

**BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA**

**Department of General Services
Metropolitan Police Department 7th District Headquarters**

**2455 Alabama Avenue, SE
Square 5728, Lot 800**

**Application for a Consolidated Planned Unit Development and
Related Zoning Map Amendment from RA-1 to RA-2**

**ZONING COMMISSION CASE NO. 25-20
Applicant's Prehearing Statement
April 30, 2026**

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Table of Contents

Certification of Compliance with Subtitle Z § 401 of the Zoning Regulations..... ii

List of Exhibits..... iii

I. INTRODUCTION1

II. OVERVIEW OF APPLICATION AND PROPOSED PROJECT.....1

III. SETDOWN AND APPLICANT’S REQUEST FOR PUBLIC HEARING.....3

IV. RESPONSES TO COMMENTS FROM THE ZONING COMMISSION AND OFFICE OF PLANNING3

 A. PROPOSED ABOVE-GRADE PARKING AND PROPERTY UTILIZATION.....4

 B. SCREENING AND VISUAL TREATMENT OF PARKING GARAGE5

 C. FINAL DESIGN SOLUTION AND PUBLIC REALM INTEGRATION6

 D. NOT INCONSISTENT WITH THE GENERALIZED POLICY MAP6

V. FLEXIBILITY REQUEST FOR TEMPORARY OFF-SITE PARKING DURING PROJECT CONSTRUCTION.....7

VI. UPDATES ON COMMUNITY OUTREACH.....12

VII. UPDATES ON DISTRICT AGENCY COORDINATION12

VIII. SUPPLEMENTAL FILING REQUIREMENTS12

 A. ADDITIONAL INFORMATION SPECIFIED BY THE COMMISSION AT THE SETDOWN MEETING13

 B. WITNESSES PREPARED TO TESTIFY ON BEHALF OF THE APPLICANT AND SUMMARY OF TESTIMONY13

 C. ADDITIONAL INFORMATION, REPORTS, OR OTHER MATERIALS13

 D. LIST OF MAPS, PLANS OR OTHER DOCUMENTS READILY AVAILABLE13

 E. ESTIMATED TIME REQUIRED FOR PRESENTATION OF APPLICANT’S CASE.....14

 F. NAMES AND ADDRESSES OF OWNERS OF PROPERTY LOCATED WITHIN 200 FEET14

 G. TRANSPORTATION REPORT14

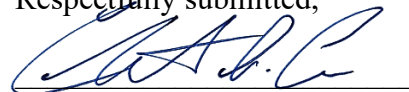
IX. CONCLUSION.....14

CERTIFICATION OF COMPLIANCE WITH SUBTITLE Z § 401 OF THE ZONING REGULATIONS

Pursuant to Subtitle Z § 401.4 of the District of Columbia Zoning Regulations, the undersigned, on behalf the District of Columbia Department of General Services, through the architecture firm Shinberg.Levinas Architects, certifies that this Prehearing Submission filed in support of Zoning Commission Case No. 25-20 complies with the provisions of Subtitle Z § 401.1 *et seq.*, as set forth below. In accordance with Subtitle Z § 401.5, the application will not be modified less than thirty (30) days prior to the public hearing.

Subtitle Z Subsection	Description	Page / Exhibit
401.1(a)	Additional information requested by the Zoning Commission and the Office of Planning	pp. 3-13
401.1(b)	List of those persons the applicant intends to call as witnesses	p. 13 / Ex. B
401.1(c)	Written summary of the testimony of all witnesses and resumes of expert witnesses	Ex. B
401.1(d)	Additional information introduced by the Applicant	pp. 3-13 / Ex. A
401.1(e)	Reduced architectural plans	Ex. H (select sheets)
401.1(f)	List of maps, plans, or other documents readily available that may be offered into evidence	Ex. C
401.1(g)	Estimated time required for presentation of Applicant's case	p. 14
401.3(a)	Names and addresses of the owners of all property located within 200 feet of the Property	Ex. D
401.3(b)	Names and addresses of each person having a lease with the owner for all or part of any building located on the PUD site	N/A
401.8	Transportation memorandum prepared by Applicant's traffic consultant	To be submitted no later than 30 days prior to the hearing
1601.1	Hearing Fee	Exempt pursuant to Subtitle Z § 1603.1

Respectfully submitted,



Jessica R. Bloomfield
 Christopher S. Cohen
 Holland & Knight LLP

LIST OF EXHIBITS

<u>Exhibit</u>	<u>Description</u>
Ex. A:	Potable Water and Storm Water Calculations
Ex. B:	Outlines of Testimony for Witnesses and Resumes of Expert Witnesses
Ex. C:	List of Maps, Plans, or Other Documents Readily Available that may be Offered Into Evidence
Ex. D:	List of Names and Addresses of all Owners of Property Located Within 200 Feet of the PUD Site (plus two sets of mailing labels submitted separately)
Ex. E	Vine System Application for Above-Grade Parking Garage
Ex. F	Supplemental Narrative on Final Design Solution
Ex. G	Proposed Plans for Temporary Off-Site Parking (the “Interim Parking Plans”)
Ex. H	Updated Architectural and Landscape Drawings (Select Sheets)

