

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Zoning Commission



ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
ZONING COMMISSION ORDER NO 11-10

Z.C. Case No. 11-10
Office of Planning

(Map Amendment for Squares 553, 554, and 554W and Request for Variance Relief from the Number of Required Off-Street Parking Spaces and Loading Berths (§§ 2101.1 and 2201.1))

September 12, 2011

The Zoning Commission for the District of Columbia ("Commission"), pursuant to its authority under § 1 of the Zoning Act of 1938, approved June 20, 1938 (52 Stat. 797; D.C. Official Code § 6-641.01), and pursuant to proper notice, having held a public hearing on July 28, 2011, to consider an application from the District of Columbia Office of Planning ("OP") on behalf of the Office of Public Education Facilities Modernization (collectively, "Applicant") for a map amendment and having referred the proposed map amendment to the National Capital Planning Commission ("NCPC") for a 30-day period of review pursuant to § 492 of the District of Columbia Charter; hereby gives notice of the adoption of an amendment to the Zoning Map incorporated into the Zoning Regulations of the District of Columbia (Title 11, DCMR), that changes the zoning of Lot 846 in Square 553, Lot 860 in Square 554, and Lots 801 and 802 in Square 554W, known as 1301 New Jersey Avenue, N.W., ("Subject Property") from R-4 to R-5-B.

For the reasons stated below, the Commission also approves the Applicant's request for variances from §§ 2101.1 and 2201.1 of the Zoning Regulations to permit a reduction in the required number of parking spaces and the elimination of the requirement to provide a 55-foot deep loading berth.

The map amendment and variances were requested in order to construct a replacement facility for Dunbar High School.

FINDINGS OF FACT

Procedural Information and Hearing

1. On April 29, 2011, OP initiated this case by submitting a report recommending that the Commission set down the map amendment application for a public hearing and that the Commission retain jurisdiction to hear a request for a full variance from the applicable schedule for required on-site parking spaces.

2. The Commission set down the map amendment application for a public hearing at its May 9, 2011 public meeting and also agreed to hear the parking variance.
3. On May 26, 2011, the Applicant filed an application for variances from the requirement of 11 DCMR § 2101.1 to provide 256 parking spaces and from the requirement of 11 DCMR § 2201.1 for a 55-foot deep loading berth.
4. Notice of the public hearing was provided in accordance with the provisions of 11 DCMR §§ 3014 and 3015.
5. Advisory Neighborhood Commission ("ANC") 5C, the ANC within which the Subject Property is located, was an automatic party to this proceeding, but did not file a report.
6. There were no requests for party status.
7. On July 18, 2011, OP submitted a report recommending approval of the map amendment and variance requests. The report states that the requested R-5-B zoning would not be inconsistent with the Comprehensive Plan and that the variance applications met the three-prong test to be discussed later in this Order.
8. On July 28, 2011, the Commission held a public hearing on the applications. At the hearing, the Applicant stated that it had modified its plans and would provide a minimum of 40 parking spaces within the new building.
9. At the conclusion of the public hearing, the Commission took proposed action to approve the map amendment. Pursuant to § 492 of the District Charter, the Commission referred its proposed decision of approval to NCPC for review and comment.
10. By delegated action dated August 25, 2011, the NCPC Executive Director found that the proposed map amendment would not be inconsistent with the Comprehensive Plan for the National Capital, nor would it have an adverse impact on any other federal interest.
11. The Commission took final action to approve the map amendment and variances at its public meeting held on September 12, 2011.

The Subject Property and the Surrounding Area

12. The Subject Property is located in the R-4 Zone District and currently has a land area of 472,165 square feet that extends from New Jersey Avenue to First Street, N.W. and from N Street to the middle of Square 553 between O and P Streets.
13. Residential uses line 1st and 3rd Streets adjacent to the Subject Property.

