



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



FORM 153 – REQUEST TO ACCEPT AN UNTIMELY FILING OR TO REOPEN THE RECORD

THIS FORM IS FOR NON-PARTIES ONLY. IF YOU ARE A PARTY, PLEASE FILE A FORM 150 – MOTION.

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.: 24-09: Wesley Theological Seminary Text Amendments

I, Neighbors for a Livable Community (NLC)/Spring Valley-Wesley Heights Citizens Association (SVWHCA) hereby request the following relief:

- ☐ Accept an untimely filing of \_\_\_\_\_
- ☒ To reopen the record to accept attached filing addressing relevant issues of Commission's authority in Campus Plan cases.

Points and Authorities:

**Accept an untimely filing:** Please state each and every reason you believe the Zoning Commission (ZC) or Board of Zoning Adjustment (BZA) should grant your request to accept an untimely filing, including relevant references to the Zoning Regulations or Map. If you require more space, please use a separate piece of paper.

**Reopen the Record:** Please state each and every reason you believe the ZC or BZA should grant your request to reopen the record, including relevant references to the Zoning Regulations or Map. The document(s) that you are requesting the record to be reopened for must be submitted separately from this form (see instructions). No substantive information is to be included on this form.

NLC and SVWHCA request the Commission to reopen the record to accept a filing prior to deliberating in the above referenced case. The Commission authorized post-hearing filings by the petitioner and ANC 3E. Recently, the Commission accepted a filing from ANC 3D responding to an ANC 3E filing. Notably, ANC 3D and ANC 3E are not petitioners or parties in this case. The ANC and petitioner filings have raised new and critical issues that were not raised or addressed during the hearing; yet are critically germane to the Commission's December 19 deliberations. NLC and SVWHCA realize there will be a comment period if the Commission advances a proposed rule. However, the Commission has selectively accepted into the record filings by non-parties in this case that were not requested to make these filings during the November 18 hearing. NLC and SVWHCA believe the issue it raises in its post-hearing filing is critically relevant to the Commission's deliberations on December 19. We have made previous requests to submit a post-hearing filing. The filing we are requesting to be accepted is limited to the same single issue raised by ANC 3D that we believe is the most critical for the Commission's review prior to any further action in this case.

I/We certify that the above information is true and correct to the best of my/our knowledge, information and belief. Any person(s) using a fictitious name or address and/or knowingly making any false statement on this application/petition is in violation of D.C. Law and subject to a fine of not more than \$1,000 or 180 days imprisonment or both. (D.C. Official Code § 22-2405)

Date:	12/12/2024	Signature:	
Name:	Dennis Paul, President, Neighbors for a Livable Community		
Address:	3700 University Avenue NW, Washington, D.C. 20016		
Phone No(s):	(202) 669-1500	E-Mail:	NLC.WashDC@gmail.com

ANY APPLICATION THAT IS NOT COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS ON THE BACK OF THIS FORM WILL BE REJECTED.

ZONING COMMISSION  
District of Columbia  
CASE NO. 24-09  
EXHIBIT NO.59