Goulston & Storrs

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October 19, 2026

VIA IZIS

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

Re: BZA Application No. 21517: Application of International Arts & Artists and the Cosmos Club (collectively, the "Applicant") for 9 Hillyer Court, NW (Square 66, Lot 807) (the "Property") – Pre-Hearing Statement

Dear Chairperson Pourciau and Members of the Board:

The Applicant hereby submits this pre-hearing statement in advance of the public hearing to be held on November 18, 2026. The Applicant filed the above-referenced application on July 14, 2026 and seeks a use variance, pursuant to Subtitle X § 1000.1, from the alley lot use requirements of Subtitle U § 600.1 to permit private club use of the existing building on the Property (the "**Project**"). Set forth below are updates and supplemental information regarding (i) the Cosmos Club's proposed use of the Property, (ii) IA&A's use and marketing of the Property, (iii) ANC support for the application, and (iv) the Applicant's Transportation Statement.

I. Updated Project Description

As described in the Application, the Project will adaptively reuse the Building as a mixed-use arts space, café, and meeting space, together with ancillary office use, in support of the Cosmos Club's mission. The Applicant expects to use the office and meeting space for the Cosmos Club Foundation and the Cosmos Club Historic Preservation Foundation, though the uses may change over time depending on the needs of the Club. The foundations are non-profit affiliates of the Club that provide direct public benefits to the District. The Cosmos Club may also use a portion of the Property for gallery space, to be included on monthly public tours offered by the Club. No interior renovation plans are yet in the works for the Building. However, the Applicant intends to maintain and upgrade the historic Building.

II. Undue Hardship to IA&A

The Applicant hereby supplements the Application with further detail regarding, specifically, the undue hardship of the strict application of the Zoning Regulations to IA&A. IA&A marketed the Property for approximately one year and received no other offers aside from the Cosmos Club. IA&A's decision to sell the Property was both financial and related to their growth – the building no longer fit their program. The location of the Property tucked away

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within an alley network at the center of the square had always constrained IA&A due to the lack of pedestrian traffic and exposure to surrounding streets. The various limitations on the Property, including its lack of open space and entrance onto an active alley, had never been ideal for its current gallery/museum use. IA&A's need to retire existing financing as well as expand its program led the organization to look elsewhere for a property better suited to their use.

During the time IA&A marketed the Property with no offers, it lost out on at least one potential new property that would have been ideal for their use. Without a buyer, IA&A could not relocate. IA&A missed opportunities due to the lack of buyers interested in any permitted use of the Property and those missed opportunities ultimately cost the organization. Accordingly, the strict application of the Zoning Regulations has already resulted in an undue hardship to IA&A and, if the use variance is not granted, will pose an even greater hardship as IA&A cannot feasibly remain at the Property.

III. Community Outreach and ANC Support

At its regular, duly-noticed public meeting on August 19, 2026, with 8 of 8 Commissioners in attendance, Advisory Neighborhood Commission ("**ANC**") 2B voted 8-0-0 to support the Application, as reflected in the ANC's resolution at Exhibit 17 of the record. The Applicant has also received support from virtually all of its neighbors, and has not received any objections. It anticipates formal letters reflecting such support to be filed in the record prior to the hearing.

IV. Outlines of Witness Testimony and Expert Witness Resumes

The Applicant expects that the following witnesses will present testimony at the public hearing:

- Mitchell Platt, General Manager, Cosmos Club, as representative of the Cosmos Club;
- Zoe Sharp, Legal Advisor and Board member, Cosmos Club, as representative of the Cosmos Club;
- Chip Ranno, Managing Principal, Clear Real Estate Services, or Gregory Houston, President and CEO, IA&A, as representative of IA&A; and
- Ashley Orr, Project Manager, Gorove Slade (to be proffered as an expert in transportation engineering).

Ms. Orr's resume is attached hereto as Exhibit A. Outlines of witness testimony are attached hereto as Exhibit B.

V. Transportation Statement

Attached hereto as Exhibit C is the Applicant's Transportation Statement prepared by Gorove Slade and submitted to DDOT on October 2, 2026.

VI. Conclusion

For the reasons set forth above and in the Application, the Applicant respectfully requests that the Board approve the requested use variance. Please do not hesitate to contact David Avitabile at (202) 721-1137 or Lee Templin at (202) 721-1153 if you have any questions. We greatly appreciate the Board's consideration of the application and look forward to presenting at the upcoming public hearing.

Sincerely,

/s/ David Avitabile
David Avitabile

/s/ Lee Templin
Lee Templin

Certificate of Service

The undersigned hereby certifies that copies of the foregoing documents were delivered by electronic mail to the following addresses on October 19, 2026.

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