I. INTRODUCTION

This Prehearing Statement and the accompanying documents (collectively, the “**Prehearing Submission**”) are submitted on behalf of the District of Columbia Department of General Services (“**DGS**” or the “**Applicant**”) through the architecture firm Shinberg.Levinas Architects, in support of its application to the Zoning Commission for the District of Columbia (the “**Commission**”) for approval of a consolidated planned unit development (“**PUD**”) and related Zoning Map amendment from the RA-1 zone to the RA-2 zone (the “**Application**”) for property located at 2455 Alabama Avenue, SE (Square 5728, Lot 800) (the “**Property**”).

As evidenced by the Certification of Compliance above and outlined in Section VI herein, this Prehearing Submission meets the requirements of Subtitle Z § 401 of the District of Columbia Zoning Regulations (Title 11 of the District of Columbia Municipal Regulations). No hearing fee is required for the Application pursuant to Subtitle Z § 1603.1, which states that “[a] department, office, or agency of the government of the District of Columbia is not required to pay a filing or hearing fee for an application where the property is owned by the District of Columbia or that agency... and the property is to be used for a government building or use.” In this case, the Property is owned by the District of Columbia, and DGS filed the Application. Thus, no Hearing Fee Calculator Form 116 or associated fee is included with this Prehearing Submission.

In light of the foregoing and the information provided herein, the Applicant respectfully requests that the Office of Zoning schedule a public hearing on the Application at the earliest available date.

II. OVERVIEW OF APPLICATION AND PROPOSED PROJECT

As described in the Applicant’s Statement in Support (Ex. [3](#)), the Application seeks approval to replace the existing Metropolitan Police Department (“**MPD**”) 7th District Headquarters building, which was constructed in 1988 and has exceeded its useful life, with a new headquarters facility connected to a new above-grade parking structure (the “**Project**”). The Project is designed to meet MPD’s current and future operational needs while enhancing safety, security, and efficiency and improving service to the surrounding communities. The new facility will include dedicated public community spaces and will help alleviate off-street parking pressures. The Project will be carried out in two carefully sequenced phases, allowing MPD operations to continue uninterrupted.

The approximately 66,371-square-foot Property is located between the Garfield Heights and Knox Hill/Buena Vista neighborhoods and is surrounded by a mix of residential, religious, institutional, and civic uses. The Property is well served by public transportation and regional roadways and has long functioned as a public safety facility. With respect to the Comprehensive Plan (“**Comp Plan**”), the Property is designated for Local Public Facility use on the Future Land Use Map (“**FLUM**”) and as Federal Lands and a Neighborhood Conservation Area on the Generalized Policy Map (“**GPM**”). The Application is not inconsistent with these designations. The Application is also not inconsistent with relevant Comp Plan policies, including those in the Far Southeast/Southwest Area Element and in many of the Citywide Elements. An assessment of how the Application is not inconsistent with the Comp Plan is provided in Ex. [3A](#) and further addressed in Section IV.D below.

To facilitate the Project, and pursuant to flexibility under Subtitle X § 303.12, the Applicant requests a PUD-related Zoning Map amendment to rezone the Property from the RA-1 zone to the RA-2 zone. The rezoning will allow a coordinated, campus-style development that accommodates the new MPD headquarters building and structured parking in a manner compatible with the surrounding neighborhood. The Applicant also seeks additional PUD flexibility from certain development standards, including: (i) the Transportation Demand Management (“**TDM**”) requirements under Subtitle C § 707.3 for having excess parking spaces; (ii) vehicle parking location and setback requirements under Subtitle C § 710.2(b) and (c), where certain garage parking spaces cannot meet the criteria; and (iii) maximum permitted lot occupancy (60% permitted; 71% proposed).

As discussed below in Section V and in response to comments raised by the Commission, the Office of Planning (“**OP**”), and the District Department of Transportation (“**DDOT**”), the Applicant requests additional flexibility from Subtitle U § 203.1(k), pursuant to Subtitle X §§ 303.1(a) and 303.13, to permit temporary off site accessory parking spaces located at Square 5727, Lot 136 (the “**Interim Parking Site**”) during construction of the Project.

The Interim Parking Site is a vacant lot adjacent to the Property that is also owned by the District of Columbia. The Interim Parking Site is zoned R-3, which permits surface parking only as a special exception pursuant to Subtitle U § 203.1(k), subject to conditions. Thus, the Applicant requests flexibility from that provision, which the Commission may approve pursuant to Subtitle X §§ 303.1(a) and 303.13. The request for flexibility includes additional flexibility from three specific criteria under Subtitle U § 203.1(k), specifically those set forth in subsections (2), (4), and (8)(B). Additional benefits in the form of new public space improvements are also being provided as part of this request, such that the value of public benefits and project amenities offered continue to outweigh the degree of development incentives requested and any potential adverse impacts.

