



June 20, 2025

**VIA IZIS**

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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. 21318**  
**Applicant's Supplemental Statement**

Chairperson Hill and Honorable Members of the Board:

The District of Columbia Department of General Services ("DGS") (the "Applicant") submits this Supplemental Statement in support of its request for variance relief pursuant to Subtitle C § 302.2 to allow multiple primary structures on a single record lot in the R-1B zone.

On June 18, 2025, Advisory Neighborhood Commission 5B voted 5-0-2 to support the application. The Commission's support was conditioned on the modular structures remaining in place for no more than six years or until they have been used by three schools, whichever comes first. The Applicant anticipates supplementing the record with additional materials following a presentation to Advisory Neighborhood Commission 5B on June 18, 2025.

The modular campus is currently projected to serve the following schools: Burroughs Elementary School from 2025 to 2027, Bunker Hill Elementary School from 2027 to 2029, and a third school (to be determined) from 2029 to 2031. The proposed six-year use period reflects the average lifecycle for modular campuses of this type. Due to their cost and portability, these structures are typically deployed for six years across multiple school sites as part of DCPS's citywide modernization efforts.

The modular campus will be secured consistent with DCPS standards, including controlled access points and fencing.

The Applicant has included a Motion to Late File this supplemental material, attached as **Tab A**. The hearing is scheduled for Wednesday, July 2, 2025, and materials were due on or before June 2, 2025, pursuant to Subtitle Y § 300.15. The Applicant respectfully submits that there is good cause for the Board to accept this filing, as the enclosed materials reflect recent developments, including the outcome of the ANC meeting and updated supporting documentation that provide further context for the requested relief.

Sincerely,

Cozen O'Connor

A handwritten signature in blue ink, appearing to read 'MM', written over a horizontal line.

Meridith Moldenhauer

A handwritten signature in blue ink, appearing to read 'ZB', written over a horizontal line.

Zachary Bradley

**Certificate of Service**

I hereby certify that on this 20<sup>th</sup> day of June, 2025, a copy of the foregoing Supplemental Statement was served, via email, on the following:

District of Columbia Office of Planning  
1100 4<sup>th</sup> Street SW, Suite E650  
Washington, DC 20024  
[planning@dc.gov](mailto:planning@dc.gov)

Advisory Neighborhood Commission 5B  
c/o Prita Piekara, SMD 5B06, Chairperson  
[5B06@anc.dc.gov](mailto:5B06@anc.dc.gov)



Meridith Moldenhauer  
2001 M Street NW, Suite 500  
Washington, D.C. 20036



Zachary Bradley  
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**Tab A**



BEFORE THE ZONING COMMISSION OR  
BOARD OF ZONING ADJUSTMENT FOR THE DISTRICT OF COLUMBIA



FORM 150 – MOTION FORM

THIS FORM IS FOR PARTIES ONLY. IF YOU ARE NOT A PARTY PLEASE FILE A  
FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD.

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

CASE NO.:

Motion of:

☐ Applicant

☐ Petitioner

☐ Appellant

☐ Party

☐ Intervenor

☐ Other \_\_\_\_\_

PLEASE TAKE NOTICE, that the undersigned will bring a motion to:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Points and Authorities:

On a separate sheet of 8 ½" x 11" paper, state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form (see instructions).

Consent:

Did movant obtain consent for the motion from all affected parties?

☐ Yes, consent was obtained by all parties

☐ Consent was obtained by some, but not all parties

☐ No attempt was made

☐ Despite diligent efforts consent could not be obtained

Further Explanation: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

CERTIFICATE OF SERVICE

I hereby certify that on this

D

D

day of

Month

,

Y

Y

Y

Y

I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning

in the above-referenced ZC or BZA case via:

☐ Mailed letter

☐ Hand delivery

☐ E-Mail

☐ Other \_\_\_\_\_

Signature:

Print Name:

Address:

Phone No.:

E-Mail: