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**BEFORE THE ZONING COMMISSION OR
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA**
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FORM 140 - PARTY STATUS REQUEST

Before completing this form, please go to www.dcoz.dc.gov > IZIS > Participating in an Existing Case > Party Status Request for instructions. Print or type all information unless otherwise indicated. All information must be completely filled out.

PLEASE NOTE: YOU ARE NOT REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM ONLY IF YOU WISH TO BE A PARTY IN THIS CASE.

Pursuant to 11 DCMR Subtitle Y § 404.1 or Subtitle Z § 404.1, a request is hereby made, the details of which are as follows:

Name:	St. Paul's College Neighbors for Thoughtful Development		
Address:	c/o John Anderson 502 Regent Place, N.E., Washington, D.C. 20017		
Phone No(s):		E Mail:	j.m.anderson.jr@gmail.com

I hereby request to appear and participate as a party in Case No.: **19377 (hearing 12/7/16)**

Signature:	<i>David W. Brown</i>	Date:	11/22/16
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Will you appear as a(n) <input type="checkbox"/> Proponent <input checked="" type="checkbox"/> Opponent	Will you appear through legal counsel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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If yes, please enter the name and address of such legal counsel.

Name:	David W. Brown, Esq., Knopf & Brown		
Address:	401 E. Jefferson St., Ste. 206, Rockville, MD 20850		
Phone No(s):	301-545-6100	E Mail:	brown@knopf-brown.com; joy@knopf-brown.com

ADVANCED PARTY STATUS CONSIDERATION PURSUANT TO: Subtitle Y § 404.3/Subtitle Z § 404.3:

I hereby request advance Party Status consideration at the public meetings scheduled for: _____

PARTY WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the party's behalf;
2. A summary of the testimony of each witness;
3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes or qualifications of the proposed experts; and
4. The total amount of time being requested to present your case.

PARTY STATUS CRITERIA:

Please answer all of the following questions referencing why the above entity should be granted party status:

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 Commission/Board? Please see attached
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee) Please see attached
3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (Preferably no farther than 200 ft.) Please see attached
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 Commission/Board is approved or denied? Please 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 Commission/Board is approved or denied. Please 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 persons in the general public. Please see attached

St. Paul's College Neighbors for Thoughtful Development (hereinafter "Neighbors")
PARTY STATUS REQUEST
Party Witness Information

1. A list of witnesses who will testify on the party's behalf:

David Brown

Knopf & Brown, 401 E. Jefferson Street, Suite 206, Rockville, MD 20850 301-545-6100

John Anderson

513 Regent Place, NE, Washington, DC 20017

Susan and Joerg Dreweke

536 Regent Place, NE, Washington, DC 20017

David and Stephanie Holloway

507 Regent Place, NE, Washington, DC 20017

Peter Poon and Marcos DaCruz

508 Regent Place, NE, Washington, DC 20017

Mihir and Parini Shah

500 Regent Place, NE, Washington, DC 20017

Colleen Vyas-Williams

2872 Chancellor's Place, NE, Washington, DC 20017

2. A summary of the testimony of each witness:

David Brown will summarize the issues and then each member of the group will testify on a specific area of the issues, which are:

1) Need for comprehensive review and consideration of the impacts of the new townhome development, full school build-out in the next three years, and new Paulist building;

2) Traffic impacts and management for the total development plan;

3) inconsistency of the application with testimony of EYA when Chancellor's Row was developed that the Zoning Commission relied on in allowing for reduced setbacks and increased density/heights, which now puts the property rights of Neighbors' members at risk;

4) loss of open space and major site trees inconsistent with the DC Comprehensive Plan;

5) stormwater management and the loss of the existing detention basin and unilateral abandonment of a permanent drainage/utility easement serving Chancellor's Row;

6) significant earthwork and grading necessary to accomplish development; and

7) impact on historic elements of the site including the St. Paul's college building and grounds as well as the visual impact from 4th St NW into the site and of the Basilica up 4th St.

3. An indication of which witnesses will be offered as expert witnesses, the areas of expertise in which any experts will be offered, and the resumes of qualifications of the proposed experts;

NONE

4. The total amount of time being requested to present your case.

ONE HOUR

St. Paul's College Neighbors for Thoughtful Development
PARTY STATUS REQUEST
Party Status Criteria

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 Commission/Board?

Approval of the requested action will lead to the development (with townhomes, schools, and new 20,000 sq.ft. Paulist building) of most of the remaining open space of the St. Paul's College site, which was suggested as being left open in perpetuity, in exchange for relaxed zoning restrictions for the Chancellor's Row development during the PUD approval process and which current residents relied on when making significant investment in the purchase of their homes. This will adversely impact Chancellors' Row residents in the quiet and peaceful enjoyment of their private property. All members of the St. Paul's College Neighbors for Thoughtful Development ("Neighbors") are persons that own and occupy townhomes in Chancellors' Row, and some are directly adjacent to the property that is the subject of this case. A list of the members of the Neighbors is attached as Attachment 1 hereto. There are 28 members in all, but only 22 members that have agreed to be publicly identified as members of the group.

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

Neighbors' legal interest in the property that is the subject of this case is as follows: its members are also members of the Chancellors' Row Homeowners Association ("Association"), which is the legal successor to certain easements granted to the developer of Chancellors' Row on property that is the subject of this case. As such, the members of Neighbors are legally entitled to the benefit of all easement rights enjoyed by the Association. None of the Neighbors is appearing as a representative of, or on behalf of, the Chancellors' Row Homeowners Association, or its Board of Directors.

3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board? (preferably no farther than 200 ft.)

Some of the members of Neighbors own property adjacent to the subject property. Others own property within 200 feet of the subject property. Others own property further than 200 feet from the subject property but all are immediately impacted by the development of this site as the community roads and other common elements of the site that are privately maintained by Neighbors and other Chancellors' Row residents will be adversely affected by the proposal.

4. What are the environmental, economic, or social impacts that are likely to affect the person and/or person's property if the action requested of the Commission/Board is approved or denied?

Members of Neighbors reasonably expect that approval will result in a reduction of the value of their adjacent or nearby properties. They also believe that they will experience adverse environmental effects from the loss of open space; loss of significant trees; decrease in light and air; increase of vehicular traffic; and reduced effectiveness of stormwater management.

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

The proximity of the members of Neighbors to the new townhome project means that its adverse effects will be felt by them to a markedly greater degree than the general public.

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 persons in the general public.

Chancellors' Row was developed by developers EYA resulting from the sale by St. Paul's College of a significant portion of its campus to EYA, which sought and obtained a PUD and rezoning from the Zoning Commission. Since that approval, Chancellors' Row has been fully developed by EYA and the townhouses sold to individual homeowners. Those homeowners and their successors, which group includes all members of Neighbors, are uniquely, significantly, distinctly, and especially located to experience the adverse effects of the proposed additional development on what remains of the St. Paul's College campus, as compared to the general public. Neighbors is broadly representative of these homeowners.