

**BEFORE THE BOARD OF ZONING ADJUSTMENT
OF THE DISTRICT OF COLUMBIA**

**Application of
Addisleigh Park Washington Properties, LLC
Square 4209, Lot 5**

**BZA Application No. _____
ANC5C, SMD07**

STATEMENT OF THE APPLICANT

This statement is submitted in support of an application (“**Application**”) for Board of Zoning Adjustment (“**BZA**” or “**Board**”) approval by Addisleigh Park Washington Properties, LLC (the “**Applicant**”), by the Applicant’s attorneys, Greenstein DeLorme & Luchs, P.C., by Lyle M. Blanchard, Esq., and John Patrick Brown, Jr., Esq. Pursuant to the District of Columbia’s Zoning Regulations, this Application seeks the Board’s special exception relief for a prepared food shop, penthouse rooftop bar, off-street parking and rear yard and variance relief from the Floor Area Ratio (“**FAR**”) and loading requirements for construction on a two-story commercial building with cellar level and penthouse habitable space called Woodbridge Commons (the “**Project**”) in the MU-4 zone at premises 1803 Rhode Island Avenue, N.E. (Square 4209, Lot 5).

I. NATURE OF RELIEF SOUGHT

In order to develop the proposed commercial Project in the MU-4 zone district, the Applicant requests special exception relief pursuant to 11 DCMR Subtitle X § 901 for a prepared food shop with more than eighteen seats under Subtitle U § 512.1(d)(3), a penthouse rooftop bar under Subtitle C § 1500.3, off-street parking under Subtitle C § 703 and rear yard requirements under Subtitle G § 1201. In addition, the Applicant seeks area variance relief pursuant to Subtitle X § 1001 for FAR under Subtitle G § 101.5 and loading under Subtitle C § 901.

II. JURISDICTION OF THE BOARD

The Board has jurisdiction to grant the requested special exception and variance relief pursuant to 11 DCMR Subtitle X §§ 901 and 1002.

III. DESCRIPTION OF THE PROPERTY AND THE SURROUNDING AREA

The Property is an acute triangular shaped lot located at the intersection of Rhode Island Avenue, N.E. and Hamlin Street, N.E. with a lot area of only 3,447 square feet. Exhibit A (Surveyor's Plat). The Property is zoned MU-4 and located in the Langdon neighborhood of Ward 5. Exhibit B (Zoning Map).

The Property is currently improved with a one-story restaurant structure which will be demolished to make way for the new proposed Project. Exhibit C (Photos of Property).

The Property is located within walking distance of both the Rhode Island Avenue and Brookland Metro Stations. There are numerous Metro Bus lines providing service along Rhode Island Avenue, including B8, B9, D8, T14 and G9. The Property is well served by readily available public transportation.

IV. BACKGROUND ON THE DEVELOPER

The Woodridge Commons development team is a seasoned group with a depth of experience gained over many years in bringing commercial and retail developments to market on time and within budget guidelines. Lenda Washington is the owner- developer, of Addisleigh Park Washington Properties, LLC. Ms. Washington is working the Woodbridge Commons Project in close collaboration with Gene Edgecombe of VMS, LLC. Together, Ms. Washington and Mr. Edgecombe have a history of working on commercial endeavors dating back to 1999 when he was brought in to work on her first office gut renovation in the Washington Convention

Center area, prior to its opening. Mr. Edgecombe is a licensed architect and engineer and formed VMS LLC in 1993, then with an emphasis on residential and mixed use development. Since those early years, Mr. Edgecombe and the other VMS, LLC principals have broadened its service to provide design solutions, as well as development and construction management of all sizes of commercial projects including the office building at 915 Rhode Island Avenue NW (a joint Washington/VMS project), 2121 Vison, a MUD in Silver Spring, Maryland, the Deanwood Community Center and Library, FEDEX Field Stadium, to name a few.

