



December 14, 2025

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

Re: Response to Applicant's Second Post-Hearing Statement (Exhibit 145)

Dear Chairman Hood and Members of the Commission,

ANC 5D writes to state, in the strongest possible terms, our full and unequivocal support for ANC 5C's filings, arguments, and requested relief in response to the Applicant's "Second Supplemental Post-Hearing Statement" (Exhibit 145). We adopt ANC 5C's position in its entirety.

Chemical Storage / Distribution —

Clear and Unequivocal Opposition

ANC 5D does not agree, does not consent, and will not support the Applicant's proposed carve-out permitting so-called "small-scale or accessory" chemical storage. This language is unacceptable.

The Applicant's formulation is not a clarification or a compromise—it is a substantive loophole that undermines the very prohibition it claims to establish. Terms such as "small-scale," "accessory," and "consistent with light industrial uses" are undefined, elastic, and unenforceable. In practice, they invite abuse, frustrate oversight, and deprive the District and the community of any meaningful ability to monitor, limit, or enforce chemical handling on-site.

ANC 5D is categorically opposed to any chemical storage or distribution allowance that is not explicitly bounded by numeric thresholds, material definitions, and mandatory DOEE review and certification. Anything less is not a safeguard—it is a permission slip.

We therefore fully and forcefully support ANC 5C's position that:

- Open-ended "accessory" allowances are unacceptable;
- Chemical storage must either be prohibited outright or strictly limited to clearly defined incidental quantities;

- Any allowance must include specific gallon limits, aggregate caps, and pre-occupancy DOEE approval for each tenant.

Absent these enforceable protections, ANC 5D considers the Applicant's proposal non-responsive, unsafe, and contrary to the public interest, particularly in a corridor already overburdened by industrial and environmental impacts.

Public Benefits — Full Alignment with ANC 5C

ANC 5D also fully rejects the Applicant's assertion that ANC 5C's proposed public benefits are "grossly disproportionate." We agree with ANC 5C that the Applicant receives a substantial and permanent development incentive through the PUD-related Zoning Map amendment, and that Subtitle X requires benefits commensurate with the long-term impacts imposed on the surrounding community.

The Applicant's narrow focus on height and density ignores the real consequence of this action: a permanent industrial entitlement with enduring environmental, transportation, and land-use impacts. ANC 5D fully supports ANC 5C's benefit framework as reasonable, lawful, and consistent with established PUD practice.

Dismissal of Community-Requested Public Realm Improvements

ANC 5D further notes, and is troubled by, the Commission's apparent dismissal—and the Applicant's continued disregard—of ANC-requested public realm improvements, including the proposed benches. These requests were modest, directly responsive to community needs, and squarely within the type of tangible, neighborhood-serving benefits the PUD process is intended to produce.

The failure to meaningfully engage with these requests reinforces the community's concern that its input is being minimized or selectively ignored, despite the permanent impacts of the zoning relief being granted. ANC 5D urges the Commission to revisit this issue and ensure that community-identified amenities are given appropriate weight in the evaluation of public benefits.

Request for Commission Direction

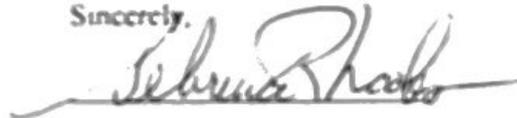
ANC 5D joins ANC 5C in respectfully but firmly requesting that the Commission:

1. Reject the Applicant's chemical-handling language as drafted and direct the Applicant to provide clear, enforceable limits with DOEE review and certification;
2. Affirm that public benefits must be evaluated under Subtitle X §305.11, accounting for the permanent nature and cumulative impacts of the PUD-related map amendment; and

3. Address the dismissal of ANC-requested public realm improvements, including benches, and require the Applicant to meaningfully respond to these requests as part of a good-faith public benefits package.

ANC 5D stands shoulder-to-shoulder with ANC 5C. On chemical storage in this location, our position is unambiguous: no loopholes, no ambiguity, and no unenforceable exceptions. The health, safety, and long-term wellbeing of Ward 5 residents demand nothing less.

Sincerely,

A handwritten signature in cursive script, reading "Sebrina Rhodes". The signature is written in black ink and is positioned above the typed name and title.

Commissioner Sebrina Rhodes
Vice Chair of ANC 5D