



RECEIVED
D.C. OFFICE OF ZONING
2010 DEC -7 PM 12:01

**ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
PUBLIC HEARING FOR THE PURPOSE OF CONSIDERING:**

**CASE NO. 09-21 (Text and Map Amendment to Create and Implement the Union
Station North (USN) District)
December 16, 2010**

Alma Hardy Gates

The Committee of 100 on the Federal City thanks the Members of the Zoning Commission for reviewing this lengthy submission prior to the hearing on Case NO. 09-21. Testimony will be presented also at the hearing on December 16.

The Committee of 100 supports the Office of Planning's goal of reconnecting the city through air rights development. We question the height that is being proposed for the Union Station North development and the point from which that height will be measured.

For the Zoning Commission to fully appreciate the ends to which the Deputy Mayor for Economic Development and the Office of Planning have gone to accommodate development at Union Station North, it is necessary to begin with the Comprehensive Plan Amendment process.

Following the June 30, 2009 amendment submission deadline, "the Office of Planning evaluation team determined that four additional amendments should be included in this amendment cycle." Two dealt with air rights development and one of them specifically addressed Capitol Hill Area Element CH-2.1.7 which states, "The allowable height of any building constructed in the air rights should be

ZONING COMMISSION
District of Columbia

CASE NO. 09-21

EXHIBIT NO. 13 FAX

measured from the existing grade of 1st Street or 2nd Street NE, rather than from the overpass.”

Perhaps members of the Zoning Commission recall Councilmember Sharon Ambrose specifically put that language into the Comprehensive Plan in light of the development that was proposed for Station Place, which is addressed later in this submission.

The rationale given by the Office of Planning for the change to CH-2-1-7 was,:

The current language is too specific. The text as exists could limit the options for redevelopment of the air rights over the tracks. The area is specifically identified as a Land Use Change Area on the Generalized Policy Map and mixed use high and medium density on the Future Land Use Map. Deleting the sentence but including its issue within a broader policy and action statement on air rights 1) ensures the opportunity for full analyses and design considerations for construction over the railroad tracks; 2) fully recognizes the opportunity of Union Station as an intermodal link; and, 3) provides for viable development opportunities with mixed use development as anticipated by the Future Land Use Map.

On September 20, the Committee of 100 presented testimony before Council on Bill 18-867, *Comprehensive Plan Amendment Act of 2010*, and noted that ...the measuring point for development in the Union Station area is the existing grade of 1st Street or 2nd Street and not the H Street overpass. Furthermore, this means of measurement relative to H Street was established in Zoning Commission Order 02-35 dated November 7, 2003.

When the Zoning Commission considered the Station Place Application, the height of buildings relative to the surrounding streets and Union Station was given considerable scrutiny. Please note the following excerpts from Zoning Commission Order 955, Case No. 01-09C (Station Place). The PUD Project (Page 4) notes:

The Applicant proposes the construction of a new office building to be known as Station Place. The number of stories in the building varies from seven to ten, with the maximum number on the western portion of the Site facing Union Station and the rail yards. Station Place will have a gross floor area of approximately 1,396,950 square feet, not to exceed 5.9 FAR. The new building is estimated to accommodate approximately 5,000 employees.

The proposed development fronts on three streets. The highest point of the roof is 89.32 feet above the curb opposite the middle of the front of the building on H Street and 115.5 feet above the curb opposite the middle of the front of the building on F Street...

Station Place will be constructed in three phases. Building 1 will include approximately 650,000 square feet of floor area... Building 2 will include approximately 287,000 square feet of floor area... Building 3 will constitute the final phase of Station Place and will include approximately 460,000 square feet of floor area. The ramp from the H Street overpass will be constructed during the first phase of development. The proposed gross floor area is approximately 46,900 square feet less than permitted under the existing matter-of-right zoning and approximately 168,000 square feet less than permitted as a matter-of-right under the proposed C-3-C District.

