DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT

In Re. **Appeal of the West End DC Community Association**	**BZA Case No.: 21221** **Next Event: Virtual Public Hearing January 29, 2025 9:30 a.m.**

PROPERTY OWNER'S OPPOSITION TO APPELLANT'S APPEAL OF BUILDING PERMIT B2401624

The District of Columbia, acting through its Department of General Services (DGS) and Department of Human Services (DHS) (collectively, the District), as the owner and operator of the property located at 1129 New Hampshire Ave. NW (the Aston), opposes the appeal by appellant West End DC Community Association (WEDCCA) of the issuance of Building Permit No. B2401624 (the Permit).

WEDCCA's appeal fails on all counts. Procedurally, WEDCCA lacks standing as it articulates nothing more than a generalized grievance and no actual injury. On the merits, the Zoning Administrator's decision to approve the Permit at issue was not erroneous. Further, the Aston's use properly falls under the "Apartment House" category, and the regulations pertaining to George Washington University's Planned Use Development (PUD) are plainly and facially inapplicable to this property. The Board should reject WEDCCA's appeal.

BACKGROUND

I. The District's Redevelopment and Intended Use of the Aston

The property at issue in this lawsuit, known as the Aston, is located at 1129 New Hampshire Ave. NW. The Aston was previously used as student housing by its previous owner, The George Washington University (GWU). It is zoned as RA-5, which is "predominantly high-density residential." *See* 11-F DCMR § 101.8. The District purchased the Aston in 2023 with

the intention of using the property for non-congregate bridge housing. *See* Ex. A (Supplemental Declaration of Rachel Pierre, Jan. 21, 2025) (Supp. Pierre Decl.). The District intends to operate the Aston as housing for up to 190 individuals, primarily consisting of couples, mix-gendered adult families, and clients in need of medical services, or others who cannot be served by current shelter facilities in the District. *Id.* ¶ 11; *see also* [11A] D.C. Opp'n Mot. Stay Ex. A ¶ 22 (Declaration of Rachel Pierre, Nov. 25, 2024). "Bridge housing" is defined as temporary apartment-style units for clients transitioning into more permanent housing. *See* Supp. Pierre Decl. ¶ 6. Each resident has access to and control of a private unit, including a kitchen and bathroom and the ability to lock their respective units. *Id.* ¶ 12. Clients will remain at the Aston for at least one month with the average projected stay lasting three to five months. *Id.* ¶ 13.

During redevelopment of the Aston, the District formed a Community Advisory Team (CAT), which includes representatives of ANC 2A, where the property is located. *See* Office of the Deputy Mayor for Health and Human Services, *Aston Community Advisory Team (CAT)*, available at https://dmhhs.dc.gov/page/aston-community-advisory-team. The CAT is made up of representatives from ANC 2A, the Foggy Bottom Association and West End Citizens Association, Ward 2 Councilmember Brooke Pinto, DGS and DHS, and homeless services stakeholders. *Id*. Its purpose is to allow an avenue for members of the community to provide feedback on concerns related to community members' quality of life during any building repurposing and construction and during the first two years of operation of the Aston; to coordinate opportunities for community feedback and share information with DHS; and to develop Good Neighbor Agreements. *Id*. The CAT continues to meet on a regular basis. *Id.*

To manage the Aston, the District entered into a contract with The Community Partnership (TCP), a non-profit corporation. *See* [11A] Ex. A ¶ 13. TCP, in turn, contracted with

Friendship Place, a housing service provider, who is overseeing day-to-day operations of the Aston. *Id.* ¶ 15. On October 25, 2024, the District received a ninety-day conditional Certificate of Occupancy (COO), enabling the first fifty residents to move in. *See* Supp. Pierre Decl. ¶ 8; [13A] Certificate of Occupancy (Oct. 25, 2024). On November 15, 2024, the first residents began moving into the Aston. *See* Supp. Pierre Decl. ¶ 9. At the latest CAT meeting, the District and its subcontractors shared that the Aston has been operating without any expressed concern from neighbors or community members regarding Aston operations. *See* Aston Cmty. Advisory Team Meeting Recording (Jan. 13, 2025) at 13:43, *available at* https://dmhhs.dc.gov/node/1739126 (in section "Aston Community Advisory Team Meeting Archive," link for "Recording" of January 13, 2025 meeting). The District also shared its plans for completing all remaining work on the Aston and obtaining a permanent COO. *Id*. at 19:46. On January 21, 2025, the District received another 90-day conditional COO, valid until April 21, 2025. *See* Ex. B.