The architectural firm on the Project, Studio Upwall Architects, is a CBE firm headed by Greg Upwall who brings a background of finding innovative and beautiful design and architectural solutions for both residential and commercial projects. His designs respect the environment and compatibility of his neighbors whether working on the West Coast or the East Coast in creating vibrant and engaging urban environments.

Woodridge Common is the catalytic Project that will spur additional private development between 18th and 22nd St., support the District's objectives to improve the Rhode Island Avenue Northeast streetscape, increase the pedestrian 'walkability index' by becoming the neighborhood destination place, create jobs for local residents and provide streetscape cohesion to the Rhode Island Avenue commercial corridor between 18th Street and South Dakota Avenue.

V. EXISTING AND INTENDED USE

The Applicant acquired the Property in late 2016. Since then, the Applicant has undertaken an exhaustive investigation of the surrounding neighborhood and potential development options for this underdeveloped site.

The existing one-story restaurant building constructed in 1961 will be demolished to allow for the proposed redevelopment of the Property with a two-story with cellar level and penthouse

habitable space commercial building. Exhibit D (Site Plan and Design Plans). In order to provide the Applicant with flexibility in marketing the space and to respond to uncertain market demand, the Project has been specifically designed to allow options for various commercial uses of the space, including, coffee shop, restaurant, grocery store and roof top bar. All of the proposed uses are permitted in the MU-4 zone, but special exception relief is required for a roof top bar, restaurant or cocktail lounge and for a coffee shop with more than eighteen (18) seats.

This floor-by-floor analysis provides the proposed optional uses:

Cellar:

- Option A: Retail Kitchen (404 sq. ft.) and Coffee Shop (Internet Café/Co-working space) with 112 seats (2,255 sq. ft.)
- Option B: Kitchen/Stockroom (408 sq. ft.) and Grocery Store (2,003 sq. ft.)

First Floor and Mezzanine:

- Option A (1st): Coffee Shop with 6 seats (783 sq. ft.), Kitchen (279 sq. ft.) and Restaurant (1,610 sq. ft.)
- Option A (Mezz.): Coffee Shop with 12 seats (256 sq. ft.) and Restaurant (536 sq. ft.)
- Option B (1st): Coffee Shop with 6 seats (783 sq. ft.), Grocery Store (1,608 sq. ft.) and Stock Room (279 sq. ft.)
- Option B (Mezz.): Coffee Shop with 12 seats (256 sq. ft.) and Grocery Store (536 sq. ft.)

Second Floor and Mezzanine:

- Options A and B (2nd): Restaurant (2,530 sq. ft.)
- Options A and B (Mezz.): Restaurant (835 sq. ft.)

Roof Level:

- Options A and B: Roof Top Bar (558 sq. ft.)
Roof Deck (1,002 sq. ft.)

