

May 14, 2025

**Meridith H. Moldenhauer**

Direct Phone 202-747-0763  
mmoldenhauer@cozen.com

**VIA IZIS**

Anthony Hood, Chairperson  
D.C. Zoning Commission  
441 4th Street, NW, Suite 200S  
Washington, DC 20001

**RE: ZC Case No. 23-22  
Applicant's Prehearing Statement**

Chairperson Hood and Honorable Members of the Commission:

The following constitutes the prehearing statement of Applicant Marshall Heights Community Development Organization, Inc. (the “**Applicant**”) regarding the subject application for a zoning map amendment. On November 4, 2024, the Zoning Commission voted to set down the application for a public hearing. Pursuant to Subtitle Z § 401 of Zoning Regulations, this submission provides additional information for the case record.

The delay in filing this prehearing statement is due to financial challenges. The current financial market in Washington, DC, presents several hurdles for affordable housing financing. Despite modest momentum in the office market, with positive net absorption and a slight reduction in vacancy rates, the overall economic outlook remains cloudy. The higher cost of capital has prompted many companies to pause and reassess their financial strategies. These factors make it challenging for developers to secure the necessary funding for affordable housing projects, as lenders are more risk-averse and financing terms are less favorable. In addition, the DC Housing Production Trust Fund (HPTF) is a crucial tool for producing and preserving affordable housing in the District. It provides gap financing for projects affordable to low and moderate-income households. However, the fund faces its own set of challenges. Despite the Mayor's commitment of at least \$100 million annually, the demand for affordable housing far exceeds the available resources.

Accordingly, the Applicant respectfully requests that the Commission schedule a public hearing on this application.

## **I. Additional Lots Added to Application Property**

During the setdown meeting, the Commission requested that the Applicant provide additional information on the properties added to the Application at Exhibits 6-6A. The Application initially included the following properties<sup>1</sup>: 4645 and 4649 G Street SE and 4648, 4654, 4656, 4658, and 4660 Hanna Place SE (Square 5359, Lots 0335, 0337, 0349, 0352, 0353, 0354, and 0355) (the “**Original Lots**”). Prior to setdown, the Applicant added the following properties<sup>2</sup>: 4647 G Street SE and 4650-4652 Hanna Place SE (Square 5359, Lots 0336, 0350, and 0351) (the “**Additional Lots**”).

As outlined in Exhibit 6, the Additional Lots were not included in the initial Application because they are owned by a separate, unrelated entity from the Applicant. However, following submission of the Application, the Office of Planning suggested that the Additional Lots be added to the Application in order to create a contiguous area. The inclusion of the Additional Lots in the subject Application will allow for a more cohesive amendment to the Zoning Map.

The Original Lots are split-zoned with the R-2 and RA-1 Zone Districts. The Additional Lots are zoned R-2. These lots infill the gap between some of the Original Lots creating a more contiguous area for the proposed map amendment. Like the Original Lots, the Additional Lots are also designated on the FLUM as Moderate-Density Residential and on the GPM as a Neighborhood Conservation Area with similar characteristics as the Original Lots. Therefore, the Applicant is seeking a Map Amendment from the R-2 and RA-1 zone to the RA-3 zone.

## **II. Community Outreach**

At the time of the setdown meeting, the Applicant had met with Advisory Neighborhood Commission (ANC) 7E to present the proposed zoning map amendment. Since the setdown meeting, ANC 7E voted unanimously (3-0-0) to support the application. No issues or concerns were raised. The ANC’s written report is attached and submitted to the record as Tab C in accordance with Subtitle Z § 406.2. This filing supplements the record as anticipated in the Office of Planning’s setdown report. See Ex. 10 at 15.

## **III. Pre-hearing Filing Requirements**

The Applicant hereby certifies that this statement complies with the requirements of Subtitle Z § 401, as follows:

Subtitle Z § 401.1(a)	Information Requested by the Commission; Updated Materials Reflecting Changes by Commission	Prehearing Statement (filed herein)
Subtitle Z § 401.1(b)	Applicant’s Witnesses	Tab A

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<sup>1</sup> See Exhibit 3.

<sup>2</sup> See Exhibit 6.

Subtitle Z § 401.1(c)	Summary of Witness Testimony with Expert Witness Resumes	Tab B <sup>3</sup>
Subtitle Z § 401.1(d)	Additional Information, Reports or Other Materials from the Applicant	Not Applicable
Subtitle Z § 401.1(e)	Reduced plans no larger than 11x17	Tabs D-G
Subtitle Z § 401.1(f)	List of maps, plans or other documents that will be offered into evidence	Not Applicable
Subtitle Z § 401.1(g)	Estimate of time for Applicant's presentation	30 minutes
Subtitle Z § 401.3(a)	Names and addresses of owners of property within 200 feet	Application (Ex. 9)
Subtitle Z § 401.3(b)	Names and addresses of each person having a lease with the owner	Not Applicable
Subtitle Z § 1601.1	Hearing Fee	Enclosed

Based on the information herein and in the case record, the Applicant respectfully requests that the Commission schedule a public hearing on this application. Thank you for attention to this submission.

Sincerely,  
COZEN O'CONNOR



Meridith Moldenhauer

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<sup>3</sup> The Applicant is not identifying an expert witness at this time. The Applicant reserves the right to supplement the record no later than 20 days prior to the hearing date as permitted under Subtitle Z § 401.5.