Station Place's design relates to its context and serves as a transition building between the various surrounding areas because of its stepped height, from the significant height of Union Station and its parking garage to the west to the lower rise commercial and residential area to the east. The design of Station Place incorporates a north-south spine adjacent to the Union Station rail yards, with the primary bulk and highest portion of the building situated on the western portion of the Site. The building steps down from the west towards 2nd Street to a height of ninety feet as measured from F Street and then steps down again to a height of seventy-eight feet along 2nd Street as measured from F Street. The ninety-foot portion of the building is set back at least fifteen feet from the property line, which is a setback of more than one-to-one above the height of the streetwall. In Building 1, the highest portion of the building is set back to the west at least eighty feet or more. Across 2nd Street's ninety-foot right-of-way, the permitted height steps down again to fifty feet in the C-2-A District. The fifty-foot height extends for a depth of approximately 100 feet, at which point the permitted height steps down to forty feet. The height of the cornice lines of the wings of Building 1 lines up with the height of the Judiciary Building. The scale of the building is appropriate for the area, which is transitional from medium densities to the west to moderate to low densities to the east...

A three-story stepped connection with landscaped plazas separates Building 2 from Building 3. Building 3 is to be built to the property line

with a ten-foot setback at the southeast corner. Building 3 is clad in granite facing 2nd Street, which wraps around to the H Street facade. The facade of Building 3 is still subject to review and modification by the Commission on Fine Arts (CFA). As a result of the setbacks along the 2nd Street facade, Station Place includes a significant amount of open space for a commercial office building. Approximately one-half of the streetwall on 2nd Street is set back from the property line. The average setback is 26.5 feet from the property line and 56.5 feet from the curb. Although lot occupancy of 100 percent is permitted as a matter-of-right, the proposed lot occupancy for Station Place is seventy-two percent, with approximately 23,409 square feet of private property devoted to open space adjacent to the 2nd Street sidewalk. The F Street entrance, which will be the primary entrance to the SEC headquarters, will be an atrium entrance flanked by the same type of stone as used for the Judiciary Building. The entrance incorporates a curved wall, and the curtain wall is stepped away from Columbus Circle to the north. The eighth floor is set back five feet from the property line on F Street, the ninth floor is set back an additional fifty-eight feet, and the tenth floor is set back an additional twenty feet...

Station Place's design has been significantly modified since it was originally submitted to the Zoning Commission in May, 2001. The following major design changes were made in response to meetings with and issues raised by the community, the Office of Planning, and the CFA: the appearance of three separate buildings facing 2nd Street, rather than the more unified design of the original proposal; addition of full height stone facing to provide variety and separate identities to Buildings 2 and 3; the setback of Building 2 and the incorporation of a public plaza with significant landscaping and water features; the combination of Buildings 3 and 4 to create one building on the north portion of the Site; the incorporation of the three-story stepped landscaped break separating Buildings 2 and 3; the incorporation of a lobby entrance at the third floor level for direct access to the H Street overpass as well as further articulation of the H Street facade; the elimination of the glass mansard roof and the setback of the eighth floor a distance of fifteen feet, reducing the height on 2nd Street to 78.25 feet as measured from F Street; the carving out of the center portion of the 2nd Street facade of the wings of Building 1; the setback of the tenth floor from F Street, to reduce the height as perceived from Columbus Circle; reduction of the allowable

18.5 feet penthouse height to eleven feet for sixty-five percent of the penthouse length; and further articulation of the west facade.

The Zoning Commission will consider compliance with the Comprehensive Plan, and possibly review Zoning Commission Orders Nos. 02-35 and 01-09C as precedent for its deliberations on height for the Text and Map Amendments to Create and Implement the Union Station North (USN) District. While the Office of Planning has managed to amend the Comprehensive Plan Capitol Hill Element (CH-2.1-7) and ignore ZC 02-35, it has been unable to change the Height Act. In fact, this Office of Planning initiative is an end run around the Height Act and may well be the precedent from which other air rights project will draw their height in the future. This must have been what David Tuchmann of Akridge meant at the Council hearing on Bill 18-867 when he stated "...The amendments we support do allow the Zoning Commission to determine the proper measuring point for this particular project. It would place within the Comprehensive Plan both protections that would constrain the Zoning Commission in creating that measuring point but would also allow the Zoning Commission to look at the unique factors of this project – how it is relating to the rail yard – how H Street is the only street that this project fronts – the current language in the plan incorrectly looks to measure the project from 1st or 2nd Street."

The Office of Planning noted in response to a question from Commissioner May at the December 2009 setdown hearing on the measuring point for the USN Zone that:

We also recognize that the platform that will be required to construct any development on this site would be extremely expensive. And also...we want to take full advantage of the proximity to Union Station....We also recognize that height is very important here, not just in terms of additional density, but in terms of design and form and allowing the building to respond to the massing and the historical resources that are around it. So as we started to look at the site and how we would start to move the density around to maintain the view sheds of the Union Station itself and some of the landmarks around the area, we wanted to have maximum flexibility in how we put that massing so we did go with the 130 feet. We also recognized that with Station Place, they could build that grade...It's (USN) only on a platform. So in order to have a commensurate type of competitive development envelope with the high density around it and the high density that is common throughout the city, there was no way to give them that without giving them the extra height. Otherwise, they would be at a 28 foot disadvantage compared to like land with the extra expense of

having to build their own platform to actually construct there...Most developments don't have to build the earth beneath it."

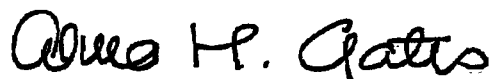
The Committee of 100 urges the Zoning Commission to determine the proper measuring point for the Union Station North (USN) District as the potential for air rights development existed when Station Place was approved and the measuring point was defined in ZC 02-35. If an amendment to the Comprehensive Plan is the solution the Office of Planning will pursue for future economic development projects, the integrity of the Comprehensive Plan is called into question. It is meant to be the framework by which the city reaches its goals but must provide predictability as the city moves forward.

As the Commission is aware, this fourteen-acre site will consist of two elevated platforms 30 feet above the rail yards divided by H Street – one to the north and one to the south. Each platform will consist of multiple buildings and these will be considered a single structure on their respective side. The Office of Planning notes it is trying something new with the "single building" concept and is considering each structure on the two platforms to be interconnected. The connection for the project is H Street, which serves as a link between 1st and 2nd Streets. The platformed site will be 30 feet above its surroundings and is similar in concept to the 30 foot mechanically stabilized earth (MSE) platform structure Frank Economides constructed in his rear yard overlooking Acclimation Park in Wesley Heights. (BZA Case No. 17285). It would be impossible to consider the Economides' platform structure a connection to its surrounding residential properties as it is 30 feet above them, however, it does reach out by casting a giant shadow over the earth below. While sunlight may not be of concern in the immediate USN case because "the earth" would be the cement floor, the fact the platform is thirty feet above the surrounding commercial and residential areas is of concern if the purpose of this text and map amendment is to reconnect the city. The buildings atop the 30 foot platform will rise to a height of 130 feet plus and 18.5 penthouse. How can existing structures below connect to this city on the platform that projects out over the rail yards? Will development on the platform provide a suitable visual relationship to its surroundings, including the neighborhoods to the east and west, historic structures like Union Station and the federal areas south of Union Station?

The Comprehensive Plan has been amended to accommodate this particular text and map amendment and existing Capitol Hill Element CH-2.1.7 has been eliminated, however, the Committee of 100 urges the Zoning Commission to continue its established practice of measuring from natural grade rather than from

the top of an overpass -- the H Street Bridge. We support the position expressed by NCPC in the attached letters, "that the allowable height of any building constructed in the air rights should be measured from the existing grade of 1st Street or 2nd Street NE, rather than from the overpass."

To conclude, the Committee of 100 has concerns about the need to create this stand alone zone; the economic development benefit and flexibility it will afford the developer vs. the benefit to residents of the city; the proposed height (130 feet plus 18.5 feet of penthouse) of the north and south "buildings" atop a 30 foot platform in a transition zone; how consistent the measuring point chosen for USN is with other Zoning Commission rulings; and, why creation of this new 14 acre stand alone zone would not be considered spot zoning.



Alma H. Gates
Chair, Zoning Subcommittee
Committee of 100 on the Federal City

Attachments (3)

National
Capital
Planning
Commission

Attachment 1

IN REPLY REFER TO:
NCPC File Nos. CP19/7151

SEP 03 2010

The Honorable Vincent Gray
Chairman
Council of the District of Columbia
John A. Wilson Building, Room 504
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Re: NCPC Comments on Bill 18-867, Amendments to the District Elements of the Comprehensive Plan

Dear Chairman Gray:

The National Capital Planning Commission has reviewed Bill 18-867 which proposes amendments to the District Elements of the Comprehensive Plan for the National Capital. The points summarized below represent staff's initial analysis of the comprehensive plan amendments and do not reflect official Commission action or position.

