

April 14, 2025

Via IZIS

Frederick L. Hill, Chairperson
District of Columbia Board of Zoning Adjustment
441 4th Street, NW, Suite 200-S
Washington, DC 20001

Re: BZA Application No. 20184B – Applicant’s Response to ANC 5Cs Motion for Reconsideration

Dear Chairperson Hill and Members of the Board:

Fort Lincoln-Eastern Avenue, LLC (the “**Applicant**”) hereby responds to the Motion for Reconsideration filed by Advisory Neighborhood Commission (“**ANC**”) 5C on April 12, 2025¹. The Board of Zoning Adjustment (“**Board**” or “**BZA**”) should deny the ANC’s Motion for Reconsideration as the substantive issues raised in the ANC’s Motion for Reconsideration were addressed in the record of this case, before the BZA granted the Applicant’s time extension request on March 26, 2025.

The Applicant notes Exhibit 9 of the record in this case (Applicant’s Response to Filing from the Fort Lincoln Civic Association, Inc., dated March 14, 2025) which addressed the issue of whether any substantial changes of material fact have occurred that undermine the Board’s approval of the original application in BZA Order No. 20184. As described in detail in that submission, the proposed re-development of the Fort Lincoln Recreation Center and the additional occupied retail storefronts at the Shops of Dakota Crossing do not constitute a substantial change of material facts that undermine the Board’s justification for approving the original application.

The Applicant notes that it has already started significant site development work on the property and is moving forward with bringing 51 townhouses, including 5 IZ townhouses, to the Fort Lincoln community. The Applicant looks forward to the Board’s denial of the Motion for Reconsideration at the earliest possible date.

Respectfully Submitted,



Paul A. Tummonds

¹ The Applicant notes that the 10-day period for filing a Motion for Reconsideration (pursuant to Subtitle Y, §700.2) expired on April 11, 2025. The Applicant is not aware of any waiver request filed by ANC 5C.

Certificate of Service

I hereby certify that a copy of the foregoing document was sent to the following by email on April 14, 2025.

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