The Project will function as a single, integrated building comprising approximately 151,854 square feet of gross floor area and rising to a maximum building height of approximately 48 feet. The Project will provide secure vehicle and bicycle parking, public-facing community spaces, and modernized facilities for the MPD. The Project design emphasizes high-quality architecture, enhanced landscaping, sustainability features, and effective screening of parking, balancing civic openness with necessary security. The Project has already been reviewed by the National Capital Planning Commission (“**NCPC**”) and the U.S. Commission of Fine Arts (“**CFA**”). See Ex. [3I](#) and [3J](#).

Plans for the Project were originally filed at Exhibits [3G](#), [3H](#), and [3L](#) in the case record. Attached hereto as [Exhibit H](#) are a select set of updated drawing sheets reflecting minor revisions since the original filing (the “**Updated Architectural and Landscape Drawings**”). The proposed updates are as follows:

- Revised window configuration at the first level of the north and east facades of the MPD building in the location of the detention area;
- Revised building signage on the north façade of the MPD building; and
- Updated landscape plans showing the location of a future Capital Bikeshare station, additional short-term bicycle parking spaces, and a new bicycle repair station.

The Updated Architectural and Landscape Drawings are intended to replace and supersede their counterparts included in Exhibits 3G, 3H, and 3L of the case record. The Applicant will file a complete set of updated drawings no later than thirty (30) days prior to the public hearing, in accordance with Subtitle Z § 401.5 (the “**Supplemental Prehearing Submission**”).

III. SETDOWN AND APPLICANT'S REQUEST FOR PUBLIC HEARING

The Application was filed with the Zoning Commission on November 24, 2025. *See* Exs. 1-4. OP filed a setdown report on March 16, 2026, recommending that the Commission set down the Application for a public hearing (*see* Ex. [11](#), the “Setdown Report”). In the Setdown Report, OP concluded that the Application is not inconsistent with the Comp Plan's FLUM or GPM and that it is “on balance, not inconsistent with the Citywide and Area Elements of the Comprehensive Plan.” *Id.* at 8. The Setdown Report also supported the Applicant's requested flexibility from the lot occupancy, parking number, and parking location requirements.

OP also noted the following in the Setdown Report:

- The proposed RA-2 zone designation “would not be inconsistent with the size and scale of surrounding developments” (p. 3);
- With respect to the Land Use Element, the new Headquarters would provide MPD with a facility to “better serve District residents” while also delivering landscaped plazas and multipurpose community spaces that enhance the public realm and reduce existing impacts (p. 8);
- With respect to the Far Southeast/Southwest (FSS) Area Element, the redevelopment “should improve the visual quality and sustainability of the site and provide green space to the public,” through features such as green walls and landscaped areas, and objectives including onsite MPD parking and space for community events or job training “should be seen as consistent” with the Area Element's intent (p. 10); and
- Applying a racial equity lens, the Property has no residents or tenants and the proposal would not result in displacement or housing impacts, while providing public space and streetscape improvements, reducing reliance on street parking, maintaining transit accessibility, introducing new community space, and supporting construction and employment opportunities (pp. 14–15).

The Commission considered the Application for setdown at its public meeting on March 26, 2025 (the “**Setdown Meeting**”) and voted unanimously to setdown the Application for a public hearing. During the Setdown Meeting, the Commission requested additional information that the Applicant has provided below.

IV. RESPONSES TO COMMENTS FROM THE ZONING COMMISSION AND OFFICE OF PLANNING

The Applicant provides the following information in response to comments received from the Zoning Commission during the Setdown Meeting and requested in OP's Setdown Report. Where noted, the Applicant will supplement the record with additional information and/or materials with its Supplemental Prehearing Submission.

A. Proposed Above-Grade Parking and Property Utilization

At the Setdown Meeting, the Commission requested additional information about why an above-grade parking structure is necessary and why such use is appropriate for the Property. The Commission also asked whether the District considered housing development at the Property. Both inquiries are addressed below.

As set forth in the Applicant's Statement in Support (Ex. 3), the subject Application for a PUD and Zoning Map amendment is a direct result of the Request for Proposals issued by DGS on behalf of MPD on December 7, 2022 (the "RFP").¹ The RFP calls for replacement of MPD's existing 7th District Headquarters with a modern facility designed to meet current and future operational needs and allow for expansion. Consistent with that directive, the RFP expressly requires construction of a new parking structure to improve building security and provide a safe work environment and access control. *See* RFP Executive Summary.

The proposed above-grade parking garage directly responds to the RFP requirements and to MPD's operational needs. MPD's 7th District currently operates approximately 120 fleet vehicles and employs a full-time staff of approximately 394 personnel, with a 20-year projection of staff increasing to 466 personnel. During initial programming, MPD and DGS initially identified a need for 580 parking spaces, but later agreed to reduce that number to encourage transit use and other non-auto travel options available near the Property.