- NCPC is supportive of the amendments related to the St. Elizabeths development and leveraging the Department of Homeland Security project into revitalization efforts for the surrounding neighborhoods. Staff is also very supportive of the amendments related to the implementation of the CapitalSpace Plan, a joint NCPC-District of Columbia initiative aimed at improving and integrating local parks and recreation facilities throughout the city.
- Bill 18-867 proposes changes to policies related to the development of the Southwest Waterfront. NCPC is very supportive of the redevelopment of this waterfront and has been working to integrate the project with revitalization of the 10th Street Corridor and Banneker Overlook. Amending the policies to allow more flexibility in the programming for the Southwest Waterfront while maintaining the goal that the waterfront is a sustainable and compact development that is less dependent upon vehicular modes of transportation and is in concert with the NCPC's goals.
- Staff generally supports the amendments regarding the reknitting of the city through air-rights development. As a policy, this is consistent with many ideas highlighted in the Monumental Core Framework Plan, which expects to increase the connectivity of the monumental core with other areas of the city by mitigating transportation barriers through such techniques as air-rights development. Staff is also supportive of identifying the Center Leg Freeway and the Union Station Air rights as priority areas. Furthermore, NCPC has been analyzing methods by which to eliminate the barriers created by the

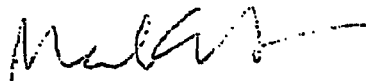
The Honorable Vincent Gray
Page2

Southeast/Southwest Freeway as part of the 10th Street Task Force work program and is exploring similar methods.

- Regarding the air-rights initiative, NCPC is supportive of the new language recommended for Policy CW-2.8.E that establishes the need for a public planning process for the Union Station Air Rights project. This project has the potential to alleviate the barriers established by the historic Union Station rail lines and provide an exciting mixed use development for the H Street, NE corridor. However, the location of this project is in a sensitive area as it is directly adjacent to the historic Capitol Hill neighborhood and directly in sight of Union Station. A development out of scale with these areas could have significant impacts to this area. While staff supports a public planning process for the project, there are concerns with the proposal to eliminate policy CH-2.1.7. This policy currently states that the allowable height of any building constructed in the air rights should be measured from the existing grade of 1st Street or 2nd Street NE, rather than from the overpass. The proposed bill will eliminate this policy, leaving the method of measurement for the Union Station air-rights unclear. In NCPC's view, the existing policy is consistent with the interpretation of the 1910 Height of Buildings Act and it also provides a clear guideline that will produce a project design that is sensitive to the existing surroundings. NCPC recommends that Council not eliminate or change Policy CH-2.1.7

Please consider these comments as the Council deliberates Bill 18-867. NCPC looks forward to reviewing these amendments to the District Elements of the Comprehensive Plan once the Council has taken a formal action. If you have any questions, please contact David Zaidain of my staff at 202-482-7230.

Sincerely,



Marcel Acosta
Executive Director

cc: Robert Miller, DC City Council
Harriet Tregoning, DC Office of Planning

Attachment 2



CHAIR

GEORGE R. CLARK, Esq.

October 4, 2010

VICE-CHAIR

NANCY MACWOOD

SECRETARY

RICHARD HOUGHTON

TREASURER

FRANCIS M. CLARKE, III

TRUSTEES

W. KENT COOPER, FAIA

BILL CREWS

ALMA GATES

CARROLL GREEN

KEVIN LOCKE

MEG MAGUIRE

HON. JAMES E. NATHANSON

LORETTA NEUMANN

CHARLES J. ROBERTSON

MARY PAT ROWAN

LANCE SALONIA

RICHARD WESTBROOK

EVELYN WRIN

JOHN YAGO

CHAIR EMERITUS

LAURA M. RICHARDS, Esq.

Mr. Vincent Gray
Chairman
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

RE: Bill 18-867, "Comprehensive Plan Amendment Act of 2010"

Dear Chairman Gray:

Thank you for providing an opportunity to enter into the record a response to Councilmember Wells. The Councilmember suggested the Committee of 100 clarify its testimony regarding the Height Act of 1910; and, referenced a particular passage cited in the testimony of Harriet Tregoning that he felt was at odds with our testimony.

