

Re: **The Boundary Companies and The Missionary Society BZA Case No. 19377**

To the Board of Zoning Adjustment:

We, the **undersigned homeowner(s) of Chancellor's Row**, an established townhome community situated directly adjacent to 5 acres of undeveloped property owned by the Missionary Society of St. Paul the Apostle, a.k.a. "Paulist Fathers," **strongly oppose** the Application for Variance/Special Exception (**No. 19377**) under which the Applicant Seller (Paulist Fathers) and Developer (Boundary Companies) intend to erect 60 townhomes plus a 20,000 s.f. communal residence upon said undeveloped property.

- Chancellor's Row homeowners will be *directly and substantially* impacted to our lasting detriment by the proposed development.
- The DC Zoning Commission has already recognized the *Chancellor's Row* townhome community as "very dense" and "very sardine like." PUD Application, Case No. 07-27; 11/19/07 transcript, pp.83-86.
- In order to offset the proposed density of the Chancellor's Row development, the Applicant (Paulist Fathers and EYA, LLC) repeatedly represented to the Zoning Commission that the Seller's remaining 5 acres of green space facing 4th Street *would be preserved from further development*. Case No. 07-27; 7/17/08 transcript, pp. 24, 29, 32, 116.
- City agencies, including the Zoning Commission, approved of the Chancellor's Row development based on the representations made by the Applicant. *See, e.g.*, DC Department of Housing and Community Development Memorandum (July 8, 2008): "DHCD offers the following reasons for support of the application *based upon the specific information presented in the application*: ... The park-like St. Paul's Campus will be retained for the portion of the site *fronting on and facing 4th Street NE*" (emphases added).
- If the BZA were to approve the current Application No. 19377, permitting another "sardine like" development on land that the Applicant *specifically* represented to the Zoning Commission as remaining off limits to further development, the residents of Chancellor's Row would be irreparably harmed by such a result.
- The predictable outcome of the proposed development will be the compounding of vehicular congestion, a paucity of street parking, the extinction of natural landscape and felling of mature trees, infringement of easements, and complete obliteration of the "park-like campus" that is core to the identity of Chancellor's Row. This was *not* the picture presented to the Zoning Commission when the Applicant sought and received approval for Chancellor's Row; quite the opposite.
- Our decision, as prospective Chancellor's Row home buyers, to invest and set roots in this community was substantially informed by the bucolic vista upon which the otherwise densely packed neighborhood was settled. That we expected this open space belonging to the Paulist Fathers to remain undeveloped was entirely reasonable and justified, given their publicly voiced representations to the Zoning Commission.
- In sum, we, the undersigned homeowner(s) of Chancellor's Row, oppose the Application for Variance No. 19377 (1) because of the predictable and detrimental effects it would have on our already highly compact community, (2) because our neighborhood was approved for such highly compact development *premised on* the preservation of the adjoining undeveloped land, and (3) because it would be unjust for the Applicant to profit from the sale and development of that land, given the profit it has already reaped from the Chancellor's Row development based on its hollow representations.

Kelly Boyer

Name: Kelly Boyer

Mailing Address: 526 Regent Place NE, Washington, DC 20017

Telephone Number: 218-831-4818

Email Address: kel_C_B@yahoo.com

Date: 3/12/18

Board of Zoning Adjustment
District of Columbia
CASE NO.19377
EXHIBIT NO.78