II. Procedural History

As part of the Aston's redevelopment, DGS filed for a demolition permit on August 18, 2023 (No. D2400001), which DOB issued on December 15, 2023.[1] On November 21, 2023, DGS filed an application for a building permit, No. B2401624. [6A] Appellant's Ex. F (Permit Application). As relevant here, the District's application indicated that the "Existing Use(s) of Building" and the "Proposed Use(s) of the Building" would remain the same: "Apartment Houses – R-2." *Id.* DOB reviewed the Permit Application in the summer of 2024 and issued the Permit on August 7, 2024. *See* [2] Building Permit No. B2401624. WEDCCA filed this appeal

[1] WEDCCA appealed the issuance of the demolition permit to the Office of Administrative Hearings on December 29, 2023, but voluntarily dismissed that case on September 12, 2024.

on Friday, October 4, 2024, and filed a motion seeking an emergency stay and expedited hearing date on October 10, 2024. *See* [6] Appellant's Memorandum in Support of Appeal (Appellant's Mem.); [8] Appellant's Emergency Motion for Stay and Request for Expedited Hearing Date (Appellant's Mot.). The Board held a public hearing on WEDCCA's emergency motions on November 6, 2024, denied both motions, and set a hearing on WEDCCA's underlying appeal for January 29, 2025.

LEGAL STANDARD

A person "aggrieved" by a decision made by an administrative officer in the administration of the zoning regulations has the right to appeal to the Board. D.C. Code § 6-641.07(f). D.C. Code § 6-641.07(g)(1) authorizes the Board to "hear and decide appeals where it is alleged by the appellant that there is error in any order, . . . decision, [or] determination . . . made by the Director of the Department of Buildings . . . in the carrying out or enforcement of any [Zoning Regulation]." D.C. Code § 6-641.07(g)(4) authorizes the Board to, "in conformity with the provisions of this subchapter, reverse or affirm, wholly or partly, or [] modify the order, . . . appealed from or may make such order as may be necessary to carry out its decision or authorization . . . ."

Under 11X DCMR § 1101.2, "the applicant bears the burden of proof to justify granting the appeal." Because appeal proceedings before the Board are contested cases, "legal conclusions must be in writing and supported by 'reliable, probative, and substantial evidence.'" *Ward 5 Improvement Ass'n v. D.C. Bd. of Zoning Adjustment*, 98 A.3d 147, 152 (D.C. 2014) (citing D.C. Code § 2-509(e)).

ARGUMENT

I. WEDCCA Lacks Standing.

As the District noted in its prior briefing, WEDCCA lacks standing to bring this appeal.[2] Standing is a fundamental prerequisite for zoning appeals, as reflected by the requirement in 11-Y DCMR § 302.12(f)(2) that an appellant provide "[a] statement as to how the appellant has standing to bring the appeal, specifically with regard to the administrative decision being appealed" and "the statement shall explain how the appellant is aggrieved." *See Economides v. D.C. Bd. of Zoning Adjustment*, 954 A.2d 427, 434 (D.C. 2008) ("Before reaching the question of whether [appellant's] appeal was time-barred, we must determine whether he had standing before the BZA in the first place."). Here, WEDCCA submits that it "is a not-for-profit civic association that is comprised of, controlled by, and represents the interests of individual owners and occupants of properties in the immediate vicinity of the Property at issue in this Appeal," and that "its individual members and contributors are 'persons aggrieved' by the DOB's decision to issue the Building Permit." [5] Appellant's Statement Pursuant to 11-Y DCMR § 302.12 ¶ 7 (Appellant's Statement). There are two fatal problems with WEDCCA's statement, however. The first is that WEDCCA never identifies how it has standing on behalf of itself, as would be required to fulfil organizational standing. Second, WEDCCA never explains how it or its members are actually "aggrieved" by DOB's issuance of the Permit.

Standing for an organization to bring actions on its own behalf "turns on whether the organization's activities in pursuit of its mission have been affected in a sufficiently specific manner as to warrant judicial intervention." *Fraternal Order of Police Metro. Police Dep't*

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[2] The District raised a standing argument in its briefing on WEDCCA's emergency motions. [11] D.C. Opp'n Mot. Stay. WEDCCA did not respond substantively. *See* Appellant's Reply in Support of Appeal (Appellant's Reply) at 1 n.1.

