Goulston & Storrs

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October 5, 2026

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")
Applicant's Prehearing Submission

Dear Chair Pourciau and Members of the Board:

On June 30, 2026, the Applicant submitted an application for special exception approval of a community center, pool, and tennis courts ("**Club**") pursuant to Subtitle U § 203.1(d) and Subtitle X Chapter 9 ("**Application**"). The Board is scheduled to hold a public hearing to consider the Application on November 4, 2026. In advance of the public hearing, the Applicant hereby submits this pre-hearing submission to provide the Board with updated materials and supplemental information regarding the Application

I. Background and Overview of the Special Exception Request

As detailed in the initial Application, the Applicant proposes to establish a private neighborhood pool and racquet club at the Property to be run by the Applicant. A private community center, pool, and athletic facilities is permitted by special exception on the Property, which is in the R-1A zone, pursuant to Subtitle U § 203.1(d), subject to the following criteria:

(1) The use shall not be organized for profit, but shall be organized exclusively for the promotion of the social welfare of the neighborhood in which it is proposed to be located;

(2) The use shall not include retail sales to the general public but may charge a fee to members for services, which may include refreshments;

(3) The use shall not likely become objectionable in a R zone because of noise or traffic; and

(4) The use shall be reasonably necessary or convenient to the neighborhood in which it is proposed to be located;

Approval of the use is also subject to the general special exception criteria:

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(a) Will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps; and

(b) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.

The Application outlined the satisfaction of these criteria in its initial statement. This Pre-Hearing Statement supplements the initial statement.

Specific Criteria 1 & 2 – Non-Profit Organized for the Social Welfare of the Neighborhood and its Members

The Applicant is a nonprofit organization founded exclusively for the purposes of promoting the social welfare of the neighborhood it serves. Here, the neighborhood is defined as the area within one mile of the Property and encompasses portions of the Mount Pleasant, Cleveland Park, Woodley Park, Lanier Heights, and Crestwood neighborhoods on each side of Rock Creek Park.

In the initial application, the neighborhood served by the Applicant was defined as the area within the one-mile radius as well as all residents within ANC 3C, which is the ANC in which the Property is located, and the Applicant required that at least 80% of members live within this geographic range. Since the filing of the initial Application, the Applicant has revised the proposed membership in three ways to emphasize its focus on serving the neighborhood and strengthening opportunities for families who choose to live in the District:

(1) The neighborhood is now limited to a one-mile radius around the Property. The area beyond the one-mile radius is no longer considered part of the neighborhood, even if they live within ANC 3C.

(2) The Applicant now requires that at least 85% of its members live within the one-mile neighborhood radius.

(3) Any members beyond that range must live with the District of Columbia.

These modifications reaffirm the Applicant's focus on serving the welfare of its local neighborhood with community gathering space and recreational facilities.

The Zoning Regulations expressly allow for these privately-operated, community-serving uses in low-density residential zones by special exception, subject to the general special exception criteria as well as specific conditions enumerated in U § 203.1(d). Like other neighborhood pool and tennis clubs, the Applicant is a member-based organization that charges fees and dues to provide for the upkeep and operation of the facility, as is expressly anticipated by U § 203.1(d)(2). The sole purpose of the membership requirement is to manage capacity and ensure opportunities

for residents in the neighborhood served by the organization. Membership in the Applicant is otherwise available to all residents who reside within the neighborhood, agree to the rules, and pay the required dues and fees.

Thus, private neighborhood-serving pool and tennis clubs such as the Applicant differ significantly from country clubs and other types of private clubs, because these neighborhood-based clubs serve a defined geographic area for a limited recreational purpose in a non-selective manner. Country clubs and other private clubs such as the University Club, by contrast, draw from a broader region yet also impose selectivity requirements to maintain their exclusivity. To this end, courts have distinguished neighborhood pool and tennis clubs from private clubs because private neighborhood pool and tennis facilities show "no plan or purpose of exclusiveness" or other intent to be selective.[1]

Specific Criteria 3 – Not Objectionable due to Noise or Traffic – and General Criteria 2 – Will Not Adversely Affect the Use of Neighboring Property

As described in detail in **Sections II - IV** of this Pre-Hearing Statement, the Applicant has engaged in significant dialogue with neighbor and agency stakeholders to review and revise its proposal to address the issues and concerns that have been raised regarding its potential impacts. The Revised Site Plan, Revised Plans, Transportation Study, and Proposed Conditions attached as **Exhibits A - D** all support a conclusion that the Applicant has made a "reasonable accommodation" of the concerns that have been expressed such that approval of the Application will not generate objectionable or adverse impacts. See Glenbrook Road Ass'n v. D.C. Bd. of Zoning Adj., 605. A.2d 22, 32 (D.C. 1992). An updated assessment of impacts is summarized below and supported in **Sections II – IV** of this Pre-Hearing Statement.

