JACKSON & CAMPBELL
A Professional Corporation

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December 19, 2001

BY MESSENGER

District of Columbia Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210 South
Washington, D.C. 20001

Re: Application of Jeffrey Joyner and Lori Trautwine – BZA Case No. 16810

Dear Sir or Madam:

Enclosed for filing is an original Request for Party Status. Please date stamp the enclosed copy and return to the messenger.

Thank you for your attention to this matter.

Sincerely yours,

JACKSON & CAMPBELL, P.C.

Vernon W. Johnson, III

BZA
Case No. 16810
Exhibit No. 27

111 South Calvert Street
Baltimore, Maryland 21202
410•385•5343

200 A Monroe Street
Rockville, Maryland 20850
301•340•0450

8300 Boone Boulevard
Vienna, Virginia 22182
703•522•1330

Board of Zoning Adjustment
District of Columbia
CASE NO.16810
EXHIBIT NO.27

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December 19, 2001

BY MESSENGER

District of Columbia Board of Zoning Adjustment
441 4th Street, N.W.
Suite 210 South
Washington, D.C. 20001

Re: **REQUEST FOR PARTY STATUS**
Application of Jeffrey Joyner and Lori Trautwine – BZA Case No. 16810

Dear Board Members:

We have been retained to represent Dr. Gordon B. and Mrs. Aristy V. Joiner in connection with the above-referenced matter. We request, on behalf of the Joiners, that they be given party status to participate and oppose the application of Jeffrey Joyner and Lori Trautwine at the hearing of this matter before the Board on January 2, 2002.

The following information is provided pursuant to D.C. Mun. Regs., Title 11, Section 3106.2:

(a) name and address of parties seeking party status:

Dr. Gordon B. Joiner
Mrs. Aristy V. Joiner
2704 Dumbarton Street, N.W.
Washington, D.C. 20007

(b) Dr. and Mrs. Joiner request to appear and participate as parties.

(c) They will appear as opponents of the application.

(d) They will appear through legal counsel:

Vernon W. Johnson, III
Jackson & Campbell, P.C.
1120 20th Street, N.W.
South Tower
Washington, D.C. 20036

(e) Dr. and Mrs. Joiner should be granted party status because the property that they own and occupy at 2704 Dumbarton Street, N.W. directly abuts the applicants' property at 1324 27th Street, N.W. The Joiner Property will be directly affected by the action requested of the Board. The rear of the Joiner Property borders on the rear of the Joyner/Trautwine Property, and, particularly, the area upon which the proposed addition would be constructed. The exact locations of the Joiner property and the Joyner/Trautwine property are shown on Exhibit A hereto.

The applicants purchased the Joyner/Trautwine Property on or about July 19, 2001 and filed the above-referenced application on October 26, 2001, requesting a special exception to allow a two-story rear addition extending approximately eight (8) feet from the rear of the existing historic structure. Over the past five months, ANC 2E has considered several different versions of this application. Initially, at the public meeting on September 4, 2001, ANC 2E unanimously rejected the application, which, at the time, featured a ten (10) foot extension to the rear.

In doing so, ANC 2E unanimously recognized the effect that an addition to the rear of the Joyner/Trautwine Property would have upon the Joiner Property:

> . . . the plans presented for a rear addition extending beyond the permitted lot usage would create a significantly negative impact on the neighbors to the north whose rear garden fence would directly abut the proposed addition. In acknowledging the neighbors' concerns about the impact of the proposed changes due to the size of the rear addition, and in recognition of the value of preserving the historic character and relationship of rear yards and residences in Georgetown, ANC 2E is unable to support the proposed addition to the property at 1324 27th Street and opposes the requested variances.

For similar reasons, the Old Georgetown Board and Commission of Fine Arts recommended against a different set of proposed plans for the Joyner/Trautwine Residence on October 4, 2001 and October 19, 2001, which included the excavation and construction of a basement underneath the existing structure.

The Old Georgetown Board also expressed its concern about historic implications of gutting the entire inside of the current structure and removing the entire rear wall, and replacing it with a rear wall much different in appearance from the existing historic structure. Although it

is not absolutely clear what renovation would be performed in the front of the structure, and the extent to which the renovation would encroach upon the public sidewalk, the OGB also expressed concerns in that respect which have not been addressed.

At the public meeting on December 4, 2001, ANC 2E rejected the proposal for an eight (8) foot extension submitted to the BZA on this application, but indicated support for an alternative proposal which, we understand, would be submitted to the Board at the January 2, 2002 hearing in place of the proposal set forth in the initial application. The alternative proposal appears to involve a 12-foot "L shaped" rear addition, extending fully for the first three feet from the existing structure and then set back only three feet from the Joiner Property line.

This alternative proposal would also have a severe and detrimental effect upon the Joiner Property. Thus, the Joiners have a special interest in the outcome of the hearing before the Board. An addition to the rear of the Joyner/Trautwine Property would uniquely affect the Joiner Property, which is adjacent to it – the addition would be built almost in the Joiners' back yard. The rear of the Joiner Property would directly face and be over-shadowed by the proposed two-story rear addition. If constructed, the proposed addition would interfere substantially with the use and enjoyment of the home where the Joiners have resided for almost forty years by blocking out sunlight to the Joiner Property and creating a claustrophobic condition by constructing a two-story wall on or very close to their property line. Equally important, the crowding and lack of sunlight and open air posed by the proposed addition would impact severely the market value of their home. Further, the actual construction of the proposed addition would cause the Joiners to endure a prolonged disruption of their daily lives. Absent from the current application is the inclusion of a plan designed to minimize the unavoidable interference with the Joiner Property during construction.