As shown in Table 1 below, the proposed garage includes 225 parking spaces, each reserved for a specific operational purpose. Of the total parking spaces, 120 spaces are dedicated to MPD fleet vehicles, 28 spaces are reserved for public use to accommodate visitors to the Property, and 77 spaces (approximately 34% of the total) are available for personal vehicles used by MPD 7th District staff commuting to the Property.

Table 1: Proposed Above-Grade Parking Allocation	
Category	No. of Spaces
MPD Fleet Vehicles	120
Public Parking	28
Staff Personal Vehicles	77
Total Supply	225

The proposed parking allocation represents a reduction in personal vehicle parking relative to both existing conditions and future staffing levels. The existing surface parking at the Property accommodates approximately 200 vehicles. Currently, approximately 100 of the 200 existing surface parking spaces are used for MPD employee parking, yielding a ratio of roughly 0.25 spaces per employee. Under the proposed plan, that ratio is reduced to approximately 0.17 spaces per employee, even as MPD staffing increases. At full buildout, up to 373 employees may be onsite during the largest of three shifts, requiring most staff to carpool or use alternative transportation modes. The Applicant's traffic consultant is working with DDOT to develop a

¹ *See* RFP at: <https://dgs.dc.gov/publication/dcam-22-ae-rfp-0001-architecturalengineering-services-mpd-7th-district-headquarters-new>.

robust TDM plan to support this outcome, which will be filed with the Supplemental Prehearing Submission. Accordingly, the proposal to construct a visually interesting and well-integrated above-grade parking structure at the Property is fully consistent with MPD's operational and safety needs and the District's goal of reducing reliance on single occupancy vehicles.

With respect to the Commission's inquiry about whether residential use was considered for the Property, such development was not seriously contemplated by the Executive Office of the Mayor. The Project was programmed in alignment with the FLUM, which designates the Property for Local Public Facilities use. The RFP was issued specifically to replace the existing deteriorating building with a new MPD Headquarters to ensure the safety of current and future District residents. While supporting and constructing new housing throughout the District remains a major focus of the current Mayoral administration, residential use at the Property was deemed to be incompatible with the critical emergency response services at this particular location. Indeed, OP noted that the "overall project is the best use of District land and resources." *See* Setdown Report, p. 10.

Based on the foregoing, the proposed above-grade parking structure directly implements the RFP and is sized to meet MPD's operational and security needs. By consolidating parking vertically in a secure, controlled facility, the Project replaces surface parking, limits personal vehicle use, reduces on-street parking pressures, and preserves space for active uses, landscaping, and community-oriented improvements.

B. Screening and Visual Treatment of Parking Garage

At the Setdown Meeting, the Commission requested additional information regarding the screening and visual treatment of the proposed parking garage, including whether additional landscaping, green walls, or other features would be provided.

While the functionality and space allocation within the parking garage are critical components of the Application, the Applicant's design team has also given careful attention to its visual treatment. As shown on the plans submitted with the original filing, the parking structure incorporates vegetative façade treatments, buffering, and architectural screening designed to conceal parking activity from public view and minimize visual impacts along surrounding streets. *See* Architectural Plans, Ex. [3L](#), Sheets A-46–A-49 and A-52–A-58.

As shown on the "Vine System Application" attached as [Exhibit E](#), the Applicant proposes a vine system wrapping all four garage façades at varying heights. The vine system is intended to soften the building's mass, add visual interest, and reduce the perception of the garage as a solid structure. In addition, a translucent stair tower is located at the corner of the south and east façades to further articulate the building and enhance its architectural character. Sustainability features include solar panels along the south façade and solar canopies on the roof. Collectively, these elements ensure the garage reads as an integrated architectural component of the Project rather than a utilitarian or visually monotonous structure.

C. Final Design Solution and Public Realm Integration

At the Setdown Meeting, the Commission requested additional information on how the Applicant arrived at the Project's final design, including the design alternatives considered, how those alternatives informed the final approach, and how the building would engage the street and improve the pedestrian experience.

The final design reflects a careful balance between security, functionality, and neighborhood compatibility. Drawing from the architectural language of the surrounding Garfield Heights and Knox Hill/Buena Vista neighborhoods, the design incorporates horizontal brick elements and textures inspired by nearby homes. Subtly angled walls near entry points create a welcoming gesture for visitors, and key public-facing elements include a 2,000-square-foot community space along Alabama Avenue and a main public entrance at the northwest corner, each expressed through large curtain wall openings. Site access and circulation have also been designed to enhance the streetscape and pedestrian experience, minimize traffic impacts, and maximize safety. A pedestrian bridge connects the parking structure to the headquarters building, and the shared use of light cream masonry and precast materials reinforces a cohesive architectural identity across the Property.

A supplemental narrative prepared by the Project architect and landscape architect, providing additional detail on the final design solution for the Project, is attached as Exhibit F.

