BEFORE THE ZONING COMMISSION OF THE DISTRICT OF COLUMBIA

Application of Community Three Development

ANC 1B

I. Summary of Requested Action

This is an application for a Zoning Map amendment for the property located at 1925

Vermont Avenue NW (Square 361, Lot 827) (the "Property"). This application is being brought

by the developer of the District-owned Property, Community Three Development (the

"Applicant"). The District awarded the Applicant, through its wholly owned subsidiary

Community Three Grimke, LLC, the right to redevelop the Property after a competitive disposition

process. The Applicant proposes to rezone the Property to the ARTS-2 Zone District.

The Property is located in the Shaw/Cardozo neighborhood of Ward 1 and contains

approximately 37,926 square feet of land area; it is currently zoned RF-1. The Property is

generally bounded by residential properties and a public alley on the north, residential properties

and a public alley the south, a public alley (known as 9½ Street) to the east, and Vermont Avenue

to the west. The Property is improved with the historic Grimke School and a rear addition

formerly for a gymnasium. The Grimke School building presently contains offices for the District

of Columbia government, and the former gymnasium contains the African-American Civil War

Museum. The Grimke School building is a contributing building in the Greater U Street Historic

District. The surrounding area is a mix of residential and commercial uses. Properties to the south

and east are developed with row dwellings, flats, and small apartment buildings. Properties to the

north and northeast, which are zoned ARTS-2, are developed with moderate density commercial

buildings. Across Vermont Avenue to the west are a small park (the African American Civil War

Memorial); an entrance to the U Street/African-American Civil War Memorial/Cardozo Metrorail

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station; row dwellings, flats, and small apartment buildings; and a four-story commercial building.

A location map of the Property and an excerpt of the Zoning Map showing the Property and surrounding properties are attached as **Exhibit D**.

The Property is designated as Mixed-Use Moderate Density Residential/Moderate Density Commercial on the Comprehensive Plan's Future Land Use Map ("FLUM"). The Applicant is seeking to rezone the Property to make it consistent with the Comprehensive Plan and the zone of the surrounding properties and to facilitate the redevelopment of the Property. The redevelopment of the Property is part of a larger redevelopment effort that includes a mix of commercial, residential, and cultural uses, as well as the new permanent home for the African American Civil War Museum. The proposed Map Amendment is not inconsistent with the Comprehensive Plan and the overall goals and policies of the District of Columbia Zoning Regulations.

II. Satisfaction of Zoning Map Amendment Application Approval Standards

This application is being brought as a contested case pursuant to Subtitle Z § 201.2, Subtitle Z § 304, and Subtitle X, Chapter 5 of the District of Columbia Zoning Regulations. Pursuant to Subtitle X § 500.3, in order to approve a Zoning Map amendment application, the Zoning Commission shall find that the new zone category is not inconsistent with the Comprehensive Plan (D.C. Code § 6-641.02) and with other adopted public policies and active programs related to the subject site.

Consistent with the FLUM designation for the Property, the Applicant proposes to rezone the Property to the ARTS-2 Zone District. The ARTS-2 Zone District is appropriate for the Property given the Mixed-Use Moderate Density Residential/Moderate Density Commercial designation, other planning policies and guidance for the Property, and the goals and intent of the ARTS-2 zone. The goals and intent of the ARTS-2 zone are to: permit mixed-use development;

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(see Subtitle K § 800.1(b)); require uses that encourage pedestrian activity, especially retail and entertainment and residential uses (see Subtitle K § 800.1(c)); provide for an increased presence and integration of the arts and related cultural and arts-related support uses (see Subtitle K § 800.1(d)); expand the area's housing supply in a variety of rent and price ranges (see Subtitle K § 800.1(e)); expand business and job opportunities and encourage development of residential and commercial buildings (see Subtitle K § 800.1(f)); and encourage adaptive reuse of older buildings in the area and an attractive combination of new and old buildings (see Subtitle K § 800.1(h)).