Labor Comm. v. District of Columbia, 290 A.3d 29, 37 (D.C. 2023). "[A]n organization's mere interest in a problem or its opposition to an unlawful practice is not sufficient . . . , nor is a simple setback to an organization's abstract social interests." *Id*. Instead, organizational standing "requires a showing that the defendant's allegedly unlawful actions have caused a concrete and demonstrable injury to the organization's activities." *Id*. Here, WEDCCA does not proffer that it in fact has any "activities" or "mission" whatsoever besides "the filing of lawsuits or administrative actions." Appellant's Statement ¶ 7. By definition, then, it has not suffered any underlying "concrete and demonstrable injury to the organization's activities" due to the District's redevelopment and intended use of the Aston, *Fraternal Order of Police*, 290 A.3d at 37, and therefore it lacks organizational standing.

As for associational standing, "an association must plausibly allege that its members, or any one of them, are suffering immediate or threatened injury as a result of the challenged action of the sort that would make out a justiciable case had the members themselves brought suit." *Id*. at 38. WEDCCA indicates that it will present a witness who can testify as to "the detrimental impact that the District's intended use of the Property will have on the surrounding neighborhood as a whole and specifically on the properties in the immediate vicinity of the Property, many of which are owned and/or occupied by Appellant's members and contributors." Appellant's Statement ¶ 10. This is insufficient. Board regulations require an appellant, "*at the time of filing the appeal*" to "explain how the appellant is aggrieved," "specifically with regard to the administrative decision being appealed." 11-Y DCMR § 302.12(f)(2) (emphasis added).[3]

[3] Analogously, a proposed intervenor must "clearly demonstrate[]" that he or she "has a specific right or interest that will be affected," and which would be "more significantly, distinctively, or uniquely affected by the proposed zoning relief than those of other persons in the general public." 11-Y DCMR § 502.13.

WEDCCA's statement that its members live between 150 feet and two blocks from the Aston and that its members' properties will suffer a "detrimental impact" could not be more vague and conclusory. Appellant's Statement ¶¶ 7, 10. "[C]lose proximity to [a] property alone does not make every use, or change in use, of the subject property injurious to [a neighborhood organization's] members." *York Apartments Tenants Ass'n v. D.C. Zoning Comm'n*, 856 A.2d 1079, 1085 (D.C. 2004). Rather, *specific* allegations of harm are necessary. *See, e.g.*, *Youngblood v. D.C. Bd. of Zoning Adjustment*, 262 A.3d 228, 235 (D.C. 2021) (alleging increased noise, congestion, traffic, and loss of parking); *Economides*, 954 A.2d at 434 (citing obstructed views, air, and light); *see also Goto v. D.C. Bd. of Zoning Adjustment*, 423 A.2d 917, 932 (D.C. 1980) (Kelly, J., concurring in part and dissenting in part) ("I would not confer automatic standing upon an adjoining property owner without some allegation of injury to that specific property. Courts have frequently denied standing to adjoining property owners who failed to make a sufficient showing of special or pecuniary damages.") (collecting cases). WEDCCA's error is compounded in that not only does it fail to specify any sort of concrete harm, WEDCCA also fails to identify with particularity *which* members may be affected by the unspecified "detrimental impact[s]." The Supreme Court has definitively rejected such "self-descriptions of [] membership" without "identify[ing] members who have suffered the requisite harm" as insufficient for organizations to assert the standing of their members. *Summers v. Earth Island Inst.*, 555 U.S. 488, 499 (2009).

Summing up, WEDCCA fails to show that, as an organization, it has anything more than a "mere interest in a problem," *Fraternal Order of Police*, 290 A.3d at 37, nor has it explained how any of its members will be specifically aggrieved by the decision at issue, 11-Y DCMR § 302.12(f)(2). As such, it lacks standing to bring this appeal. *Cf. YATA*, 856 A.2d at 1085

(denying neighborhood group's petition of a Zoning Commission order on standing grounds for failure to show any direct harm).

II. WEDCCA's Appeal Fails on the Merits.

A. The District Did Not Need A Special Exception Because the Zoning Administrator Correctly Found the District's Planned Use of the Aston Consistent with Apartment Use.

