

January 2, 2026

**VIA IZIS**

Frederick Hill, Chair  
D.C. Board of Zoning Adjustment  
441 4<sup>th</sup> Street, NW  
Suite 200S  
Washington, DC 20001

RE: **BZA Case No. 21406 – 2502 Martin Luther King, Jr. Ave., SE – Pre-Hearing Submission**

Dear Chairman Hill and Members of the Board:

On October 2, 2025, Consys, Inc. (the “**Applicant**”) filed the above-referenced application for special exception relief (i) to shift the zone boundary line pursuant to Subtitle A § 207.2; and (ii) for relief from the minimum vehicle parking requirements pursuant to Subtitle C § 703.2 for the property located at 2502 Martin Luther King, Jr. Ave., SE (Square 5868, Lot 175) (the “**Property**”). The relief requested will facilitate construction of a new multifamily building with ground floor retail (the “**Project**”). In advance of the February 4, 2026 public hearing on the application, the Applicant hereby submits this pre-hearing statement and supplemental information pursuant to Subtitle Y § 300.15.

**I. Revised Plans**

The District Department of Transportation (“**DDOT**”) provided feedback to the Applicant requesting that the plans show how the Project will potentially interact with the proposed building’s Sheridan Road frontage as well as how expected loading and delivery activities will be managed on that side of the building. DDOT further requested that the Project discourage curbside deliveries along Martin Luther King, Jr. Ave. In response to this feedback, the Applicant has revised the plans to potentially relocate the lobby entrance to the Sheridan Road frontage of the Property as “Option 2” shown on Page A.13 of the attached revised plans (the “**Revised Plans**”). The Revised Plans also show the lobby in its originally proposed location at the Martin Luther King, Jr. Ave. side as “Option 1” at page A.12. The Applicant requests that the final approved plans include both alternatives. The Applicant will continue to work with DDOT to determine the best location for the lobby entrance with respect to loading and delivery activities and the Project’s integration with public space.

**II. Bicycle Parking**

In light of the Applicant's request for relief from the minimum vehicle parking requirement, DDOT also requested that the Project exceed both long- and short-term bike parking requirements and provide charging accommodations for e-bikes and scooters in the bicycle storage room. In response, the Applicant has increased the number of bike parking spaces from three (3) short-term spaces to six (6) short-term spaces and the long-term bike parking spaces from twelve (12) long-term spaces to sixteen (16) long-term spaces. In addition, the Applicant agrees to include outlets in the bike room to provide bike charging. These revised bike parking numbers are reflected at pages A.02 and A.03 of the Revised Plans.

### **III. Witnesses**

The Applicant intends to present the following witnesses on its behalf at the public hearing:

- Raj Shukla, Vice President, or Jay Narain, President, Consys, Inc.
- Sean Pichon, Principal, or Kaloyan Yordanov, Project Manager, Michael Graves Architects
- Daniel Solomon, Principal, Gorove Slade

Outlines of witness testimony are attached hereto as Exhibit B. The Applicant intends to proffer Mr. Pichon or Mr. Yordanov as an expert in architecture and Mr. Solomon as an expert in transportation engineering. Resumes for Mr. Pichon, Mr. Yordanov and Mr. Solomon are attached hereto as Exhibit C.

### **IV. Conclusion**

We look forward to presenting the Project to the Board at the February 4, 2026 public hearing. Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/s/ Jeff Utz  
Jeff Utz

/s/ Lee Templin  
Lee Templin

### **Certificate of Service**

The undersigned hereby certifies that copies of the foregoing document were delivered by electronic mail to the following addresses on January 2, 2026.

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