VI. ZONING ANALYSIS

Zoning Requirement	MU-4 Matter of Right	Proposed ¹	Zoning Relief Required
<p>USES 11-U DCMR §512 MU-4 is within the “MU-Use Group E”</p>	<p>Eating and Drinking Establishment (Restaurant, Café, Nightclub, etc.) is allowed as matter-of-right.</p> <p>A prepared food shop, which includes a “coffee shop” is limited to 18 seats for patrons (or else a special exception is required) [see 11-U DCMR §512(d)(3)]</p> <p>Retail (Grocery) is allowed as matter-of-right.</p>	<p style="text-align: center;"><u>OPTION A:</u></p> <p><u>Cellar:</u> Coffee Shop/Internet Café/Co-working space <u>1st Floor:</u> Coffee Shop/Restaurant <u>1st Floor Mezzanine:</u> Coffee Shop/Restaurant</p> <p style="text-align: center;"><u>OPTION B:</u></p> <p><u>Cellar:</u> Grocery <u>1st Floor:</u> Coffee Shop/Grocery <u>1st Floor Mezzanine:</u> Coffee Shop/Grocery</p> <p style="text-align: center;"><u>BOTH OPTIONS A & B:</u></p> <p><u>2nd Floor:</u> Restaurant <u>2nd Floor Mezzanine:</u> Restaurant <u>Penthouse Habitable Space:</u> Bar</p>	<p>Coffee Shop in Cellar and Rooftop Bar require a SPECIAL EXCEPTION (see below)</p>
<p>HEIGHT 11-G DCMR §403.1 11-B DCMR §307.1</p>	<p>50 ft./no limit in stories</p>	<p>50 ft. to the top of the parapet</p>	<p>NONE</p>
<p><u>PENTHOUSE Use</u> 11-C DCMR §1500.3(c)</p> <p><u>Height</u> 11-G DCMR §403.2</p> <p><u>Setback</u> 11-C DCMR §1502</p>	<p><u>Use of Penthouse:</u> A nightclub, bar, cocktail lounge, or restaurant use shall only be permitted as a special exception if approved by the BZA [see 11-C DCMR §1500.3]</p> <p><u>Maximum Penthouse Height:</u> 12 ft. except 15ft. for penthouse mechanical space</p> <p><u>Maximum Penthouse Stories:</u> 1; second story permitted for penthouse mechanical space</p> <p><u>Setback:</u> Penthouses, screening around unenclosed mech. equipment, rooftop platforms for pools, roof decks, trellises, and any guard rail on a roof shall be setback from the edge of the roof upon which it is located [11-C DCMR §1502].</p>	<p style="text-align: center;"><u>Use:</u> Bar</p> <p style="text-align: center;"><u>Height:</u> Penthouse: 10ft./1 Story Mechanical: 10 ft. Roof Deck: approx. 6 in. above roof Stair Towers: 10 ft.</p> <p style="text-align: center;"><u>Setbacks:</u> Front: Roof Deck with be setback 1:1 from edge of front roof Side: No Setback is required since building will adjoin the adjacent building (to the east) face-on-lot-line wall. Rear: 10 ft. setback provided.</p>	<p style="text-align: center;"><u>Use</u> (Bar/Restaurant) SPECIAL EXCEPTION</p> <p style="text-align: center;"><u>Height:</u> NONE</p> <p style="text-align: center;"><u>Setback:</u> NONE</p>

¹ Based on Studio Upwall’s Schematic Design Plans, dated 2-28-19.

Zoning Requirement	MU-4 Matter of Right	Proposed ¹	Zoning Relief Required										
Area 11-C DCMR §1503	Area: [see 11-C DCMR §1503] Non-residential bldg. with penthouse space exceeding 1,000 sq. ft. would trigger affordable housing requirement (housing trust fund) see 11-C DCMR §1500.12. <i>Not applicable here.</i>	Area: Habitable Space (Bar): less than 600 sq. ft.	Area: NONE										
FLOOR AREA RATIO (“FAR”) 11-G DCMR §402.1 11-C DCMR §709.1 11-C DCMR §1503.1	Maximum of 1.5 FAR for Non-Residential Use 1.5 FAR = 5,019 GFA Max 3,346 Lot Area Penthouse FAR does not include: <ul style="list-style-type: none"> • mechanical space • communal recreation space • habitable space with a FAR of less than 0.4 [see 11-C DCMR §1503.1] 0.4 FAR = 1,338.4 GFA Exempt 3,346 Lot Area	<table border="1" data-bbox="932 569 1300 747"> <tr> <td>1st Floor</td> <td>3,347</td> </tr> <tr> <td>1st Floor Mezz.</td> <td>821</td> </tr> <tr> <td>2nd Floor</td> <td>3,347</td> </tr> <tr> <td>2nd Floor Mezz.</td> <td>835</td> </tr> <tr> <td>TOTAL</td> <td>8,350</td> </tr> </table> 2.49 = $\frac{8,350}{3,346}$ GFA 3,346 Lot Area	1st Floor	3,347	1st Floor Mezz.	821	2nd Floor	3,347	2nd Floor Mezz.	835	TOTAL	8,350	AREA VARIANCE [see 11-G DCMR §101.5]
1st Floor	3,347												
1st Floor Mezz.	821												
2nd Floor	3,347												
2nd Floor Mezz.	835												
TOTAL	8,350												
LOT OCCUPANCY 11-G DCMR §404.1	100% maximum for commercial 60% maximum for residential	100% commercial	NONE										
REAR YARD 11-G DCMR §405.2	15 ft. minimum [see 11-B DCMR §318 for Rules of Measurement for Rear Yards]	0	SPECIAL EXCEPTION [per 11-G DCMR §1201 for exception criteria for Rear Yard Relief]										
SIDE YARD 11-G DCMR §406.1	No side yard is required. If provided, it shall be at least 2 in. wide for each 1 ft. of height of building but not less than 5 ft. [see 11-B DCMR §320 for Rules of Measurement for Side Yards]	0	NONE										
GREEN AREA RATIO (“GAR”) 11-G DCMR §407.1 11-C DCMR Chapter 6	0.3	0.3 Green Roof	NONE										

