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BEFORE THE ZONING COMMISSION OR BOARD OF ZONING ADJUSTMENT OF 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.:	25-05
Dennis Hugh	nes, on behalf of Harvard University's Center for Hellenic Studies, hereby request the following relief:
Accept an unti	
☐ To reopen the	record to accept
CASE NO.: 25-05	
should grant your	r request to accept an untimely filing, including relevant references to the Zoning Regulations or Map. If you require more
grant your reques	st to reopen the record, including relevant references to the Zoning Regulations or Map. The document(s) that you are
	d letter requesting waiver of 11-Z DCMR 401.5 to allow modification of campus plan document fewer than 30 days prior
	owingly 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
Date: 7	/11/2025 Signature: Dennis Hughes, Holland & Knight LLP, Agent for Harvard University's
lame:	ennis Hughes, Holland & Knight LLP, Agent for Harvard University and the following test of the following test

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

Fax No.:

Holland & Knight

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Dennis R. Hughes 202.419.2448 dennis.hughes@hklaw.com

July 11, 2025

VIA IZIS

Zoning Commission for the District of Columbia 441 4th Street, NW, Suite 210S Washington, DC 20001

Re: Z.C. Case No. 25-05 - Harvard University, Center for Hellenic Studies University Campus Plan Renewal (2025-2045)(the "Application") Modification to Application Materials

Dear Members of the Zoning Commission:

On behalf of Harvard University's Center for Hellenic Studies ("Center" or the "Applicant"), we respectfully submit a slightly modified Campus Plan document for your consideration in advance of the July 28, 2025, public hearing. Given that these materials are being provided fewer than 30 days prior to the hearing, we request a waiver of Subtitle Z Section 401.5 of the Zoning Regulations (11 DCMR) pursuant to your authority under Subtitle Z Section 101.9, as the request will not prejudice the rights of any property nor is it otherwise prohibited by law.

We request that the attached "Campus Plan 2025" document prepared by Richard Williams Architects supersede and replace the previously-filed document of the same title included at Exhibit 3(f) of the hearing record in this matter. The refinements to the document can be found at Figure 2 (Proposed Facilities Plan) and Figure 3 (Proposed Parking and Circulation Plan).

As the Applicant noted in its supplemental submission dated June 27, 2025, it continues to work with DDOT regarding scoping pursuant to DDOT's Comprehensive Transportation Review guidelines. To that end, the Applicant plans to submit a Transportation Statement to the hearing record prior to the public hearing following additional coordination with DDOT. This review and coordination already has yielded improvements to the campus site plan, as reflected in the revised Figures 2 and 3.

Specifically, as shown on revised Figure 2, the Applicant has slightly reconfigured and relocated proposed Building 1 (new facilities building) and Building 3 (administrative building addition) to reflect further study it has undertaken in coordination with a certified arborist to protect against any disturbance to "heritage" trees and to avoid disturbance to "special" trees to the maximum extent practicable. The lighter shaded portions of those building sites represent opportunities to cantilever, if needed, to further avoid disturbance to root zones, if any. Likewise, the access

drive extension to service Building 1 also has been refined to more accurately reflect the location of existing mature trees and to optimize avoidance of same.

Similarly, Figure 3 has been revised to remove a new parking area that had been proposed at the southeastern corner of the campus. Given the Center's current and anticipated future needs over the course of the next campus plan cycle, this additional parking area does not appear necessary to address conditions nor is required under the Zoning Regulations.

The Applicant appreciates the feedback received from DDOT and believes these refinements further promote a well-planned and designed educational campus and minimize any potential negative impacts on surrounding residential areas, as contemplated in Subtitle X Section 100.2. Likewise, the campus plan renewal application, as revised, remains consistent with the Comprehensive Plan, including the policies of the Transportation Element, as described at Page 11 of the Applicant's Comprehensive Plan analysis included at Exhibit 3(e) of the hearing record.

Thank you for your consideration of these additional materials in advance of the July 28 public hearing.

Respectfully submitted,

HOLLAND & KNIGHT LLP

Dennis R. Hughes

cc: Certificate of Service

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 11, 2025, electronic copies of Harvard University's Center for Hellenic Studies' supplemental prehearing materials were delivered as follows:

D.C. Office of Planning (By email)

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Mr. Joel Lawson
Mr. Michael Jurkovic
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Dennis R. Hughes