The ARTS-2 Zone District permits a maximum building height of 70 feet (65 feet for non-residential use), a maximum residential lot occupancy of 80%, and a maximum floor area ratio ("FAR") of 4.2 (of which up to 1.5 FAR is permitted to be non-residential use). The ARTS-2 zone permits office, general service, museum, and multifamily residential uses as a matter-of-right.

With the proposed Zoning Map amendment, the Applicant intends to construct a mixed-use project that will include office, cultural, museum, and multifamily residential uses on the Property (the "Project"). The historic Grimke School building will be preserved, renovated, and converted to include approximately 30,000 square feet of general office space, approximately 11,000 square feet for a new home for the African-American Civil War Museum ("AACWM"), and approximately 4,000 square feet of space for cultural uses. The existing rear gymnasium addition (where the AACWM is temporarily and currently located) is intended to be razed, and in its place, the Applicant will construct a new rear addition that will contain approximately 25 residential units.

The Project will be made possible with the proposed Zoning Map amendment since the existing zone would not otherwise allow the density and mix of uses, The Project will allow for an

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¹ Additional density is permitted through bonus density generated by the provision of certain uses.

active reuse of the historic Grimke School and an improved, larger, and permanent facility for the AACWM that is consistent with the height and bulk requirements of the ARTS-2 zone. The proposed residential component of the Project will include a significant number of affordable units (30%) as well as additional market-rate units. A preliminary site plan for the Project is attached as **Exhibit E**.

This Zoning Map amendment application is consistent with the Comprehensive Plan's Future Land Use designation for the Property, Policies and Elements of the Comprehensive Plan, and the DUKE Plan. In addition, contiguous properties to the north and northeast of the Property are already zoned ARTS-2, so the proposed rezoning of the Property to ARTS-2 would be a continuation and consistent with the surrounding context.

III. Compliance with the Comprehensive Plan and DUKE Plan

This application to rezone the Property to the ARTS-2 zone is not inconsistent with the Comprehensive Plan, satisfies the multiple Citywide Elements and the Area Element, and advances polices and goals in the Strategic Development Plan for the Uptown Destination District ("DUKE Plan"), as described in the following sections.

1. <u>Future Land Use Map Designation</u>. The proposed rezoning of the Property is consistent with the Property's Future Land Use Map Designation:

Definition of Moderate Density Residential: This designation is used to define the District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. (§225.4)

Definition of Moderate Density Commercial: This designation is used to define shopping and service areas . . . Retail, office, and service businesses are the predominant uses. Areas with this designation range from small business districts that draw primarily from the surrounding neighborhoods to larger business districts that draw from a broader market area. Buildings are larger and/or taller than those in low density commercial areas

but generally do not exceed five stories in height. The corresponding Zone districts are generally C-2-A, C-2-B, and C-3-A, although other districts may apply. (§225.9)

Mixed Use Categories: The Future Land Use Map indicates where the mixing of two or more land uses is encouraged. The Mixed Use category generally applies in (a) established, pedestrian-oriented commercial areas which also include substantial amounts of housing, typically on the upper stories of buildings with ground floor retail or office uses; [and] (b) commercial corridors or districts which may not contain substantial amounts of housing today, but where more housing is desired in the future. The pattern envisioned for such areas is typically one of pedestrian-oriented streets, with ground floor retail or office uses and upper story housing. . . . " (§228.18)

Rezoning the Property to the ARTS-2 zone is entirely consistent with the FLUM's designation for the Property. Under the 1958 Zoning Regulations, to which the Comprehensive Plan refers in the land use designation descriptions, the predecessor zone to ARTS-2 was ARTS/C-2-B. Accordingly, since the Comprehensive Plan identifies the C-2-B zone as appropriate for the Mixed Use Moderate Density Residential/Moderate Density Commercial land use category, when the descriptions of the use categories above are considered together, the ARTS-2 zone is also appropriate for this FLUM designation. Further, as stated in the "Mixed Use" designation description, the mixing of uses "in commercial corridors...where more housing is desired in the future" justifies the ARTS-2 zone since it facilitates this objective. In addition, the Property's location adjacent to the properties already included in the Uptown Arts neighborhood corridor and zoned ARTS-2, and the Project's proposed mix of cultural, office, and residential uses support the specific rezoning to the special purpose ARTS-2 zone.