Mr. Wells read from the following paragraph from Harriet Tregoning's testimony regarding the proposed Comprehensive Plan amendments the Committee of 100 focused on in testimony (LU-1.1.5 and LU-1.1.8) "...With further review and collaboration with the National Capital Planning Commission, we are no longer recommending deleting the existing Comp Plan language in the Capitol Hill Area Element, but instead are recommending changing the existing wording as follow to: 'The allowable height of any building constructed in the air rights should be measured consistent with the Height Act of 1910 and relate positively to the surroundings with special attention to Union Station and other

Page 2 (Committee of 100 on the Federal City)

historic buildings, the Federal precincts on Capitol Hill, and existing neighborhoods to the east and west. Development must give special attention to the preservation and enhancement of and view to Union Station and its historic surroundings by ensuring the provision of exemplary architecture and encouraging upper story setbacks and minimized penthouses.’ “

Mr. Wells advised that an agreement had been reached on language between the Office of Planning and the National Capital Planning Commission and therefore the Committee of 100’s concerns regarding height had been addressed. This assertion is incorrect.

The Office of Planning is using semantics,” deleting vs. changing,” to accomplish its intention to eliminate specific restrictive language in the Comprehensive Plan regarding the measuring point for H Street and replace it with more general language that no longer includes: “The allowable height of any building constructed in the air rights should be measured from the existing grade of 1st Street or 2nd Street NE, rather than from the overpass.”

In its September 3 letter, the National Capitol Planning Commission informed Council, “While staff supports a public planning process for the project, there are concerns with the proposal to eliminate Policy CH-2.1.7. This existing policy states that the allowable height of any building constructed in the air rights should be measured from the existing grade of 1st Street or 2nd Street, NE, rather than from the overpass. The proposed bill will eliminate this policy, leaving the method of measurement for the Union Station air-rights unclear. In NCPC’s view, the existing policy is consistent with the interpretation of the 1910 Height of Buildings Act and it also provides a clear guideline that will produce a project design that is sensitive to the existing surroundings. NCPC recommends that Council not eliminate or change Policy CH-2.1.7.”

Both the National Capital Planning Commission letter of September 3 and the Committee of 100’s testimony addressed measuring point for air-rights development. Both agree that the measuring point for development in the Union Station area is the existing grade of 1st Street or 2nd Street and not the H Street overpass. Furthermore, this means of measurement for H Street was established in Zoning Commission Order 02-35 dated November 7, 2003. Policy CH-2.1.7 should be maintained in the Comprehensive Plan to support the zoning regulation that established the measuring point for H. Street rather than replacing with the

Page 3 (Committee of 100 on the Federal City)

language suggested in the Office of Planning's testimony.

To further reinforce the measuring point, Section 7 of An Act to Regulate Height in the District of Columbia (The Height Act of 1910) states the following regarding the "Basis for Measurement:" "That for the purpose of this Act the height of buildings shall be measured from the level of the sidewalk opposite the middle of the front of the building to the highest point of the roof. If the building has more than one front, the height shall be measured from the elevation of the sidewalk opposite the middle of the front that will permit of the greater height. No parapet walls shall extend above the limit of height."

The ZC also has noted the problem with OP's approach. OP has removed the references to Height Act measuring practices from its proposals in the Zoning rewrite process at the specific request of the ZC because of fear of conflict with federal law. The Council should take the same precaution and not try to do by indirection what Home Rule specifically forbids – changing the Height Act.

The Committee of 100 would also like to address the comments made by David Tuchmann of Akridge when he stated, "...The amendments we support do allow the Zoning Commission to determine the proper measuring point for this particular project. It would place within the Comprehensive Plan both protections that would constrain the Zoning Commission in creating that measuring point but would also allow the Zoning Commission to look at the unique factors of this project – how it is relating to the rail yard – how H Street is the only street that this project fronts – the current language in the plan incorrectly looks to measure the project from 1st or 2nd Street."

Mr. Tuchmann indicates the proposed amendments to the Comprehensive Plan are the tools necessary to eliminate the authority and ability of the Zoning Commission to set limits on the height of buildings in the air rights development areas of the city. Approval of the proposed amendments would constrain the Zoning Commission from using the measuring point relied on since 2003 in ZC 02-35.

In closing, the Committee of 100 appreciates the invitation extended by Councilmember Wells to restate its position, "The proposed Land Use amendments represent the Office of Planning's attempt at an end run around the Height Act and the established measuring point for building height for buildings fronting a bridge or viaduct that has been relied upon since 2003 (ZC 02-38). Council should be

Page 4 (Committee of 100 on the Federal City)

cognizant that with one vote they have the ability to abandon 100 years of building within a height standard because the Office of Planning proposes a different vision for the skyline of the city..."