- **Traffic**. The initial Application asserted that the majority of users would not drive or park at the Property. As discussed in **Section III** and detailed in **Exhibit C**, the Transportation Study confirms that nearly two-thirds of trips are expected to be by foot, bike, or transit. The Transportation Study also confirms that the impacts associated with the remaining trips are limited, particularly on the access roadway from Porter Street that leads to the Property. In addition:
    - Main Entrance: The Applicant has further developed the design of the new main entrance for pedestrians and bicyclists, which is shown on **Exhibit A**, and the Applicant

[1] Sullivan v. Litter Hunting Park, Inc., 396 U.S. 229 (1969) (concluding a neighborhood recreation center in Fairfax County was not a "private club" exempted from civil rights protections); Tillman v. Wheaton-Haven Recreation Ass'n, 410 U.S. 431 (1973) (concluding the same for a neighborhood pool in Silver Spring).; see also Olzman v. Lake Hills Swim Club, Inc., 495 F.2d 1333 (2nd Cir. 1974) ("If limitation on the number of users were the test, every restaurant or night club limited by law or fire regulations to a given number of occupants at a given time would be magically transformed into a "private club.")

commits to construct the entrance prior to the issuance of a certificate of occupancy for the proposed use.

- Turnaround: The Applicant has agreed to construct an on-site turnaround to accommodate pickup and dropoff activity, also as shown on **Exhibit A**, and the Applicant commits to construct the turnaround prior to the issuance of a certificate of occupancy.

- Access Roadway Maintenance: The initial Application asserted that the access road would have limited use due to limited on-site parking. The Transportation Study confirms this assertion. Nevertheless, as set forth in the Conditions, the Applicant has agreed to maintain the access road.

- **Parking**. The initial Application asserted that the use would not generate adverse parking impacts because the majority of users would not drive to and park at or near the Property. The Transportation Study supports this conclusion, finding that only 20% of users will park on or off site and further finding that there is adequate off-street parking supply to accommodate parking demand.

  - On-Site Parking: The Application continues to limit the number of on-site parking spaces to no more than 14 spaces, which equates to the existing number of parking spaces, and limit who is permitted to utilize the on-site parking spaces. The Revised Site Plan incorporates a gate to further ensure that unauthorized parking does not occur.

  - Off-Site Parking: As set forth in the Conditions, the Applicant will strongly discourage members from parking on Williamsburg Lane. Williamsburg Lane currently allows unrestricted parking, and the Applicant further agrees to support any petition to establish residential permit parking on the block.

- **Noise**: The initial Application stated that hours of operation would be from 7 AM – 10 PM.

  - Additional Restrictions on Hours: As set forth in the Conditions and in response to concerns regarding early morning and late evening noise, the Applicant has moved the closing time on Sunday through Thursday to 9 PM and moved the opening time on Saturday and Sunday to 8 AM. Further, the Applicant has limited the hours for the racquet courts to 8 AM to sunset.

  - Amplified Noise: As set forth in the Conditions, amplified exterior noise is not permitted other than during special events, which are limited to 6 per year.

  - Events: As set forth in the Conditions, special events are limited to no more than six per year, and large private events are prohibited.

- **Lighting**: The initial Application stated that there would be no lighting of either the pool facilities or tennis courts other than safety and security lighting. The Conditions reaffirm this commitment and further clarify that (1) any safety and security lighting shall be reasonable in intensity and (2) prohibit any uplighting.

- **Trash**: The Applicant has further developed its plan to mitigate impacts from trash removal by developing a comprehensive plan for trash removal as follows:

    - Trash will be stored in storage bins that will be located on the Property at least 100 feet from adjacent residential neighbors.