Zoning Requirement	MU-4 Matter of Right	Proposed ¹	Zoning Relief Required
<p>VEHICLE PARKING SPACES 11-C DCMR §701.5 “Eating and Drinking Establishments”</p> <p>11-C DCMR §709.1 Rules of Calculation (Include penthouse habitable space)</p> <p>11-C DCMR §701.8(b)(1))</p>	<p>The requirements for parking are based on the use of the property.</p> <p>OPTION #A (Restaurant, Coffee Shop(s) and Bar in 1st and 2nd Floors, Mezz. and Roof habitable space) GFA is 12,976 sq. ft. Parking Use Category: Eating and Drinking Establishments; 1.33 per 1,000 sq. ft. in excess of 3,000 sq. ft.; 13.25 spaces required</p> <p>Option A Total of 13 required spaces.</p> <p>OPTION #B (Grocery in Cellar, 1st Floor and Mezz.) GFA for Grocery Store is 6,089 sq. ft. Parking Use Category: Retail; 1.33 per 1,000 sq. ft. in excess of 3,000 sq. ft.; 4.10 spaces required</p> <p>OPTION #B (Restaurant, Coffee Shop(s) and Bar in 1st and 2nd Floors, Mezz. and Roof) GFA is 6,887 sq. ft. Parking Use Category: Eating and Drinking Establishments; 1.33 per 1,000 sq. ft. in excess of 3,000 sq. ft.; 5.17 spaces required</p> <p>Option B Total of 9 required spaces.</p> <p>Parking can be provided off-site if it is within 600 ft. of the subject property. Restrictions and requirements apply. [see 11-C DCMR §701.8(b)(1)]</p>	<p>No on-site parking spaces</p>	<p>SPECIAL EXCEPTION Reduction in the number of 13 required parking spaces per criteria in see 11-C DCMR § 703.2.</p>
<p>BICYCLE PARKING SPACES 11-C DCMR §802.1 “Eating and Drinking Establishment”</p>	<p>All non-residential uses with 4,000 sq. ft. or more of GFA shall provide bike spaces.</p> <p>Long Term Spaces: 1 space for each 10,000 sq. ft.</p> <p>Short Term Spaces: 1 space for each 3,500 sq. ft.</p>	<p>7 bicycle spaces are shown in <u>public space</u>. “A use providing short-term bicycle parking on adjacent public space must obtain approval of a public space application.” [see 11-C DCMR §804.1]</p>	<p>PUBLIC SPACE RELIEF REQUIRED for short term spaces.</p>

