STATEMENT IN SUPPORT OF THE PROPOSED INGLESIDE AT ROCK CREEK MEDICAL CAMPUS PLAN AND SPECIAL EXCEPTION APPLICATIONS

INTRODUCTION

This statement is submitted on behalf of Ingleside at Rock Creek ("IRC" or "Applicant"), in support of IRC's application to the District of Columbia Zoning Commission for approval of a medical campus plan under Subtitle X, §103 and special exception approval for a continuing care retirement community pursuant to Subtitle U, § 203.1(g). This application seeks medical campus plan approval for the existing buildings on the IRC campus (which were previously approved by Board of Zoning Adjustment ("BZA") special exception approval[1]), special exception approval to construct an addition to the existing Manor House that will include approximately 59-66 (depending on market demand for various unit sizes) new independent living units (plus one or two new independent living units in the Manor House), special exception approval for a portion of the retaining wall that is adjacent to the addition to the Manor House, and special exception approval to replace the structure located at 3024 Military Road, N.W. with a structure of similar size and appearance containing one additional independent living unit, for a total of 62-69 additional independent living units.

THE IRC PROPERTY

The medical campus plan application will include the properties with addresses of 3020, 3024, and 3050 Military Road, N.W., consisting of Lots 802, 804, 813, and 818 in Square 2287, which together make up the IRC campus ("IRC Campus"). The IRC Campus is predominantly located in the R-1A Zone, with a small portion of the IRC Campus, adjacent to Military Road, N.W., located in the R-1B Zone (see the relevant portion of the DC Zoning Map included in Exhibit

[1] IRC is now proposing a medical campus plan application, as this process did not exist until the adoption of the 2016 Zoning Regulations.

A). The IRC Campus is bound by Military Road, N.W, to the north, single-family homes and 29th Street, N.W. to the east, Broad Branch Road, N.W. and the embassy residences of Tunisia and Ivory Coast to the south, and institutional uses (Temple Sinai and the Carnegie Institution of Washington) to the west. Further to the south, across Broad Branch Road, N.W. are large properties owned by the Government of Chile and parkland.

As depicted in the site plan included in Exhibit A, the IRC campus includes approximately 13.9 acres (604,674 SF) of landscaped terrain, characterized by rolling hills and a mature tree canopy. Existing residential offerings include a mix of independent living units, assisted living units, assisted living memory support units, and skilled nursing beds provided in nine buildings. The IRC facilities also feature centralized commons with multiple dining venues, gathering spaces, and administrative functions.

The eastern portion of the IRC Campus includes significant topographical changes and a wooded area that is referred to as the "Ravine". The southern portion of the IRC Campus, located behind the existing Manor House and between the properties owned by Tunisia and Ivory Coast includes a significant topographical change of approximately 60 feet. This portion of the IRC Campus is the location of the proposed addition to the Manor House that will include approximately 61-68 new independent living units (including the one or two new independent living units in the renovated Manor House).

The 3024 Military Road, NW property was formerly a single-family residence but was most recently used as the construction office for the last phase of development on the IRC Campus. IRC proposes to remove the existing structure and replace it with a building that has a similar height, scale, and appearance that will include one independent living unit.

PREVIOUS ZONING APPROVALS

IRC has a longstanding and significant presence along Military Road, N.W. for almost 60 years of its 108-year history. IRC is a successor of The Presbyterian Home of DC. When The Presbyterian Home was originally established in 1906, it was located in a row house at 1420 M Street, N.W. In 1918, it relocated to The Presbyterian Home Mansion at 1818 Newton Street, N.W. IRC was already in its fifth decade of operation when it acquired the IRC Campus in 1958 and subsequently constructed its first building in 1960.