    - Trash will be rolled to the Main Entrance on Porter Street on the morning of pickup (after 8 AM) and retrieved the same day (before 6 PM).

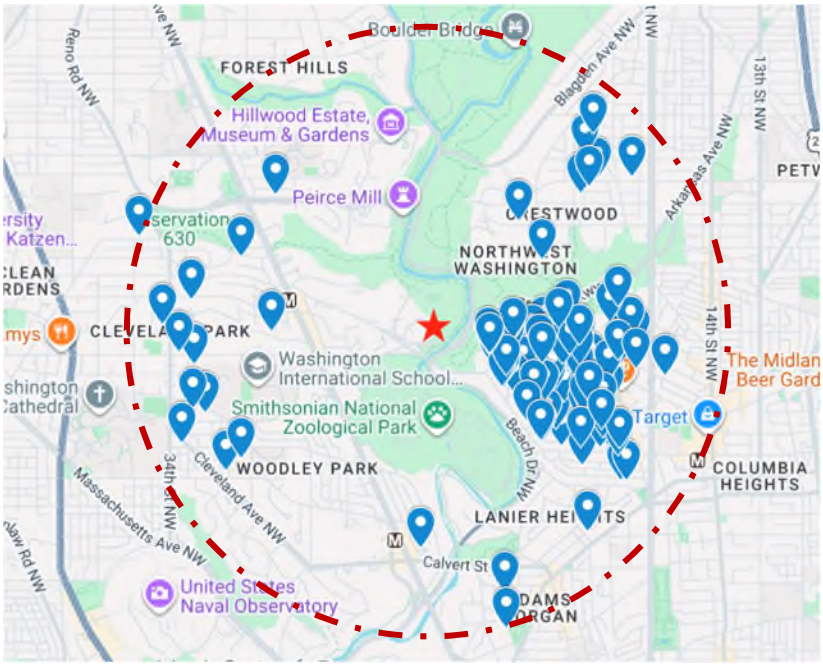
    - Private trash collection will be arranged for pickup from Porter Street during normal business hours.

  This plan eliminates the need for trash trucks to use the access road, stores trash away from residential neighbors, and confines the noise associated with trash activity to daytime hours.

- **Deliveries**: As set forth in the Conditions, deliveries will be scheduled during normal business hours, with regular deliveries to occur when the club is otherwise closed. As noted in the Transportation Study, deliveries will be limited to trucks no longer that 28 feet in length, which are able to turn around within the Property.

Specific Criteria 4 – The Use is Reasonably Necessary and Convenient to the Neighborhood it Serves

As explained in the initial Application, the Property is centrally located within the neighborhood that is served by the Applicant, and the Applicant meets a need for outdoor recreational facilities and social gathering space. To date, over 125 families—all within one mile of the Property—have signed up to join the Applicant and paid the required deposit. This map illustrates the general location



of these families relative to the location of the Property, and the broad interest in the Applicant provides real-world evidence that residents in these neighborhoods find the proposed use to be both "necessary" and "convenient."

The Transportation Study further demonstrates that use is convenient to the surrounding neighborhood because of the Property's multi-modal accessibility. As demonstrated in the Transportation Study, the Property is well-served by both bus and Metro access and it is also located within reasonable biking and walking distance of the neighborhood it serves.

General Criteria 1 – Harmony with the Purposes and Intent of the Zoning Regulations

As set forth in the initial Statement, the proposed use is permitted by special exception, which is presumed to be compatible with the zone and thus expressly allowed, so long as relevant standards and conditions are met. Recreational facilities are regularly constructed on property in low-density residential zones, including not only public recreation and community centers as a matter of right but also private athletic facilities associated with universities and private schools pursuant to special exception approval. In approving such recreational facilities on private property by special exception, the BZA necessarily concludes that such use is in harmony with the purposes and intent of the Zoning Regulations. The same is true for private community centers such as the one proposed by the Applicant, which are also permitted by special exception.

Here, the proposed special exception furthers the public health and welfare. Creating safe and usable outdoor recreation space of any kind is a priority in a dense city with limited green space, and private recreation facilities such as the one proposed by the Applicant free up capacity in public recreation in community centers for other District residents. Furthermore, because of historic preservation guidelines and other covenants, the Property cannot be developed with additional housing. Therefore, the adaptive reuse of the Property as a neighborhood-serving community center is the best option for adaptively reusing the property to benefit the broader neighborhood.