For all the foregoing reasons, we respectfully submit, on behalf of the Joiners, that their interests will be more significantly, distinctively and uniquely affected by the zoning action proposed by Mr. Joyner and Ms. Trautwine than those of the general public. Accordingly, the Joiners request party status to appear and participate at the hearing on January 2, 2002.

Thank you for your attention to this matter. Should the Board have any questions or require additional information, please do not hesitate to contact me at (202) 457-1613.

Sincerely yours,

JACKSON & CAMPBELL, P.C.

Vernon W. Johnson, III

cc: Stephen N. Gell, Esquire
Dr. and Mrs. Gordon B. Joiner

EXHIBIT A

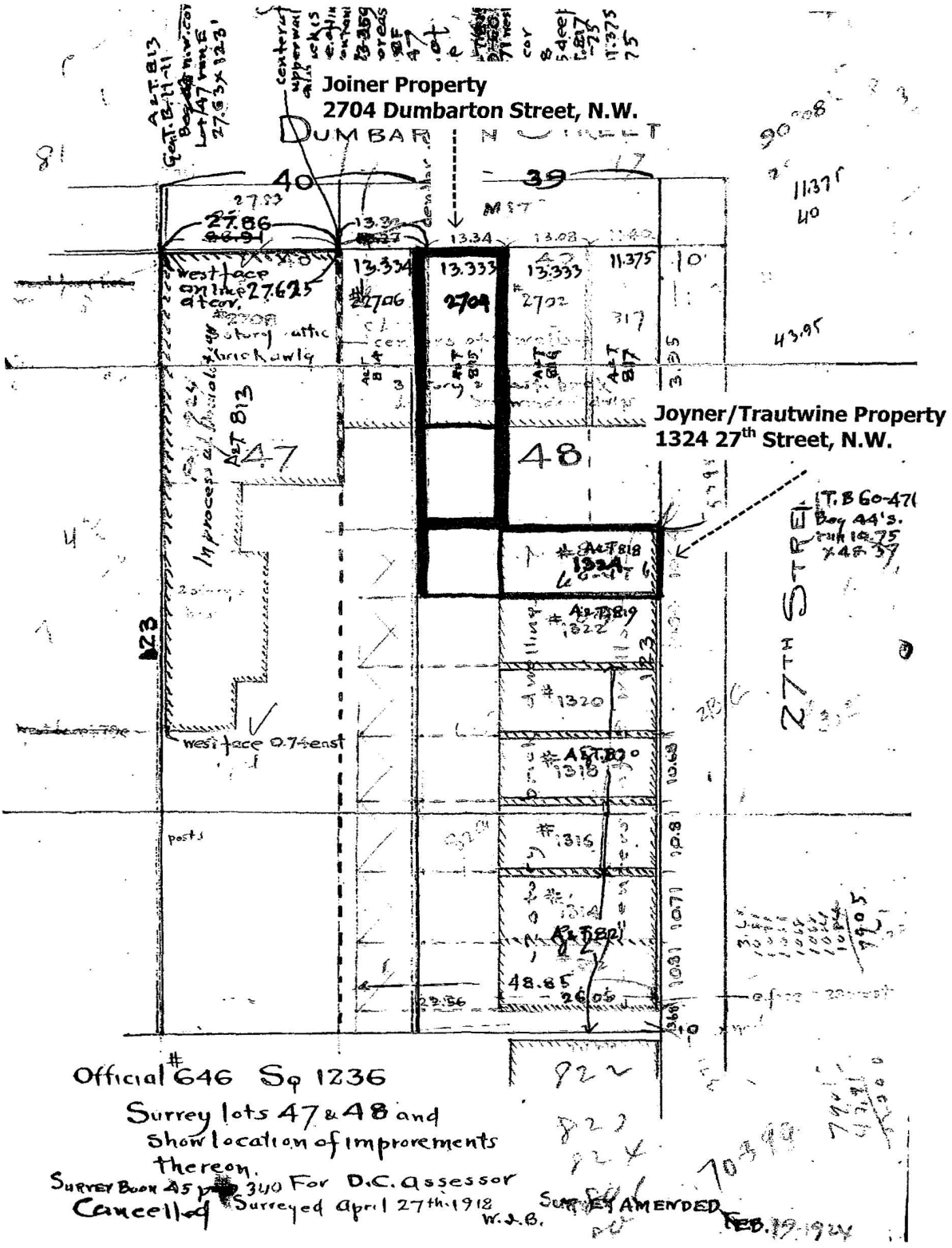

Joiner Property
2704 Dumbarton Street, N.W.
Joyner/Trautwine Property
1324 27th Street, N.W.
27TH STREET
Official #646 Sq 1236
Surrey lots 47 & 48 and
show location of improvements
thereon.
Survey Book 45 p. 340 For D.C. assessor
Surveyed April 27th 1918 W.J.B.
Cancelled
SURVEY AMENDED FEB. 19 1924

Exhibit A