

November 24, 2025

Via IZIS

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

Re: **Z.C. Case No. 15-24C: Application for the Extension of Time of the Approved Second-Stage Planned Unit Development (“PUD”) for Parcel 129/112 (“Property”)**

Dear Chairperson Hood and Members of the Commission:

Gallaudet University and JBG/6th Street Associates, LLC (collectively, the “**Applicant**”) hereby request a two-year extension of the period to apply for a building permit under Z.C. Order No. 15-24C (the “**Order**”) pursuant to Subtitle Z § 705.2. The Order approved the development of a mixed-use building with approximately 647 multifamily residential units and approximately 43,100 square feet of ground-floor commercial use (the “**Project**”) on the Property, which constitutes Parcel 4 of the Applicant’s multi-parcel PUD located along 6th Street NE.

Since approval of the Order, the Applicant has continued to diligently pursue development of the Project, including working with the development team to progress the design. However, the Applicant requires additional time to secure financing to move the Project toward construction given the continuing challenges in the market conditions for commercial real estate development in the District.

Agent authorization letters for this Application are attached as Exhibit A, and a copy of Z.C. Order No. 15-24C is attached as Exhibit B.

I. Project Background

The Property is located in the Florida Avenue Market neighborhood and constitutes Parcel 4 of the Applicant’s four-parcel overall PUD located along 6th Street NE. The First Stage approval for the overall PUD was originally approved in 2017 in Z.C. Order 15-24/15-24A, which also included a Zoning Map amendment to rezone Parcels 1 and 2 from C-M-1 to the C-3-A zone and to rezone Parcels 3 and 4 from C-M-1 to the C-3-C zone pursuant to the 1958 Zoning Regulations then in effect. In 2023, the Commission approved Order No. 15-24C granting Second

Stage approval for Parcel 4. Order No. 15-24C remains valid until December 15, 2025.¹ No prior extensions have been granted for the Second Stage approval for Parcel 4 approved by the Order.

Parcel 4, located at the southwest corner of 6th and Penn Streets NE, will be redeveloped with a 12-story mixed-use building with approximately 647 residential units and approximately 43,100 square feet of ground-floor commercial use. The Project includes significant public benefits including a substantial affordable housing commitment, an approximately 5,000-square foot public open space plaza, and public space improvements surrounding the Property, among other benefits. The Parcel 4 Project will be the last of the Parcels to be developed by the Applicant, following development of Parcels 2 and 3, with the Gallaudet University developing Parcel 1 thereafter.

Since receiving Second Stage approval in the Order, the development team has continued to move the Project forward including progressing the design, and has invested substantial financial resources to that end, as discussed in more detail below. However, since the Order was issued the development of the Project has continued to be impacted by the adverse market conditions affecting commercial real estate development. These include sustained elevated construction costs and ongoing challenges in the financing market for development in the District. The Applicant remains committed to delivering the Project and the significant public benefits approved in the Order but requires additional time to continue pursuing financing to realize the Project.

II. The Commission Should Grant the Requested Time Extension

A. Standards of Review of Time Extension Request

The standards for a time extension are enumerated in Subtitle Z § 705.2 of the Zoning Regulations. The Commission is authorized to extend a PUD provided that:

- (a) The extension request is served on all parties to the application by the applicant and all parties are allowed thirty (30) days to respond;*
- (b) There is no substantial change in any of the material facts upon which the Commission based its original approval of the application that would undermine the Commission's justification for approving the original application; and*
- (c) The applicant demonstrates with substantial evidence one (1) or more of the following criteria:*

¹ The Commission also granted a Modification of Significance for Parcels 1, 2, and 3, and Second Stage approval for Parcels 2 and 3, which was approved in 2022 by Order No. 15-24B, and subsequently granted an extension for that approval in 2024 in Order No. 15-24D.