Thus, the proposed use will expand access to the historic estate and allow for the 3.5-acre parcel to enhance the public health and welfare in another manner that is consistent with the balance and flexibility afforded by the Zoning Regulations for museums, schools, and similar institutional uses. Other examples of adaptive reuses of historic mansions and estates in residential zones include Hillwood Museum and Gardens, Dumbarton Oaks, Tudor Place, Halcyon House, Evermay, the portion of the Tregaron Estate that is now the location of Washington International School, the Zartman House on the campus of Sidwell Friends, and Meridian House and White-Meyer Mansion on the campus of Meridian International Center. Indeed, while on federal land and not open to the public, the use of Peirce Klinge Mansion immediately north of the Property as NPS's headquarters for Rock Creek Park is another example of the adaptive reuse of a historic landmark for an institutional purpose.

Finally, the proposed special exception is consistent with guidance in the District's Comprehensive Plan, which is also "part of [the Board's] task when reviewing applications for special exceptions" because those Plan provisions help inform the application of the special exception criteria. Youngblood v. D.C. Bd. of Zoning Adj., 262 A.3d 228, 242 (D.C. 2021). As detailed in **Section V** of this Pre-Hearing Statement, the Application furthers many goals and policies of the Plan that call for the expansion of community-serving spaces such as outdoor recreational facilities to retain residents, support families, and build neighborhood character. The Application also furthers policies that call for the preservation of historic estates and their open spaces, and it includes extensive design and operational measures to manage its proposed impacts on the immediate residential neighbors. Accordingly, the Application is in harmony with the policies and goals of the Comprehensive Plan, which is further evidence that it furthers the public health and welfare.

II. ANC, Community, and Agency Outreach and Planning Process

Since the filing of the Application, the Applicant has engaged in a sustained dialogue with community and agency stakeholders regarding the proposed Application. Shortly after filing, the Applicant presented the Application at a July 6, 2026, meeting of ANC 3C's Planning, Zoning, Housing and Economic Development Committee. During that meeting and in the weeks that followed, the Applicant received extensive input from the neighbors who are most proximate to the Property and raised a number of issues and concerns. The Applicant also received significant input from other families who live within the surrounding neighborhood and expressed strong interest in participating in the club.

The strong interest from well over a hundred families within a mile of the Property reaffirms that a neighborhood-based pool and tennis club is indeed "reasonably necessary and convenient" to the neighborhood as a whole, which is at the heart of the special exception at issue in this case. Nevertheless, the Applicant also takes seriously its commitment to be a good neighbor to those who are immediately proximate to the Property and has undertaken significant efforts to further study the issues and concerns raised by neighbors. To this end:

- Site Plan: The Applicant engaged a landscape architect to develop its overall site plan, met with representatives of the National Park Service as well as staff at the U.S. Commission of Fine Arts and the D.C. Historic Preservation Office to discuss the potential alterations to the Property, and refined the plan based on input from NPS, CFA, and HPO as well as surrounding neighbors. The updated Site Plan is attached as **Exhibit A**.

- Building Renovation Plans: The Applicant also engaged its architect to further study the renovations that would be required to adaptively reuse the existing house as the

community center and then discussed the alterations with CFA and HPO staff. The proposed Building Renovation Plans are attached as **Exhibit B**.

- Transportation Study: The Applicant engaged Wells & Associates as its transportation engineer to evaluate the potential traffic and parking impacts, met with representatives of DDOT to review the scope and methodology to be used for its analysis, and then undertook the study. In connection with this analysis, the Applicant also studied potential locations for pick-up and drop-off activity based on input from surrounding neighbors and established a proposed on-site turnaround as the best location to balance their concerns. The Transportation Study's findings and recommendations are attached as **Exhibit C**.

- Operational Impacts and Proposed Conditions of Approval: The Applicant developed a series of proposed conditions, based on best practices and precedent for other pool and tennis clubs as well as other institutional uses located in low-density residential zones such as schools and museums. The Applicant then shared the proposed conditions with the immediately affected neighbors for their input and comment and further refined the proposed conditions. The proposed Conditions of Approval are attached as **Exhibit D**.

Further details on these elements are discussed in more detail below.

