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July 17, 2019

VIA IZIS

Mr. Frederick Hill, Chairperson
D.C. Board of Zoning Adjustment
One Judiciary Square
441 4th Street N.W., Second Floor
Washington, D.C. 20001

Re: **Request for Late Filing of Limited Pre-Hearing Submission**
BZA Application No. 20082
2721-2725 Martin Luther King, Jr., Avenue, S.E.
Square 5982, Lots 812, 822, Parcel 234/31 (“Property”)

Dear Chairperson Hill:

On behalf of Friendship Public Charter School, Inc. (the “Applicant”), we request the Board to accept this late filing of the Applicant’s Limited Pre-Hearing Submission for two issues.

First, the Applicant submits the attached revised First Floor Plan as Exhibit A. The revised Floor Plan shows a Bike Room which meets the applicable requirements for long-term bicycle parking for the project.

As a result, the Applicant withdraws its request for special exception relief from Subtitle C §802 for long-term bicycle parking.

Second, the Applicant adopts the following Loading Management Plan recently requested by DDOT.

Loading Management Plan:

- No deliveries or trash pick-up will occur during peak school drop-off or pick-up hours.
- No deliveries or trash pick-up will occur within public space. Deliveries and trash pick-up for both buildings will occur in the designated service area along the rear of the existing building.
- No trash pick-up or deliveries will occur on MLK Avenue or Milwaukee Place, S.E.



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- Trucks using the loading area will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the regulations set forth in DDOT’s Freight Management and Commercial Vehicle Operations document, and the primary access routes listed in the DDOT Truck and Bus Route System.
- A staff member will be designated as the loading facility manager. The loading facility manager will be responsible for disseminating suggested truck routing maps to drivers from delivery services that frequently utilize the loading facility. The facility manager will also distribute materials such as DDOT’s Freight Management and Commercial Vehicle Operations document to drivers as needed to encourage compliance with idling laws. The loading facility manager will also be responsible for coordinating with vendors to schedule deliveries and will work with the community to resolve any conflicts should they arise.

The Applicant respectfully requests that this limited information be accepted by the Board after the July 10, 2019 deadline for the Pre-Hearing Submission. This information was not available prior to the filing deadline. No prejudice will result to the Board or any other party and the withdrawal of the request for relief from the long-term bicycle parking requirements will limit the scope of the scheduled hearing.

Finally, the Applicant notes that Advisory Neighborhood Commission 8C voted to support this Application at its regularly scheduled and noticed meeting with a quorum present on June 5, 2019. To date, ANC 8C has not submitted its letter of support.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to ask the Office of Zoning staff to contact the undersigned.

Very truly yours,
GREENSTEIN DELORME & LUCHS, P.C.

John Patrick Brown, Jr.

Lyle M. Blanchard

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2019, a copy of the Applicant's Request for Late Filing of Limited Pre-Hearing Submission was served on the following:

ANC 8C

Commissioner Mike Austin, Chairperson

ANC 8C

c/o RISE

2730 Martin Luther King, Jr., Avenue, S.E.

Washington, D.C. 20032

(By Mail and Electronically: 8C01@anc.dc.gov)

Commissioner Chyla D. Evans, Jr. SMD 8C02

ANC 8C

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