- (1) An inability to obtain sufficient project financing for the development, following an applicant's diligent good faith efforts to obtain such financing, because of changes in economic and market conditions beyond the applicant's reasonable control;*
- (2) An inability to secure all required governmental agency approvals for a development by the expiration date of the order because of delays in the governmental agency approval process that are beyond the applicant's reasonable control; or*
- (3) The existence of pending litigation or such other condition, circumstance, or factor beyond the applicant's reasonable control that renders the applicant unable to comply with the time limits of the order.*

11-Z DCMR § 705.2.

Here, the requested extension will preserve the future development of the Project's approximately 647 units of new housing and affordable housing, street-activating ground-floor commercial uses, 5,000 square feet of public open space, public space improvements, and the Project's other important benefits, while allowing the Applicant to continue working to secure financing in order to bring the Project forward.

B. Time Extension Request and Applicant's Satisfaction of the Standards for Granting Time Extension

The Applicant requests a two-year extension of the period to apply for a building permit for the Project such that the Order will remain valid through December 15, 2027. Since issuance of the Order, the Applicant has invested significant resources into moving the Project toward development, as discussed below, and has diligently pursued financing despite the significant adverse conditions affecting the market for commercial real estate development in the District. However, the Applicant requires additional time to secure financing to enable the Project's construction.

As discussed in detail below, the Applicant meets all of the standards for the requested time extension.

C. Service on Parties

This request is being served on Advisory Neighborhood Commission ("ANC") 5D and ANC 6C², which were the only parties to the original PUD application and Second Stage approval.

² ANC 6C is located to the south of Florida Avenue NE across from Parcel 1, the southernmost PUD Parcel. The Applicant notes that ANC 6C has not participated in the prior PUD proceedings for the Project and has instead deferred to ANC 5D, in which the Property is located. The Applicant will serve this Application for time extension on ANC 6C as required and will continue to keep ANC 6C apprised of the Project as it moves forward.

The Applicant asks that the Commission not place this request on its meeting agenda until the 30-day period has lapsed.

D. No Substantial Change of Material Facts

There has been no substantial change in any material facts that would undermine the basis for the Commission’s original approval of Z.C. Order No. 15-24C. The Project remains consistent with the design and program approved by the Commission, and the Project will continue to provide the proposed combined 647 housing units, ground-floor commercial uses, and the significant public benefits approved as part of the PUD.

E. Good Cause Shown

Here, there is good cause to grant the requested extension, specifically, to allow the Applicant to continue pursuing financing to enable the Project’s development while the development team continues to advance the design. As discussed above, the Applicant has invested substantial time and resources into moving the Project forward. Below is a summary of the Applicant’s estimated expenditures toward the development team’s work to advance the Project toward ultimate permit submission and construction:

Cost Category	Amount
Architectural and Engineering	\$233,000
Legal	\$161,000
Marketing	\$25,000
Site Enablement	\$109,000
General and Administrative	\$610,000
Total Expenditures to Date	\$1,138,000

Despite this significant investment by the Applicant to move the Project forward, the ongoing challenges affecting commercial real estate development in the District — namely, sustained elevated construction costs and an exceedingly challenging financing market — have created difficulties in securing construction financing for the Project.

Accordingly, the Applicant requires additional time to secure such financing and preserve the development of the approved approximately 647 new housing units and other significant benefits tied to the Project. Accordingly, there is good cause for extension of the PUD approval.

III. Exhibits

In support of the Application, attached are the following Exhibits:

Exhibit A – Letters of Authorization from the Applicant and Form 100
Exhibit B – Z.C. Order No. 15-24C

IV. Conclusion

For the foregoing reasons, the Applicant requests that the Commission grant the requested time extension. Please feel free to contact the undersigned if you have any questions or comments regarding this application.

Respectfully Submitted,

/s/
Lawrence Ferris

Certificate of Service

I hereby certify that a copy of the foregoing document and enclosures were sent to the following by first-class mail, email, or by hand delivery by no later than November 24, 2025.

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/s/ Lawrence Ferris