14. The original Dunbar High School was constructed in 1917 and was located between N, O, 1st and 3rd Streets. Among its many iconic features was a student meeting area known as the Armory.
15. The Subject Property is currently improved with an eight-story public high school, playing fields, and surface parking lots.
16. The existing building occupies a portion of the former O Street right of way.
17. The building has a gross floor area of 343,000 square feet and a height of 98 feet.
18. The building was constructed to accommodate an enrollment of approximately 3,000 students and 250 teachers
19. The school currently enrolls approximately 900 students and employs approximately 130 faculty members.
20. After the building was constructed, two Metrorail stations were built within walking distance. Those stations are the New York Avenue (red line) and Mount Vernon (green line) Metrorail Stations.
21. The school is also served by the G2 and 96 Metrobus routes, and is located within one-half mile of 15 Metrobus stops.
22. The school's parking lots can accommodate 128 vehicles. Currently, only about half of these spaces are used on a regular basis.
23. The existing school has two 30-foot-deep loading berths and one 20-foot-deep loading berth.
24. The school loading requirements, such as the delivery of food and office supplies and the removal of trash, are fully met using standard box trucks.

The Proposed Project

25. The Office of Public Education Facilities Modernization proposes to replace the existing under-utilized facility with a new and smaller state of the art school.
26. O Street will be re-opened. The principal school building and athletic fields will be located on the portion of the site that will be south of the re-opened street, while the area north of the right of way will be used as an auxiliary playing and practice field.

27. A new Armory will connect the academic wing, the sports fields, the gym, pool, auditorium, and cafeteria seating area.
28. The school will be oriented toward 1st and N Street with the main building entrance on N Street.
29. In order to meet state of the art standards, the school's classrooms will have a height of 10 feet, six inches clear.
30. In order to accommodate the number of classrooms needed, the school is designed to achieve a height of 67 feet, which exceeds the 60 foot maximum permitted public schools in an R-4 District pursuant to 11 DCMR § 400.10.
31. The building will have a gross floor area of 265,000 square feet.
32. A parking structure will be constructed at the building's lowest level beneath most of the Armory space. Cars will enter at grade off O Street.
33. The re-opened O Street will add 54 parking spaces to the neighborhood inventory.
34. The school will have one 30-foot-deep loading berth, a 200-square-foot loading area, and a 20-foot-long delivery space.
35. Trucks will access the loading berth from O Street.
36. The loading needs of the new building, in terms of truck deliveries and pick-ups, will be the same as for the current school.

Current and Proposed Zoning and the Comprehensive Plan

37. The Subject Property is located in the R-4 Zone district. Adjacent properties to the north, east, and south are also within the R-4 Zone District. An area to the west is within the R-5-B Zone District.
38. The R-4 Zone District is designed to accommodate existing row house development and stabilize single-family residential neighborhoods. The Zone District permits one- and two-family dwellings, the conversion to multi-family dwellings under certain circumstances, public schools, and some institutional uses. The R-5-B Zone District permits a variety of residential and institutional uses, including public schools, at a moderate height and density.
39. The requested map amendment would extend the existing R-5-B Zone District across New Jersey Avenue to the Subject Property.

40. The 2010 Comprehensive Plan Future Land Use Map recommends local public facilities land use for the Subject Property, a category used to identify land and facilities occupied and used by the District's agencies. Local public facilities typically include public schools, public hospitals, and government office complexes. The Comprehensive Plan also indicates that the zoning designations for these areas vary depending on surrounding uses. The Future Land Use Map recommends moderate density residential land uses for the areas immediately adjacent to the Subject Property. This designation refers to row house neighborhoods as well as low-rise apartment complexes. Zone Districts ranging from R-3 through R-5-B may apply, depending on location.

41. A recent amendment to the Educational Facilities element of the Comprehensive Plan added language directly relevant to this application:

Encourage DCPS and OPEFM to plan for the modernization of entire school campuses rather than just the school buildings. Where school facilities are adjoined by athletic fields, playgrounds, and open space, the improvements of these areas should be included in renovation plans wherever feasible. In addition, school employee parking should not be provided at the expense of recreational space. 10 DCMR A § 1206.3.

42. The proposed rezoning is also supported by other policies of the Framework, Land Use, and Educational Facilities elements of the Comprehensive Plan that encourage high quality design for educational facilities, recognize the importance of institutions and their contribution to neighborhood character, and call for the preservation of school sites when located near transit.