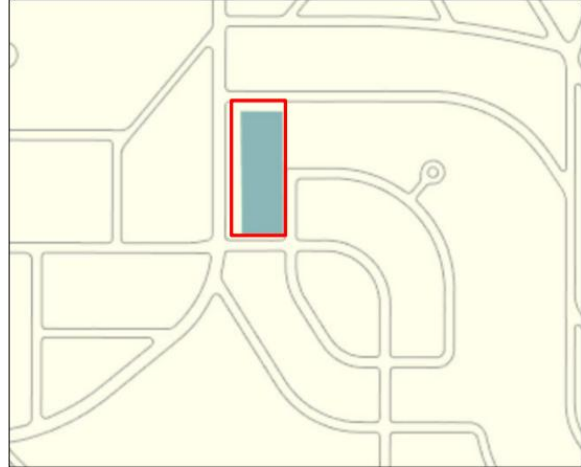
D. Not Inconsistent with the Generalized Policy Map

In its Setdown Report, OP noted that a small portion of the Property, along its northern frontage on Hartford Street, SE and its western frontage on Alabama Avenue, SE, is designated as a Neighborhood Conservation Area on the GPM. *See* Ex. [11](#), pp. 7–8. At the Setdown Meeting, the Commission cited OP's assessment and requested additional analysis regarding the Application's consistency with the GPM.

In its Comp Plan Evaluation, the Applicant analyzed the Property's Federal Lands designation on the GPM and concluded that the Application is not inconsistent with that designation. The Project modernizes an existing District owned institutional use in a manner expressly contemplated by the Comp Plan, which recognizes that public facilities may evolve over time to meet changing needs. As proposed, the Application accommodates such change consistent with 10-A DCMR § 225.22, maintains neighborhood compatibility through the PUD related RA-2 zoning, and delivers public benefits through the PUD process. *See* Ex. [3A](#), pp. 9–11.

The Applicant also acknowledges that a small portion of the Property appears to be designated as a Neighborhood Conservation Area on the GPM. Pursuant to 10-A DCMR § 225.2, the GPM is required to be interpreted in conjunction with the Comp Plan text, the FLUM, and other Comp Plan maps, and in light of the site's context. Therefore, as described below, the Application is not inconsistent with the Neighborhood Conservation Area designation as it applies to the Property.

Neighborhood Conservation Areas are generally residential in character, with little vacant or underutilized land, and are intended to maintain existing land uses and community character. “Where change occurs, it will typically be modest in scale and will consist primarily of infill housing, *public facilities, and institutional uses.*” 10-A DCMR § 225.4 (emphasis added). The guiding philosophy in such areas is to conserve and enhance established neighborhoods, while not precluding limited development or redevelopment, provided that new construction is compatible with the existing scale, natural features, and character of the surrounding area. 10-A DCMR § 225.5.



The Application is not inconsistent with a Neighborhood Conservation Area where it is designated on the Property. The MPD 7th District facility has been located on the Property since 1988 and is a longstanding, critical public-serving institutional use that is an established part of the community fabric. The Project does not introduce new or incompatible uses, but rather modernizes and reconfigures an existing public safety facility. The proposed increase in density is moderate and remains within the PUD guidelines for the RA-2 zone, which is intended for areas developed with predominantly moderate-density residential uses. Subtitle X § 303.7; Subtitle F § 101.5. Given the Property's long-standing institutional use and the Project's compatibility with surrounding development, the Application conserves and enhances neighborhood character rather than detracting from it, while providing improved public facilities, parking access, and community-oriented amenities.

Moreover, as shown on the proposed site plan (*see* Ex. [3L](#), Sheet A-16) no vertical building development is proposed on those portions of the Property designated as Neighborhood Conservation Areas on the GPM. Along Hartford Street, SE, the Project is set back 15 feet due to an existing building restriction line. Along Alabama Avenue, SE, proposed improvements include landscaping, streetscape enhancements, and other public space improvements that focus on the pedestrian experience rather than additional building mass that would materially alter the existing frontage. Accordingly, the Application is not inconsistent with the Neighborhood Conservation Area designation on the GPM.

V. FLEXIBILITY REQUEST FOR TEMPORARY OFF-SITE PARKING DURING PROJECT CONSTRUCTION

In the Setdown Report, OP requested that the Applicant provide a “phasing plan for temporary parking arrangements through the redevelopment of the site,” explaining that such information is needed to ensure parking impacts are mitigated during phased construction and that the MPD facility needs to continue meeting parking needs while operations remain ongoing. *See* Ex. [11](#), p. 2. At the Setdown Meeting, the Commission also requested this information.