Zoning Requirement	MU-4 Matter of Right	Proposed ¹	Zoning Relief Required
	<p>2 short term spaces required Short term spaces must be located within 120 ft. of the primary entrance to the building they serve. [see 10-C DCMR §804.2]</p>		
<p>LOADING 11-C DCMR §901.1 “Food and Alcohol Services” 11-C DCMR §901.4 Platform 11-C DCMR §901.4 Calculation of GFA for loading requirements for non-residential uses 11-C DCMR §904 Access Requirements 11-C DCMR §905 Size and Layout Requirements</p>	<p>For 5,000 to 20,000 sq. ft. of GFA: Minimum Loading Berths: 1 At least: 12 ft. wide, 30 ft. deep, and 10 ft. vertical clearance Minimum Loading Platform: 1 At least: 100 sq. ft. Driveway access to loading at least 12 ft. in width (max of 24 ft.) Minimum Number of Service/Delivery Spaces: None See DDOT Design & Engineering Manual for Commercial Curb Cut Requirements § 31.5.1 - 31.5.2 and Minimum Setbacks for Driveways § 31.5.5</p>	<p>Curbside Loading from Either Hamlin Street or Rhode Island Avenue</p>	<p>AREA VARIANCE</p>
<p>COURT 11-G DCMR §202.1 Definitions: 11-B DCMR §100.2</p>	<p>No court is required. If provided, it shall have the following minimum dimensions: <u>CLOSED COURT</u> Minimum Width: 2.5 in./ft. of height of court; 12 ft. minimum Minimum Area: Twice the square of the required width of court dimension; 250 sq. ft. minimum. <u>OPEN COURT</u> Minimum Width: 2.5 in./ft. of height of court; 6 ft. minimum</p>	<p>N/A</p>	<p>NONE</p>

This Zoning Analysis has been confirmed by the Zoning Administrator in a Zoning Determination Letter dated February 26, 2019. Exhibit E.

VII. THE APPLICATION MEETS THE REQUIREMENTS FOR A SPECIAL EXCEPTION UNDER SUBTITLE X § 901

The Applicant is requesting the following special exception relief, including:

- Prepared Food Shop with more than 18 Seats – U § 512.1(d)(3).

In the MU-4 zone, a prepared food shop is a permitted use, provided that the number of seats is limited to eighteen (18). The proposed prepared food shop will have approximately 112 seats which requires a special exception under U § 513.1(h). The additional number of seats is proportional based on the size of the cellar space. The intended use is meant to be similar to a co-working space where neighborhood residences can have a pleasant, attractive and efficient alternative to working from home. The coffee shop is akin to an internet café or co-working space where patrons have internet access, coffee, tea, juice and healthy snacks. Because the use is neighborhood serving, the coffee shop use will not result in objectionable conditions from its operation with respect to sounds, odor, lights or other conditions.

- Penthouse Rooftop Bar – C § 1500.3

In the MU-4 zone, a nightclub, bar, cocktail lounge or restaurant are generally permitted uses, except when located in a permitted penthouse. The proposed roof top bar and exterior roof deck with a maximum occupancy of 144 persons requires special exception relief under C § 1500.3(c). The public patron portion of the rooftop bar is oriented toward the wide 90 ft. right of way of Rhode Island Avenue and a solid privacy wall is oriented toward Hamlin Street so as to have its operations result in a minimal impact on neighboring properties.

- Off-Street Parking – C § 703

Under the applicable parking requirements under C § 701.1, the proposed Project is required to provide thirteen (13) parking spaces. Given the unique corner location and small, narrow and irregular shaped configuration of the Property, the Applicant is “physically unable to

provide” any off-street parking and is requesting special exception relief under C § 703.3.