IRC's proposed expansion is not a new or untested use in this neighborhood, it is the latest chapter in a long history of approved growth at this site. Since 1958, seven applications to the BZA were approved. The most recent development project occurred in 2015 pursuant to BZA Application No. 18898 (BZA Order No. 18898 is attached as Exhibit B) in which the BZA granted special exception relief to create the nine buildings that make up the IRC continuing care retirement community that exists today[2]. That application was supported by ANC 3/4G, which voted unanimously in favor of the application after extensive negotiation with IRC and community representatives. BZA Order No. 18898 incorporated a series of conditions negotiated between IRC and ANC 3/4G, addressing communications with the community, landscaping and screening along Military Road, N.W., restrictions on new driveways and curb cuts, a twenty-year restriction on development in the Ravine, stormwater mitigation measures, and a detailed long-term parking management plan. IRC has honored those commitments. On November 19, 2020, ANC 3/4G issued a report on the approved project, prepared through the Ingleside Task Force established pursuant to the BZA order, which concluded that the project was a success and could serve as a model for similar projects in the future.

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[2] In the Pre-Hearing statement in support of BZA Application No. 18898, IRC noted "Finally, Ingleside is considering an addition to the Manor House to house independent living units as needs dictates. This addition is not part of this application, Ingleside only mentions it to provide context for its future plans." (Ex. 27 of BZA Application No. 18898.)

CURRENT IRC OPERATIONS AND ECONOMIC IMPACT OF IRC

IRC is guided by its mission, which is to provide strategic and operational leadership that enables its affiliates to excel in their missions. IRC's vision is to be a premier, not-for-profit provider of services for older persons. Through its vibrant communities and network of partners, IRC offers diverse, enriching opportunities for purposeful living, wellness, and growth, in a financially responsible manner to those within and beyond, its campuses. Every day IRC lives its values of accountability, respect, innovation, stewardship, and excellence.

IRC is a 501(c)3 organization that is known for its quiet presence, well-maintained grounds and excellent care for its residents in a home-like, wooded setting. IRC serves a critical need in the community by providing a warm and supportive environment, that currently includes 34 skilled nursing beds (with an 88.4% occupancy), 32 memory support assisted living beds (with an 89.2% occupancy), 21 assisted living beds (with an occupancy of 97%), and 233 independent living units (with 97.2% occupancy). Supporting its focus on wellness, IRC offers robust fitness and wellness programming. Units at IRC are in constant demand, as shown by the incredibly high occupancy rates, and there are currently **550** individuals and couples on its waiting list.

IRC provides a number of other benefits by way of economic development and community service. IRC residents (50% of IRC residents were DC residents prior to moving to the IRC Campus) pay approximately $2.1 MM in income taxes to DC annually. IRC currently employs 245 individuals and plans to increase this number to 255 employees. Approximately 37% of these employees are District residents. IRC also spends approximately $1MM annually with DC-based vendors.

IRC also provides benefits for the immediate community. IRC provides emergency preparedness space for Temple Sinai and it hosts meetings for Northwest Neighbors Village, Cantate Chamber Choir, Footworks Percussive Dance, and Politics and Prose educational sessions. In addition, Ingleside Engaged

provides social day program activities that are open to both IRC residents and those in the greater community. These activities provide engagement for those with cognitive decline, and much needed respite for caregivers. IRC residents make many other charitable contributions to the community through activities such as tutoring and volunteering.

DESCRIPTION OF THE PROPOSED ADDITION AND NEW BUILDING TO CREATE 62-69 NEW INDEPENDENT LIVING UNITS ON THE IRC CAMPUS

The District's population of older adults (persons 60 years of age and older) is expected to be the fastest growing segment of DC's population during the next 15 to 20 years. Census data shows that approximately 13% of DC's population is aged 65 or older. In contrast, the Rock Creek West Planning Area (as delineated in the District's Comprehensive Plan) has approximately 20% of its residents age 65 and older, while Wards 3 and 4 have approximately 19% and 15%, respectively. The increased percentages within these defined geographic areas compared to DC as a whole underscore the acute need for senior housing in the primary area served by IRC. The new independent living units proposed in this application will help address the current and expected continued need for these types of facilities.

To strengthen its long-term competitiveness and better align with evolving senior living preferences, IRC engaged in a master planning effort that addressed the issues of how best to expand, enhance, and reposition the current campus assets (recognizing the previous commitment to not propose any development in the Ravine until 2035), while also increasing the number of independent living units on the IRC Campus in order to meet the unmet demand for these types of units in the District of Columbia.

