of an 8 or 10 foot width requirement. *See* Excerpted Transcripts at **Exhibit D**. In particular, Commissioner May stated, "I think 24 [-foot wide alley] still is excessive. I mean, maybe 15 is sufficient to be able to navigate certain things ... I think we also have a provision for some individual review by special exception. Is that right?" Z.C. 08-06A Oct. 7, 2014 Trans. at p. 164. To which Ms. Steingasser confirmed that special exception relief for alley width would be permitted. Id.

In addition, Commissioner Hood's motion to approve what is now Subtitle U § 301.1(c)(4) specifically provided for special exception relief to the provision. *See* Excerpted Transcripts at **Exhibit E**. His motion was unanimously approved:

I move that we accept the recommendations, keep across access requirement through alley width of 24 feet minimum⁴ where there is not a minimum side yard

⁴ The minimum width was later changed to 15 feet.

access *and allow relief by special exception*, incorporating the comments of Commissioner May of the 300 feet and ask for a second. Z.C. 08-06A Oct. 7, 2014 Trans. at p. 294 (emphasis added).

Finally, nothing in the Applicant's review of the Zoning Commission hearings and discussions showed an intent to restrict the RF Zones more than the lower residential zones on this type of residential use in an accessory building. The Zoning Regulations are structured such that each zone incorporates lower zone uses as a matter of right. *See* U § 301.1(a). The lower zones' uses and permitted relief are incorporated into the higher zones. It follows, then, that higher-density residential zones permit more uses than lower-density residential zones, not less. In this case, the accessory dwelling use provision for the lower-density R Zones permits special exception relief from the permanent access provisions pursuant to Subtitle U § 253.8 as follows:

(c) The permanent access shall be provided by one (1) of the following:

(1) A permanent passage, open to the sky, no narrower than eight feet (8 ft.) in width, and extending from the accessory building to a public street through a side setback or shared recorded easement between properties; (2) Through an improved public alley with a minimum width of twenty-four feet (24 ft.) that connects to a public street; or

(3) The accessory building is within three hundred feet (300 ft.) of a public street accessible through an improved public alley with a minimum width of fifteen feet (15 ft.)...

(f) An accessory apartment proposed within an accessory building that does not meet the conditions of this section shall be permitted as a special exception if approved by the Board of Zoning Adjustment under Subtitle X, and subject the following conditions:

(1) The accessory building shall be located such that it is not likely to become objectionable to neighboring properties because of noise, traffic, parking, or other objectionable conditions; and

(2) Evidence that there are adequate public utilities for the health and safety of the residents.

Therefore, the R Zone specifically permits special exception relief from the alley access

provisions, and particularly carves out the instances in which variance relief would be required.⁵

It follows, then, that the less-restrictive RF Zone would incorporate the same permissive use and

 $^{^{5}}$ The Regulations for the R Zones further specify that any request to modify more than two of the requirements of the subsection shall be deemed a request for a variance. Subtitle U § 253.12.

relief. Consequently, the Applicant contends that Regulations should be read to permit relief from Subtitle U 30.1(c)(4)(C) via special exception.

IV. <u>APPLICANT MEETS BURDEN FOR SPECIAL EXCEPTION RELIEF</u>

A. The Project Satisfies the Special Exception Requirements for Expansion of an Accessory Building for Residential Use

The Project meets the requirements of Subtitle U § 301.1(c)(2) because the accessory building was in existence on January 1, 2013, and access to the accessory building dwelling shall be provided from a dedicated and improved right of way. Based on the ZA's most recent determination that additional relief is required for alley width, the Applicant requests special exception relief from subsection U § 301.1(c)(4)(C) pertaining to the 15-foot wide alley requirement. As explained in the initial application, the Applicant meets the special exception standard.

B. The Project Satisfies the Special Exception Requirements for Accessory Structure Alley Access, Lot Occupancy and Rear Yard

In addition to the issues outlined in the initial application regarding special exception relief for lot occupancy and rear yard, we submit that the Project satisfies the special exception standard for the alley access requirement. The Carriage House has been located on the alley since at least 1919 according to the Baist Map at BZA Ex. No. 12. While the Carriage House has not previously been used for human habilitation, the Project is accessible to 13th Street by only 159 linear feet. The addition will not have a substantially adverse effect on the use or enjoyment of any abutting or adjacent dwelling or property. Specifically, the light and air available to neighboring properties will not be unduly affected, the privacy of use and enjoyment of neighboring properties shall not be unduly compromised, and the addition or accessory structure, together with the original building, as viewed from the street, alley, and other public way, shall not substantially visually intrude upon the character, scale, and pattern of houses along the subject street frontage. *See* BZA Ex. No. 8. The Applicant provided plans, photographs, and elevation section drawings to represent the relationship of the proposed addition or accessory structure to adjacent buildings and views from public ways. *See* BZA Ex. Nos. 5-6. Finally, the lot occupancy of the existing structure and the addition will not exceed the permitted 60% lot occupancy for the RF-1 Zone. For these reasons, the Project satisfies the special exception requirements for lot occupancy, rear yard, and alley access pursuant to Subtitle E §§ 5003.1, 5004.1.

