



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

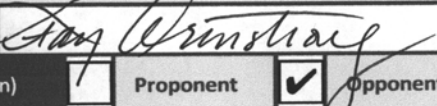


FORM 140 - PARTY STATUS REQUEST

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:	Fay Armstrong, President, Historic Mount Pleasant			
Address:	1731 Lamont Street, NW, Washington, DC 20010			
Phone No(s):	202-387-2734	E Mail:	farmstrong6@comcast.net	
I hereby request to appear and participate as a party in Case No.:		19256		
Signature:			Date:	April 22, 2016
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:			
Address:			
Phone No(s):		E Mail:	

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.

RECEIVED
DISTRICT OF COLUMBIA
OFFICE OF ZONING
APR 22 AM 10:11
CASE NO.19256
EXHIBIT NO.26



April 22, 2016

Marnique Y. Heath, Chairperson
The District of Columbia
Board of Zoning Adjustment
441 4th Street NW, Suite 200
Washington, DC 20001

RECEIVED
D.C. OFFICE OF ZONING
2016 APR 22 AM 10:14

Re: Application No. 19256/Appeal of Kerry Reichs/1716 Hobart Street NW
Request for Party Status of Historic Mount Pleasant, Inc.

Dear Ms. Heath:

Historic Mount Pleasant, Inc., (HMP) hereby requests party status in the above-referenced case based on the following answers to questions posed in Form 140. We do not intend to call any witnesses.

Question 1: HMP is a nonprofit organization formed in 1985 to preserve and protect the historic character of our neighborhood, designated a historic district in 1986. A variance is requested to enable what would be the first freestanding rooftop addition in the historic district on a property that already occupies 74% of its lot. Approval would undoubtedly encourage more such projects, as well as requests for other kinds of area variances, adding to the already significant development pressure now threatening the character of the historic district.

Question 2: HMP has no legal interest in any real property in the neighborhood. Our principal function is to review proposed alterations to existing buildings to ensure that changes are compatible with the character of the historic district. We also testify regularly before the DC Council on preservation-related issues and represented the neighborhood before the Zoning Commission in Cases 08-06A and 14-11.

Question 3: HMP members reside, own property or own businesses in Mount Pleasant. Some reside within the 200-foot radius of 1716 Hobart. However, all residents of Mount Pleasant would be negatively affected by a favorable ruling on the application presented in this case.

Question 4: Approval of a variance in this case would set a bad precedent for the neighborhood. The applicant has in no way demonstrated a unique exceptional condition that warrants such relief. If the relief sought were granted, similarly situated properties would expect similar treatment. Any number of possible projects could be anticipated – from other rooftop additions in close quarters, even larger rear additions than have already been approved, to requests for

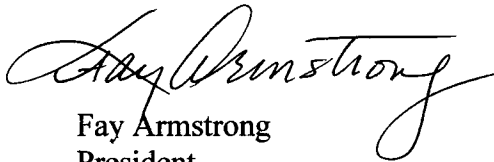
relief from the 900 square foot rule when converting single family homes to apartment houses of 3 or more units. In short, a variance in this case would open another path for approval of projects to increase density in ways that would be incompatible with the single family character of our original houses.

Question 5: N/A

Question 6: As a result of several very large and controversial projects in Mount Pleasant, HMP has expended considerable effort over the last two and one-half years learning about zoning and informing others in the neighborhood. Our petition to the Zoning Commission in Case 14-11 had more than 500 signatures. It asked that conversions be limited to two units, with any over that subject to approval only as variances. The underlying premise was that a variance – as opposed to a special exception – was truly exceptional relief granted only upon meeting a serious three-part needs test. HMP is continuing to argue for that outcome on conversions. If instead variances were to be as readily granted as is suggested by the current application, they would provide no real protection for neighborhoods or the zone plan itself.

The Board's favorable consideration of this application would be appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fay Armstrong".

Fay Armstrong
President

Attachment: Form 140