The master planning effort explored the development of new independent living units connected to the Manor House, along with needed parking and loading facilities. Expanded amenities were explored in the Manor House as well as an enclosed pedestrian connection

between the Manor House and the adjacent independent living building. Three key priorities emerged from the study: (i) renovation and modernization of the Manor House; (ii) development of additional independent living units to expand housing options and support campus growth; and (iii) creating an enclosed pedestrian linkage from the new independent living units to existing Building 4 on the IRC Campus. Proposed improvements also include expanded parking for staff as well as the new independent living residents. Through a collaborative planning process, the project team developed a program that supports services for expanded independent living to better reflect current and future market demands. The resulting plan thoughtfully connects the cherished Manor House to both the new independent living units, as well as the existing campus, in a way that does not currently exist.

The proposed addition to the Manor House will include seven stories of independent living units, with a total of approximately 59-66 new independent living units, as seen from the interior of the IRC Campus. As shown in the materials provided in Exhibit A, the proposed massing of the addition, including stepped setbacks at the upper levels, is designed to preserve the architectural prominence of the Manor House and to avoid concentrating mass toward the interior of the campus. Balconies are provided for a number of these units and the plaza behind the Manor House will become a vibrant outdoor amenity space for the entire IRC community. The interior spaces of the Manor House will be incorporated into the daily lives of the new independent living residents and the second floor of the Manor House will include one or two new independent living units. The materials and color palette for the addition have been thoughtfully chosen to fully integrate this new structure into the existing architectural vernacular of the IRC Campus.

The new addition will also include approximately 145 parking spaces and loading/service delivery facilities in four levels that will be accessed from the interior of the IRC Campus by

residents of the new independent living units, and from Broad Branch Road, N.W. by IRC staff and vendors. As noted above, this portion of the IRC Campus includes a significant topographical change of approximately 60 feet. The four parking levels effectively tuck these needed parking and loading facilities into the hillside. In order to mitigate the visual impact of these parking levels, the design team is proposing extensive landscaping and decorative railings and partially opaque metal mesh to obscure views into the parking areas from Broad Branch Road, N.W. The building is set-back 25 feet from the IRC Campus' lot line along Broad Branch Road, N.W. A series of retaining walls along the eastern property line with the Embassy Residence of the Ivory Coast will be created to address the significant topographical change. The majority of these retaining walls satisfy the Zoning Regulations' requirements as to height. A portion of these walls, only 27%, will need to be approximately seven feet tall and require special exception approval. The discussion of the satisfaction of the special exception requirements for those portions of the proposed retaining wall system is provided below.

The proposed new structure located at 3024 Military Road, N.W. maintains the look and feel of a single-family home. As shown in the materials included in Exhibit A, this building will seamlessly fit into the existing architectural treatment of adjacent and nearby structures along Military Road, N.W. The independent living unit provided in this structure will be able to utilize all of the services and facilities of other independent living units located on the IRC Campus.

THE MEDICAL CAMPUS PLAN APPLICATION PROCESS

Subtitle X, §103.5 of the Zoning Regulations expressly provides that a medical campus may include a continuing care retirement community, which the Zoning Regulations define as a building or group of buildings providing a continuity of residential occupancy and health care for elderly persons, including dwelling units for independent living, assisted living facilities, or a skilled nursing care facility, restricted to persons sixty years of age or older or married couples or

domestic partners where either party is at least sixty. IRC has operated as exactly this kind of facility for decades, and its proposed expansion is squarely within the use the medical campus plan process was designed to address.