C. The Relief for Alley Access is Harmonious with the General Purpose and Intent of the Zoning Regulations and Maps

Two principal dwelling units are permitted on one lot as a matter of right in the RF-1 Zone. The requested relief will allow the Applicant to create one additional residential dwelling unit above the existing Carriage House. The total number of units on the Property, therefore, will be two. The requested special exception relief will maintain the residential use of the Property. Because the Regulations specifically permit residential units in accessory dwellings, and particular in structures facing alleys, the Project will not conflict with the purpose and intent of the Zoning Regulations and Maps.

D. The Proposed Relief for Alley Access will not Adversely Affect the Use of Neighboring Property

As outlined in the Applicant's initial Statement (BZA Ex. No. 8), the use of neighboring property will not be adversely impacted by the Project. Relief from the alley access requirements will not change neighboring properties' use of the shared alley or access to the rear of their properties. Also, the Carriage House is located to the rear of the Property facing north into the alley, and the Applicant intends to continue the current use of the Carriage House ground floor for storage and parking. The Project will not cause further impact to traffic, or impact neighboring properties' use or access to their property or the alley.

V. <u>ALTERNATIVELY, THE APPLICANT MEETS BURDEN FOR VARIANCE</u> <u>RELIEF</u>

A. Nature of Variance Relief and Standard of Review

Under D.C. Code § 6-641.07(g)(3) and 11 DCMR § X-1000.1, the Board is authorized to

grant an area variance where it finds that:

(1) The property is affected by exceptional size, shape or topography or other extraordinary or exceptional situation or condition;

(2) The owner would encounter practical difficulties if the zoning regulations were strictly applied; and

(3) The variance would not cause substantial detriment to the public good and would not substantially impair the intent, purpose and integrity of the zone plan as embodied in the Zoning Regulations and Map.

See French v. District of Columbia Bd. of Zoning Adjustment, 658 A.2d 1023, 1035 (D.C.

1995) (quoting Roumel v. District of Columbia Bd. of Zoning Adjustment, 417 A.2d 405, 408 (D.C.

1980)); see also, Capitol Hill Restoration Society, Inc. v. District of Columbia Bd. of Zoning

Adjustment, 534 A.2d 939 (D.C. 1987). Applicants for an area variance must demonstrate that

they will encounter "practical difficulties" in the development of the property if the variance is not

granted. See Palmer v. District of Columbia Bd. of Zoning Adjustment, 287 A.2d 535, 540-41 (D.C.

1972) (noting, "area variances have been allowed on proof of practical difficulties only while use

variances require proof of hardship, a somewhat greater burden"). An applicant experiences

practical difficulties when compliance with the Zoning Regulations would be "unnecessarily

burdensome." See Gilmartin v. District of Columbia Bd. of Zoning Adjustment, 579 A.2d 1164,

1170 (D.C. 1990).

B. The Property is Affected by an Exceptional Situation or Condition

The phrase "exceptional situation or condition" in the above-quoted variance test applies not only to the land, but also to the existence and configuration of a building on the land. *See Clerics of St. Viator, Inc. v. District of Columbia Bd. of Zoning Adjustment,* 320 A.2d 291, 294 (D.C. 1974). Moreover, the unique or exceptional situation may arise from a confluence of factors

which affect a single property. *Gilmartin*, 579 A.2d at 1168. The Property is characterized by an exceptional situation and condition arising from a confluence of four factors: (1) the Property's exceptionally large lot size; (2) the Property is only one of three non-apartment buildings of similar length on the block facing Park Road; (3) the Property's location next to a large apartment building with windows facing the Property's rear yard; and (4) the existing nonconforming Carriage House at the rear of the Property.

The Property, Lot 0119, is particularly large as compared to the other lots facing south on Park Road NW. *See* Baist Map at BZA Ex. No. 12. It has 3,209 square feet of lot area and therefore is large enough to be converted from one unit into three (an apartment building) via special exception.⁶ Instead, the Applicant seeks to add one accessory dwelling unit to the Property in addition to the existing single-family dwelling.

Of the RF-1 zoned lots of equal length on the block facing Park Road NW, the Property is only one of three non-apartment buildings. Of those non-apartment buildings, the Property is the largest.

The Property is the only lot on the row directly adjacent to a large apartment building with windows facing into the rear yard. The apartment building to the east has two floors of seven windows facing the Property.

Finally, the Carriage House at the rear of the Property is nonconforming as to rear yard setback from the alley. It is also the only accessory structure on the row built directly to the rear lot line. The other garages on the row are set back further from the alley.

⁶ See Subtitle U § 320.2. If the Board finds that the Project requires a variance, the application to add one unit is held to a higher standard than that of adding two units and converting the Property to an apartment building.