Further, DDOT has told the Applicant not to use any of the existing curb cuts and that approval of any future curb cuts is unlikely. However, the Property is located within walking distance of both the Rhode Island Avenue and Brookland Metro Stations. There are numerous Metro Bus lines providing service along Rhode Island Avenue, including B8, B9, D8, T14 and G9. The Property is well served by readily available public transportation and the Project will increase the pedestrian ‘walkability index’ by becoming the neighborhood destination place. Additionally, filling in the existing curb cuts on the Hamlin Street and Rhode Island Avenue sides of the Project will result in five (5) additional street parking spaces.

- Rear Yard – G § 1201.

In the MU-4 zone, the Project would require a minimum rear yard of fifteen (15) feet under G § 405.2. Based on the corner location and small, narrow and irregularly shaped configuration of the Property, the Applicant is requesting this special relief in accordance with the criteria set forth in G § 1201.1(a)-(e). The Project does not include apartment or office uses, nor area such uses located within the threshold distances in G § 1201.1(a)-(b). Therefore, G § 1201.1(a)-(b) are not applicable.

Using the 40 ft. distance in 1201.1(a) as a benchmark for comparison, the sight lines to the habitable rooms across Hamlin Street are at least 60 ft., if not more. The width of the Hamlin Street public right of way is 60 feet, and the Pleasant Grove Baptist Church building which occupies the north side of 1800 Hamlin Street, NE across from the Project is further setback from its property line. Therefore, the Project meets the criteria in G § 1201.1(c).

As discussed above, due to the unique corner location and small, narrow and irregular shaped configuration of the Property, the Applicant is unable to provide parking and

loading areas on site. Thus, the Applicant is seeking variance relief of the parking and loading requirements. The Applicant is in the process of looking for suitable off-site within 600 ft. of the Property to provide parking if possible. Loading will be provided off-site through a loading zone on Rhode Island Avenue, NE adjacent to the Property. Thus, the Project is seeking to address the criteria of G § 1201.1(d) through alternative means.

The Applicant has discussed these issues with DDOT and OP in anticipation of the agency reviews required by G § 1201.1(e). Thus, the Applicant's Project will satisfy the special exception criteria in G § 1201.1(a)-(e) for rear yard relief.

A. The Application is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps.

The MU-4 zone is intended to permit moderate density mixed use development to provide facilities for shopping and business needs, housing and mixed uses. Subtitle G § 400.3. The Project is in harmony with the general purpose and intent of the Zoning Regulations, as the proposal is for permitted uses including matter of right uses of coffee shop, grocery store and restaurant as well as uses allowed by special exception, the proposed rooftop bar use.

B. The Project will not tend to adversely affect the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps.

The Project will replace an obsolete, unattractive and underdeveloped one-story structure with a new community serving commercial building. The Project has been thoughtfully designed to ensure the structure and uses will not adversely affect the neighboring property owners of the greater community. The attendant impacts on the surrounding neighborhood is anticipated to be minimal as all of the proposed uses are intended to be neighborhood serving.

VIII. THE APPLICATION MEETS THE REQUIREMENTS FOR VARIANCE RELIEF UNDER SUBTITLE X § 1002

The Applicant is requesting the following area variance relief, including:

- Floor Area Ratio – G § 101.5

In the MU-4 zone, a maximum FAR of 2.5 is permitted, provided commercial, non-residential FAR is not more than 1.5. The proposed Project has an all commercial FAR of 2.49 requiring area variance relief under G § 101.5.

- Loading – C § 901.1

For the proposed Project and uses, the Applicant is required to provide one (1) loading berth (12' x 30'), one (1) loading platform (100 sf.) and driveway access to loading at least twelve (12) feet. For the same reasons that off-street parking cannot be provided, the Applicant is requesting an area variance for the applicable loading requirements.