The medical campus plan framework in Subtitle X, §103 is well suited to a facility such as IRC. Section 103.1 allows medical care uses located in two or more buildings that would individually require special exception approval to be collectively approved as a medical campus plan, and §103.3 notes that the focus of the Commission's review be on site planning, efficient arrangement of uses and buildings, flexibility to use shared facilities, and mitigation of adverse impacts rather than a building-by-building design review. Section 103.7 allows the Zoning Commission to permit a comprehensive allocation of floor area ratio, shared parking, and loading to achieve an efficient use of land and delivery of services across the campus, and §103.8 allows all buildings covered by an approved medical campus plan to proceed to building permit as a matter of right consistent with the plan's conditions. The medical campus application will be referred to OP, DDOT, and the Department of Energy and Environment for review. (Please note that IRC representatives have already engaged in meetings with OP and DDOT representatives). Importantly, pursuant to §103.10, the Zoning Commission will base its approval of the medical campus plan application on a determination that the application will be in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps, and will not tend to affect adversely the use of neighboring property, in accordance with the Zoning Regulations and Zoning Maps, subject to the special conditions specified in this section and in the applicable special exception provisions of the zone in which the medical campus is located. The Zoning Commission will apply the special exception standards of Subtitle U, §203.1(g) to the proposed new addition

to the Manor House and the new structure at 3024 Military Road, N.W. in the same manner that the BZA previously reviewed individual development projects on the IRC Campus.

THE APPLICATION SATISFIES THE REQUIREMENTS OF SUBTITLE Z, §302

Satisfaction of the relevant filing requirements of the Medical Campus Plan application[3] are detailed in the attached Exhibit C. In particular, IRC notes the following:

Number of Existing and Proposed Units

The IRC currently has 320 units (34 skilled nursing beds, 32 memory support assisted living beds, 21 assisted living beds, and 233 independent living units), the proposed addition to the Manor House and new structure at 3024 Military Road, N.W. will result in a total of 382-389 units (34 skilled nursing beds, 32 memory support assisted living beds, 21 assisted living beds, and 295-302 independent living units).

Number of Existing and Proposed Employees

The IRC currently has 245 employees. Approval of this application will result in the IRC having approximately 255 employees in the future.

Neighborhood Context

As noted above, IRC has been using the IRC Campus for continuing care retirement community use since the 1960's in a manner that has been respectful to the surrounding institutional, parkland, and low-density residential character of the surrounding neighborhood. The proposed addition to the Manor House and the proposed outdoor terrace amenity area is

[3] Subtitle Z, §302 includes the filing requirements for campus plan/further processing (college and university uses) and medical campus plan applications. There are some requirements that are not applicable to a medical campus plan, such as the reference to number of "students" or "number of students enrolled in a District of Columbia public or charter school . . ." In those instances, similar information that is relevant to a continuing care retirement community is provided.

significantly separated from the single-family homes to the east by the Ravine. The proposed addition to the Manor House is adjacent to institutional uses (Temple Sinai and the Carnegie Institution of Washington), embassy residences (Tunisia, Ivory Coast and Chile across Broad Branch Road, N.W.), and parkland. There are no single-family residential uses that are impacted by the location, massing and height of the addition to the Manor House. Along Military Road, N.W. the new structure has the same massing and appearance of other single-family homes in the immediate area.

The IRC team is committed to making sure that the construction and operations of the new independent living units do not create adverse impacts on adjacent and nearby properties. Construction traffic will enter the site from Broad Branch Road, N.W. in order to minimize impacts on existing IRC residents and the residential areas north of Military Road, N.W. Construction parking will be offsite with workers shuttled to the site. At times, some construction related vehicles will park within the footprint of the project's limit of disturbance. All construction materials will be stored offsite or within the project's limit of disturbance and a washdown rack will be installed onsite to clean trucks before exiting onto public streets. All construction activity will occur within DC permitted work hours. Just as it did during the last period of construction on the IRC Campus, IRC and its representatives will work closely with the Carnegie Institution of Washington and Temple Sinai to ensure that construction activity will not negatively impact the operations of these adjacent institutions.

