

From: [Peter Ciferri](#)
To: [Clerk of the Council](#)
Cc: [Brown, Donna J.](#); [Moses, Leonard D.](#); [Margaret Burke](#)
Subject: DSP-19050 and DSP-19050/01 | Appeal of 6525 Belcrest Road, LLC
Date: Friday, October 2, 2020 4:06:39 PM
Attachments: [image001.jpg](#)
[3392301-PEC to District Council 10-2-20.PDF](#)

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Good afternoon:

Please see the attached filing on behalf of the Appellant in this matter. A copy will follow by mail. Please distribute to the Council. Thank you,

Peter E. Ciferri, Esquire
pciferri@mcmillanmetro.com

McMillan Metro, P.C.

ATTORNEYS AT LAW

7811 Montrose Road • Suite 400 • Potomac, Maryland 20854

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Please note that due to COVID-19, our offices are closed to the public. Our team remains available to you via e-mail, video conferencing and telephone while we work to provide the legal assistance you need.

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From: Peter Ciferri
Sent: Wednesday, September 30, 2020 2:15 PM
To: 'Clerk of the Council' <ClerkoftheCouncil@co.pg.md.us>
Cc: Brown, Donna J. <djbrown@co.pg.md.us>; Moses, Leonard D. <LDMoses@co.pg.md.us>; Margaret Burke <MBurke@mcmillanmetro.com>
Subject: RE: Case Information - DSP-19050 and DSP-19050/01 | Appeal of 6525 Belcrest Road, LLC re

Thank you. We were encountering a firewall with the website earlier; however, it now appears we can now access. Either I or my assistant will call you if we have any other issues accessing. Thank you and best regards,

Peter E. Ciferri, Esquire

pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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122 E. Patrick Street • No. 121 • Frederick, Maryland 21701 (By Appointment Only)

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From: Clerk of the Council <ClerkoftheCouncil@co.pg.md.us>

Sent: Wednesday, September 30, 2020 1:35 PM

To: Peter Ciferri <PCiferri@mcmillanmetro.com>

Cc: Clerk of the Council <ClerkoftheCouncil@co.pg.md.us>; Brown, Donna J.

<djbrown@co.pg.md.us>; Moses, Leonard D. <LDMoses@co.pg.md.us>; Margaret Burke

<MBurke@mcmillanmetro.com>

Subject: Case Information - DSP-19050 and DSP-19050/01 | Appeal of 6525 Belcrest Road, LLC re

CAUTION: This email originated from outside of the firm. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon Mr. Ciferri,

Thank you for contacting the Office of the Clerk of the Council. Per your request below, the Persons of Record list is attached and in accordance with the hearing notice, case information for hearings can be found online on the Council's Legislative/Zoning Information System (LZIS) at www.pgccouncil.us/LZIS. Below is a direct link to the case information for DSP-19050 and DSP-19050-01 Dewey Property on LZIS where attachments can be found; however, please note that the PDF files can be large, so it may take several minutes to download the PDF files (which may include bookmarks to specific items).

DSP-19050 Dewey Property – Direct LZIS link:

<https://princegeorgescountymd.legistar.com/LegislationDetail.aspx?ID=4613641&GUID=29C9E1F8-DE83-4C5D-9FDD-96B2624C0183&Options=Advanced&Search=>

DSP-19050-01 Dewey Property – Direct LZIS link:

<https://princegeorgescountymd.legistar.com/LegislationDetail.aspx?ID=4613606&GUID=365E2D16->

[C4A6-4D3C-9C99-DD195DA7AEF3&Options=Advanced&Search=](#)

In addition, a courtesy quick list of case links for upcoming hearings can also be found at <https://pgccouncil.us/312/District-Council>. Please contact the Office of the Clerk if you have any difficulty accessing or locating any file information.

Have a great day.



Donna J. Brown, Clerk of the Council

O: 301-952-3528 F: 301-952-5178 E: djbrown@co.pg.md.us Telework: 240-351-9777

October 2, 2020

VIA E-MAIL AND FIRST-CLASS MAIL

Prince George's County Council
C/O Donna J. Brown, Clerk of the Council
14741 Governor Oden Bowie Drive
Upper Marlboro, MD 20772
(djbrown@co.pg.md.us)
(ClerkoftheCouncil@co.pg.md.us)

Peter E. Ciferri

Direct: 240-778-2307
pciferri@mcmillanmetro.com

Maryland Bar
District of Columbia Bar

Re: Appeal of 6525 Belcrest Road, LLC ("Appellant")
Planning Board Files: DSP-19050 & and DSP-19050/01
Planning Board Resolution Numbers 2020-125 and 2020-127

**MOTION TO CORRECT ADMINISTRATIVE RECORD
OR, IN THE ALTERNATIVE, REQUEST FOR REMAND**

Dear Chairman Turner and members of the County Council:

This Motion is made by the Appellant, 6525 Belcrest Road, LLC, upon review of the Administrative Record as published on the District Council's Legislative/Zoning Information System (LZIS) (www.pgccouncil.us/LZIS).