In direct response, the Applicant requests flexibility to allow temporary off-site accessory parking on the Interim Parking Site. The Interim Parking Site is a vacant parcel owned by the

District and located directly east of the Property, across the unimproved portion of Knox Street, SE. The Interim Parking Site is zoned R-3 and lies outside the boundaries of the PUD site.² The location and zoning of the Interim Parking Site are shown below in the accompanying aerial view and excerpt of the Zoning Map:



Due to its R-3 zoning, using the Interim Parking Site for temporary MPD parking during construction requires additional zoning flexibility. In all R zones, including the R-3 zone, “accessory parking elsewhere than on the same lot as the principal use” is permitted if approved as a special exception pursuant to Subtitle U § 203.1(k), and subject to the conditions set forth in subsections (1) through (11). As part of a PUD, an applicant may request approval of any relief for which special exception approval is required. In such cases, the Commission applies the special exception standards applicable to the requested relief “unless the applicant seeks flexibility from those standards. Any such flexibility is treated as development flexibility against which the Commission weighs the benefits and amenities of the PUD.” See Subtitle X § 303.13. The Commission is also authorized to grant relief from development standards applicable to an underlying zone as part of the PUD balancing test. See Subtitle X § 303.1(a)

The Interim Parking Plans (Exhibit G) comply with the applicable criteria of Subtitle U § 203.1(k), except where specific additional flexibility is being requested, as summarized below:

- **Subtitle U § 203.1(k)(1):** *Parking garages shall not be permitted; parking spaces shall be in an open parking lot area or in an underground parking garage no portion of which, except for access, shall extend above the level of the adjacent finished grade;*

Complies. The accessory parking spaces will be located on an open parking lot area. No portion of the surface parking will extend above the level of the adjacent finished grade.

² The Zoning Commission has previously approved relief to allow for off-site accessory parking spaces within a residential zone that would serve an adjacent PUD project. See, e.g., Z.C. Case No. 24-12, which granted relief to allow accessory parking spaces in the R-2 zone on property located outside of the adjacent PUD boundary.

- **Subtitle U § 203.1(k)(2):** *All parking shall meet the conditions of Subtitle C, Chapter 7;*

Flexibility Requested. The Interim Parking Plans do not fully satisfy the conditions set forth in Subtitle C, Chapter 7, including the maintenance, screening, and landscaping requirements of Subtitle C §§ 713 through 715. Accordingly, the Applicant requests flexibility from these requirements. Such flexibility is appropriate because the off-site parking is temporary and will be discontinued upon completion of Project construction. Requiring the Interim Parking Site to comply with full maintenance, screening, and landscaping standards intended for permanent principal or accessory parking is unnecessary given the circumstances.

- **Subtitle U § 203.1(k)(3):** *No commercial advertising signs shall be permitted outside a building, except a sign advertising the rates as required by Chapter 6 of Title 24 DCMR, Public Space and Safety;*

Complies. No commercial advertising signs are proposed or will be provided on the Interim Parking Site.

- **Subtitle U § 203.1(k)(4):** *At least eighty percent (80%) of the parking surface shall be of pervious pavement;*

Flexibility Requested. Given its temporary nature, the Interim Parking Site will not provide at least eighty percent (80%) pervious pavement. The Interim Parking Site will not be improved with permanent pavement and will instead retain existing grass areas, with limited gravel improvements as needed. The proposed surfacing of the Interim Parking Site is commensurate with its duration and purpose, making flexibility from this condition warranted in this case.

- **Subtitle U § 203.1(k)(5):** *Accessory parking shall not be accessory to “parking as a principal use”;*

Complies. The accessory parking located on the Interim Parking Site will be accessory to the MPD use located on the Property and not to parking as a principal use.

- **Subtitle U § 203.1(k)(6):** *The Applicant shall demonstrate the following:*
 - (A) *The parking spaces shall be so located, and facilities in relation to the parking lot shall be so designed, that they are not likely to become objectionable to adjoining or nearby property because of noise, traffic, or other objectionable conditions;*
 - (B) *The present character and future development of the neighborhood will not be affected adversely; and*
 - (C) *The parking is reasonably necessary and convenient to other uses in the vicinity;*

Complies. The proposed off-site accessory parking is temporary and will not be objectionable to nearby properties due to noise, traffic, or other adverse impacts. The Interim Parking Site will accommodate parking activity that is comparable to existing conditions and is needed solely to support continued MPD operations during the interim

phases of the Project. The off-site parking does not introduce a new use or incompatible activity to the immediate area. In addition, the Interim Parking Site will serve to buffer the adjacent uses located east of the Property from construction of the Project.

Subject to DDOT approval, the Applicant will install new public space improvements and a curb cut on Hartford Street to provide access to the Interim Parking Site. It will also implement pedestrian safety measures and public space upgrades on Knox Street between the Property and the Interim Parking Site. Such improvements will support safe vehicular, pedestrian, and bicycle circulation during construction of the Project and will significantly improve existing conditions. Once the Project is complete and the temporary parking is no longer needed, the affected public space will be restored to improved permanent conditions, including possible closure of the curb cut accessing the Interim Parking Site, all subject to DDOT review and approval. As a result, the present and future development of the neighborhood will not be adversely affected. The proposed temporary parking and public realm conditions are shown on the Interim Parking Plans (Exhibit G).