- 2. <u>Guiding Principles and Framework Element</u>. The proposed rezoning of the Property is consistent with the following Guiding Principles enumerated in the Framework Element of the Comprehensive Plan:
 - (3) Diversity also means maintaining and enhancing the District's mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples. (§217.3)

- (4) The District needs both residential and non-residential growth to survive.

 Nonresidential growth benefits residents by creating jobs and opportunities for less affluent households to increase their income. (§217.4)
- (6) Redevelopment and infill opportunities along corridors and near transit stations will be an important component of reinvigorating and enhancing our neighborhoods. Development on such sites must not compromise the integrity of stable neighborhoods and must be designed to respect the broader community context. Adequate infrastructure capacity should be ensured as growth occurs. (§217.6)
- (7) Growth in the District benefits not only District residents, but the region as well. By accommodating a larger number of jobs and residents, we can create the critical mass needed to support new services, sustain public transit, and improve regional environmental quality. (§217.7)
- (10) The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. (§218.3)
- (21) Land development policies should be focused to create job opportunities for District residents. This means that sufficient land should be planned and zoned for new job centers in areas with high unemployment and under-employment. A mix of employment opportunities to meet the needs of residents with varied job skills should be provided. (§219.6)
- (29) The District continues to grow in reputation as an international cultural center. To sustain this growth, it must continue to support a healthy arts and cultural community through its land use, housing, and economic development policies. The power of the arts to express the identity of each community while connecting neighborhoods and residents must be recognized. (§220.5)
- (31) The District's communities are connected by a shared heritage of urban design, reflecting the legacy of the L'Enfant Plan, the McMillan Plan, the Height Act of 1910, and preservation of much of the historic urban fabric. After more than two centuries of building, the nation's capital is still a remarkable place. Urban design and streetscape policies must retain the historic, majestic, and beautiful qualities that make Washington unique among American cities. (§220.7)

The proposed ARTS-2 zone and Project are consistent with these Guiding Principles of the Comprehensive Plan.

- 3. <u>Land Use.</u> The application to rezone the Property is consistent with the following policies of the Land Use Element of the Comprehensive Plan:
 - **Policy LU-1.3: Transit Oriented and Corridor Development**: Certain principles should be applied to the management of land around all of the District's neighborhood stations, include[ing]: a preference for mixed residential and commercial uses rather than single purpose uses, particularly a preference for housing above ground floor retail uses.
 - **Policy LU-1.3.3: Housing Around Metrorail Stations:** Recognize the opportunity to build senior housing and more affordable "starter" housing for first-time homebuyers adjacent to Metrorail stations, given the reduced necessity of auto ownership (and related reduction in household expenses) in such locations.
 - **Policy LU-1.4.1: Infill Development:** Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create "gaps" in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern.
 - **Policy LU-1.4.3: Zoning of Infill Sites:** Ensure that the zoning of vacant infill sites is compatible with the prevailing development pattern in surrounding neighborhoods. This is particularly important in single family and row house neighborhoods that are currently zoned for multi-family development.
 - **Policy LU-2.1.3:** Conserving, Enhancing, and Revitalizing Neighborhoods: Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to "create successful neighborhoods" in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others.
 - *Policy LU-2.1.12: Reuse of Public Buildings*: Rehabilitate vacant or outmoded public and semi-public buildings for continued use. Reuse plans should be compatible with their surroundings, and should limit the introduction of new uses that could adversely affect neighboring communities.
 - **Policy LU-2.4.1: Promotion of Commercial Centers:** Promote the vitality of the District's commercial centers and provide for the continued growth of commercial land uses to meet the needs of District residents, expand employment opportunities for District residents, and sustain the city's role as the center of the metropolitan area. Commercial centers should be inviting and attractive places, and should support social interaction and ease of access for nearby residents.
 - *Policy LU-2.4.6: Scale and Design of New Commercial Uses:* Ensure that new uses within commercial districts are developed at a height, mass, scale and design that is appropriate and compatible with surrounding areas.