On an Appeal of a Planning Board decision, County law requires: "[T]he Planning Board shall transmit to the District Council a copy of the Detailed Site Plan, **all written evidence and materials submitted for consideration by the Planning Board**, a transcript of the public hearing on the Plan, **and any additional information or explanatory material deemed appropriate.**" *See* Section 27-290(b) (emphases supplied).

The Planning Board has the obligation to consider a complete record before rendering a decision and then to prepare and transmit that same complete and correct record to the District Council on an appeal. In this matter, the Administrative Record published on LZIS is incomplete. Specifically, the Planning Board omitted from the record each of the five written submissions made by the Appellant, each of which present exhibits and legal argument prior to the Planning Board's July 16 hearing.



Instead, the Planning Board submitted a partial copy of the Appellant's materials that is largely disorganized, mostly out of sequence, and sometimes associated with incorrect exhibit numbers.¹ None of the letters submitted with this evidence are included.

On a record appeal, the reviewing body cannot undertake meaningful review of the decisions and allegations of error absent a complete record. *See Assateague Coastkeeper v. MDE*, 200 Md. App. 665, 703 n. 25 (2011); *Holt v. State*, 192 Md. App. 194, 211 (1999). For the purposes of administrative review of an agency decision, the record consists of the entire administrative record including all transcripts, documents, information, and materials that were before the final decision maker at the time of its ruling. *Mehrling v. Nationwide Ins. Co.*, 371 Md. 40, 60 (2002). The Planning Board is the party responsible under County law for both considering the record before it before rendering a final decision, and then compiling and transmitting the entire record to the District Council.

What is most troubling is that the incomplete record issue was raised by the Appellant prior to the July 16 hearing in response to Planning Staff's request that the parties inspect the record prior to the hearing; and further objected to by the Appellant at the July 16 hearing.² Copies of these communications and the applicable portion of the hearing transcript are attached and summarized below:

- On July 15 at 9:35 AM, Appellant's counsel wrote Planning Staff: "For the avoidance of doubt, please include all memoranda and exhibits submitted by 6525 Belcrest Road, LLC, into the record for both applications."
- On July 15 at 12:13 PM, Planning Staff wrote Appellant's counsel: "All additional backup should be uploaded this afternoon please let us know if we overlooked anything."
- On July 15 at 6:23 PM, Appellant's counsel advised: "I just reviewed the 816 page ... document posted on the agenda and it does not include any of the legal memoranda I submitted in this case: March 31, April 15, May 28, July 10. It also does not appear that all of the exhibits are included, specifically it appears that Exhibits 1-3 are not included, though it is hard to tell because many of them are disorganized. Please include the additional materials that we submitted in this matter and please confirm inclusion."
- On July 15 at 6:28 PM, Appellant's counsel provided an additional copy of each of the missing materials.
- On July 16 at 11:33 AM, after the Planning Board had already commenced its agenda, Planning Staff wrote counsel: "**These items are part of record, but were not included for the Planning Board consideration.** You may state your issues for the record. I am sorry for the issue." (Emphasis supplied).

¹ Appellant's Exhibits appear beginning in the document labeled at "DSP-19050-01_Additional Backup" beginning at Page 146 and in the document labeled "DSP-19050 Technical Staff Report" beginning at Page 584.

² See also, Aug. 27, 2020, appeal memorandum at pp. 3-4, fn. 1.

At the hearing, Appellant's counsel raised this issue before Appellant's presentation:

- "...I don't think you have the entire record in front of you..." (Tr. 50:17-18)
- "[W]e submitted letters on March 31st, April 8th, May 28th, July 10th and July 15th and I believe those have now been put before you but the e-mail I got at 11:30 this morning from staff is that these items are part of the record but they were not included for Planning Board consideration." Tr. 50:22-25 – 51:1-2.
- **"[M]y concern is that you may not have had a complete record before you in advance of the hearing in order to understand and appreciate the sorts of arguments that we're going to make today on something that's relatively complex and unique. And what I don't want is for there to be an issue where you're making determinations without having the opportunity to consider a full and complete record, which really is the foundation of determining the sorts of legal issues that were raised here. So I'm pointing that out for the record, I do object to proceeding without your having an opportunity to consider our memorandum in advance of the hearing and so I'd just note that objection for the record."** Tr. 51:4-16. (Emphases supplied).

