



BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA



FORM 140 - PARTY STATUS REQUEST

Before completing this form, please review the instructions on the reverse side.
Print or type all information unless otherwise indicated. All information must be completely filled out.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.
(Please see reverse side for more information about this distinction.)

Pursuant to 11 DCMR §§ 3022.3 or 3106.2, a request is hereby made, the details of which are as follows:

Name:	Citizens Association of Georgetown		
Address:	1365 Wisconsin Avenue, N.W., Suite #200, Washington, D.C. 20007		
Phone No(s):	202-337-7313	E Mail:	www.cagtown.org
I hereby request to appear and participate as a party in Case No.:		BZA 19056	
Signature:		Date:	September 2, 2015
Will you appear as a(n)	☐ Proponent ☒ Opponent	Will you appear through legal counsel?	☒ Yes ☐ No

If yes, please enter the name and address of such legal counsel.

Name:	Richard Hinds		
Address:	2000 Pennsylvania Avenue, N.W., Washington, DC 20006		
Phone No(s):	202-974-1540	E Mail:	rhinds@cgsh.com

PARTY WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the party's behalf;
2. A summary of the testimony of each witness (*Zoning Commission only*);
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts (*Zoning Commission only*); and
4. The total amount of time being requested to present your case (*Zoning Commission only*).

PARTY STATUS CRITERIA:

Please answer all of the following questions referencing why the above entity should be granted party status:

1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.)
4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.
6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.

Board of Zoning Adjustment
District of Columbia
CASE NO. 19056
Form 140-19056

PARTY WITNESSES INFORMATION:

Robert P. vom Eigen, President

Citizens Association of Georgetown

One or more of the neighbors listed below.

PARTY STATUS CRITERIA:

- 1. How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission/Board?**

The requested variances would result in a loss of open space, excessive density and harm to an historic site in Georgetown. It would permit the subdivision of one lot into two which is inconsistent with the purposes of R-3 single family zoning in Georgetown. The failure to provide parking would have a negative impact on the neighbors of this property who rely on on- street parking.

- 2. What legal interest does the person have in the property? (i.e., owner, tenant, trustee, or mortgagee)**

None.

- 3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board?**

The Citizens Associate of Georgetown (CAG) is a non-profit organization dedicated to historic preservation in Georgetown. It has over 1,200 resident members, several of whom live in close proximity to the property who join CAG in opposing the proposed subdivision. The following residents all of whom live within 200 feet of the property at 3324 Dent Place, NW have authorized CAG to represent them in this proceeding:

- Harriet R. Swankin, 3332 Dent Place, NW
- Aline Hommes, 3305 dent Place, NW
- Patty Ivey, 3318 Dent Place, NW
- Patricia Murphy, 3320 Dent Place, NW
- Terence Bell, 3308 Dent Place, NW

- 4. What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission/Board is approved or denied?**

There would be a loss of green space which previously existed on this site which was previously owned by Yarrow Mamout ((b. circa 1736 - d. 1824), an important person in the history of Georgetown. He came to Georgetown as a slave, was freed 1796, four years later he purchased a house on this lot and became a well known successful entrepreneur in Georgetown . His picture hangs in the Georgetown Library. Preserving existing green space in Georgetown is vital to preserving the historic streetscape of the National Register listed Georgetown Historic District and to preserving the historic setting of this site.

The subdivision of this lot into two substandard lots and building attached narrow attached row houses on those lots lacking the required lot width and parking would have an adverse impact on not only the immediate neighbors but also the integrity of R-3 zoning restrictions throughout Georgetown. It would obliterate a site important to the history of Georgetown and the District of Columbia. The site has historically contained a small detached frame house. Given its history and the importance of maintaining existing green space in Georgetown the site is not appropriate for the intensive development proposed by the applicant.

- 5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.**

The substantial increase in density on this property without providing any parking will have a negative impact on neighboring property. Most historic houses in this area lack on-site parking and adding two houses without parking-which is required for new houses-would have an adverse impact on the availability of scarce street parking places in this neighborhood.

- 6. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.**

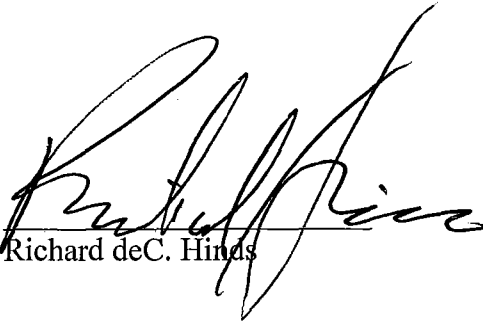
The site of the Yarrow Mamout home is an important to the history of the historic district of Georgetown. Eliminating all side yards would change significantly the historic streetscape of this street and have a significant negative impact on an important historic site in Georgetown. The subdivision of this lot into two substandard lots lacking the required lot width could have adverse impacts throughout Georgetown as it would create a precedent for the elimination of green space and over-development inconsistent with its historic streetscape. The members of the Citizens Association of Georgetown, all of whom

are residents of Georgetown, would be significantly, distinctively and uniquely affected by the proposed zoning action because of the loss of an historic site important to the history of Georgetown. The immediate neighbors of this property also would be adversely affected by the loss of green space historically provided on this site and by the failure to provide parking for the proposed houses

CERTIFICATE OF SERVICE

I certify that copies of the attached document were sent, postage prepaid by
Federal Express or first class mail, on the 2nd day of September, 2015, to the following:

Kinley R. Bray
1912 Sunderland Place, N.W.
Washington, DC 20036



Richard deC. Hinds