BOARD OF ZONING ADJUSTMENT
FOR THE DISTRICT OF COLUMBIA

Application of Babak Mohavedi pursuant to 11 DCMR § 3103.2 for a variance from the use provisions to convert A single-family dwelling to general office use under Subsection 350.3i n the DC/R-5-B District at premises 1700 Q Street, N.W. (Square 156, Lot 264)	)	No. 17392

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REQUEST FOR STATUS AS A PARTY IN OPPOSITION TO THE APPLICATION

Pursuant to 11 DCMR § 3106, Dupont Circle Citizens Association ("DCCA"), and its individual members whose names and addresses are identified below, hereby file this motion to appear as a party in opposition to the above-captioned application filed by Mr Babak Mohavedi for a use variance to convert a single family residence located at 1700 Q Street N.W. in the DC/R-5-B district into an office for the applicant's title insurance business.[1] DCCA and the individual members identified below will be represented in this proceeding by Andrea C. Ferster, 1100 17th Street, N.W. 10th Fl., Washington, D.C. 20036. Letters authorizing the undersigned counsel to represent DCCA and its individual members in this proceeding are attached hereto.

Dupont Circle Citizens Association is a nonprofit, tax exempt organization formed in 1922 to protect and preserve the traditional, residential character of the Dupont Circle neighborhood, which will be threatened by the proposed application. The subject property lies within the neighborhood boundaries identified in DCCA's Articles of Incorporation. DCCA's membership consists of more than 400 persons, the overwhelming majority of whom live in the

1 DCCA understands that the Applicant may amend the application to instead seek a special exception and use variance to operate the identical business as a home occupation under 11 DCMR § 203.10. DCCA is also opposed to any such amended request for zoning relief as it would involve the identical negative impacts to the residential character, mix of uses, and quality of life in the Dupont Circle neighborhood.

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 17392
EXHIBIT NO. 27

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Dupont Circle neighborhood, including a number of members who live within a 200-foot radius of the subject property, and many more who live within a slightly larger radius.

The following individual members of DCCA who reside within 200 feet of 1700 Q Street, N.W. also request status as individual parties in opposition to this application:

Alexis Rieffel
1709 Q Street N.W
Washington, D.C. 20009

Mr. Rieffel is a member of DCCA who owns and resides in property located approximately 100 feet from 1700 Q Street, N.W.

Patricia Steele
1711 Q Street, N.W.
Washington, D.C. 20009

Ms. Steele is a member of DCCA who owns and resides in property located within 200 feet from 1700 Q Street, N.W.

Although the above-named individuals requesting party status will be represented by the same counsel as DCCA, and do not intend to present witnesses, evidence, or argument separately from DCCA, these individuals nonetheless wish to be recognized as individual parties in opposition in order to ensure that their interests are represented throughout the duration of this proceeding, including but not limited to any judicial review of this Board's rulings. [2]

As indicated above, DCCA and its members, including the individuals identified above, will be significantly, distinctively, and uniquely affected if this application or the intended amended application is granted. Many of DCCA's members reside in close proximity to the

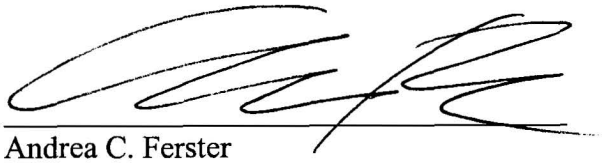
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2 In addition, several other individual members of DCCA have prepared letters authorizing Andrea Ferster to represent them as party in opposition to this application. These individuals do not intend to present witnesses, evidence, or argument separately from DCCA.

property that is the subject of this application, and believe that the proposed conversion of the single-family home located at 1700 Q Street, N.W. to office use will negatively impact the values of residential properties impacts on the 1700 block of Q Street, will negatively impact the already limited parking in that neighborhood, will reduce the quality of life for residents by upsetting the fragile balance in the neighborhood between residential and non-residential uses, and will introduce a use that is not permitted or preferred for this area under the Ward 2 Comprehensive Plan. Accordingly, DCCA and the individuals requesting party status will be more significantly, distinctively, and uniquely affected in character and kind by the proposed application than other persons in the general public.