Variance Request

Zoning Relief Needed

43. The school plans to provide approximately 40 parking spaces on the Subject Property.

44. Pursuant to the schedule of parking spaces appended to 11 DCMR § 2101.1, a high school in any Zone District must provide the following number of parking spaces:

2 for each 3 teachers and other employees, plus either 1 for each 20 classroom seats or 1 for each 10 seats in the largest auditorium, gymnasium or area usable for public assembly, whichever is greater.

45. Applying this schedule to the proposed development results in a parking requirement of 256 parking spaces.

46. The school will have two 30-foot deep loading berths.
47. The schedule for loading facilities appended to § 2201.1 does not include a specific loading requirement for public schools, and so this project falls under the schedule for "Any Other Use in All Districts." That schedule requires that a building in excess 100,000 square feet of gross floor area provide one 30-foot-deep loading berth and one 55-foot-deep loading berth.

Exceptional Conditions of the Property

48. The current Dunbar High School is housed in a building that was constructed for a school with an enrollment of 3,000 students.
49. O Street was closed in order to create a site large enough to accommodate a school of that size.
50. Because Dunbar's enrollment is approximately 30% of its current capacity, the new school was designed to accommodate a maximum enrollment of 1,100 students.
51. A school with that enrollment no longer requires the large site upon which the current school sits.
52. The construction of a smaller school allows for the reopening of O Street, N.W between 1st and 3rd Streets.
53. The reopened O Street will have a right of way width of approximate 69 feet.
54. The new street will split the site into two parcels. The north parcel will have a land area of 54,767 square feet and the south parcel will have a land area of 346,566 square feet.
55. The north parcel is too small to accommodate a principal public school use and will therefore be used as an auxiliary practice and playing field.
56. Roughly 70% of the south parcel's land area must be devoted to open spaces including the athletic field and loading area.
57. A public school is one of the few institutional uses that is permitted as a matter of right in a residence zone. It therefore must be designed to be compatible with any adjacent residential neighborhood and to protect such areas from adverse impacts.
58. Although a maximum height of 90 feet is permitted public schools in an R-5-B Zone District, per 11 DCMR § 400.11, the architects selected a lesser height that would allow the new building to be compatible with its surroundings.

59. The architects selected O Street as the access point for loading because of a variety of circumstances driven by the school's mission and the desire to protect the adjacent residential neighborhood.
60. Approval of a curb cut on New Jersey Avenue was viewed as unlikely. Moreover access from New Jersey Avenue would have required trucks to traverse the bulk of the site to access the loading facilities and resulted in smaller outdoor athletic fields. Access from 3rd Street would have required trucks to travel through a residential neighborhood.

Practical Difficulties

A. Parking Spaces

61. There is not enough space on the south parcel to accommodate a modern school with adequate space for classrooms, labs, administrative offices, and outdoor recreation opportunities, and also include the required number of parking spaces and related drive aisles.
62. The construction of one or more surface parking lots would have unacceptably reduced the size of the athletic field or limited the footprint of the new building. Adding additional height was not an option, both because of its impact on school operations and the adjacent neighborhoods.
63. Constructing more than the proposed 40 internal at-grade parking spaces would have the same adverse consequences.
64. Constructing underground parking would be practically difficult because: (1) the cost would have exceeded the project's budget by five percent; (2) much of the O Street side of the building is to be used for auditorium and natatorium below-grade support and loading; and (3) much of the N Street frontage is not to be excavated or has basement space intended for building support.
65. Given the current under-utilization of the school's existing 128 parking spaces, requiring full compliance with the parking schedule would be wasteful.

B. Loading

66. Vehicular access for loading is proposed to take place from O Street for the reasons explained in Findings of Fact No. 59 and 60.
67. This location does not allow adequate turning radii for 55-foot-long trucks without the vehicles using the public street for maneuvering.

68. In any event, the loading needs of the school does not now, and will not in the future, require deliveries to be made by trucks of this size, so requiring the construction of a 55-foot-deep loading berth would be wasteful.

No Substantial Detriment to Public Good or Impairment of Zone Plan

69. The school's existing parking facilities are usually occupied by no more than 64 vehicles, which can be accommodated by the 40 new on-site spaces and the 54 new spaces that will result from the re-opening of O Street.
70. This parking capacity is sufficient to handle any increased need should student enrollment increase to the full 1,100-student capacity for which the school has been built.
71. As noted, the Comprehensive Plan discourages the construction of new parking spaces for a school's faculty at the expense of recreational facilities.
72. The absence of a 55-foot-deep loading berth would not harm the public good because trucks of this size will not be servicing the school.
73. The school as designed is compatible with the adjacent residential neighborhood.