The Committee of 100's testimony is unchanged and as presented.

Sincerely,

--S--

Alma H. Gates

**cc: Councilmember Tommy Wells
Anthony Hood
Marcel Acosta
Harriet Tregoning
George R. Clark, Esq.**

Attachment 3



401 9th Street, NW North Lobby Suite 500 Washington, DC 20004 Tel 202 482.7200 Fax 202.482.7272 www.ncpc.gov

Commission Members**Presidential Appointees**

L. Preston Bryant, Jr., Chairman
Herbert F. Ames
John M. Hart

Mayoral Appointees

Arrington Dixon
George Ty Simpson

Ex Officio Members

Secretary of Defense
The Honorable Robert M. Gates

Secretary of the Interior
The Honorable Ken Salazar

Administrator
General Services Administration
The Honorable Martha Johnson

Chairman
Committee on Homeland Security
and Governmental Affairs
United States Senate
The Honorable Joseph I. Lieberman

Chairman
Committee on Oversight
and Government Reform
U.S. House of Representatives
The Honorable Edolphus Towns

Mayor
District of Columbia
The Honorable Adrian M. Fenty

Chairman
Council of the District of Columbia
The Honorable Vincent C. Gray

Executive Director
Maicol C. Acosta

IN REPLY REFER TO:
NCPC File Nos. CP19/7151
OCT 19 2010

Ms. Alma H. Gates
Committee of 100 on the Federal City
1317 G Street, NW
Washington, DC 20005

Re: Letter to Chairman Vincent Gray dated October 4, 2010

Dear Ms. Gates:

We are in receipt of a courtesy copy of a letter from you dated October 4, 2010 to Vincent Gray, Chairman of the Council of the District of Columbia. The letter focused on the recent hearing regarding the proposed amendments to the District Elements of the Comprehensive Plan and in particular the amendments dealing with the forthcoming Union Station Air Rights Project proposed for the H Street, NE overpass. The letter sought to clarify our position on this project in light of our letter to Chairman Gray dated September 3, 2010 (copy attached) and in light of Harriet Tregoning's testimony at the September 20, 2010 Council hearing. Ms. Tregoning offered alternative language for the Capitol Hill Element of the Comprehensive Plan, stating that the language was agreed upon by NCPC and the District of Columbia Office of Planning (DCOP). I would like to clarify our position on this project as it stands at this time.

After submitting our letter of September 3, 2010 to Council stating NCPC's position on the proposed amendments, DCOP staff contacted NCPC staff and proposed alternative language regarding the project. It is our understanding that the details of what is certainly to be a complex project are still being developed. It is our intent that the alternative language agreed upon by DCOP and NCPC staff was meant to cover NCPC's concerns related to *design* of the project and not the technical details of the measuring point for the buildings. Without seeing the project's details, it is difficult to ascertain what the appropriate measuring point should be, although we reiterate that measuring from the crown of the H Street, NE overpass would be, in our view, contrary to the Height Act and past Zoning

Ms. Alma Gates

Page 2

Commission actions related to measuring from elevated roadways or man-made grades. Hence, the language that was verbally agreed to between DCOP staff and NCPC staff is related to the overall design of the project and NCPC will take a position on the measurement of the project once the design details are known.

I hope this clarifies our position on this issue. We look forward to reviewing these amendments to the District Elements of the Comprehensive Plan once the Council has taken a formal action. We also look forward to reviewing aspects of the Union Station Air Rights project as the Zoning Commission establishes zoning at the site. If you have any questions, please contact David Zaidain of my staff at 202-482-7230.

Sincerely,



Marcel Acosta
Executive Director

Attachment

cc: Chairman Vincent Gray
Council of the District of Columbia

Councilmember Tommy Wells
Council of the District of Columbia

Anthony Hood
District of Columbia Zoning Commission

Robert Miller
Council of the District of Columbia

Harriet Tregoning
DC Office of Planning

FAX COVER SHEET

TO: Sharon Schellin
FROM: Alma Gates
DATE: December 7, 2010
RE: Testimony to be sent to Commissioners in advance of December 16 ZC hearing
PAGES: 16, Including cover sheet

RECEIVED
I.C. OFFICE OF ZONING
2010 DEC -7 PM 12:00