For the foregoing reasons, this request for party status should be granted.

Respectfully submitted,



Andrea C. Ferster
1100 17th Street, N.W., 10th Fl.
Washington, D.C. 20036
(202) 974-5142

November 8, 2005

CERTIFICATE OF SERVICE

I hereby certify that, on November 8, 2005, a copy of the foregoing Request for Party Status was served by mail on, or as otherwise indicated:

Steven N. Gell, Esq.
1101 30 Street, N.W
Washington, D.C. 20007

Darren Bowie, Chair
ANC 2B
9 Dupont Circle
Washington, D.C. 20036

Joel Lawson
Office of Planning
801 N. Capital Street, N.E., Suite 4000
Washington, D.C. 20002



Andrea C. Ferster

DUPONT CIRCLE CITIZENS ASSOCIATION
P.O. Box 73616, Washington, D.C. 20056-3161 www.dupont-circle.com

November 8, 2005

Board of Zoning Adjustment
Room 210
441 Fourth Street, N.W.
Washington, D.C. 20001

RE: Application for Variance, Case No. 17392 – 1700 Q Street, N.W.

Dear Sir or Madam:

The Dupont Circle Citizens Association (DCCA) requests party status in the above-referenced proceeding. DCCA is an incorporated non-profit community organization whose purpose, as stated in our by-laws, is "to promote and protect the interests of the residents of the National Capital, and especially those in the vicinity of Dupont Circle." DCCA's by-laws further empower the organization to work "to preserve the historic, architectural, and aesthetic value of property" within the Association's boundaries, and to appear before government agencies in furtherance of those ends. Nothing could be closer to the heart of DCCA's mission as an organization devoted to protecting the residential character of the Dupont Circle neighborhood than opposing an unwarranted and unsupported request for a variance to convert to office use a building that is residentially-zoned, and has been used for residential purposes since the 19th Century.

DCCA further states in support of its request for party status that its membership includes approximately 400 persons, the overwhelming majority of whom live in the Dupont Circle neighborhood. Several DCCA members live within a 200-foot radius of the subject property, and many more live within a slightly larger radius. The subject property lies well within the neighborhood boundaries identified in DCCA's Articles of Incorporation.

The loss of a long-time residential building to commercial use would be a tremendous blow to our community and to our members, especially those whose homes are near the subject property. DCCA accordingly requests party status in the above-captioned matter.

DCCA has retained Andrea Ferster, Esq., to represent the Association in this matter.

Respectfully submitted,

/s/ Bill Glew

Bill Glew, President
Dupont Circle Citizens Association

November 3, 2005

Board of Zoning Adjustment
Room 210
441 4th Street, NW
Washington, DC 20001

Re: 1700 Q Street, NW (Square 156, Lot 264)
Application for Variance
Case No. 17392

Dear Sirs:

As the owner of a residence located within 200 feet of the residence located at 1700 Q Street, NW, I hereby request party status in Case No. 17392. Further, I hereby authorize Andrea Ferster, Esq. to represent me in connection with this Case. Finally, I hereby state that I am a member of the Dupont Circle Citizens Association.

Sincerely yours,

Patricia E. Steele
(Signature)

Patricia E. Steele
(Printed Name)

1711 Q Street, NW
Washington DC 20009
(Address)

Alexis Rieffel
1709 Q Street NW
Washington, DC 20009

4 November 2005

Ms. Andrea Ferster, Esq.
1100 17th Street NW
Washington, DC
Fax: 331-9680

Re: BZA Case No. 17392 (Babak Movahedi)

Dear Ms. Ferster:

I am writing you in connection with Mr. Movahedi's application for a variance or a special exception so that he can use his residentially-zoned rowhouse at 1700 Q Street NW more intensively for office purposes. I am vehemently opposed to this application and am formally authorizing you to represent me in this matter.