The Planning Board's Principal Counsel responded: "Actually all those letters have been reviewed by the Board because they were all directed to the Board, addressed to the Board on those ... different dates, because they related to those earlier hearings ... and when those hearings didn't get heard, they moved forward. So they have been all seen by the Board members and they are being included in this record. So I don't see the objection." Tr. 52:9-20.

Appellant's counsel responded: "Well they weren't included in the case file that was published yesterday and that's the basis for the objection." Tr. 52:21-22.

The Planning Board Principal Counsel's protestations, coupled with the Planning Staff's honest acknowledgement that the materials were omitted and not considered by the Planning Board, underscores the seriousness of these material omissions. The Administrative Record before the District Council is substantively deficient. Those same materials were apparently never considered by the Planning Board, either.

Under County law, the burden is on the Planning Board to consider a complete record before making a decision and to transmit it to the District Council on appeal. Neither of those things apparently occurred in this case. In order for the Planning Board to sufficiently demonstrate its compliance with its own rules, Appellant demands that the Board both:

1. Transmit a complete Administrative Record to the District Council; and
2. Provide any written communications and "additional information or explanatory material" appropriate to substantiate Board Counsel's claims that the letters were provided to the Board members in advance of the hearing and considered as part of the Administrative Record.

Donna J. Brown, Clerk of the Council
Prince George's County Council
October 2, 2020
Page 4 of 4

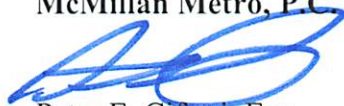
The District Council cannot undertake meaningful review without the record. As this hearing is quickly approaching, once the Planning Board transmits a complete record and explanation, we ask that the District Council rule on a motion to postpone the hearing in order to give the Council sufficient time to review the complete record and the additional materials.

If the Planning Board cannot transmit a complete record, along with evidence to support Counsel's contention that the Planning Board had an opportunity to review and consider the record prior to its hearing, then this matter should be remanded to the Planning Board as a matter of law.

Thank you for your consideration.

Respectfully submitted,

McMillan Metro, P.C.

A handwritten signature in blue ink, appearing to read 'Peter E. Ciferri', is written over the printed name.

Peter E. Ciferri, Esq.
Counsel for the Appellant

Enclosures (As noted)

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of October, 2020, a copy of the foregoing correspondence was sent by first-class mail, postage prepaid, to the Clerk of the County Council, and to all parties of record, *to wit*:

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Peter E. Ciferri, Esq.

1 THE PRINCE GEORGE'S COUNTY PLANNING BOARD OF
2 THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

3
4
5 DEWEY PROPERTY

6 Detailed Site Plans, DSP-19050 and DSP-19050-1
7 Departure from Design Standards, DDS-660

8
9 T R A N S C R I P T

10 O F

11 P R O C E E D I N G S

12
13 COUNTY ADMINISTRATION BUILDING

14 Upper Marlboro, Maryland

15 July 16, 2020

16
17 VOLUME 1 of 1

18
19 BEFORE:

20 ELIZABETH M. HEWLETT, Chair

21 DOROTHY F. BAILEY, Vice-Chair

22 MANUEL R. GERALDO, Commissioner

23 WILLIAM M. DOERNER, Commissioner (Absent)

24 A. SHUANISE WASHINGTON, Commissioner

25
Deposition Services, Inc.

12321 Middlebrook Road, Suite 210

Germantown, MD 20874

Tel: (301) 881-3344 Fax: (301) 881-3338

info@DepositionServices.com www.DepositionServices.com

OTHERS PRESENT:

JEREMY HURLBUTT, Staff, Urban Design Section

DAVID WARNER, Principal Counsel

KENNY FLANAGAN, Staff

TOM MASOG, Staff, Transportation Section

BEN RYAN, Staff, Transportation Section

HELEN ASAN, Staff, Parks and Recreation Department

THOMAS HALLER, Attorney for Applicant

C O N T E N T S

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Scott Decain	93
Matthew Tedesco	99
Brandon Gurney	100

1 MR. HALLER: Madam Chair, I have Pepco guidelines
2 but I did not include them with the application. What they
3 say is that they want the transformers above ground unless
4 the local jurisdiction, unless it's not possible or unless
5 the local jurisdiction prohibits them being above ground.