The Applicant also delayed its return visit to ANC 3C to allow for more time to develop the plans, study, and conditions. The Applicant presented the updated application at ANC 3C's PZHED Committee this evening (October 5) and will continue to discuss the materials with all affected stakeholders. To the extent that additional revisions are made to the Site Plan, Conditions, or other aspects of the Application, the Applicant will provide the Board with an update prior to the hearing.

III. Revised Plan

The updated Site Plan attached as **Exhibit A** reflects changes and refinements to the location of program elements made in response to community and agency input. Each material change is discussed in detail below.

- Main Pedestrian Entrance. The initial Application called for the construction of a new main entrance to the Property directly on Porter Street NW, so that the majority of users arriving by bike or foot would be able to access the property directly from Porter Street rather than use the access roadway to the west of the Property. Since that time, the Applicant has engaged a landscape architect to study and design this entrance, which is shown on **Exhibit A**. The proposed entrance consists of an elevated deck that will

extend from the sidewalk into the Property and connects with a trail that leads up to the main building. The main entrance will also be used for trash pickup.

- Vehicular Drop-Off Area. Since the initial Application was filed, the Applicant also studied potential locations for vehicular pick-up and drop-off activity. While such activity is expected to be limited, the Applicant received concerns from multiple stakeholders about such activity taking place at the Main Entrance given the roadway configuration at that location. Therefore, the Applicant has designed a turnaround for pick-up and drop-off activity at the end of the access road that leads to the Property, which is shown on **Exhibit A**.

  The turnaround is located entirely on the Applicant's Property and the gate to the Property is located beyond the turnaround, so that there will not be a backup along the access road. As explained in the Transportation Study attached as **Exhibit C**, the number of trips at the peak use of the club are expected to be quite low, and the turnaround is able to accommodate this activity without any spillover impacts to the use of the access road. Finally, the Applicant has proffered to take responsibility for all costs of maintaining the access roadway.

- Aquatic Facilities. The initial Application called for a garden area north of the existing pool to be replaced with other pool-related facilities, such as a hot tub, cold plunge, and kids pool. As shown on **Exhibit A**, the Applicant has relocated the hot tub and cold plunge deeper into the Property, which allows for the western portion of the garden closest to the neighbor to the west to be retained as a garden.

- Racquet Facilities. The initial Application called for a meadow area southeast of the existing tennis court to be used for a second tennis court or other racquet sports. Since that time, the Applicant has identified locations for padel courts further into the Property, closer to the main residence, and is studying whether the second tennis court could be located immediately adjacent to the existing tennis court. The Applicant has also agreed to prohibit pickleball and install an acoustic barrier along the tennis court fence.

- Fencing and Screening. The updated Site Plan shown on **Exhibit A** calls for the construction of an open fence surrounding the Property as well as 10-foot planted buffer area along the Property perimeter. The design of the fence will be coordinated with CFA and HPO during the permitting process, and the planted buffer will use native plant species.

IV. Transportation Study

As set forth in the Transportation Study attached as **Exhibit C**, the use of the Property by the Applicant will have limited impacts on the surrounding transportation network. The Study highlights that the Property is located along major bus routes that connect to the surrounding neighborhoods and is a half-mile from the Cleveland Park Metro station. The vast majority of the one-mile range for the neighborhood falls within an easy 10-minute bicycle ride, and much of the area falls within a short 15-minute walkshed. Based on these factors and other data sources, the Applicant's transportation consultant concluded that nearly two-thirds of trips to the Property would be through non-auto modes. Of the remaining trips, nearly half would be for those who would drive and park on the surrounding streets, leaving only 20% of trips utilizing the access road and either parking on-site or utilizing the turnaround.

The Applicant's transportation consultant developed the trip generation rates for the proposed use by utilizing data collected from the Cleveland Park Club, a similarly-situated neighborhood pool that is further west in the Cleveland Park neighborhood. These counts were taken during peak summer days for such use (sunny Fridays and Saturdays in July), and rates were developed based on CPC's membership count. The Applicant's consultant then applied the rates to the proposed Rock Creek Club's membership count (including the 20 free memberships that have been offered to the immediate neighbors) and, based on the mode splits discussed above, concluded that the Applicant would generate a de minimis number of vehicle trips on the access road, even during the proposed use's peak summer periods when the pools are open. Accordingly, the Application will not generate objectionable impacts due to traffic.