**Certificate of Service**

I HEREBY CERTIFY that on this 14<sup>th</sup> day of May, 2025, a copy of this Prehearing Statement with attachments was served, via email, on the following:

District of Columbia Office of Planning  
c/o Karen Thomas  
1100 4<sup>th</sup> Street SW, Suite E650  
Washington, DC 20024  
karen.thomas@dc.gov

Advisory Neighborhood Commission 7E  
c/o Natasha Dupee, Chair  
Aaron Harris SMD Commissioner 7E02  
7E@anc.dc.gov  
7E02@anc.dc.gov

A handwritten signature in blue ink, appearing to read 'M. Moldenhauer', is written over a horizontal line.

Meridith Moldenhauer

**Tab A**

## **OUTLINE OF WITNESS LIST**

- I. Meredith Moldenhauer, Cozen O'Connor
- II. Babatunde Oloyede, Marshall Height Community Development Organization

Tab B

## **OUTLINE OF TESTIMONY**

**Meridith Moldenhauer, Cozen O'Connor**

- III. Introduction
- IV. Background on Zoning & Comprehensive Plan
- V. Conclusion



## **OUTLINE OF TESTIMONY**

### **Babatunde Oloyede, Marshall Height Community Development Organization**

- I. Introduction
- II. Background on MHCDO
- III. Project Goals
- IV. Community outreach
- V. Conclusion

Tab C



BEFORE THE ZONING COMMISSION AND  
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA



FORM 129 – ADVISORY NEIGHBORHOOD COMMISSION (ANC) REPORT

Before completing this form, please review the instructions on the reverse side.

Pursuant to Subtitle Z § 406.2 and Subtitle Y § 406.2 of Title 11 DCMR Zoning Regulations, the written report of the Advisory Neighborhood Commission (ANC) shall contain the following information:

IDENTIFICATION OF APPEAL, PETITION, OR APPLICATION:

Case No.:	ZC 23-22	Case Name:	MHCDO G St and Hanna PI Map Amendment
Address or Square/Lot(s) of Property:	G St and Hanna PI SE		
Relief Requested:	Map Amendment		

ANC MEETING INFORMATION

Date of ANC Public Meeting:	1	0	/	1	2	/	2	4	Was proper notice given?:	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Description of how notice was given:	The meeting notice was provided in the October 16, 2024 email for the ANC Listserv. The agenda and meeting notice were also available on the ANC7E.US website. Additionally, the notice was provided via the DC Public Library public system for room reservation on October 26.												
Number of members that constitutes a quorum:	3				Number of members present at the meeting:	3							

MATERIAL SUBSTANCE

The issues and concerns of the ANC about the appeal, petition, or application as related to the standards of the Zoning Regulations against which the appeal, petition, or application must be judged (*a separate sheet of paper may be used*):

No issues emerged.

The recommendation, if any, of the ANC as to the disposition of the appeal, petition, or application (*a separate sheet of paper may be used*):

No recommendations submitted.

AUTHORIZATION

ANC	7	E	Recorded vote on the motion to adopt the report (i.e. 4-1-1):	3-0-0	
Name of the person authorized by the ANC to present the report:			Natasha Dupee		
Name of the Chairperson or Vice-Chairperson authorized to sign the report:			Natasha Dupee		
Signature of Chairperson/ Vice-Chairperson:				Date:	5/2/2025

ANY APPLICATION THAT IS FOUND TO BE INCOMPLETE MAY NOT BE ACCORDED "GREAT WEIGHT" PURSUANT TO  
11 DCMR SUBTITLE Z § 406 AND SUBTITLE Y § 406.

### INSTRUCTIONS

Pursuant to 11 DCMR Subtitle Z § 406.2 and Subtitle Y § 406.2, the Zoning Commission (ZC) and Board of Zoning Adjustment (BZA) shall give "*great weight*" to the written report of the affected Advisory Neighborhood Commission (ANC), as required by the Comprehensive Advisory Neighborhood Commissions Reform Amendment Act of 2000.

1. All ANC reports shall be made pursuant to this form. If additional space is necessary, use separate sheets of 8½" x 11" paper to complete the form.
2. ANC reports and any accompanying documents must be submitted to the record by using:
  - a. The Interactive Zoning Information System (IZIS) at [www.dcoz.dc.gov](http://www.dcoz.dc.gov);
  - b. By email to [zcsubmissions@dc.gov](mailto:zcsubmissions@dc.gov) for the ZC or [bzasubmissions@dc.gov](mailto:bzasubmissions@dc.gov) for the BZA; or
  - c. In person or by U.S. mail addressed to 441 4th Street, NW, Suite 200-S, Washington, DC 20001.
3. Submission deadlines are as follows:
  - a. ANCs must file this form at least seven (7) calendar days in advance of the hearing, if they wish to participate in a public hearing under Subtitle Z § 406.3 and Subtitle Y § 406.3.
  - b. In all cases before the ZC or BZA, ANCs must file this form before the ZC or BZA makes a decision in order to receive great weight.

If You See Something, Say Something Report Fraud, Waste, Abuse, and Mismanagement in the  
Government of the District of Columbia to the Office of the Inspector General  
717 14th Street, N.W., Suite 500 | Washington, D.C. 20005

CALLS ARE CONFIDENTIAL

Toll Free Hotline

1-800-521-1639 | 202-724-TIPS (8477) | Email: [hotline.oig.dc.gov](mailto:hotline.oig.dc.gov) | Web Page: [www.oig.dc.gov](http://www.oig.dc.gov)



If you need a reasonable accommodation for a disability under the Americans with Disabilities Act (ADA) or Fair Housing Act, please complete a Form 155 - Request for Reasonable Accommodation.

District of Columbia Office of Zoning

441 4th Street, N.W. Ste. 200 S, Washington, D.C. 20001

(202) 727 6311 \* (202) 727 6072 fax \* [www.dcoz.dc.gov](http://www.dcoz.dc.gov) \* [dcoz@dc.gov](mailto:dcoz@dc.gov)