Community Dialogue

IRC representatives have already started a significant community engagement and dialogue process. The IRC Design Team made presentations to IRC residents regarding the proposed project on April 29, 2026, May 21, 2026, and June 30, 2026. The Applicant also made

a presentation to ANC 3/4G on July 13, 2026, and on August 28, 2026, responded to 37 questions posed by ANC 3/4G. The IRC Team also presented the medical campus plan application to ANC 3F on July 14, 2026, and co-hosted a meeting with Chevy Chase Forward[4] on October 19, 2026. The IRC Team will continue this robust level of community dialogue leading up to the public hearing in this case.

Comprehensive Accessibility

IRC's transportation engineering firm, Gorove Slade, has already begun the process of preparing a Transportation Demand Management Plan, addressing the need for a Multi-Modal Transportation Plan, and preparing a Parking and Loading Study. Gorove Slade representatives have submitted a Scoping Form to DDOT and will be prepared to submit the relevant transportation plans noted above at least 30 days prior to the public hearing in this case, as required by the Zoning Regulations.

Conservation

The IRC Campus is not located within a Historic District and no buildings on the IRC Campus are designated as an individual historic landmark. However, IRC leadership and the current residents of IRC take great pride in the historic nature of the Manor House and have required the design team to take all appropriate steps to design the addition to the Manor House to be respectful of this important structure.

The Applicant's Design Team has created a stormwater management system that will manage both quality and quantity of stormwater runoff by employing green roofs and bio-retention facilities that meet applicable Department of Energy and Environment requirements.

[4] Chevy Chase Forward is a 501(c)4 organization that is led by a 17-member volunteer board.

Landscape/Open Space

The vast majority of the IRC Campus will remain open space. The existing lot occupancy of the IRC Campus is approximately 26% and it will only increase to 30% with the construction proposed in this application. The existing pervious area of the IRC Campus is approximately 81% and will remain a substantial majority, at approximately 75%, after construction. As shown in the materials included in Exhibit A, a significant amount of new landscaping will be provided adjacent to the new addition to the Manor House. The proposed construction will result in the removal of approximately 240 trees on the IRC Campus and the relocation of three Heritage Trees. The IRC team will follow all DDOT Urban Forestry requirements for tree protection and replacement. Construction of the addition to the Manor House will only affect approximately nine percent of the IRC Campus' existing tree canopy.

Comprehensive Plan Consistency and Racial Equity Analysis

Attached as Exhibit D is an analysis of the application's consistency with relevant policies and elements of the Comprehensive Plan and a Racial Equity Analysis. This analysis finds that the proposed IRC medical campus plan will advance several policies within the Rock Creek West, Land Use, Housing, Transportation, Environmental Protection, Urban Design, and Community Services and Facilities Elements related to senior housing, institutional land uses, neighborhood compatibility, and the provision of continuing care retirement community services. To the extent that there are any potential tensions between this application and elements and policies found elsewhere in the Comprehensive Plan, those potential tensions do not rise to the level of a policy inconsistency that would preclude approval of this application by the Zoning Commission, and, to the extent any are ultimately viewed as inconsistencies, they are substantially outweighed by the numerous competing

Comprehensive Plan policies advanced by the IRC medical campus plan. Accordingly, the IRC medical campus plan is not inconsistent with the Comprehensive Plan when read as a whole.

THE APPLICATION SATISFIES THE REQUIREMENTS OF SUBTITLE U, §203.1(G) AND THE GENERAL SPECIAL EXCEPTION REQUIREMENTS OF SUBTITLE X, §901.2

A special exception use is a use deemed compatible with other uses permitted in that particular zoning classification provided certain requirements are met. In reviewing applications for special exception under the Zoning Regulations, the decision maker's discretion is limited to determining whether the proposed exception satisfies the requirements set forth therein. If the prerequisites set out in the regulations are satisfied, the decision maker is required to grant the application. See, e.g., Bakers Local Union No. 118 v. D.C. Board of Zoning Adjustment, 437 A.2d 176, 178 (D.C. 1981). As detailed below, the granting of the requested special exception relief will be in harmony with the general purpose and intent of the Zoning Regulations and Map and will not tend to affect adversely the use of neighboring properties.