The projected limited traffic impacts are due primarily to three factors: the Property's location within a well-connected urban location that is convenient by transit, bike, or foot; a membership base that resides within that location and regularly uses non-auto modes of transportation; and the limited amount of on-site parking spaces that are restricted to a handful of users. To further ensure that the use of the Property will not generate objectionable traffic impacts, the Applicant has agreed to construct the new main entrance for pedestrian and bicycle users, construct at least 40 on-site parking spaces, and install a gate to limit unauthorized on-site parking.

As set forth in the Transportation Study, only 15% of trips are expected to drive and park on surrounding streets. The Applicant also conducted a parking study and determined that there is generally parking available along Porter Street within 1/3 mile of the Property to meet that limited parking demand.[2] On-street parking is also available on Williamsburg Lane, which is currently not restricted to residential permit parking ("RPP"), but the Applicant has agreed to strongly

[2] The parking study was conducted during Rosh Hashanah and reflected significant on-street parking use that corresponded with services at the nearby Adas Israel synagogue. The Applicant expects to close the Club on Rosh Hashanah and Yom Kippur, which will avoid potential conflicts for on-street parking during Adas Israel's peak demand, and so the study is intentionally conservative.

discourage its members from parking on Williamsburg Lane and has further agreed to support any petition to establish RPP restrictions on Williamsburg Lane.

V. Consistency with the Comprehensive Plan

The Application furthers goals and policies in the District of Columbia's Comprehensive Plan. The Zoning Commission, which evaluates consistency with the Comprehensive Plan when it adopts the Zoning Regulations and Map, has already established that the proposed private community center use is consistent with the Comprehensive Plan, even in low-density residential zones, provided that the special exception criteria are met. When considering the special exception criteria, the Board may also consider whether the special exception furthers the goals and policies of the Comprehensive Plan, reading the maps in conjunction with the text of the Plan. 10-A DCMR §§ 2502.10. Here, the Application furthers many of the goals and policies of the Plan as well as its guiding principles, including in particular the following principles:

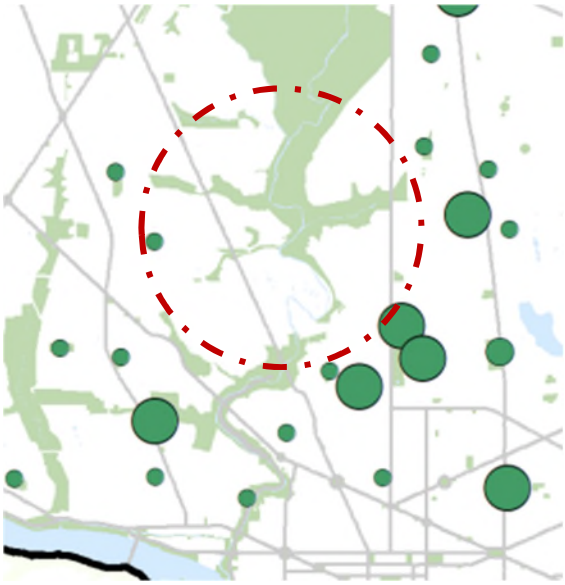
> *3. A city must be diverse to thrive, and the District cannot sustain itself by only attracting small, affluent households. To retain residents and attract a diverse population, the city should provide services that support families. A priority must be placed on sustaining and promoting safe neighborhoods offering health care, quality education, transportation, childcare, parks, libraries, arts and cultural facilities, and housing for families.*
>
> *12. Many neighborhoods include commercial and institutional uses that contribute to their character. Neighborhood businesses, retail districts, schools, parks, recreational facilities, houses of worship and other public facilities all make our communities more livable. These uses provide strong centers that reinforce neighborhood identity and provide destinations and services for residents. They too must be protected and stabilized.*

10-A DCMR §§ 219.3, 220.4

The Property is located in the Low-Density Residential Land Use category on the Future Land Use Map and within a Neighborhood Conservation Area on the Generalized Policy Map. The Low-Density Residential Land Use category is not limited to just single-family residential use and is intended to be interpreted broadly, 10-A DCMR §§ 227.5, 228(a), and institutional uses on smaller sites such as the Property are permitted in other land use categories, 10-A DCMR § 227.18. Neighborhood Conservation Areas explicitly include institutional uses as part of the diversity of land uses in these areas, with alterations permitted when compatible with the existing scale, natural features, and character of each area. 10-A DCMR §§ 225.4, 225.5.