CONCLUSIONS OF LAW

Map Amendment

The Zoning Commission's authority to amend the Zoning Map derives from the Zoning Act of 1938, effective June 20, 1938 (52 Stat. 797, D.C. Official Code § 6-641.01) ("Zoning Act").

Section 1 of the Zoning Act, authorizes the Commission to regulate the uses of property in order to "promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital." D.C. Official Code § 6-641.01.

Section 2 of the Zoning Act provides that the "zoning regulations shall be designed to lessen congestion on the street, to secure safety from fire, panic, and other dangers to promote health and the general welfare, to provide adequate light and air, to prevent the undue concentration and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a

view to encouraging stability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.” (D.C. Official Code § 6-641.02.)

Section 3 of the Zoning Act, among other things, authorizes the Commission to amend the zoning regulations and maps. (D.C. Official Code § 6-641.03.)

The Commission concludes the proposed map amendment is consistent with the purposes of the Zoning Act. The amendment will allow use of the property consistent with its designation on the Future Land Use Map for local public facilities land uses.

In amending the Zoning Map, the Commission is constrained by the limitation § 492(b)(1) of the District of Columbia Home Rule Act, D.C. Official Code § 6-641.02, that the Zoning Map be “not inconsistent” with the Comprehensive Plan. The Commission concludes that approval of the requested map amendment from the R-4 Zone District to the R-5-B Zone District is not inconsistent with the Comprehensive Plan.

The requested map amendment furthers the goals of the Comprehensive Plan, and promotes orderly development in conformity with the Zone Plan as embodied in the Zoning Regulations and Map. The Commission also concludes that the requested map amendment is in the best interests of the District of Columbia and will benefit the community in which the property is located.

Variances

Section 8 of the Zoning Act of 1938 authorizes the grant of variances from the strict application of the Zoning Regulations to relieve difficulties or hardship where “by reason of exceptional narrowness, shallowness, or shape of a specific piece of property ... or by reason of exceptional topographical conditions or other extraordinary or exceptional situation or condition” of the property, the strict application of the Zoning Regulations would “result in particular and exceptional practical difficulties to or exceptional or undue hardship upon the owner of the property... .” D.C. Official Code § 6-641.07(g)(3). Relief can be granted only without substantial detriment to the public good and without substantially impairing the intent, purpose, and integrity of the zone plan as embodied in the Zoning Regulations and Map.” *Id.*

A showing of “practical difficulties” must be made for an area variance, while the more difficult showing of “undue hardship,” must be made for a use variance. *Palmer v. D.C. Board of Zoning Adjustment*, 287 A.2d 535, 541 (D.C. 1972). The Applicant in this case is requesting an area variance; therefore, it had to demonstrate an exceptional situation or condition of the property and that such exceptional condition results in a practical difficulty in complying with the Zoning Regulations. Lastly, the Applicant had to show that the granting of the variance would not substantially impair the public good or the intent or integrity of the Zone Plan and Regulations.

1. *Exceptional Situation or Condition of the Property*

The District of Columbia Court of Appeals has recognized that the needs of a public service use can constitute an exceptional situation.

[W]hen a public service has inadequate facilities and applies for a variance to expand into an adjacent area in common ownership which has long been regarded as part of the same site, then the Board of Zoning Adjustment does not err in considering the needs of the organization as possible "other extraordinary and exceptional situation or condition of a particular piece of property."

Monaco v. District of Columbia Board of Zoning Adjustment, 407 A.2d 1091, 1099 (D.C. 1979).

The Court of Appeals later noted that:

The need to expand does not, however, automatically exempt a public service organization from all zoning requirements. Where a public service organization applies for an area variance in accordance with *Monaco*, it must show (1) that the specific design it wants to build constitutes an institutional necessity, not merely the most desired of various options, and (2) precisely how the needed design features require the specific variance sought.

Draude v. District of Columbia Bd. of Zoning Adjustment, 527 A.2d 1242, 1256 (D.C. 1987).