6 MADAM CHAIR: Okay. Thank you. Okay. Okay. So
7 let's see, Kate Powers, were you finished?

8 MS. POWERS: Yes, to speaking about the
9 transformers, just quickly an addition.

10 MADAM CHAIR: Okay.

11 MS. POWERS: As always, public art is very
12 important to you know the culture and community of
13 Hyattsville so the City Council would like to see the
14 integration of public art into the project and we're
15 appreciative that this request is reflected in staff's
16 recommendations.

17 And lastly, the City supports the applicant's
18 request for a departure from design standards for the 9 foot
19 by 18 foot universal sized parking spaces that are proposed
20 within the parking garage structure on Parcel 5.

21 Thank you, that concludes my comments.

22 MADAM CHAIR: Thank you. And the applicant would
23 love to incorporate your request for public art right around
24 the transformers, I see. Okay. So are there any questions
25 of Ms. Powers from Hyattsville? Madam Vice Chair?

1 MADAM VICE CHAIR: No questions.

2 MADAM CHAIR: Commissioner Washington?

3 COMMISSIONER WASHINGTON: No questions.

4 MADAM CHAIR: Commissioner Geraldo?

5 COMMISSIONER WASHINGTON: You're muted.

6 COMMISSIONER GERALDO: No questions.

7 MADAM CHAIR: Thank you. Okay. So I'm going to
8 now go to Peter Ciferri.

9 MR. CIFERRI: Good afternoon, Madam Chair and
10 Board, this is Peter Ciferri --

11 MADAM CHAIR: Good afternoon.

12 MR. CIFERRI: -- and I'm with McMillian Metro Law
13 Firm. I represent the adjacent property owner 6525 Belcrest
14 Road LLC, the owner of Metro Three, and I do thank you for
15 the opportunity to be heard today. I know it's getting late
16 in the day and I appreciate your indulgence.

17 I do need to start out with something that I think
18 you're going to be shocked to hear this, but I don't think
19 you have the entire record in front of you, as crazy as that
20 may sound.

21 MADAM CHAIR: Okay.

22 MR. CIFERRI: And what I'm referring to is we
23 submitted letters on March 31st, April 8th, May 28th, July
24 10th and July 15th and I believe those have now been put
25 before you but the e-mail I got at 11:30 this morning from

1 staff is that these items are part of the record but they
2 were not included for Planning Board consideration. You may
3 state your issues for the record, I'm sorry for the issue.
4 And you know my concern is that you may not have had a
5 complete record before you in advance of the hearing in
6 order to understand and appreciate the sorts of arguments
7 that we're going to make today on something that's
8 relatively complex and unique.

9 And what I don't want is for there to be an issue
10 where you're making determinations without having the
11 opportunity to consider a full and complete record, which
12 really is the foundation of determining the sorts of legal
13 issues that were raised here. So I'm pointing that out for
14 the record, I do object to proceeding without your having an
15 opportunity to consider our memorandum in advance of the
16 hearing and so I'd just note that objection for the record.
17 Now --

18 MADAM CHAIR: Okay. So before you do that, we can
19 note your objection for the record and I am going to turn to
20 our counsel, I'm presuming our counsel is aware of this, Mr.
21 Warner, and I don't know what your letters are going to say.
22 If they're addressing the issue of the lease versus the
23 ownership --

24 UNIDENTIFIED SPEAKER: (Indiscernible).

25 MADAM CHAIR: Excuse me?

1 UNIDENTIFIED SPEAKER: He sent it late last night.

2 MADAM CHAIR: Okay.

3 UNIDENTIFIED SPEAKER: Like it was after the
4 cutoff.

5 MADAM CHAIR: But they were letters from March.

6 COMMISSIONER GERALDO: Yes.

7 UNIDENTIFIED SPEAKER: Oh, okay.

8 MADAM CHAIR: That's what.

9 MR. WARNER: Madam Chair, David Warner, Principal
10 Counsel. Actually all those letters have been reviewed by
11 the Board because they were all directed to the Board,
12 addressed to the Board on those --

13 MADAM CHAIR: Okay.

14 MR. WARNER: -- different dates, because they
15 related to those earlier hearings --

16 MADAM CHAIR: But this case --

17 MR. WARNER: -- and when those hearings didn't get
18 heard, they moved forward. So they have been all seen by
19 the Board members and they are being included in this
20 record. So I don't see the objection.