C. Strict Application of the Zoning Regulations Would Result in Practical Difficulty

Strict application of the Zoning Regulations with respect to alley access would result in a practical difficulty to the Applicant. The width of the alley, and the access to the Carriage House from Park Road cannot be changed. Even though the Property is one of the largest single family home lots, it would be unduly burdensome on the Applicant to create an 8 foot wide open to the sky pedestrian access along the side of the Property without completely reconstructing the Property. The Applicant's only possibility for adding habitable space is to create a rear addition, construct a pop-up third floor which would require additional zoning relief, or add to the Carriage House. Any alternative configuration for an additional bedroom off the existing structure would create a practical difficulty as it pertains to privacy, use and enjoyment due to the adjacent apartment building. Therefore, the practical difficulty the Applicant faces in complying with the alley access is directly related to the unique confluence of factors impacting the Property.

D. No Substantial Detriment to the Public Good or Impairment of the Zone Plan

There will be neither substantial detriment to the public good nor substantial impairment of the intent, purpose, and integrity of the zone plan by approving the requested relief for alley access. Two units are permitted as a matter of right in the RF-1 Zone, and three units are allowed via special exception. As indicated in the Zoning Commission's and Office of Planning's discussion of the requirements for dwellings on alleys in Section III. B. above, the purpose of the 300 linear feet from a street requirement is for access to emergency services. The Commissioners and Ms. Steingasser agreed that special exception relief should be available from the alley width requirements so long as the Regulations included the proximity to a street requirement (the length of a fire hose).⁷ The Project meets this proximity requirement. Thus, the requested relief does not impair the Zone Plan.

Finally, the Applicant has made every attempt to preserve the important historic elements of the existing Carriage House. The Carriage House is depicted on the Baist Map at BZA Ex. No. 12, dating from 1919. Therefore, the Applicant wished to preserve as much of the existing structure as possible, including the façade facing the alley, despite the fact that the Carriage House does not comply with the rear yard setback requirements from the alley.

There will be no detriment to the public good by expanding the existing Carriage House for an additional residential unit. The Applicant has no intention to rent or sell the additional unit at this time, but instead will use it as a guest room for their large family and storage space. In fact, the addition will actually increase the square footage of the garage portion of the Carriage House to permit access and adequate parking space for two cars. Moreover, the Project has already garnered unanimous ANC support.

For all these reasons, the Applicant meets the requirements for variance relief in this case.

VI. <u>COMMUNITY OUTREACH</u>

The Applicant has conducted significant community outreach to the neighbors in the area. As longstanding community members, the Applicant and her husband have communicated with the community members about the Project to add more space from their family, resulting in 14 letters of support; this includes neighbors on both sides of the Property whose letters are filed in the record.

⁷ Ms. Steingasser stated: The Commission asked us last night to revisit [the width] and talk again with the fire department and we're going to be doing that . . . *special exception relief is available to all of these provisions through the BZA and that would have the public hearing* . . . Z.C. 08-06A Nov. 7, 2013 Trans. at pp. 15-16 (emphasis added).

On December 13, 2017, the Applicant presented the Project to ANC 1A at their full ANC meeting. The full ANC 1A voted unanimously to support the Applicant's Project. The ANC's resolution is found at BZA Ex. No. 42 in the case record.

VII. <u>PROPOSED CONDITIONS</u>

1. Interior partition locations, size, and location of units and stairs are preliminary and shown for illustrative purposes only. Final layouts, design and interior plans may vary to the extent that such variations do not require additional relief from the Zoning Regulations and such that the variations do not change the external configuration or appearance of the building.

2. Flexibility to vary the final selection of exterior materials within the color ranges of the material types and based on the availability at the time of construction, without reducing the quality of materials or intent of the original design.

3. Flexibility to make minor refinements to exterior details and dimensions, including belt courses, sills, bases, cornices, railings trim, and windows or that are otherwise necessary to obtain a final building permit to the extent that such changes do not require additional relief from the Zoning Regulations and such that the variations do not change the external configuration or appearance of the building.

VIII. <u>CONCLUSION</u>

For the reasons stated above, and for the reasons enumerated in the Applicant's prior filings as well as the reasons discussed at the Board's hearing, the Applicant submits that the application meets the requirements for special exception relief. Accordingly, the Applicant respectfully requests that the Board approve the application on February 7, 2018.

Respectfully submitted, COZEN O'CONNOR

Alyssa L. Bigley

Meridith H. Moldenhauer

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of January, 2017, a copy of the foregoing Prehearing Statement was served, via electronic mail, on the following:

District of Columbia Office of Planning c/o Matthew Jesick 1100 4th Street SW, Suite E650 Washington, DC 20024 matthew.jesick@dc.gov

Advisory Neighborhood Commission 1A c/o Kent Boese, Chairperson 1A08@anc.dc.gov

Alyssa L. Bigley