

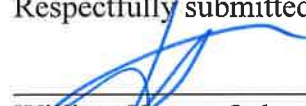
**AFFIDAVIT OF SERVICE**

I, William von Oehsen, hereby state:

On October 11, 2017, I served the attached Party Status Request, on Applicant Max Salas and the Advisory Neighborhood Commission 2B04 in connection with Board of Zoning Adjustment Case N. 19602. The Party Status Request was served by electronic mail in accordance with Title 11, Subtitle Y, Chapter 205.3 of the D.C. Board of Zoning Adjustment Rules.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,



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William H. von Oehsen  
1612 Riggs Place, NW  
Washington, DC 20009

Dated: October 11, 2017



**FORM 140 - PARTY STATUS REQUEST**

Before completing this form, please go to [www.dcoz.dc.gov](http://www.dcoz.dc.gov) > IZIS > Participating in an Existing Case > Party Status Request for Instructions. 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.**

Pursuant to 11 DCMR Subtitle Y § 404.1 or Subtitle Z § 404.1, a request is hereby made, the details of which are as follows:

Name:	William H. von Ohlson		
Address:	1612 Riggs Place, NW, Washington, DC 20009		
Phone No(s)::	301-928-7987	E-Mail:	VONO58@MSN.COM

I hereby request to appear and participate as a party in Case No.: 19802

Signature:		Date:	10/9/17
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Will you appear as a(n)	<input type="checkbox"/> Proponent	<input checked="" type="checkbox"/> Opponent	Will you appear through legal counsel?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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If yes, please enter the name and address of such legal counsel.

Name:			
Address:			
Phone No(s)::		E-Mail:	

**ADVANCED PARTY STATUS CONSIDERATION PURSUANT TO: Subtitle Y § 404.3/Subtitle Z § 404.3:**

I hereby request advance Party Status consideration at the public meetings scheduled for:

**PARTY WITNESS INFORMATION:**

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

- A list of witnesses who will testify on the party's behalf;
- A summary of the testimony of each witness;
- 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; and
- The total amount of time being requested to present your case.

**PARTY STATUS CRITERIA:**

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

- 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? *See attached Statement of Opposition*
- What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee) *Owner of 1612 Riggs Place*
- 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.) *0 ft., adjoining property*
- 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? *See attached Statement of Opposition*
- 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. *See attached Statement of Opposition*
- 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. *See attached State of Opposition*

**WITNESS INFORMATION**

<b>Name</b>	<b>Address</b>	<b>Testimony</b>	<b>Expert Witness?</b>	<b>Time Requested</b>
Dean Storer	1616 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Lamar Whitman	1616 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Richard Little	1618 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
David Gilchrist	1620 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Michael Ormonde	1620 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Nicholas Delledonne	1622 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Daniel Adler	1628 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Barbara Donaldson	1628 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Scott Allen	1632 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Joe Bilancio	1634 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes
Reid Dudley	1634 Riggs Place	Opposition to Zoning Variance Application	No	2 minutes

**STATEMENT OF OBJECTION  
to Proposed Exterior Staircase at 1610 Riggs Place, NW**

We reside fulltime at 1612 Riggs Place which is immediately adjacent to the applicant's property. 1610 Riggs Place abuts the east side of our property. We are writing to express our strong objection to the proposed exterior staircase and to ask the Zoning Planning and Development Committee to join us in recommending to the ANC that it oppose construction of the staircase.

We have a patio behind our house that we use all the time for dining, entertaining and growing a garden. It is at ground level. Except for a narrow stretch of alleyway, the entire rear area of the 1610 Riggs is above ground level. There is literally no back yard because it has been filled in with (1) a three story rear addition, (2) a garage, (3) an apartment unit connecting the house and garage and (4) a fenced-in roof deck over both the garage and connecting apartment. As a result, our patio sits well below the outdoor living space at 1610, giving it a feeling of being in a hole, deprived of light, air and privacy. We do not have this problem with any of our neighbors on the west side of the property. In contrast to 1610, their back yards are all at ground level.

Construction of the proposed staircase would exacerbate the above problem. We are especially concerned about the loss of privacy and feeling even more boxed in by having the stairwell only inches away from our property line and looming three stories above our patio. Our view is that, since the structure at 1610 is larger than any other townhouse on the block, there should be ample room to place the staircase within the existing building. That would protect the safety of individuals residing at 1610 without interfering with the light, air and privacy of neighbors like us.

Sincerely,

Bill and Helen von Oehsen  
1612 Riggs Place, NW