21 MR. CIFERRI: Well they weren't included in the
22 case file that was published yesterday and that's the basis
23 for the objection. I know it might be getting into the
24 technical weeds, but I want to be sure that there was an
25 opportunity and if that's the case, then there was an

1 opportunity.

2 MADAM CHAIR: Okay.

3 MR. CIFERRI: But I do just need to state that for
4 the record.

5 MADAM CHAIR: Okay. Thank you.

6 MR. CIFERRI: So moving to the substance here,
7 there is a fundamental question before the Board as to
8 whether it can consider an application --

9 UNIDENTIFIED SPEAKER: (Indiscernible).

10 MR. CIFERRI: -- on one property owner that has
11 the effect of eliminating a use --

12 UNIDENTIFIED SPEAKER: What did he say?

13 MR. CIFERRI: -- for a different property.

14 MADAM CHAIR: Okay. Too many people are talking,
15 can others --

16 UNIDENTIFIED SPEAKER: (Indiscernible).

17 MADAM CHAIR: -- let's mute everyone else. Okay.
18 Mr. Ciferri, you can continue, thank you.

19 MR. CIFERRI: Okay. Am I unmuted now?

20 MADAM CHAIR: Yes.

21 MR. CIFERRI: Okay. So the issue here is that you
22 have an application being submitted by one property owner
23 that has the effect of eliminating the use rights of a
24 different property owner. Metro Three is the beneficiary of
25 the use right that was established by valid entitlement

1 approvals obtained jointly by both the owner of the Dewey
2 parking parcel and the owner of the Metro Three building.
3 That right of use gives Metro Three's owner an equitable
4 interest use of the parking lot. Today, the applicant only
5 controls the parking lot and Belcrest Road LLC owns the
6 building.

7 Metro Three's right of use to the parking parcel
8 has always been vested in those original approvals. And the
9 applicant really has no right to proceed with a plan to
10 eliminate the building's parking approvals without both
11 owners participating as co-applicants in an application that
12 meets the interest of both properties.

13 MADAM CHAIR: So I'm going to stop you
14 periodically, if I have questions. So but you don't have an
15 ownership interest in the parking lot, you have a lease
16 agreement --

17 MR. CIFERRI: We have --

18 MADAM CHAIR: -- and I want to get back to what
19 Mr. Haller said earlier about relocating the parking.

20 UNIDENTIFIED SPEAKER: Ownership interest in the
21 property.

22 MADAM CHAIR: Excuse me? Right. Right.

23 UNIDENTIFIED SPEAKER: That's not the parking --

24 MADAM CHAIR: An ownership interest in, right, you
25 don't have ownership interest in the property. I'm trying

Peter Ciferri

From: Hurlbutt, Jeremy <Jeremy.Hurlbutt@ppd.mncppc.org>
Sent: Thursday, July 16, 2020 11:33 AM
To: Peter Ciferri
Cc: Kosack, Jill
Subject: RE: DSP 19050; 19050-01; DDS 660 Administrative Record

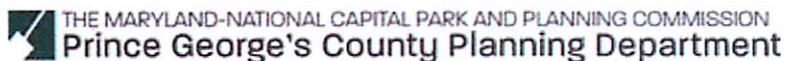
Peter:

These items are part of record, but were not included for the Planning Board consideration. You may state your issues for the record. I am sorry for the issue.

Sincerely,

Jeremy Hurlbutt

Master Planner | Urban Design Division



14741 Governor Oden Bowie Drive, Upper Marlboro, MD 20772
301-952-4277 | jeremy.hurlbutt@ppd.mncppc.org



From: Peter Ciferri <PCiferri@mcmillanmetro.com>
Sent: Wednesday, July 15, 2020 6:28 PM
To: Hurlbutt, Jeremy <Jeremy.Hurlbutt@ppd.mncppc.org>; PGCPB <PGCPB@MNCPPC.ORG>
Subject: RE: DSP 19050; 19050-01; DDS 660 Administrative Record

Attached are the applicable letters which have already been submitted in this matter. Please include them in the record together with the exhibits. Thank you,

Peter E. Ciferri, Esquire

pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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From: Peter Ciferri
Sent: Wednesday, July 15, 2020 6:23 PM
To: 'Hurlbutt, Jeremy' <Jeremy.Hurlbutt@ppd.mncppc.org>; 'PGCPB' <PGCPB@MNCPPC.ORG>
Subject: RE: DSP 19050; 19050-01; DDS 660 Administrative Record
Importance: High

Good evening Jeremy:

I just reviewed the 816 page "[DSP-19050 & DDS-660_Additional Material_07152020](#)" document posted on the agenda and it does not include any of the legal memoranda I submitted in this case: March 31, April 15, May 28, July 10. It also does not appear that all of the exhibits are included, specifically it appears that Exhibits 1-3 are not included, though it is hard to tell because many of them are disorganized.