Furthermore, the temporary off-site parking is necessary for the MPD to continue to operate during construction of the Project. The Interim Parking Site is located adjacent to the Property thus allowing for reasonably necessary and convenient access. Use of the Interim Parking Site will also ensure that MPD vehicles do not utilize street parking otherwise used by residents of the surrounding neighborhood.

- **Subtitle U § 203.1(k)(7):** *Parking as a principal use shall be subject to the following conditions;*
 - (A) *All parking shall be located in its entirety within two hundred feet (200 ft.) of an existing MU, NMU, D, or PDR zone;*
 - (B) *The lot shall be contiguous to or separated only by an alley from a MU, NMU, D, or PDR zone; and*
 - (C) *A majority of the parking spaces shall serve residential uses or short-term parking needs of retail, service and public facility uses in the vicinity;*

Not applicable. The parking spaces will not be a principal use.

- **Subtitle U § 203.1(k)(8):** *Accessory parking shall be subject to the following conditions*
 - (A) *All parking spaces shall be located in their entirety within two hundred feet (200 ft.) of the area to which they are accessory; and*
 - (B) *All parking spaces shall be contiguous to or separated only by an alley from the use to which they are accessory;*

Flexibility requested. The off-site accessory parking spaces will be located within 200 feet of the Property but are separated by Knox Street, SE, which is unimproved in this location. This segment of Knox Street will be upgraded with pedestrian safety measures and public space enhancements to facilitate safe, direct, and convenient movement between the MPD facility and the Interim Parking Site. Because these improvements will provide a functional and continuous connection between the sites, flexibility from the technical contiguity requirement is appropriate.

- **Subtitle U § 203.1(k)(9):** *The Board of Zoning Adjustment may require that all or a portion of the parking spaces be reserved for the following:*
 - (A) Residential parking;
 - (B) Unrestricted commercial parking
 - (C) Accessory parking for uses within eight hundred feet (800 ft.); and
 - (D) Shared parking for different uses by time of day; conditioned on lighting to reduce impacts on adjoining properties;

Complies. The parking spaces are needed to serve MPD staff and personnel during construction of the Project and are not necessary to be reserved for other uses.

- **Subtitle U § 203.1(k)(10):** *In the R-1B/GT and R-3/GT zones, no commercial parking lots shall be permitted; and*

Not applicable. The Interim Parking Site is not in the R-1B/GT or the R-3/GT zone; it is zoned R-3.

- **Subtitle U § 203.1(k)(11):** *The application shall be referred to the District Department of Transportation for review and report.*

Complies. The Applicant acknowledges that this request will be referred to DDOT for review and report. The Applicant consulted with DDOT regarding the proposal for temporary parking prior to filing this submission and received informal support.

Based on the foregoing, the request to have temporary parking located on the Interim Parking Site during the Project's construction is a favorable solution. This approach allows for uninterrupted operations and parking availability for the MPD while avoiding spillover parking on neighborhood residential streets.

The proposed solution is also compatible with the purposes of a PUD and the Interim Parking Site's R-3 zoning. The PUD process is intended to promote high quality development through flexibility where a project "results in a project superior to what would result from the matter-of-right standards." Subtitle X § 300.1. The off-site parking is necessary to support the MPD during construction of the Project, one that is superior to what could be achieved at the Property as a matter of right. Moreover, one of the purposes of the R-3 zone is to "allow for limited compatible accessory and non-residential uses." Subtitle D § 101.2(e).

Regarding the PUD balancing test, the additional flexibility requested from Subtitle U § 203.1(k) is significantly outweighed by the numerous benefits provided as part of the PUD, which include superior urban design and landscaping, efficient site planning, and uses of special value to the neighborhood. *See Applicant's Statement in Support, Ex. 3*, at pp. 15–20. The accessory parking on the Interim Parking Site is temporary in nature, and it is necessary to facilitate construction of the Project and the delivery of its associated benefits. Although the proposed temporary parking will not fully satisfy all applicable conditions set forth in Subtitle C, Chapter 7, the Applicant will work with DDOT to ensure that the surrounding public space meets applicable design and safety requirements and is approved through the public space permitting process. These improvements will benefit not only MPD staff traveling between the Property and the Interim

Parking Site, but also residents of the surrounding streets. Following the temporary use, the affected public space will be restored to improved permanent conditions.

VI. UPDATES ON COMMUNITY OUTREACH

The Applicant's community outreach for the Application has been ongoing and consistent for several years. *See* Ex. [3](#) at pp. 20-21. Following initial engagement and meetings with community stakeholders in 2024, the Applicant attended Advisory Neighborhood Commission ("ANC") 8B's duly noticed and regularly scheduled public meeting on February 18, 2025, to formally present the Application. The ANC has filed a letter in support of the Project dated June 30, 2025, a copy of which is included in the record as Ex. [3K](#).

The Applicant continued its community outreach efforts by presenting at ANC 8B's regularly scheduled public meeting on April 21, 2026. At that meeting, the Applicant provided updates on the Project, solicited feedback on the most recent design, and addressed comments and requests previously raised by the MPD Citizens Advisory Council.

