

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

Before completing this form, please review the instructions on the reverse side. Print or type all information unless otherwise indicated. All information must be completely filled out.

**CASE NO.:** 14-18D

**Motion of:** Applicant

**PLEASE TAKE NOTICE, that the undersigned will bring a motion to:**

Request the Zoning Commission to extinguish the First Stage Planned Unit Development and Zoning Map Amendment that was approved pursuant to Zoning Commission Order No. 14-18 and extended pursuant to Zoning Commission Order Nos. 14-18B and 14-18D.

**Points and Authorities:**

Please state each and every reason why the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your motion, including relevant references to the Zoning Regulations or Map and where appropriate a concise statement of material facts. If you are requesting the record be reopened, the document(s) that you are requesting the record to be reopened for must be submitted separately from this form. No substantive information should be included on this form.

See attached

Consent: No attempt was made

Further Explanation:

**CERTIFICATE OF SERVICE**

I hereby certify that on this  day of , 2026

I served a copy of the foregoing Motion to each Applicant, Petitioner, Appellant, Party, and/or Intervenor, and the Office of Planning

in the above-referenced ZC or BZA case via:

**Signature:** Paul A. Tummonds Jr.

**Print Name:** Paul A. Tummonds Jr.

**Address:** 1999 K Street, NW, Suite 500, Washington, DC 20006

**Phone No.:** 202-721-1157 **E-Mail:** ptummonds@goulstonstorrs.com

April 21, 2026

**VIA IZIS**

Anthony J. Hood, Chairman  
Zoning Commission for the District of Columbia  
441 Fourth Street, NW, Suite 200S  
Washington, DC 20001

**Re:** Z.C. Case No. 14-18, 14-18B, and 14-18D: Motion for the Extinguishment of the First Stage Planned Unit Development and Zoning Map Amendment for Brookland Manor (Square 3954, Lots 3, 4 and 800-804; Square 4024, Lots 1, 800-804; and Square 4025, Lots 1-3, 5, and 800-803) (“**Property**”<sup>1</sup>)

Dear Chairman Hood and Commissioners:

Mid-City Financial Corporation (“**Applicant**”) hereby requests that the Zoning Commission extinguish the First Stage PUD and Zoning Map Amendment that was approved pursuant to Zoning Commission Order No. 14-18 and extended pursuant to Zoning Commission Order Nos. 14-18B and 14-18D. The First Stage PUD approval was most recently extended in Zoning Commission Order No. 14-18D and is set to expire on August 1, 2027<sup>2</sup>. The Zoning Commission has the authority to extinguish the First Stage PUD and Zoning Map Amendment approval pursuant to Subtitle X, §310.2.

The First Stage PUD approved approximately 1.9 million square feet of mixed-use development on approximately 20 acres of property in Ward 5. In that application, the Applicant noted that approval of the project provided a unique and exciting opportunity to create a new and revitalized community that corrects some of the mistakes of earlier urban planning concepts, and creates a great place for existing residents, as well as new residents.

Since the Commission’s approval of the last time extension request, the Applicant has exhausted all fronts to move the proposed redevelopment of the Brookland Manor Apartments forward. The Applicant has determined that the approved massive multiphase redevelopment of affordable housing is not financially feasible, as the costs to move the redevelopment forward are far greater than any potential returns. For these reasons, the Applicant has determined that the best path forward for the future of the Brookland Manor Apartments and its residents is to extinguish the First Stage PUD and Zoning Map Amendment approvals and sell the property to a new owner

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<sup>1</sup> Some of the lot numbers have changed since the First-Stage PUD was approved. However, the properties that are subject to the First Stage PUD approval have not changed.


<sup>2</sup> The Second-Stage PUD that was approved pursuant to Zoning Commission Order No. 14-18A and extended pursuant to Zoning Commission Order No. 14-18C expired on March 4, 2026.

ZC Case No. 14-18,14-18B, and 14-18D  
Applicant's Motion to Extinguish  
April 21, 2026

who can better meet the needs of the residents, most likely through a major rehabilitation of the existing buildings.

Please feel free to contact the undersigned if you have any questions or comments regarding this motion. Thank you for your attention to this matter.

Respectfully submitted,



Paul Tummonds

# Certificate of Service

I certify that on April 21, 2026, I delivered a copy of the foregoing motion to extinguish Zoning Commission Order Nos. 14-18, 14-18B and 14-18D via email to the addresses listed below.

Radhika Mohan  
Maxine Brown-Roberts  
D.C. Office of Planning  
[Radhika.Mohan@dc.gov](mailto:Radhika.Mohan@dc.gov)  
[Maxine.Brownroberts@dc.gov](mailto:Maxine.Brownroberts@dc.gov)

Advisory Neighborhood Commission 5C  
[5C@anc.dc.gov](mailto:5C@anc.dc.gov)

Tequia Hicks Delgado, ANC 5C, Chairperson  
[5C03@anc.dc.gov](mailto:5C03@anc.dc.gov)

Darlene Oliver, SMD ANC 5C05  
[5C05@anc.dc.gov](mailto:5C05@anc.dc.gov)

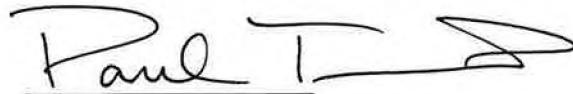
Harry "Tommy" Thomas Jr., SMD ANC 5C06  
[5C06@anc.dc.gov](mailto:5C06@anc.dc.gov)

Advisory Neighborhood Commission 5B  
[5B@anc.dc.gov](mailto:5B@anc.dc.gov)

Jingwen Sun, SMD ANC 5B03  
[5B03@anc.dc.gov](mailto:5B03@anc.dc.gov)

Edward Barrego, ANC 5B, Chairperson  
[5B01@anc.dc.gov](mailto:5B01@anc.dc.gov)

Brookland Manor / Brentwood Village Resident Association  
c/o Minnie Elliott  
Brookland Manor/Brentwood Village Resident Association President  
[bmbvassociation@gmail.com](mailto:bmbvassociation@gmail.com)



Paul Tummonds