Form 140
(Revised 03/15/02)

Case No. 16970

# PARTY STATUS APPLICATION

*Notice: See other side of party status form for instructions.*

| NAME: Last | First | Middle I. |
|---|---|---|
| LITTLE | HENRY | P. |

| ADDRESS: Street | Apt. # (If any) | City | State | Zip Code |
|---|---|---|---|---|
| 1336 SHRADER | ST. | SAN FRANCISCO | CA | 94117 |

| Phone No. | Fax No. | E-Mail |
|---|---|---|
| (415) 281-0406-office<br>753-0535-home | (415) 777-0244 | hlittle@TNC.org |

Signature: H. P. Little Date:

Will you appear as a(n) [ ] Proponent [X] Opponent Will you appear through legal counsel [ ] [X]

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

| NAME: Last | First | Middle Initial |
|---|---|---|
| | | |

| ADDRESS: Street | Ste. # (If any) | City | State | Zip Code |
|---|---|---|---|---|
| | | | | |

| Phone No. | Fax No. | E-Mail |
|---|---|---|
| | | |

BZA Case No. 16970 Exhibit No. 88

RECEIVED D.C. OFFICE OF ZONING 2001 DEC 30 PM 3:55

Please answer all of the following questions referencing why the above person should be granted party status.
(If you require additional space, please attach an additional sheet.)

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 Board?
Noise, damage to vegetation, traffic congestion + traffic-related safety, blockage of air + light, drainage, economic impact. (see attached letter)

2). What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee) My wife and I own a home at 3220 Ordway St, N.W., adjacent to NCRC, the applicant (#16970). (See attached letter)

3). What is the distance between the person's property and the property that is the subject of the appeal or application before the Board? (Preferably no farther than 200ft.) We share a 75 ft. ± common boundary with NCRC.

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 Board is approved or denied? Same as the 1). above. (See attached letter)

5). Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Board is approved or denied. Lack of trust in NCRC living up to it commitments. (see attached letter).

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 person's in the general public.

My home is immediately adjacent to NCRC, which wishes to build a new structure within a foot of my home. (see attached letter)

Board of Zoning Adjustment
District of Columbia
CASE NO.16970
EXHIBIT NO.88

★ This is my current, temporary residence. My home is in Washington, D.C., at 3220 Ordway St., N.W., Washington, DC. 20008

**Henry P. Little**
**1336 Shrader Street**
**San Francisco, CA 94117-4232**
**(415)753-0535—home**
**(415)281-0406—office**
**hlittle@tnc.org**

**Sent via Federal Express and FAX (202)727-6072**

January 28, 2003

District of Columbia Office of Zoning
Board of Zoning Adjustment
441 Fourth Street, N. W., Suite 210-S
Washington, D.C. 20001

Re: BZA Application No. 16970
National Child Research Center
3209 Highland Place, N. W.; Square 2072, Lot 30

**REQUEST TO APPEAR AS A PARTY**

Dear Sir/Madame:

In addition to the attached Form 140, which I have filled out completely, I am providing the following information as stipulated in the District of Columbia Zoning Regulations (11 DCMR Zoning) to support my request for Party Status with respect to Application No. 16970.

a. My name is Henry P. Little, and currently my address is: 1336 Shrader Street, San Francisco, California, 94117-4232

b. I wish to appear as a party in this matter.

c. I will appear in opposition to the application.

d. I will not appear through legal counsel.

e. No witnesses will testify on my behalf.

f. My written statement setting forth why I should be granted Party Status:

(1). Property Owned by Henry P. Little:

My wife Lydia Mendoza and I own a single family home at 3220 Ordway Street, N. W., which is immediately adjacent to National Child Research Center (NCRC), the entity which has submitted BZA Application No. 16970. We have owned the home since 1984, and we lived there with our two sons from 1984 until 1998, at which time for reasons having to do with my work we moved to San Francisco. We intend to return to our home, which we have rented to tenants for the past five years, within the next few years.

(2). Henry P. Little's Legal Interest in Such Property:

As mentioned above, my wife Lydia Mendoza and I jointly own the single family residence at 3220 Ordway Street, N. W., adjacent to NCRC.

(3). Distance Between Our Home and NCRC:

Our home at 3220 Ordway Street, N. W., is immediately adjacent to NCRC, and our property shares a common boundary of approximately 75 feet, marked by a low chain link fence, with NCRC (this is my estimate of the boundary's length, as living in California I do not have the exact footage information readily at hand). The east wall of our home is approximately 5 feet from this fence, and thus NCRC's property.