Furthermore:

- I have resided since 1973 at 1709 Q Street NW, which is roughly 100 feet from Mr. Movahedi's rowhouse.
- I am a member of the Dupont Circle Citizen's Association, and have been one for many years.
- I have fought again and again over the past 32 years to preserve the residential character of our neighborhood. There are much better ways for me to contribute to the neighborhood than fighting outrageous applications for zoning variances and special exceptions. I would rather use this time, for example to mentor students at our neighborhood elementary school (Ross School). If the BZA grants Mr. Movahedi's request, other rowhouse owners on my block will quickly apply for similar variances and more of my time will be wasted opposing these applications. This adds insult to the injury of living amidst commercial properties, such as truck deliveries and parking scarcity. Another adverse impact I will suffer beyond other persons in the general public is that my property taxes, which are already heavy, will become unbearable as buyers who want the adjacent rowhouses for office purposes bid up prices.

If there is any other information you need from me regarding this matter, please call me at 202-309-2478 or contact me by email at

Sincerely yours,

Alexis Rieffel

November 4, 2005

Board of Zoning Adjustment
Room 210
441 4th Street, NW
Washington, DC 20001

Re: 1700 Q Street, NW
Application for Variance
Case No. 17392

Dear Sirs:

As the owner of a residence in the historic Cairo Apartments, which is located just over 200 feet from the residence located at 1700 Q Street, NW, I hereby request party status in Case No. 17392. Further, I hereby authorize Andrea Ferster, Esq. to represent me in connection with this Case. In addition, I hereby state that I am a long-time and active member of the Dupont Circle Citizens Association, having served on the board and multiple committees.

Over the more than 20 years I have lived in this neighborhood, I have been very involved in many struggles to preserve the residential character of our neighborhood. There are much better ways for me to contribute to the neighborhood than fighting outrageous and baseless applications for special commercial-use or home-occupation-permit zoning variances. My home is located less than a block from the residence of the applicant, and unlike the general public, my home, and the rest of the residences in the Cairo, is affected directly by the people and automobile traffic, parking, and messenger and truck delivery problems which are generated by the extensive commercial activities that the applicant carries on in his residence in violation of the Zoning Regulations. Moreover, there is a grave danger that if the variance or variances that the applicant seeks are granted, our residentially-zoned district, which already is under great pressure from commercial interests, will quickly succumb to the sequential "domino effect" seen on the other side of 17th Street, where businesses wrap around on to Q Street and encroach significantly down what otherwise would be a residential block.

I thank you for your consideration.

Respectfully,

Anne Scanley
1615 Q Street, NW, G-4
Washington, DC 20009

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Frank A. Hornstein
1700 17th Street, NW
Washington, DC 20009

November 3, 2005

Board of Zoning Adjustment
Room 210
441 4th Street, NW
Washington, DC 20001

Re: 1700 Q Street, NW
Application for Variance
Case No. 17392

Dear Sirs:

As a resident of the Admiral Dupont apartments, which is located just over 200 feet from the residence located at 1700 Q Street, NW, I hereby request party status in Case No. 17392. Further, I hereby authorize Andrea Ferster, Esq. to represent me in connection with this Case. In addition, I hereby state that I am a long-time member and a former President of the Dupont Circle Citizens Association.

Over the years I have lived in this neighborhood, I have been very involved in many struggles to preserve the residential character of our neighborhood. There are much better ways for me to contribute to the neighborhood than fighting outrageous and baseless applications for commercial-use or home-occupation-permit zoning variances. My home is located just a block from the residence of the applicant, and unlike the general public, my home, and the rest of the residences in the Admiral Dupont, is affected by the people and automobile traffic, parking, and messenger and truck delivery problems that are generated by the extensive commercial activities which the applicant now carries on in his residence in violation of the Zoning Regulations. In addition, there is a grave danger that if the variance or variances which the applicant seeks are granted, our residentially-zoned district, which is already under great pressure from liquor-serving and –selling interests, will quickly succumb to sequential "domino effect" commercialization.

Thank you for your consideration.

Sincerely yours,

Frank A. Hornstein