The proposed mix of office, cultural, museum, and residential uses in the Project, enabled by the proposed ARTS-2 Zone District, are consistent with these policies. The proposed Project will preserve, rehabilitate, and reuse a historic public building across the street from a Metrorail station. The Project also will include new housing, of which a significant portion will be affordable. The design of and uses within the Project will be compatible with the surrounding building types and mix of uses. Further, the mix of commercial, cultural, and residential uses in the project will foster pedestrian activity at the site and within the adjacent Uptown Arts neighborhood.

- 4. <u>Housing</u>. The proposed rezoning of the Property is consistent with the following policies of the Housing Element of the Comprehensive Plan:
 - **Policy H-1.1 Expanding Housing Supply**: Expanding the housing supply is a key part of the District's vision to create successful neighborhoods. Along with improved transportation and shopping, better neighborhood schools and parks, preservation of historic resources, and improved design and identity, the production of housing is essential to the future of our neighborhoods. It is also a key to improving the city's fiscal health. The District will work to facilitate housing construction and rehabilitation through its planning, building, and housing programs, recognizing and responding to the needs of all segments of the community. The first step toward meeting this goal is to ensure that an adequate supply of appropriately zoned land is available to meet expected housing needs.
 - **Policy H-1.1.1: Private Sector Support**: Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives.
 - **Policy H-1.1.3: Balanced Growth.** Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing.
 - **Policy H-1.1.4:** *Mixed Use Development*. Promote mixed use development, including housing, on commercial zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations.

Policy H-1.1.5: Housing Quality: Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood.

The ARTS-2 Zone District appropriately allows and encourages additional housing – with a considerable affordable component – at the Property that will contribute transit-oriented residential units to the District able to access existing nearby amenities. The ARTS-2 zone allows a balanced mixed-use development containing office, cultural, museum, and residential uses. All of the Project's housing is intended to be of a high quality and historically sensitive design that will allow it to be compatible with the historic Grimke School and the neighborhood at large.

- 5. <u>Economic Development.</u> The application to rezone the Property is consistent with the following policies of the Economic Development Element of the Comprehensive Plan:
 - **Policy ED-2.1.5: Infill and Renovation:** Support the continued growth of the office sector through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space.
 - **Policy ED-2.1.6: Local-Serving Office Space:** Encourage the development of small local-serving offices within neighborhood commercial districts throughout the city to provide relatively affordable locations for small businesses and local services (such as real estate and insurance offices, accountants, consultants, and medical offices).
 - **Policy ED-2.3.3: Amenities Beyond the Mall:** Promote the development of cultural amenities beyond the Mall in an effort to more fully capitalize on the economic benefits of tourism.
 - **Policy ED-3.1.1:** Neighborhood Commercial Vitality: Promote the vitality and diversity of Washington's neighborhood commercial areas by retaining existing businesses, attracting new businesses, and improving the mix of goods and services available to residents.
 - **Policy ED-3.1.5: Public-Private Partnerships:** Leverage the expenditure of public funds to produce private sector investments, including joint development on publicly-owned land and redevelopment in areas considered to be high risks by investors. Support the involvement of local community development corporations in commercial development and revitalization efforts within these areas.

Policy ED-4.2.12: Local Hiring Incentives: Maintain requirements for resident job training and placement for projects built and/or operated with any form of public subsidy/loan, grant or other incentives. Promote incentives for similar training and hiring programs by the private sector.

Rezoning the Property to the ARTS-2 Zone District will allow the redevelopment of a historic infill site for commercial uses that will be compatible with and beneficial to the surrounding neighborhood. The new office space will attract a new, local employer to the neighborhood, and the cultural and museum uses will draw tourist and residents alike. The proposed ARTS-2 zone will facilitate this mix of uses that is consistent with the neighborhood. Pursuant to the terms of its agreement with the District, the Applicant will enter into First Source Employment and CBE Agreements related to the development of the Property.