Please include the additional materials that we submitted in this matter and please confirm inclusion.

Thank you,

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pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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 Please consider the environment before printing this email.

From: Peter Ciferri
Sent: Wednesday, July 15, 2020 9:35 AM
To: 'Hurlbutt, Jeremy' <Jeremy.Hurlbutt@ppd.mncppc.org>; PGCPB <PGCPB@MNCPPC.ORG>
Subject: DSP 19050; 19050-01; DDS 660 Administrative Record

Good morning Jeremy:

I see that DSP 19050 and DSP 19050-01 are not listed as companion cases on the Planning Board's agenda, as of last evening. For the avoidance of doubt, please include all memoranda and exhibits submitted by 6525 Belcrest Road, LLC, into the record for both applications. The legal issues raised are applicable to both.

Thank you,

Peter E. Ciferri, Esquire

pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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Peter Ciferri

From: Peter Ciferri
Sent: Wednesday, July 15, 2020 6:28 PM
To: 'Hurlbutt, Jeremy'; 'PGCPB'
Subject: RE: DSP 19050; 19050-01; DDS 660 Administrative Record
Attachments: 32J4840-Objection Statement.PDF; 32K4537-Response to Staff Report.PDF; 32X3690-PEC to Planning Board.PDF; 32W8013-Planning Board Reply 7-10-20.PDF; 32Q7295-SDRC Letter 5-28.PDF

Attached are the applicable letters which have already been submitted in this matter. Please include them in the record together with the exhibits. Thank you,

Peter E. Ciferri, Esquire
pciferri@mcmillanmetro.com

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From: Peter Ciferri
Sent: Wednesday, July 15, 2020 6:23 PM
To: 'Hurlbutt, Jeremy' <Jeremy.Hurlbutt@ppd.mncppc.org>; 'PGCPB' <PGCPB@MNCPPC.ORG>
Subject: RE: DSP 19050; 19050-01; DDS 660 Administrative Record
Importance: High

Good evening Jeremy:

I just reviewed the 816 page "[DSP-19050 & DDS-660_Additional Material_07152020](#)" document posted on the agenda and it does not include any of the legal memoranda I submitted in this case: March 31, April 15, May 28, July 10. It also does not appear that all of the exhibits are included, specifically it appears that Exhibits 1-3 are not included, though it is hard to tell because many of them are disorganized.

Please include the additional materials that we submitted in this matter and please confirm inclusion.

Thank you,

Peter E. Ciferri, Esquire
pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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From: Peter Ciferri
Sent: Wednesday, July 15, 2020 9:35 AM
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Subject: DSP 19050; 19050-01; DDS 660 Administrative Record

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Thank you,

Peter E. Ciferri, Esquire
pciferri@mcmillanmetro.com

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Peter Ciferri

From: Peter Ciferri
Sent: Wednesday, July 15, 2020 12:14 PM
To: 'Hurlbutt, Jeremy'
Subject: RE: Dewey

Jeremy: Thanks for reaching out. Would a call be easier? I am available, otherwise I can email a response. Thanks,

Peter E. Ciferri, Esquire
pciferri@mcmillanmetro.com

McMillan Metro, P.C.

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From: Hurlbutt, Jeremy <Jeremy.Hurlbutt@ppd.mncppc.org>
Sent: Wednesday, July 15, 2020 12:13 PM
To: Peter Ciferri <PCiferri@mcmillanmetro.com>
Subject: Dewey

Peter:

I just wanted to touch base and make sure I can summarize your concerns and what you are expecting to happen tomorrow?

I understand that you believe your parking agreement and past development approvals give you the right to maintain the surface parking on the dewey property and that it is need for your property. I am sure you can say it better but I need a summary for my supervisor.

Also, do you plan to speak and use your powerpoint and if so how long to think that will take?

All additional backup should be upload this afternoon please let us know if we overlooked anything.

Thank you,

Jeremy Hurlbutt

Master Planner | Urban Design Division

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
Prince George's County Planning Department

14741 Governor Oden Bowie Drive, Upper Marlboro, MD 20772
301-952-4277 | jeremy.hurlbutt@ppd.mncppc.org