Community reception was generally positive. Attendees expressed support for the proposed dedicated community room and public parking accommodations, as well as the Project's planned environmental sustainability features. Questions and comments focused primarily on safety and security protocols, sustainability initiatives, construction management practices, streetscape improvements, and the overall public benefits of the proposed PUD. The ANC requested supplemental materials from the Applicant, including a geotechnical report, projected occupancy figures for the community room, and traffic impact studies. The Applicant will follow up with the ANC on these items in advance of the public hearing and will provide additional updates on its outreach efforts in its Supplemental Prehearing Submission.

To date, the Applicant is not aware of any opposition to the Application.

VII. UPDATES ON DISTRICT AGENCY COORDINATION

On April 28, 2026, the Applicant and its development team participated in an interagency meeting coordinated by OP, with representatives in attendance from DDOT, including from the Urban Forestry Division (UFD), the Department of Energy and the Environment (DOEE), Fire and Emergency Medical Services (FEMS), and the Department of Buildings (DOB). The Applicant received feedback on the Project overall, including development phasing and permit coordination, sustainability measures, the proposed Interim Parking Site and related public space improvements, and other aspects of the Project. The Applicant will continue to work with these and other District agencies and will provide updates to the case record with its Supplemental Prehearing Submission, as needed.

VIII. SUPPLEMENTAL FILING REQUIREMENTS

The Applicant provides the following information in accordance with Subtitle Z § 401.1 *et seq.* of the Zoning Regulations.

A. Additional Information Specified by the Commission at the Setdown Meeting

In accordance with Subtitle Z § 401.1(a), the Applicant has provided the additional information requested by the Commission at the Setdown Meeting.

B. Witnesses Prepared to Testify on Behalf of the Applicant and Summary of Testimony

Pursuant to Subtitle Z § 401.1(b), the Applicant intends to present the following individuals as witnesses during its direct presentation:

- Jamil Hamilton – Representative of the Applicant/DGS
Project Manager, Public Safety & Justice Services Portfolio
- Salo Levinas – Project Architect
Principal, Shinberg Levinas Architects
To be proffered as an expert witness in architecture and urban design
- Daniel Solomon, AICP – Traffic Consultant
Principal, Gorove Slade
Qualified expert witness in transportation and traffic engineering

The Applicant will also have Evan Timms of Bradley Site Design and Craig Kubicz of Wiles Mensch, its expert witnesses in landscape architecture and civil engineering, respectively, available to respond to questions following the Applicant's direct presentation and throughout the public hearing. In accordance with Subtitle Z § 401.1(c) of the Zoning Regulations, outlines of testimony for all witnesses and resumes for all designated expert witnesses are attached hereto as Exhibit B.

C. Additional Information, Reports, or Other Materials

In accordance with Subtitle Z § 401.1(d) of the Zoning Regulations, additional information that the Applicant wishes to introduce at the hearing has been provided herein. In addition, Exhibit A includes information regarding the Project's potable water demand and sanitary sewage and stormwater generation, as required by Subtitle Z § 300.11(g)(6).

D. List of Maps, Plans or Other Documents Readily Available

In accordance with Subtitle Z § 401.1(f) of the Zoning Regulations, a list of the maps, plans, or other documents that are readily available to the general public and that may be offered into evidence at the public hearing is attached as Exhibit C.

E. Estimated Time Required for Presentation of Applicant's Case

In accordance with Subtitle Z § 401.1(g) of the Zoning Regulations, the Applicant estimates it will require approximately **45 – 60 minutes** to present its case, subject to the discretion of the presiding officer at the public hearing.

F. Names and Addresses of Owners of Property Located within 200 feet

In accordance with Subtitle Z § 401.3(a) of the Zoning Regulations, a list of the names and addresses of the owners of all property located within two hundred feet (200 ft.) of the Property is attached hereto as Exhibit D. The Applicant will provide the Office of Zoning with two (2) sets of mailing labels under separate cover. There are no lessees for the Property. *See* Subtitle Z § 401.3(b).

G. Transportation Report

In accordance with Subtitle Z §§ 401.7 and 401.8 of the Zoning Regulations, the report prepared by the Applicant's transportation expert will be filed with the Commission at least thirty (30) days prior to the public hearing, and said report will be provided to DDOT prior to or on the same day of filing with the Office of Zoning.

IX. CONCLUSION

This Prehearing Submission, together with the Applicant's original filing, meets the requirements for a consolidated PUD and related Zoning Map amendment, pursuant to Subtitle X, Chapter 3 and Subtitle Z of the Zoning Regulations. The Applicant has provided additional information requested by the Commission at the Setdown Meeting to facilitate a thorough review of the Project and will provide additional information as part of the Supplemental Prehearing Submission as needed. Accordingly, the Applicant respectfully requests that the Office of Zoning schedule a public hearing on the Application.