6. <u>Historic Preservation</u>. The proposed rezoning of the Property is consistent with the following policies of the Historic Preservation Element of the Comprehensive Plan:

Policy HP-2.1.1: Protection of District-Owned Properties: Sustain exemplary standards of stewardship for historic properties under District ownership or control. Use historic properties to the maximum extent feasible when adding new space for government activities, promote innovative new design, and ensure that rehabilitation adheres to the highest preservation standards. Properly maintain both designated and eligible historic properties and protect them from deterioration and inappropriate alteration.

Policy HP-2.1.2: Disposition of District-Owned Properties: Evaluate District-owned properties for historic potential before acting on disposition. When disposal of historic properties is appropriate, ensure their continued preservation through transfer to a suitable new steward under conditions that ensure their protection and reuse.

Rezoning the Property to the ARTS-2 zone will allow for the disposition of the Property to facilitate the Project, including the rehabilitation and reuse of a District-owned historic resource.

7. Arts and Culture. The proposed Zoning Map amendment for the Property to the ARTS-2 zone is consistent with the following policies of the Arts and Culture Element of the Comprehensive Plan:

- **Policy AC-1.1.2: Development of New Cultural Facilities:** Develop new neighborhood cultural facilities across the District, providing affordable space for grass roots and community arts organizations. Provide technical and financial assistance to organizations to help plan and build such facilities.
- **Policy AC-1.1.5: Siting of Facilities:** Support the siting of arts facilities in locations where impacts upon nearby uses can be most easily managed. Give preference to locations near public transit, or sites where shared parking facilities are available. Conversely, ensure that appropriate parking and transit access improvements are made when arts and cultural venues are developed.
- *Policy AC-3.2.1: Promoting Cultural Amenities:* Promote the development of cultural amenities "beyond the Mall" in an effort to more fully capitalize on the economic benefits of tourism for District residents, businesses, and neighborhoods.

The rezoning of the Property to the ARTS-2 zone will allow for the new, improved, and permanent space for the AACWM, as well as new cultural spaces directly adjacent to a Metrorail station. The improved museum and the cultural spaces will draw additional visitors to the Property, helping to fully capitalize on the economic benefits of tourism to this neighborhood.

- 8. <u>Area Element: Mid-City.</u> This application to rezone the Property is consistent with the following policies of the Mid-City Area Element of the Comprehensive Plan:
 - *Policy MC-1.1.2: Directing Growth:* Stimulate high-quality transit-oriented development around the Columbia Heights, Shaw/Howard University, and U St./African American Civil War Memorial/Cardozo Metrorail station areas, as well as along the Georgia Avenue corridor and the North Capitol Street/Florida Avenue business district. Opportunities for new mixed income housing, neighborhood retail, local-serving offices, and community services should be supported in these areas, as shown on the Comprehensive Plan Policy Map and Future Land Use Map.
 - *Policy MC-1.1.6: Mixed Use Districts*: Encourage preservation of the housing located within Mid-City's commercially zoned areas. Within mixed use (commercial/residential) areas, such as Mount Pleasant Street and Columbia Road, encourage commercial uses that do not adversely impact the established residential uses.
 - **Policy MC-2.3.2: Uptown Subareas:** Create a distinct and memorable identity for different sub-areas in the Uptown District, based on existing assets such as the Lincoln Theater, Howard University, the African-American Civil War Memorial, and the Howard Theater.

Policy MC-2.3.3: Uptown Design Considerations: Ensure that development in the Uptown Area is designed to make the most of its proximity to the Metro Stations at Shaw and 13th Street, to respect the integrity of historic resources, and to transition as seamlessly as possible to the residential neighborhoods nearby.

Policy MC-2.3.4: Cultural Tourism: Promote cultural tourism initiatives, public art, signage, and other improvements that recognize the African-American historical and cultural heritage of the Uptown area. Such initiatives should bring economic development opportunities to local residents and businesses, and establish a stronger identity for the area as a nationally significant African-American landmark.

The Proposed rezoning to the ARTS-2 zone and the resulting Project will be transitoriented and will provide a desired mix of local-serving offices, cultural space to attract tourists, and housing that will cater to different income levels. The Project – enabled by the proposed zone change – will preserve a distinct historic building and will be designed to be compatible with the surrounding neighborhood.