WEDCCA insists that the "District's planned use of the Aston is the textbook example of an Emergency Shelter under the Zoning Regulations." Appellant's Mem. at 14. Stemming from this legal conclusion, WEDCCA argues that the District needed to apply and receive a special exception from the Board before proceeding with development of the Aston. *Id.* According to WEDCCA, the Aston cannot fall under Apartment House use under the Zoning Regulations. *Id.* at 15. This is because residents "will not occupy or control units in the Aston by rental agreement or ownership," *id.* at 16, or have "exclusive control of individual units," *id.* at 17, and thus the Aston is "inherently incompatible with the residential use category applicable to the RA-5 zone." *Id.* at 19. WEDCCA's argument fails easily.

Under the Zoning Regulations, an apartment is defined as, "One (1) or more habitable rooms with kitchen and bathroom facilities exclusively for the use of and under the control of the occupants of those rooms. Control of the apartment *may* be by rental agreement or ownership." 11-B DCMR § 100.2 (emphasis added). In turn, an apartment house is defined as "any building or part of a building in which there are three (3) or more apartments, providing accommodation on a monthly or longer basis." *Id.* WEDCCA argues that residents of the Aston will not have control of their rooms because they will not sign a lease nor own the units. Appellant's Mem. at 16. Neither is necessary under the Zoning Regulations, however, to establish use and control of the units. *See* 11-B DCMR § 100.2 ("Apartment"). Moreover, the District's use of the Aston

includes private units with kitchens and bathrooms over which each resident has or will have exclusive control, *i.e.*, the ability to lock their respective units. Supp. Pierre Decl. ¶ 12. And even WEDCCA concedes that "the minimum length of stay at the Aston will be one month," Appellant's Mem. at 23, plainly falling within the Zoning Regulation's definition of Apartment House, requiring "accommodation on a monthly or longer basis," 11-B DCMR § 100.2.

Two BZA cases are instructive. Indeed, the Board has previously rejected the precise arguments WEDCCA makes here. In BZA Case No. 20183, condominium association Residences of Columbia Heights (RCH) challenged a proposed short-term family shelter by arguing that the DOB predecessor agency, the Department of Consumer and Regulatory Affairs (DCRA), issued a building permit in error. *See* [11A] Ex. C (DCRA Pre-Hearing Statement, *In re. Appeal by Residences of Columbia Heights*, BZA Appeal No. 20183) at 1–2. The proposed new facility in that case was comprised of units that each had a private bedroom, kitchen, and bathroom, with each resident having a key to control entry into their respective units. *Id.* at 5. Just like WEDCCA here, RCH specifically argued that the use of the intended facility was more appropriately defined as an "emergency shelter," and that, because the District had not sought a special exception, DCRA had issued the permit in error. *Id.* Part of RCH's argument, which WEDCCA doubles down on, hinged on RCH's contention that to demonstrate adequate control under "apartment use" an inhabitant needed to establish a tenancy. *Id.* at 7–8; *see also* Appellant's Mem. at 15–18. The Board rejected RCH's arguments, finding that the Zoning Administrator "correctly identified this as an apartment house because the apartment was one or more habitable rooms with kitchen/bathroom facility exclusively for the use of, and under the control of, the occupants of those rooms." *See* [11A] Ex. D (Transcript of May 6, 2020 BZA Public Meeting) at 39. The Board also noted that residents would have a right to occupy their

units for over "30 consecutive days . . . Therefore . . . it qualified under the lodging definition."). *Id.* at 40. The Board ignored RCH's argument as to the purported necessity of a tenancy through rental agreement or ownership. *Id.* Here, the parallels could not be clearer. The composition of each unit at the Aston (including a bedroom, kitchen, and bathroom), each resident's right of control via a key, and intended stays lasting beyond thirty days, render this matter virtually indistinguishable from the proposed use of the property in Case No. 20183.