(4). Likely Environmental, Economic and/or Social Impacts Likely to Effect Henry P. Little and Henry P. Little's Property if BZA Application No. 16970 is Approved:

Noise:

If NCRC builds a huge new classroom building nearly abutting my home and approximately twice the size of my home, the noise associated with such a large institutional facility (versus NCRC's current residence-like buildings) undoubtedly will increase greatly. Such increased noise will result from:

- Increased student enrollment
- NCRC's increased maintenance activities
- the operation of commercial size air handling (conditioning) units on the new building's roof right next to my home
- the additional traffic associated with NCRC's planned expansion of its student body and of activities such as conferences, and night and weekend meetings on NCRC's new campus-like facilities (as opposed to its current residential-like facilities)

Damage to Trees and Other Vegetation:

The front yard of my home is a large double cherry tree, the trunk of which is located several feet from Ordway Street. Often when parents are dropping off their children at NCRC they park their vehicles several feet onto my front lawn, both destroying the grass and damaging the roots to the cherry tree which unfortunately are close to the surface.

Traffic Congestion and Traffic-Related Safety:

For the 14 years my wife and I lived in our home adjacent to NCRC, we experienced steadily increasing traffic congestion associated with parents dropping off and picking up their children at NCRC. Parents' vehicles often were parked on our front lawn or blocking my driveway, or were double parked in the street in front of our home. My sense is that as the years passed more an more of NCRC's students came from outside of the neighborhood and thus needed to be driven to the school, as opposed to walking (as my youngest son did when he attended NCRC in 1984-1985). Moreover, expansion of NCRC's facilities surely will further increase the use of Ordway Street between Connecticut Avenue and 34th Street as a east-west traffic conduit. Indeed, increased student enrollment at NCRC and increased usage of the NCRC for conferences, meetings, fundraising events and the like surely will exacerbate the traffic congestion and the attendant traffic safety circumstances in front of my home.

Blockage of Air and Light:

Given the close proximity of my home to NCRC, the light on our patio and in our kitchen/family room, both of which currently look out over NCRC's playground, would be blocked and therefore diminished considerably were NCRC to build its new facility—one twice the size of my entire home—immediately adjacent to my home. Moreover, while living in our home for 14 years my wife and I rarely (perhaps one or two days each year) used our central air conditioning, preferring instead in the summer to leave open the three sets of double glass doors which open up from our kitchen/family room on to the backyard patio, where we often ate breakfast and dinner. Having a huge wall-like building, instead of a playground with several tall trees, just a few feet (perhaps as little as 20 feet) from the patio and these glass doors would greatly diminish the light and air circulation on my patio and in my home.

Possible Drainage and Other Damage Due to Construction:

I am concerned that constructing a huge building so close to my home will cause drainage problems, and possibly even damage to the foundation and walls of my home from blasting and other such activities often associated with large construction projects.

Economic Impact:

In that my home and NCRC share an extensive common boundary, I believe that a large-scale expansion of NCRC immediately adjacent to my home would make my property far less attractive residential property and thus significantly adversely affect the value of my home.

(5). Other Relevant Matters:

Trust of NCRC in the Future:

In 1994, while my wife, our sons, and I were living in our home on Ordway Street NCRC, without having secured the proper permits and without having communicated with its neighbors, undertook a construction project involving the building of a new playground and the expansion of a large cement deck. Astonished, my wife and I joined other neighbors in confronting NCRC's staff and board members. NCRC then agreed both to secure the requisite permits and to improve the landscaping along NCRC's property facing Ordway Street, and we and other neighbors thus ended up supporting NCRC's permit requests before the Historic Preservation Review Board, in December of 1994. I share this with you to point out that in 1994 NCRC neither communicated with nor gave consideration to the views of its Ordway Street neighbors until forced to do so through a public process, a process it had sought to avoid. From what I have experienced over the past year in dealing with NCRC, its pattern of behavior has not changed—namely, it does not communicate with or take into consideration the views of it Ordway Street neighbors until forced to do so through a public process . Therefore, I question whether the commitments NCRC might be required to make in exchange for securing approval of its BZA Application No. 16970 would be commitments I, or other neighbors, or the District of Columbia's public officials could rely on NCRC to live up to in the future.

(6). How Henry P. Little's Interests will be Uniquely Impacted:

I believe that, given its immediate proximity to NCRC's largest proposed new building, my wife's and my home will be as severely impacted as, if not more severely impacted than, just about any other homes in the neighborhood. I have outlined above the specific impacts I fear. Were NCRC's BZA application to be approved, in a few years my wife and I will be living next to a large complex of institutional buildings, besieged by traffic and noise, instead of living in a quiet residential neighborhood noted for its distinctive historical qualities—a neighborhood listed on the National Register of Historic Places as Cleveland Park Historic District.

In conclusion, I believe that I meet the criteria to be granted Party Status with respect to BZA Application No. 16970. I will be attending the hearing scheduled for February 11, 2002. Should any additional information be needed, please do not hesitate to let me know.

Sincerely,

Henry P. Little

cc: Bruce Beckner, Jane Vanneman
Attachment: Form 140