**BEFORE THE DISTRICTOF COLUMBIA**
**BOARD OF ZONING ADJUSTMENT**

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| **Application for Special Exception from R-1 Zoning, Concerning Properties: 1670 31st Street, NW, Lot 827; and 1644 31st Street, NW, Lot 830** | **Application No. 16974** |

**STATEMENT IN OPPOSITION OF APPLICATION**
**BY STEPHEN E. WELLS AND JANE E. WILSON**

**1. Reason for Interest**

**We are neighbors directly affected by the activities of Tudor Place as we reside at 1677 31st Street, NW, which is within 25 yards of 1670 31st Street, the so-called "Dower House," and within 50 yards of 1644 31st Street, the main Tudor Place property. Our house is nearly directly across 31st Street from the Dower House. Since our house is a neighboring property that is adversely affected by the activities of Tudor Place, we are interested in limiting those activities to a level that is reasonable and essential.**

**2. The Application Is Unacceptably Broad**

**We agree with many of the objections to the application that have been expressed by others who have submitted comments. We, too, have experienced the traffic congestion, the lack of street parking, and the noise from the traffic and the music that have resulted from Tudor Place events. However, we would like to focus primarily on an objection that has not been emphasized enough and can be remedied readily without significant hardship to Tudor Place; i.e., the unacceptable breadth of the application.**

**The statement of Tudor Place in support of its application states that the special exception is "economically necessary" to the continuing operation of Tudor Place but offers no detail to support this assertion or to quantify the extent of the need. Tudor Place has provided no business plan or budget to support its assertion, although surely it must have such a plan. Moreover, the publicly available financial information, Tudor Place's tax returns, suggest that Tudor Place has in fact been financially able to fulfill its mission with its existing resources.**

**Even if Tudor Place is able to demonstrate financial need beyond its existing resources, even Tudor Place does not claim a need for more than an "occasional" event. Nonetheless, Tudor Place is requesting a special exception for up to ten events annually for up to 500 guests, and an unlimited number of "small" events annually for up to 200 guests. If approved, this special exception would permit an extraordinary level of commercial activity that is far beyond what any residential community should be required to endure under any circumstances, and far beyond what even Tudor Place says it needs. For example, at the ANC meeting in February, when asked what neighbors would experience in coming years if the application were approved, Ms. Leslie Buhler, the Executive Director, responded that there would be no difference from last year.**

**It is unreasonable for Tudor Place to request, and for the BZA to approve, an application that even Tudor Place acknowledges is significantly overbroad given the needs and objectives of Tudor Place. This application should be rejected and Tudor**

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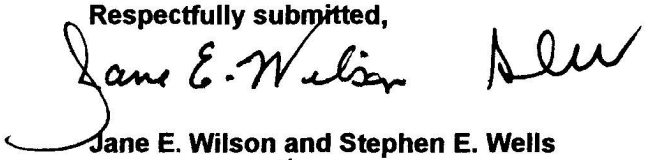
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Place should be instructed to return only when it can substantiate its level of financial need and provides a specific and detailed plan to satisfy that need, minimizing the adverse impact on neighbors. This is the least that should be expected; anything less would be unbusinesslike and unreasonable. As two who own and reside in a neighboring property, we are entitled to know what Tudor Place has planned. And the BZA certainly is entitled to know before it approves a special exception.

3. The Dower House

The Dower House portion of the request should be denied outright. First, the Dower House was not posted by March 31, 2003, as required by section 3113.14 of the zoning regulations. Second, the Dower House is simply another residential property in the neighborhood with no buffer from other residences, including ours. Approval of the use of the Dower House for an unlimited number of annual events for up to 50 guests would be an unreasonable commercial intrusion on the community, especially on those other residences in the immediate vicinity, such as ours.

Respectfully submitted,



Jane E. Wilson and Stephen E. Wells
1677 31st Street, NW
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April 15, 2003