Form 140
(Revised 03/15/02)

Case No. 17022

PARTY STATUS APPLICATION

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

NAME: Last	First	Middle I.
GUERARD,	Collot	

ADDRESS: Street	Apt. # (if any)	City	State	Zip Code
2951 Tilden St.	NW	Wash	DC	20008

Phone No.	Fax No.	E-Mail
202-326-3338 (o); 202-363-9440 (h);	202-326-3395;	cguerard@ftc.gov

Signature: Collot Guerard Date: 6/10/03

Will you appear as a(n) ☐ Petitioner ☑ Protestant - Will you appear through legal counsel ☐ Yes ☑ No

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

NAME: Last	First	Middle I.

ADDRESS: Street	Ste. # (if any)	City	State	Zip Code

Phone No.	Fax No.	E-Mail

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?

See attached

2). What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)

See attached

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.) According to Burka application, within 200 feet

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?

See attached

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.

See attached

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.

See attached

2003 JUN 26 PM 4:29 D.C. BOARD OF ZONING

BZA
Case No. 17022
Exhibit No. 41

Board of Zoning Adjustment
District of Columbia
CASE NO. 17022
EXHIBIT NO. 41

Attachment to Party Status Application by Collot Guerard
In re Burke School. Case No. 17022

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?

Burke has applied to expand its current school by constructing a new building and increasing its student enrollment and faculty. I live at 2951 Tilden Street. If the Board approves the Burke application, my property will be affected in the following ways:

1. Traffic in the vicinity of my residence will increase, making my travel more difficult.

Traffic on the 2900 block of Tilden, which is already congested, will increase during the morning and afternoon rush hours, during the drop-off and pick-up times. Burke's own application concedes that traffic on Tilden Street will increase. Even before the additional Burke cars are added to Tilden Street, the traffic is backed up on Tilden as much as 20 cars in the morning and evening as the cars wait for the traffic light at the corner of Connecticut and Tilden to turn left or right. Adding Burke cars will worsen this highly congested area.

Traffic in the Tilden alley will increase. Burke parents use the Tilden alley to drop students in the morning because the Burke parents can avoid being seen by the so-called traffic monitor in front of the school.

Traffic on Upton Street will increase, making it more difficult and time-consuming for me to use Upton Street to turn right onto Connecticut Ave. When I am traveling north, I exit my garage in the Tilden alley, and use Upton Street, from which I turn right onto Connecticut Ave. (Because of the congestion of Connecticut Ave., it takes too long to turn right from Tilden onto Connecticut Ave.). If the Burke application is granted, I will be facing an increased delay in turning right from Upton onto Connecticut, both because of the Burke cars that will emerge onto Upton from the Burke driveway (parallel to the public alley) and because of Burke cars that will be waiting to turn right from Connecticut Avenue into the Burke driveway on Connecticut Ave.

North-bound traffic on Connecticut Ave. between Upton and Van Ness during the evening rush hour will be completely blocked for those cars who are traveling north on what are the two north-bound lanes of Connecticut Ave. This is not only extremely annoying, but it is unsafe. The right-hand lane on Connecticut Ave. will be used by the Burke parents turning right into the Burke driveway. The left-hand lane will be used by those cars trying to turn left onto Van Ness Street. During the evening rush hour, cars are often stacked 10 deep waiting to be able to turn left from Connecticut onto Van Ness. When I try to turn right from Upton onto Connecticut Ave., I will be stalled behind Burke

cars waiting to turn right from Connecticut Avenue into the Burke driveway. All cars behind me on Connecticut Ave. will be blocked until the Burke cars are able to enter the Burke driveway from Connecticut Ave. Some of the cars behind me traveling north may be Burke cars, who will impede the cars behind them.

2. There will be additional people in the area, using the sidewalks and my alley to smoke and eat lunch, making my residence less desirable to me and future purchasers.

If the Burke application is granted, there will be as many as an additional 50 students and faculty (270 students will increase to 320 students), so there will be increased pedestrian traffic on Tilden and Upton Streets, and in the Tilden alley. Already, students loiter smoking and eating in the alley, dropping cigarette butts and lunch papers. I see them when I leave my residence via the Tilden Alley. With an increase in students, the problem of smoking, cigarette butts, and lunch papers will worsen.

3. There will be an increase in noise in the area with an increase in the student and faculty population.

If the Burke application is granted, there will be more students and faculty hanging around the front and side of the school before school starts and after school ends. The students laugh, yell, and generally are boisterous. They create a certain level of noise. That noise will increase if the student population is allowed to increase.

4. The Upton Street/public alley area will become less safe.

If the Burke application is granted, there will be an isolated unpopulated area at the end of Upton Street at night and on weekends. During the winter, when I come home from work, it is dark. Walking by Burke at night is sort of spooky because it is dark. I usually walk down the middle of Upton Street, and stay away from the sidewalk in front of Burke, in case someone is loitering in the bushes. I currently feel insecure walking past Burke. The security problem will worsen if there is another large building unoccupied at night and on weekends.

5. The residential character of the neighborhood will diminish, which makes my residence less attractive to me and to potential buyers.

Our neighborhood already has enough institution-like buildings. In addition to Burke, we have Howard Law School and the Levine School of Music on Upton Street. Intelsat and UDC are in the vicinity, across Connecticut Ave. We also have large apartment houses. Another large building will detract from the lovely row houses along Upton and Tilden. This in turn will make my home less attractive to me and to potential purchasers.

Attachment to Party Status Application by Collot Guerard
In re Burke School. Case No. 17022

2. What legal interest does the person have in the property?

I am the owner of 2951 Tilden St. NW. I have owned the property since 1987.

3. What is the distance between the person's property and the property that is the subject of the application before the Board.

According to the Burke application, my property is within 200 feet of the Burke School, which is the subject of the application. I have no reason to doubt Burke's statement.

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?

See points 1-5 above.

5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved in the action requested of the Board is approved.

In addition to the points 1-5 above, if the Burke application is granted, the neighborhood is likely to become less of a neighborhood and more of a place populated during the day and abandoned at night. This is a loss that is not easily quantified in dollars and cents.

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.

The general public that travels Connecticut Avenue, or that uses Upton and Tilden Streets, will be adversely affected as the driving public will face more traffic and congestion due to the Burke cars. I, as a long-time resident, within 200 feet of the Burke school, will be more adversely affected than the general public because there will be increased traffic in my alley and on the street on which I live, and more loitering and littering. The increased traffic will mean more noise, gas fumes, and dust at my residence. The increased loitering and littering means increased mess and noise on my street and in my alley.

Respectfully submitted,

Collot Guerard 6/25/03

Collot Guerard, owner
2951 Tilden St. NW