



www.gdllaw.com

John Patrick Brown, Jr., Esq. jpb@gdllaw.com Lyle M. Blanchard, Esq. lmb@gdllaw.com

November 6, 2024

## **BY IZIS**

Mr. Anthony J. Hood, Chairman D.C. Zoning Commission One Judiciary Square 441 4th Street, N.W. Second Floor Washington, D.C. 20001

> Applicant's Supplemental Pre-Hearing Submission Re:

> > Z.C. Case No. 24-09

Petition for Text Amendments to Subtitle C, §1006.6(c) and

Subtitle X, §101 ("Petition")

Dear Chairman Hood and Members of the Commission:

On behalf of The Wesley Theological Seminary of The United Methodist Church ("Wesley"), we respectfully submit this Supplemental Pre-Hearing Submission. As a result of ongoing and productive negotiations with ANC 3E, Wesley agreed to submit the proposed minor revision below to Subtitle X, §101.5 for Commission consideration. This proposed revision is intended to clarify, but not change the substance of the proposed text amendment.

## PROPOSED REVISION REQUESTED BY ANC 3E

## Add new provision 11-X DCMR § 101.5

101 **CAMPUS PLANS** 

101.3 Any commercial use customarily incidental to a university use in an R, RF, or RA zone, or as an adjunct use to a university building, shall be subject to the following conditions:

- There shall be a demonstrated and necessary relationship between the use and (a) the university functions;
- The total floor area of all commercial uses, including basement or cellar space, (b) shall occupy no more than ten percent (10%) of the gross floor area of the total campus plan floor area; and



www.gdllaw.com

Mr. Anthony J. Hood, Chairman November 6, 2024 Page 2 of 2

- (c) The commercial use shall be located so that it will not become objectionable to non-university residential neighbors due to hours of operation, noise, parking, loading, lighting, trash, or other operational characteristics that are not customarily associated with a residential use.
- The campus plan process shall not serve as a process to create general commercial activities or developments unrelated to the educational mission of the applicant or that would be inconsistent with the Comprehensive Plan.
- 101.5 A dormitory purpose built student housing building providing housing exclusively for Wesley Theological Seminary and American University students, faculty, and staff on Square 1600, Lot 819 shall not be subject to the commercial activity restrictions in this Section if approved by the Zoning Commission as part of a campus plan.

Thank you for the Commission's assistance with this Petition.

Very truly yours,

GREENSTEIN DELORME & LUCHS, P.C.

John Patrick Brown, Jr.

Lyle M. Blanchard

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2024, the foregoing Applicant's Supplemental Pre-Hearing Submission was filed in IZIS and delivered via electronic mail to the following:

Ms. Jennifer Steingasser

Mr. Joel Lawson

Ms. Maxine Brown-Roberts

D.C. Office of Planning 1100 4th Street, SW Suite E650

Washington, D.C. 20024 jennifer.steingasser@dc.gov joel.lawson@dc.gov maxine.brownroberts@dc.gov

maxine.browinoberts@uc.

Mr. Erkin Ozberk

D.C. Department of Transportation 55 M Street, SE, Suite 400 Washington, D.C. 20003 erkin.ozberk1@dc.gov

ANC 3D

3D@anc.dc.gov

Ms. Tricia Duncan, Chair, ANC 3D

3D02@anc.dc.gov

Mr. Chuck Elkins, ANC 3D01

3D01@anc.dc.gov

ANC 3E

3E@anc.dc.gov

Mr. Jonathan Bender, Chair, ANC 3E

jonbender@gmail.com

Commissioner Ali Gianinno, ANC 3E06

3E06@anc.dc.gov

Commissioner Amy Hall, ANC 3E02

3E02@anc.dc.gov

Mr. Diego Carney, ANC 3E07

3E07@anc.dc.gov

Mr. Rohin Ghosh, ANC 3E08

3E08@anc.dc.gov

William Clarkson

Spring Valley Neighborhood Association

wclarksonv@gmail.com

**Dennis Paul** 

Neighbors for a Livable Community

dennis.paul@verizon.net

nlc.washdc@gmail.com

William F. Krebs

Spring Valley-Wesley Heights Citizens Association

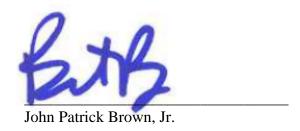
w\_krebs@msn.com

Thomas M. Smith

Neighbors for a Livable Community/Spring Valley

- Wesley Heights Citizens Association

tmfsmith@rcn.com



Note: As a courtesy, the Certificate of Service includes all the Parties in the related Z.C. Case No. 23-08(1).