- A. **As a result of the attributes of a specific piece of property, the strict application of the Zoning Regulations would result in peculiar and exceptional practical difficulties to the owner of the property.**

Unlike a typical rectangular shaped lot, the unusually small, narrow and irregular shape of the Property makes it very difficult to fit a commercial building of only 1.5 FAR. The amount of density relief is justified based on the very large core space needed to make the building operational. See Exhibit F, the Gross to Net Floor Area Comparison Drawings. The triangular shape of the lot does not allow for a typical distribution between circulation/utility space and leasable/habitable space. The Applicant with their architect have explored several potential configurations for the proposed building and in all of these potential uses the floor area that must be devoted to circulation and utility space is disproportionate when compared with a rectangular building footprint. The area needed for utility and circulation space is largely driven

by building code requirements. As illustrated in Exhibit F, the net leasable area for this irregular site is significantly reduced as a result of the triangular shape.

The proposed scheme at 2.49 FAR is felt to be reasonable accommodation in light of the reduced leasable area that results from the triangular shape of the lot. As also shown on page 4 of Exhibit F, providing loading facilities (berths, loading platform and driveway access) is infeasible given the corner location and small, narrow and irregularly shaped configuration of the Property. If a rear yard was provided for loading, it would cover over 47% of the Property. Access would be difficult, as DDOT requires that any new curb cut be located a minimum of 60 feet from any intersection, which complicates the Applicant's ability to seek a curb cut for loading on the Hamlin Street frontage. Moreover, DDOT has told the Applicant that it will not support new curb cuts on Hamlin Street for parking or loading access across the existing sidewalk and public parking right of way. Thus, the requirements for a loading berth, loading platform and the driveway access to these loading facilities cannot be provided either on-site or in the adjacent public space due to the practical difficulties inherent in the Property.

B. Relief Can Be Granted Without Adversely Affecting the Use of the Neighboring Property in Accordance with the Zoning Regulations and Zoning Map.

The commercial Project has been thoughtfully designed to comply with the Zoning Regulations with relatively minor impacts on light, air and traffic. The Applicant is working with DDOT to establish a loading zone in front of the building on Rhode Island Avenue as the appropriate off-site location for loading that will not impact the neighboring properties on Hamlin Street. Accordingly, there will be no detrimental effects on neighboring residential or commercial properties.

IX. STATEMENT OF SATISFACTION OF BURDEN OF PROOF FOR ZONING RELIEF SOUGHT

The Applicant submits that, based upon (i) its Application and the materials submitted in conjunction herewith, (ii) the evidence to be presented at the public hearing and (iii) other evidence to be submitted hereto, it will satisfy and comply with the applicable legal standards and burdens for the special exception and variance relief requested.

X. AGENCY AND COMMUNITY OUTREACH

During the planning process for this Project, the Applicant has met with both the Office of Planning and Zoning Administrator to obtain important guidance and assistance. The Applicant has also had several meetings with DDOT in 2018 and has had several discussions with the single member district ANC commissioner (5C07) as well as presenting in concept to ANC 5C at its meeting on September 19, 2018 where the Commission unanimously supported the Project. This Project will be presented again to ANC 5C once the Application is filed with the Office of Zoning.

XI. WITNESSES EXPECTED TO TESTIFY

Applicant's Representative: Ms. Lenda Washington,
Addisleigh Park Washington Properties, LLC

Architect's Representative: Greg Upwall,
Studio Upwall Architects

XII. EXHIBITS

Exhibit A: Surveyor's Plat

Exhibit B: Zoning Map

Exhibit C: Photos of the Property

Exhibit D: Site Plan and Design Plans

Exhibit E: Zoning Determination Letter

Exhibit F: Gross to Net Floor Area Comparison Drawings

XIII. CONCLUSION

For the reasons set forth above, the Applicant is entitled to, and respectfully requests approval of, the grant of special exception and variance relief to allow for the development of the Property.

Respectfully submitted,
GREENSTEIN DELORME & LUCHS, P.C.

By: 
Lyle M. Blanchard

By: 
John Patrick Brown, Jr.

1620 L Street, N.W., Suite 900
Washington, D.C. 20036
Telephone: (202) 452-1400
Attorneys for Applicant