Both of these quotations assume some form of physical expansion to meet growing needs. That is not the case here. Instead, the Applicant has proposed to build a smaller replacement facility because the school's needs have been reduced as its enrollment has declined. Thus, the new building's height will be 31 feet shorter than the current structure and it will have a gross floor area of 265,000 square feet as compared with the 343,000 square feet of the existing facility. The problem for this school is not that it seeks to expand into its existing site, but that the existing site is being split and shrunk, leaving it with effectively 30% less land area upon which to build a modern school building and athletic field. Thus, the variances do not arise from an expansion that will exceed matter of right limits, but from a matter of right building that cannot fully meet its parking and loading requirements and still accomplish its educational mission. It is in this unusual context that the Commission must apply the *Draude* test.

First, the Commission finds that the Applicant has demonstrated “that the specific design it wants to build constitutes an institutional necessity, not merely the most desired of various options.” In fact, the Applicant had no options that would permit it to provide the parking and loading facilities required without sacrificing the “institutional necessity” of constructing a modern school that fully met the needs of its students without adversely impacting its surroundings. There is simply no room to construct surface parking lots or further intrude into the building itself. Underground parking would have been prohibitively expensive and there was little if any additional area for such excavation to occur. The choice of any other location but O Street for access to loading would have adversely impacted the adjacent neighborhoods and unacceptably reduced the size of the athletic fields.

As to the second part of the *Draude* test, the “needed design feature” in the unusual context presented is fitting this modern school on a compacted site. There is no doubt that without the variances requested such a school could not be built upon this smaller site.

2. *Practical Difficulties*

The Court of Appeals has interpreted the *Monaco* doctrine for public services as also applying to the second prong of the variance analysis. In *National Black Child Development Institute, Inc. v. District of Columbia Bd. of Zoning Adjustment*, 483 A.2d 687 (D.C. 1984), the Court of Appeals indicated that “in *Monaco*, we permitted the BZA to apply a more flexible *standard for determining hardship* when a ‘public service,’ or nonprofit entity, is the applicant.” 483 A. 2d at 690 (emphasis added). Although the court was applying this flexible standard to the “undue hardship” prong applicable to use variances, there is no reason why a similar approach should not be used for the more lenient practical difficulty standard applied to the area variance sought here.

The Commission finds that the same circumstances that created the exceptional situation on the property also make it practically difficult to provide 256 parking spaces and a 55-foot deep loading berth. Strict compliance with the parking requirements would have unacceptably reduced the size of the school’s facilities and the choice of a different location for loading in order to accommodate a 55-foot berth would have adversely impacted the surrounding neighborhood and reduced the size of the athletic field.

In addition, the Commission must be mindful of the cost impact of its decisions upon a government-funded project. In *National Black Child Development* the Court of Appeals granted a use variance to permit a non-profit office use in a residence zone in part because “the great expense of operating offices at another site would cause serious detriment to the Institute.” *National Black Child Development Institute, Inc., supra*, 483 A.2d at 690.

The cost to construct below ground parking would have exceeded the project's budget by five percent. Such an expenditure cannot be justified, both because of District's difficult financial condition and because the additional parking is unnecessary. The present school's 128 parking spaces are usually less than half filled. Given the additional 54 parking spaces that will result from the re-opening of O Street, there is no justification for requiring more than the 40 parking spaces that will be constructed on site.

3. *No Substantial Detriment to Public Good or Impairment of Zone Plan*

The requested variances from the off-street parking and loading requirements would not be detrimental to the purpose and integrity of the zone plan.

As to parking, the school will be located within walking distance of two Metrorail stations and within one-half mile of 15 Metrobus stops. The school's present parking facilities are underutilized, with only half of the 128 spaces being occupied on a regular basis. Assuming this represents a parking demand of 64 spaces, 40 of these will be accounted for on-site while the remaining parking needs can be accommodated through neighborhood parking, including the 54 additional parking spaces that will result from the re-opening of O Street.

Loading needs for the school will be generally limited to trash pickup, food deliveries, office supplies, and mail, which can be handled via standard box trucks, and will not require the larger trucks that the 55-foot loading berth is designed to accommodate. Requiring this size berth potentially could harm the public interest, because the loading area is not large enough to permit trucks of this size to turn without using the public street to maneuver.