Subtitle U, §203.1(g) of the Zoning Regulations governs special exception approval for a use consisting of dwelling units for independent living, assisted living facilities, or a licensed skilled nursing care facility in the R-1 Zones. Section 203.1(g)(1) permits, as a special exception, dwelling units for independent living, assisted living facilities, or a licensed skilled nursing care facility. The Manor House addition and the new structure at 3024 Military Road, N.W. will consist of independent living units, consistent with this provision, and both buildings will be part of the broader IRC continuing care retirement community, which also includes assisted living and skilled nursing care.

Section 203.1(g)(2) limits a use that does not include assisted living or skilled nursing facilities to no more than eight residents. Because the Manor House addition and the new structure at 3024

Military Road, N.W. are part of the IRC campus, which includes assisted living and skilled nursing care facilities, this numerical limitation does not apply to the proposed new independent living units.

Section 203.1(g)(3) permits ancillary uses for the further enjoyment, service, or care of residents. The ancillary uses included in the addition to the Manor House are consistent with similar uses that are found in IRC's existing facilities on the IRC Campus.

Section 203.1(g)(4) requires the use and related facilities to provide sufficient off-street parking for employees, residents, and visitors. The addition to the Manor House will include approximately 145 parking spaces provided in four levels. Approximately 82 parking spaces will be reserved for the new residents and their guests, and those spaces will be accessed from the interior of the IRC Campus. Approximately 63 spaces will be reserved for IRC staff from all of the facilities on the IRC Campus as well as personal aides of individual IRC residents. These parking spaces will be accessed from Broad Branch Road, N.W. via an existing curb cut, which will be improved and shared with the Ivory Coast's property.

Section 203.1(g)(5) requires that the use, including any outdoor spaces, be located and designed so that it is not likely to become objectionable to neighboring properties because of noise, traffic, or other objectionable conditions.

Noise

The current continuing care retirement community use of the site is inherently quiet and has not resulted in any objectionable conditions on neighboring properties related to noise. The location of the new independent living units, along Military Road, N.W. and on the southern edge of the IRC Campus, are similarly not likely to create any objectionable impacts related to noise created by these new residents.

Traffic

As noted above, Gorove Slade representatives have submitted a Scoping Form to DDOT and will be prepared to submit the relevant transportation related plans noted above at least 30 days prior to the public hearing in this case, as required by the Zoning Regulations. Given the history of continuing care retirement community use on the site and the modest growth in the number of independent living units and employees that will be added as a result of this application, there is likely to be very little impact on the overall amount of traffic in the surrounding area.

Other Objectionable Conditions

IRC has always been a thoughtful and considerate neighbor in its operations on the IRC Campus. This application will continue that history and will not create any new objectionable conditions. The IRC Team will agree to appropriate conditions of approval that mitigate any potential adverse impacts, such as necessary transportation management plans and a construction management plan.

Section 203.1(g)(6) allows the Zoning Commission to require special treatment in the way of design, screening of buildings, planting and parking areas, signs, or other requirements it deems necessary to protect adjacent and nearby properties. At this time, IRC believes that no special treatment is necessary to protect adjacent and nearby properties.

The general Special Exception criteria standards are enumerated in Subtitle X, § 901.2 and authorize approval of special exceptions when granting such a special exception:

(a) Will be in harmony with the general purpose and intent of the Zoning Regulations and Maps;

(b) Will not tend to affect adversely, the use of neighboring property in accordance with the Zoning Regulations and Zoning Maps; and

(c) Will meet such special conditions as may be specified in this title[5].

For the reasons noted above, approval of the proposed medical campus application and the development of the new structures that will result in the 62-69 new independent living units on the IRC Campus is in harmony with the general purpose and intent of the Zoning Regulations and Maps. IRC is a well-established continuing care retirement community that has operated on this site for decades with a demonstrated record of responsiveness to community concerns. The proposed medical campus plan preserves substantial open space and canopy, maintains and enhances the campus' stormwater management approach, keeps traffic and parking impacts contained through a dedicated parking plan and an increase in on-site parking supply, and continues to address a documented and continuing shortage of senior housing and health care capacity in the District of Columbia, and in Ward 4 in particular. For these reasons, the application is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to adversely affect the use of neighboring property.

