Goulston & Storrs

David Avitabile
davitabile@goulstonstorrs.com
202-721-1137

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VIA IZIS

D.C. Board of Zoning Adjustment
441 4th Street, N.W.
Suite 200S
Washington, D.C. 20001

Re: **BZA Application No. 21510 -- Rock Creek Club ("Applicant")**
2325 Porter Street NW (Square 2224, Lots 4, 823, and 826) ("Property")

Opposition to Second Motion to Postpone Hearing from Joseph Sellers and Laurie Davis

Dear Chair Pourciau and Members of the Board:

The Applicant continues to request that the Board move forward with the scheduled public hearing on November 4. The Applicant has thoughtfully reviewed and evaluated the issues and concerns that have been raised regarding the Application over the course of sustained engagement over the past three months and produced substantive, meaningful concessions to address the concerns. This engagement has continued over the past two weeks, following feedback received at ANC 3C's Planning, Zoning, Housing and Economic Development Committee meeting on October 5 and leading up to the ANC's business meeting last night on October 19, at which ANC 3C voted 5-1-1 to support the Application and oppose the request to postpone the hearing.

Rather than wait for the public hearing on November 4, the Applicant has provided updates in advance of the hearing to both convey its earnest focus on being a good neighbor and narrow the hearing's focus to any unresolved or outstanding issues. To its credit, the team hired by Mr. Sellers and Ms. Davis (which includes not only counsel but also transportation and historic preservation consultants) as well as other neighbors have also provided detailed feedback on the Application. The proposed conditions that have been submitted to the record reflect responses to this feedback, and the Applicant will continue to engage with the neighbors on the most recent feedback raised at last night's ANC meeting and consider potential additional measures.

However, mindful that the Board may consider Mr. Sellers' and Ms. Davis' request for postponement (including the new grounds raised in their counsel's October 16 filing) tomorrow, the Applicant offers the following response to assist the Board in evaluating their postponement request. The outstanding issues referenced in Mr. Sellers' and Ms. Davis' October 16 letter generally relate to concerns about the potential impact of the Applicant's operations on the access

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road. In response to feedback regarding the potential impact of the Application on the access roadway, the Applicant is prepared to supplement its Transportation Management Plan with two specific mitigation measures to address these concerns:

(1) An **Event Management Plan** to manage impacts associated with RCC events. Among other measures, during Special Events (which are limited to no more than 6 per year), the Applicant would utilize traffic control personnel to direct pickup and dropoff activity to do so on Porter Street and stagger arrival windows for all attendees.

(2) A **Monitoring Plan** to ensure that the vehicular use of the roadway associated with club use does not exceed the forecasts in the Applicant's Transportation Study. The Monitoring Plan would utilize a formal "trip cap" that limits the number of trips on the access road to no more than 68 trips per day, based on estimates that reflect feedback received from Mr. Sellers' and Ms. Davis' traffic consultant. Because each vehicle that visits the facility makes two trips (one inbound and one outbound), 68 daily trips equates to 34 vehicles per day, or no more than two to three vehicles per hour, on average. Formal counts would be undertaken at least three times per year to start, and remedial measures would be enacted if the counts show the trip cap is exceeded.[1]

Both strategies are regularly employed to manage the transportation impacts of institutional uses, particularly in residential zones. They directly address the activity- and event-based transportation concerns raised by the opponents, which obviates the need for the bulk of information they have requested as grounds for postponement. In addition to the foregoing and to further bolster the Transportation Management Plan, the Applicant has supplemented its transportation demand management plan to include a $120 tax-free monthly transit stipend to all part-time and full-time employees. The updated Transportation Management Plan is attached as Exhibit A, and the Applicant agrees to incorporate these measures as part of the conditions of approval.

With respect to the remaining issue raised by the opponents as grounds for postponement—the survey of the access road—the Applicant has already produced a survey as part of its acquisition of the Property, and a copy of this survey, which shows the location of the road relative to the underlying easement, is included in Exhibit 2 of the record. The opponents have had months to review this information or obtain their own assessment. Indeed, the opponents first notified the Application of their intent to do so on July 22, when the opponents asked the Applicant to refrain from taking steps to widen the road on its own property while they secured their own survey. The

[1] The Monitoring Plan implements and expands upon one of ANC 3C's recommendations, which was for a one-time monitoring report. The ANC's other two recommendations are to limit Special Events to only 6 events per year, which the Applicant has already agreed to do, and to limit social events to indoors only, which the Applicant agrees to do.

Applicant did so and followed up twice on the status of the peer survey, on August 6 and again on Sept 1, at which point the opponents stated that they were "closer to having it done."

Regardless, a second survey is not needed to evaluate the impacts of the Application on the ability of the roadway to manage pedestrian and vehicular traffic. Pursuant to measurements in the field taken by the Applicant's transportation engineer, the road varies in width from approximately 14'9" to 21'5" and operates like many low-volume residential streets throughout the District where one driver pulls to the side or waits briefly at wider sections while the other goes through. The road offers two locations where vehicles can easily pass—a stretch midway up the road that extends for a length of 147 feet, and a second location further north at a bend in the road—and the Applicant is also prepared to widen the final stretch of the road to 18 feet on its own property where possible. Given the low volume of traffic on the road as projected in the Transportation Study, two vehicles needing to pass would be an occasional event, not a routine one, and easily navigable given the multiple passing points. Moreover, the gravel road functions as a de facto shared street and has many of the same characteristics as intentionally designed shared streets (no curbs or separate sidewalks, carries low traffic volumes, and has a narrow width and textured surface that keeps speeds low). Drivers feel and hear the rougher surface, which signals that the road is not a conventional street and encourages drivers to slow down and yield to pedestrians and cyclists. These conditions are what make shared streets work, and those same conditions are already present on the gravel road.

Again, the Applicant seeks a timely hearing before the Board, which will provide a further opportunity for all parties to be heard and for the Board to assess the merits of the Application. Accordingly, the Applicant respectfully requests the Board move forward with the public hearing on November 4. Please do not hesitate to contact the undersigned with any questions or comments regarding the information provided in this supplemental submission.

Sincerely,

/s/ David Avitabile

David Avitabile

Certificate of Service

The undersigned hereby certifies that copies of the foregoing documents were delivered by electronic mail to the following addresses on October 20, 2026.

Radhika Mohan
Maxine Brown-Roberts
Crystal Myers
Office of Planning
radhika.mohan@dc.gov
maxine.brownroberts@dc.gov 4
crystal.myers@dc.gov

Erkin Ozberk
Madeline Sanders
District Department of Transportation
erkin.ozberk1@dc.gov
madeline.sanders@dc.gov

ANC 3C
3c@anc.dc.gov

SMD 3C06
3C06@anc.dc.gov

ANC 3C Chair: Janell Marie Pagats
3C03@anc.dc.gov

Meridith Moldenhauer
Zachary Bradley
Counsel for Joseph Sellers and Laurie Davis
mmoldenhauer@cozen.com
zbradley@cozen.com

/s/ David Avitabile
David Avitabile