Similarly, in BZA Case No. 18151, the Van Ness South Tenants' Association (the Association) challenged DCRA's issuance of a building permit which allowed the University of the District of Columbia (UDC) to erect partition walls in 21 units within an existing 625-unit apartment house. *See* [11A] Ex. E (Decision and Order, *In re. Appeal of Van Ness S. Tenants' Ass'n*, BZA Appeal No. 18151, Apr. 5, 2011) at 1. The Association argued that the building permit impermissibly authorized a "dormitory" or "rooming house" within an apartment house because residents did not have "exclusive use and control of their units." *Id.* The Board noted that the issue of control was not at issue in the permitting process and, as such, DCRA "was not obligated to investigate whether that element was met." *Id.* at 6. Even so, the Board considered the issue on appeal and found that "[t]he 21 units remain under the exclusive control of the occupants of each unit, inasmuch as the occupants control the locks to their individual units, and are thereby able to exclude other residents from the units." *Id.* The Board rejected the Association's argument that the UDC Occupancy Agreement, which granted UDC, among other things, the prerogative to force students to leave during breaks and limited access to overnight guests, did not meaningfully "affect the long term control of the occupant so long as they are allowed to remain on the premises." *Id.* Similarly, here, all residents will receive keys to their units, and will sign Program Rules allowing for periodic inspections; the Aston's Program Rules

are not meaningfully different from the UDC Occupancy Agreement in this respect. *See* [10A] DOB Ex. A (Aston Program Rules). Because residents at the Aston "retain the rights to exclude all others," with exceptions designed in the Rules, residents have the necessary control of their units to constitute apartment use. WEDCCA's argument as to exclusive control and access fails.

B. DOB Properly Considered the Zoning Regulations in Reviewing the District's Permit Application.

Making matters worse, according to WEDCCA, "[t]he Zoning Administrator did not consider or even mention the 'emergency shelter' classification." Appellant's Mem. at 21. And further, WEDCCA claims, in issuing the construction permit, DOB "blindly relied on the 2022 Determination Letter," *id.* at 20, and "fail[ed] to conduct a meaningful assessment of the District's plans for zoning compliance." *Id.* at 22. WEDCCA's arguments are unsupported and baseless. WEDCCA speculates that both the Zoning Administrator and the DOB zoning reviewer did not consider other classifications in assessing the zoning compliance of the Aston. The only support WEDCCA offers for this speculation is that the Zoning Administrator did not mention "emergency shelter" in the 2022 Determination Letter and that the only comment the DOB zoning reviewer left on the building permit application related to possible office use. *Id.* at 20–21. This evidence of absence, however, does not reflect that DOB failed to conduct a meaningful assessment.

WEDCCA offers no support in the regulations or elsewhere for the proposition that DOB must affirmatively *disclaim* the applicability of other zoning categories in its comments on an application. In fact, issuance of the building permit itself "reflects a zoning decision about whether a proposed structure, and its intended use as described in the permit application, conform to the zoning regulations." *Basken v. D.C. Bd. of Zoning Adjustment*, 946 A.2d 356, 364 (D.C. 2008). Thus, it is implicit in issuing the permit that DOB determined that the

proposed use is permissible under the specific classification in the Zoning Regulations, rather than finding that the property might or might not be permissible under *other* classifications.[4] Here, DOB's determination that the indicated use falls within the definition of an "Apartment" was proper, and the BZA should affirm its decision. *See Ward 5 Improvement Ass'n v. D.C. Bd. of Zoning Adjustment*, 98 A.3d 147, 155 (D.C. 2014) ("The BZA may consider the [Zoning Administrator's] views in arriving at its own de novo interpretation [of the Zoning Regulations] . . . .").

C. The Proposed Residential Use for the Aston Included in the Permit Is Proper.

WEDCCA takes another related swipe at the Permit in challenging the District's intended use of the property under the R-2 occupancy category. According to WEDCCA, because the District's intended use of the Aston "does not fall under the R-2 occupancy category," the permit is "fundamentally defective and should be revoked on that basis alone." Appellant's Mem. at 23. Given the clear precedent described above, this is simply incorrect. Because residents will stay for at least a month, if not significantly longer, and have exclusive control of their units, the use classification of Apartment House is proper. As such, "Residential Group R-2"—which includes Apartment Houses—is in fact appropriate. *See* 12-A DCMR § 310.4 (defining "Residential Group R-2" as "occupancies containing sleeping units or more than two dwelling units where the occupants are primarily permanent in nature," and which generally include "Apartment houses."); 11-B DCMR § 100.2 (defining apartment house as "any building or part of a building

