

February 4, 2025

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**VIA IZIS**

Anthony Hood, Chairperson  
District of Columbia Zoning Commission  
441 4<sup>th</sup> Street NW, Suite 200-S  
Washington, DC 20001

Re: Applicant's Supplemental Statement  
Z.C. Case No. 24-17; Application for a Campus Plan  
1619 Massachusetts Avenue NW (Square 0181, Lot 0850)

Dear Chairperson Hood:

Please accept this letter as a Supplemental Statement in Support of the Application of Indiana University Foundation, Inc. ("Indiana University Foundation") (hereinafter referred to as the "Applicant") for a new Campus Plan at 1619 Massachusetts Avenue NW.

**I. Revised Plans**

Along with this statement, the Applicant has submitted revised plans with minor changes, including:

- Replaced one existing vehicle parking space with eight permanent bicycle parking spaces.
- Minor changes to the loading areas at the rear of the building.
- Minor changes and additional detail related to the interior layout and usage of each floor of the interior of the building.

**II. Witnesses**

The Applicant intends to call the following representatives from Indiana University as witnesses: Thomas Morrison, Jason Banach, Patrick McAleer, and Adam David Thies. Mr. Morrison, Mr. Banach, Mr. McAleer, and Mr. Thies will testify regarding the proposed Indiana University Campus Plan, including the proposed use and operations of 1619 Massachusetts Avenue NW as Indiana University's D.C. Campus.

The Applicant also intends to call the following expert witnesses:

Josh Vacca and Lynden Garland, Jr., SmithGroup. Mr. Vacca and Mr. Garland, Jr. are the architects for this project and will testify regarding the plans, interior layout, and design proposed for the Indiana University Campus Plan. The resumes of Mr. Vacca and Mr. Garland, Jr. are attached as Exhibit 1.

Daniel Solomon, Gorove Slade. Mr. Solomon is a traffic engineer with Gorove Slade. Mr. Solomon is the lead traffic engineer for this project and will testify regarding the traffic study completed for this Application and submitted to the record as Exhibit 13 as well as communications with the District Department of Transportation (“DDOT”) regarding same. Mr. Solomon’s resume is attached as Exhibit 2.

### **III. Zoning Commission Hearing**

The Applicant anticipates that it will need 20 minutes to present its Application at the Zoning Commission hearing scheduled for March 6, 2025.

### **IV. Conclusion**

For all of the reasons discussed in this letter and in prior submissions, the Applicant respectfully requests that the Zoning Commission approve this Application for a new Campus Plan. Please do not hesitate to contact me at [zgwilliams@venable.com](mailto:zgwilliams@venable.com) or at 202-344-4369 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Zach Williams", written in a cursive style.

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Zachary G. Williams

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Supplemental Statement and all accompanying materials including the revised architectural plans, traffic study, and resumes were sent to the below addresses by e-mail on February 4, 2025.



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Zachary G. Williams

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