9. <u>DUKE Plan</u>. This application to rezone the Property to the ARTS-2 zone advances the following goals and policies of the DUKE Plan:

The "African-American Civil War Memorial Sub-district" will be an active civic and cultural gateway to the Shaw community. The primary use within this section of the overall plan will be cultural uses and activities at which residents demonstrate the best in civic pride. (p. 28)

Relocate Fire/EMS and Corrections from Grimke. Consider an interpretive museum for the African-American Civil War Memorial and possibly other museum uses at Grimke School. (p. 29)

Maximize transit use to reduce parking demand and adopt parking management plan to mitigate conflict with surrounding residential neighborhood. (p. 29)

Allow for commercial, residential and/or cultural use of the Grimke School; properties between Grimke School and the southeast corner of the intersection of U Street and Vermont Avenue; properties on the south of U Street on the 900 block and properties on the 1900 block of 9th Street. In doing so, be mindful of the historic preservation regulations which also impact these properties and that some residential and mixed uses properties are currently within residential or light manufacturing zones. Continue to require retail in properties fronting on U Street and 9th Street. (p. 37)

Designate the Grimke School for adaptive reuse to include among other uses facilities for an interpretive museum for the African American Civil War Memorial and its Foundation, a welcoming and orientation center for visitors to the area, and potentially other cultural facilities (e.g., the Black Fashion Museum); initiate a design and programming study to determine capacity and feasibility; and implement. (p. 42)

In conjunction with redevelopment of publicly-owned/controlled properties and extension of publicly-assisted financing (e.g., revenue bonds) for projects in the vicinity, require redevelopers and beneficiaries to provide priority outreach and opportunities for contracting with Project Area businesses as part of their Local, Small and Disadvantaged Business Enterprises (LSDBE) commitments. (p. 45)

The revitalization of the Property, as contemplated in the DUKE Plan, can only be possible by the proposed rezoning to the ARTS-2 zone. Realized though the Project, this effort will result in the preservation and adaptive reuse of the historic Grimke School to include cultural space and an improved and permanent home for the AACWM. The proposed rezoning will also facilitate the development of a mixed-use transit-oriented ensemble containing local-serving office and new housing that will include a significant affordable component. As part of the Project, the Applicant, a wholly owned subsidiary of a Local, Small, Resident-Owned Business Enterprise, will enter into a CBE Agreement with the District that will provide contracting opportunities as part of the Local, Small and Disadvantaged Business Enterprise (LSDBE) Program.

IV. Community Dialogue

The Applicant extensively engaged with the community and Advisory Neighborhood Commission ("ANC") 1B prior to the filing of this application. Over 12 months during the disposition process for the Property, the Applicant met with ANC 1B and other neighborhood stakeholders. During those meetings, the Applicant presented its proposal to rezone and redevelop the Property. In fact, this application to rezone this site to the ARTS-2 zone (as opposed to another zone) to facilitate the redevelopment of the Property is because of a community recommendation.

In addition, the Applicant sent a Notice of Intent on October 30, 2017 to ANC 1B and all property owners located within 200 feet of the Property. A copy of that Notice of Intent is included

in **Exhibit F**. The Applicant made a presentation about this application to ANC 1B on December 14, 2017. At that meeting, the Applicant shared the justification and timeline for the Project and Application.

V. List of Publicly Available Documents

- 1. Zoning Regulations and Zoning Map of the District of Columbia, available at dcoz.dc.gov.
- 2. Comprehensive Plan of the District of Columbia, available at planning.dc.gov/page/comprehensive-plan.

VI. Exhibits

Exhibit A	Application Form
Exhibit B	Agent Authorization Letters
Exhibit C	Surveyor's Plat
Exhibit D	Location Map and Zoning Map of Property and Surrounding Area
Exhibit E	Proposed Site Plan
Exhibit F	Certificate of Notice
Exhibit G	List of Property Owners within 200 Feet of the Property

VII. Conclusion

For the foregoing reasons, we respectfully request that the Commission set down this Zoning Map amendment application for a public hearing at its earliest convenience.

Respectfully,
GOULSTON & STORRS, PC

/s/
Allison C. Prince
/s/
Cary R. Kadlecek