The school has been designed to be compatible with its surroundings.

Great Weight

The Commission is required under § 13(d) of the Advisory Neighborhood Commissions Act of 1975, effective March 26, 1976 (D.C. Law 1-21; D.C. Official Code § 1-309.10(d)) to give great weight to issues and concerns expressed in the affected ANC's written recommendation. As noted, the affected ANC did not submit a report.

The Commission is required under § 5 of the Office of Zoning Independence Act of 1990, effective September 20, 1990 (D.C. Law 8-163, D.C. Official Code § 6-623.04) to give great weight to OP recommendations. The Zoning Commission concurs with the OP's recommendation for approval, and has given the recommendation the great weight to which it is entitled.

DECISION

In consideration of the Findings of Fact and Conclusions of Law contained in this Order, the Zoning Commission for the District of Columbia hereby **ORDERS APPROVAL** of the application for an amendment of the Zoning Map to change the zoning of Lot 846 in Square 553, Lot 860 in Square 554, and Lots 801 and 802 in Square 554W, from the R-4 Zone District to the R-5-B Zone District.

Further, in consideration of the Findings of Fact and Conclusions of Law contained in this Order, the Zoning Commission for the District of Columbia hereby **ORDERS APPROVAL** of the application for variances from §§ 2101.1 and 2201.1 of the Zoning Regulations to permit a reduction in the required number of parking spaces from 256 to 40, and the elimination of the requirement to provide a 55-foot-deep loading berth.

Approval of the variance application includes approval of the plans submitted with the application for the construction of the school. The Applicant shall carry out the construction, renovation, or alteration only in accordance with the plans approved by the Commission as the same may be amended and/or modified from time to time by the Commission.

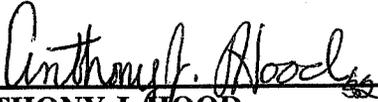
The Applicant is required to comply fully with the provisions of the D.C. Human Rights Act of 1977, D.C. Law 2038, as amended, D.C. Official Code § 2-1404.01 *et seq.* ("Act"). This order is conditioned upon full compliance with those provisions. In accordance with the Act, the District of Columbia does not discriminate on the basis of actual or perceived: race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, or place of residence or business. Sexual harassment is a form of sex discrimination that is prohibited by the Act. In addition, harassment based on any of the above protected categories is prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.

On July 28, 2011, upon the motion of Commissioner Turnbull, as seconded by Commissioner Selfridge, the Commission **APPROVED** the application by a vote of **5-0-0** (Anthony J. Hood, Konrad W. Schalter, Greg M. Selfridge, Peter G. May, and Michael G. Turnbull to approve).

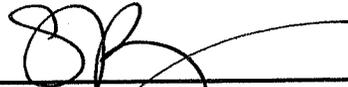
On September 12, 2011, upon the motion of Vice Chairman Schlater, as seconded by Commissioner Turnbull, the Commission **ADOTPED** this Order by a vote of **5-0-0** (Anthony J. Hood, Konrad W. Schlater, Peter G. May, and Michael G. Turnbull to adopt; Greg M. Selfridge to adopt by absentee ballot).

Z.C. ORDER NO. 11-10
Z.C. CASE NO. 11-10
PAGE 14

In accordance with the provisions of 11 DCMR § 3028, this Order shall become final and effective upon publication in the *D.C. Register* on February 3, 2012.



ANTHONY J. HOOD
CHAIRMAN
ZONING COMMISSION



SARA A. BARDIN
DIRECTOR
OFFICE OF ZONING

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of Zoning



Z.C. CASE NO.: 11-10

FEB 7 2012

As Secretary to the Commission, I hereby certify that on _____ copies of this Z.C. Order No. 11-10 were mailed first class, postage prepaid or sent by inter-office government mail to the following:

- | | |
|---|--|
| 1. D.C. Register | 8. Commissioner Mark Dixon
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ATTESTED BY:

A handwritten signature in black ink, appearing to read "S.S. Schellin", is written over a horizontal line.

Sharon S. Schellin
Secretary to the Zoning Commission
Office of Zoning