THE APPLICATION SATISFIES THE REQUIREMENTS OF SUBTITLE C, §1402 FOR THE PROPOSED RETAINING WALLS

Subtitle C, § 1400 et seq. enumerates the standards for retaining walls constructed in the R Zones. Subtitle C, § 1401.2 notes that the maximum height of a retaining wall shall be six feet, and Subtitle C, § 1401.3 notes that the maximum height of a retaining wall located in a required side yard is four feet. As shown in Exhibit E, a portion of the overall retaining wall system will need to have a height of approximately seven feet. A portion of the retaining wall (28 feet) that requires special exception relief runs parallel to the property line that is shared with the Ivory

[5] This language is substantially similar to the language noted above in Subtitle X, §103.10 regarding approval of a medical campus plan.

Coast, and the majority of the retaining wall (50 feet) that requires special exception relief runs parallel to Broad Branch Road, N.W.

Subtitle C, § 1402.1 enumerates the standard for special exception approval for retaining walls not meeting the requirements of Subtitle C § 1401. This Section states:

> Retaining walls not meeting the requirements of this section may be approved by the Board of Zoning Adjustment as a special exception pursuant to Subtitle X. In addition to meeting the general conditions for being granted a special exception as set forth in that subtitle, the applicant must demonstrate that conditions relating to the building, terrain, or surrounding area would make full compliance unduly restrictive, prohibitively costly, or unreasonable.

The Applicant believes that approval of a portion of the retaining wall system that exceeds the permitted height of six and four feet satisfies the general special exception standards of Subtitle C §1402.1, as compliance with the retaining wall height requirements is unduly restrictive and unreasonable in this case. The retaining wall system created by the IRC Team has been very thoughtfully analyzed and refined. A series of retaining walls that account for the significant grade change that is occurring on this portion of the site (approximately 60 feet) is proposed and the majority of the walls (73%) satisfy the height requirements. The only portion of the walls that do not satisfy the height requirement are along the garage entrance at the eastern side of the addition to the Manor House. The Applicant is not able to meet the retaining wall height requirements on this portion of the site because of the existing steep topography, the need to grade out a flat area for vehicles as they enter the garage, and to allow for an area for vehicles to turn around should they not be able to enter the garage.

The height of the retaining wall that runs parallel to the Ivory Coast's property has a height of seven feet when viewed from the Ivory Coast's property for only 28 feet. The portion of the retaining wall that is perpendicular to the Ivory Coast's property, and parallel to Broad Branch Road, N.W. has minimal visual impact on the Ivory Coast's property. This portion of the retaining

wall is located over 150 feet from the property line along Broad Branch, Road, N.W. and 215 feet from the Broad Branch, N.W. roadway. Therefore, the Applicant does not believe that the adjacent Ivory Coast property, or the general public traveling along Broad Branch Road, N.W. will be adversely impacted by the proposed retaining wall height. Requiring the Applicant to reduce the retaining wall height in these locations is unduly restrictive and unreasonable. For the reasons noted above, the Applicant has satisfied the special exception requirements of Subtitle C, §1402.1 and the general special exception requirements of Subtitle X, §901.2.

EXHIBITS

The following exhibits are included with this statement:

Exhibit A – Plans/Elevations/Renderings/Materials Depicting the IRC Campus and Proposed Additions

Exhibit B – BZA Order No. 18898

Exhibit C – Satisfaction of the Medical Campus Plan Filing Requirements

Exhibit D – Evaluation of Comprehensive Plan Consistency and Racial Equity Analysis

Exhibit E – Plan Showing the Area of Proposed Retaining Walls that Require Special Exception Relief

CONCLUSION

The information provided herein supports approval of the proposed medical campus plan and special exception applications. The Applicant looks forward to the scheduling of this case for a public hearing and working with ANC 3/4G, ANC 3F, neighboring institutions, and community stakeholders to resolve any issues or concerns well in advance of the public hearing.

Paul Tummonds