The Application furthers the Land Use Element's policies for institutional uses, which recognize the importance of these uses to the character, livability, and future of the District,

because the Applicant has proposed design and operational measures that proactively address issues and concerns such as transportation and parking, hours of operation, noise, and lighting. 10-A DCMR §§ 312.7, 317.7, 317.8, 317.9. And the Application furthers land use policies that support low-density neighborhoods because the Applicant's proposed use maintains the current design character and scale of the existing development and preserves the Property's open space. 10-A DCMR § 310.12.



The Application will further many of the goals within the Parks, Recreation, and Open Space Element because it will provide access to open space, recreation, and aquatic facilities within an area that is underserved. The PROS Element anticipates that demand for recreational programs will grow with population growth, expressly finds that there are many parts of the District that require additional recreation spaces, including aquatic and active outdoor recreation spaces, and acknowledges that the District's compact urban nature means that meeting such needs will need to arise in a variety of settings. 10-A DCMR §§ 808.3, 809.4-809.7. The map to the right illustrates that the neighborhoods served by the Applicant fall within one such area that is underserved. To this end, the Application furthers the overall goals of the PROS Element as well as specific policies because it enables the establishment of a nonprofit recreational facility that meets the needs of District residents in the surrounding neighborhoods and allows for the use of the Property's open space for the benefit of District residents. 10-A DCMR §§ 817.9, 818.3. The Application also provides for the development of property adjacent to Rock Creek Park with a compatible recreation use. 10-A DCMR § 812.15.

The Application will also further goals and policies of the Historic Preservation Element because it supports the continued investment and maintenance of the historic landmark, maintains the integrity of the former estate's historic open spaces, and allows for an adaptive use that is consistent with the character of the Property—with minimal alterations to the scale and design of the existing historic building. 10-A DCMR §§ 1011.8, 1014.8, 1014.9, 1014.10, 1014.11; see also 10-A DCMR § 1011.4 (preserving distinguishing historic landscapes).

Finally, the Application furthers goals for the Rock Creek West, Mid-City, and Rock Creek East Area Elements.[3] Most directly, the Application expands active outdoor recreation spaces

[3] The Property is located within the RCW element but immediately adjacent to land in the Mid-City Element, which includes the Mount Pleasant and Lanier Heights neighborhoods, and the Rock Creek East Element, which includes the Crestwood neighborhood.

adjacent to Rock Creek Park, which furthers goals in not only the RCW Element but also in the Mid-City and Rock Creek East Element. 10-A DCMR §§ 2309.10 (RCW), 2009.3, 2009.4 (MC), 2209.3 (RCE). The Application also conserves the historic Greystone estate with a use that is compatible with its landmark status and protects the integrity of its architectural and landscaping design, in keeping with the policies of the RCW Element. 10-A DCMR §§ 2308.11, 2309.6; see also 10-A DCMR § 2309.3 (maintaining park-like settings on land adjacent to Rock Creek Park and its important scenic and visual resources). While the reuse of the Property maintains the existing scale and conserves open space on the Property, the Application also calls for measures to manage the function of the proposed use so that it will operate in a manner consistent with the character of the surrounding neighborhoods yet also meet the changing nature of the District. 10-A DCMR §§ 2308.2, 2308.9, 2308.10. The Application also incorporates transportation demand management measures to promote non-auto modes of transportation to the Property. 10-A DCMR §§ 2308.12, 2308.13.

VI. Witness Testimony and Expert Witness Resumes

Enclosed as Exhibit E is an outline of witness testimony and enclosed as Exhibit F are resumes of the Applicant's proposed planning expert, Shane Dettman, and transportation expert, Jami Milanovich. Additional witnesses are expected to include Adam Vitarello, the president of the Applicant, the Applicant's architect, Megan Downey of Megan Downey Studio, and the Applicant's landscape architect, Jordan Clough of Richardson & Associates.

VII. Conclusion

We look forward to presenting the Application to the Board at the November 4 public hearing. 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 5, 2026.

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