[4] Even if a proposed use fits within multiple potential definitions, the prevailing question is simply whether the proposed use comports with the applicable Zoning Regulations, or, more simply, whether DOB erred. *See Kalorama Citizens Ass'n v. D.C. Bd. of Zoning Adjustment*, 640 A.2d 179, 180 (D.C. 1994) (noting with approval that "[t]he Board further concluded, and the regulations confirm, that intervenor's bed and breakfast establishment conformed to the definition of a 'rooming house' in 1982, even if it more closely fit the definition of an 'inn'").

in which there are three (3) or more apartments, providing accommodation on a monthly or longer basis."). By the text of the Zoning Regulations, and clear BZA precedent, the District's intended use of the Aston reflects apartment use. Thus, DOB's issuance of the building permit was not in error. 11-Y DCMR § 100.4 ("The Board . . . shall also hear and decide zoning appeals where it is alleged by the appellant that there is error in any order, requirement, decision, determination, or refusal made by any administrative officer or body, including the Mayor, in the administration or enforcement of the Zoning Regulations.").

D. No PUD Applies to the Aston.

The Zoning Regulations "prohibit[ ] any construction on [a] PUD site that is not authorized in the order approving the PUD, including development under matter-or-right standards, until: (a) The validity of the PUD order expires; or (b) The Zoning Commission issues an order granting the applicant's motion to extinguish the PUD." 11-X DCMR § 310.2. WEDCCA argues that the Aston is located on a lot that falls under GWU's Campus Plan No. 06-11 and PUD No. 06-12, first approved by the Zoning Commission in March 2007 and effective until October 2027. Appellant's Mem. at 24. In addition, WEDCCA asserts that a temporary amendment to the GWU PUD, PUD #06-12Q, applies. *Id.* Because a PUD applies to the property, WEDCCA asserts that the District should have obtained approval from the Zoning Commission to extinguish the PUD, and because it did not, DOB's issuance of the Permit was in error. *Id.* Not so.

In support of its argument that a PUD applies to the lot on which the Aston sits, WEDCCA relies on a letter from the previous Zoning Administrator, the Zoning Map, and contract documents from the sale of the Aston. *Id.* at 25. These documents, however, are not dispositive as to the applicability of a PUD. *See Bannum, Inc. v. District of Columbia Bd. of*

Zoning Adjustment, 894 A.2d 423, 431 (D.C. 2006) ("It is the Board, not the Zoning Administrator, which has final administrative responsibility to interpret the zoning regulations.") (quotation omitted)). Indeed, the problem for WEDCCA is that neither GWU's Campus Plan or the temporary PUD applies to the Aston. For starters, the Aston is located at Square 72, Lot 7,[5] a lot not contained within the original GWU PUD. *See* Z.C. Order No. 06-11/06-12, at 5–6 (listing the precise Lot numbers that are included in the GWU PUD and omitting the Aston's). For this reason alone, WEDCCA's claim pertaining to the PUD should be dismissed.

Moreover, PUD #06-12Q, which operated for the express and temporary purpose of rearranging the housing assignments for some of GWU's student population while one of GWU's other dormitory buildings underwent renovations, expired in 2022. *See* Z.C. Order No. 06-11Q/06-12Q, at 10 (indicating that "[t]he Limited Period [of PUD #06-12Q] shall end on the date when the last undergraduate student moves out of the above-referenced property" and further "the Temporary Housing Plan use for The Aston ... will last no more than 24 consecutive months."); *see also* [10A] DOB Ex. B (Letter from Matthew Le Grant, Zoning Administrator, to Anthony Hood, Chairperson, D.C. Zoning Commission (Aug. 8, 2022)) (confirming that GWU ended its temporary housing at the Aston pursuant to PUD 06-12Q). Because no PUD applies now—if one ever did—WEDCCA's argument necessarily fails.

CONCLUSION

For the foregoing reasons, the Boad should deny WEDCCA's appeal of Permit No. B2401624.

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[5] The Aston's lot and square number, a matter of public record, can be found on the Official Zoning Map of the District of Columbia, at https://maps.dcoz.dc.gov/zr16/#l=20&x=-8576913.1414&y=4707986.845899999&mms=lots!square!zoneDistrict!pendingZones!puds!pendingPuds!campusPlans.

Date: January 22, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 11-Y DCMR § 205, undersigned counsel certifies that on January 22, 2025, copies of this filing were served by email on:

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