


BEFORE THE ZONING COMMISSION OR  
BOARD OF ZONING ADJUSTMENT OF THE DISTRICT OF COLUMBIA

**FORM 140 - PARTY STATUS REQUEST**

Before completing this form, please go to [www.dcoz.dc.gov](http://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:	Beekman Place Condominium Association (by JonMarc P. Buffa, President)		
Address:	1600 Beekman Place, NW, Washington, DC 20009		
Phone No(s):	202-234-9097 (Beekman's office)	E Mail:	jonmarcbuffa2001@yahoo.com
I hereby request to appear and participate as a party in Case No.:		19689	
Signature:		Date:	
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

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

Name:	Cornish F. Hitchcock, Hitchcock Law Firm, PLLC		
Address:	5614 Connecticut Avenue, NW No. 304, Washington, DC 20015		
Phone No(s):	(202) 489-4813	E Mail:	conh@hitchlaw.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?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
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.)
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?
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.
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.

## **Party Witness Information:**

### **1. List of witnesses who will testify on the party's behalf**

- JonMarc Buffa, President, Beekman Place Condominium Association
- Pete Quinnan, Vice President, Beekman Place Condominium Association
- Carl Schmid, Resident, Beekman Place
- Joe Mehra, MCV Associates, Inc. (*see* expert witness statement below)

### **2. A summary of the testimony of each witness**

The Beekman Place witnesses identified above will testify as to why they oppose the request for special exceptions because the property in which we have an interest, Beekman Place, will be adversely impacted by:

- increased traffic, noise, congestion, and decreased parking;
- a significant loss of greenery and mature trees and landscaping;
- a significant reduction in property values;
- Overall degradation of the character of the neighborhood which is part of the Meridian Hill Historic District;
- the expanded Meridian event space will cause ongoing community disruption; and
- the project will have an adverse effect on light, airflow, and privacy, thereby decreasing Beekman owners' and residents' enjoyment of their homes.

### **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;**

Mr. Mehra will be offered as an expert in the area of transportation planning and traffic engineering.

Joe Mehra, P.E., P.T.O.E., is the President and founder of MCV Associates, Inc. He has over thirty years of experience in the areas of transportation planning, traffic impact studies, traffic engineering and environmental planning. His experience includes local, state, federal government and the private sector. He has managed and contributed to projects requiring multi-disciplinary teams and multi-year assignments. The scope of his studies range from small site access studies to statewide and national level studies.

Mr. Mehra's testimony will focus on his review of the Applicant's traffic study, which was prepared by Wells and Associates and submitted with their BZA application. Mr. Mehra's testimony will show that the study prepared by Wells and Associates contains numerous inconsistencies and errors, including outdated traffic data, growth rates, and unbalanced traffic volume. These errors are meaningful and significant and so undermine the accuracy and reliability of the Wells report.

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

We request one hour to present our case.

**Party Status Criteria:**

**1. How will the property in which we have an interest be affected by the action requested of the BZA?**

If the BZA grants the Applicant's request for special exceptions, the property in which we have an interest will be adversely impacted by increased traffic, noise, congestion, decreased parking, loss of greenery and overall degradation of the quality and character of the neighborhood.

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

The Beekman Place Condominium Association is a 216-unit condominium complex across the street from the project. Beekman has approximately 520 owners and residents. The Beekman Place condominium complex lies 45-60 feet from the proposed development -- it is literally across the street -- and thus received notice of this application. This project will adversely affect our property and our owners and residents.

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

Beekman Place is located directly to the south of the proposed project, 45-60 feet from the motor court entrance and property line of the proposed project.

**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 BZA is approved or denied?**

Noise

Once constructed, noise related to the proposed Project will have considerable on the neighboring properties, especially those located near the entrance of Beekman Place, which will be particularly vulnerable to traffic noises in and around the Motor Court. This includes sounds associated with delivery trucks, garbage trucks, and moving trucks

that will be servicing both the 9,266 square foot conference center and the 115-unit<sup>1</sup> residential building. Noises caused by increased pedestrian and vehicle traffic in and around the Motor Court, including valet operations for Meridian events, will have an impact on surrounding properties, especially the Beekman Place condominiums.

These increases will come from residents and their visitors, as well as employees and guests of Meridian.

### Traffic

The proposed Project will exacerbate existing traffic problems in the immediately surrounding neighborhood, especially at the intersections of Belmont Street and 16<sup>th</sup> Street and Crescent Place and 16<sup>th</sup> Street.

Allowing the new vehicular traffic to make a left turn out of the Motor Court would create congestion and confusion in the 2-way portion of Belmont Street due to cars and trucks simultaneously leaving Beekman Place, cars and trucks turning onto Belmont Street from the northbound or southbound lanes of 16<sup>th</sup> Street, and idling vehicles (i.e. ride share vehicles).

Furthermore, any vehicular congestion within the Motor Court will create traffic on Belmont Street, as traffic waiting to enter will block the right lane, and any vehicular congestion on Belmont Street will compound the challenges associated with turning onto Belmont Street from 16<sup>th</sup> Street, creating traffic backups on 16<sup>th</sup> Street.

### Parking

The proposed Project will exacerbate existing parking problems in the immediately surrounding neighborhood during the construction phase and permanently.

The immediately surrounding community will lose approximately thirty (30) parking spots during the construction process on Belmont Street and Crescent Place and another forty (40) in the current Meridian International parking lot. Meridian will still be conducting their rental events and other activities during the construction period, which will necessitate parking. The measures that have been proposed by the Applicant during the construction phase of the project will not be sufficient to accommodate the parking demands of the neighborhood.

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<sup>1</sup> It is unclear whether the building will have 111 units or 115 units, as both figures have been used in various documents and MOU drafts.

The proposed Project will result in the permanent removal of three (3) parking spots on Belmont Street.

The proposed 115-unit building would adversely affect the availability of on-street parking for residents and visitors, which is already difficult.

### Meridian International Concerns

Meridian currently uses its property for Meridian-specific events of varying sizes, duration, and location, including day and evening events; and also for private rental events, including weddings and corporate events.

An existing Memorandum of Understanding (MOU) between Meridian and the surrounding neighbors memorialized agreements pertaining to (1) noise (specifically related to delivery and pick-up trucks, amplified music during evening events, arriving and departing guests, idling bus engines, shouting of valet parkers, and garbage trucks and other vehicles); (2) traffic and parking (specifically guest and employee parking, valet parking, vehicles operating proscribed spaces, and hazards to traffic); (3) limits on special events (specifically the number of events Meridian is permitted to hold, and the size of said events), and (4) consequences of violations. The existing MOU has not improved the problems caused by Meridian's events, and the following violations are routinely observed by neighboring residents:

- illegally parked and idling shuttle buses,
- double-parked catering trucks, rental equipment trucks, and other service vehicles which frequently block traffic on Belmont Street for unacceptable periods of time,
- illegally parked diplomatic vehicles on Crescent Street;
- amplified music and guest noise stemming from Meridian events, especially with regard to weddings and large outdoor events.

Throughout the process of attempting to negotiate a new MOU between neighbors and Meridian for the purposes of this development, violations of the existing MOU continued to occur, calling into question the likelihood of future improvement.

In light of the ongoing violations of the existing MOU in place between Meridian and the neighbors, and the fact that the requirements for a private school are not presently being met, the addition of a 9,266 square foot conference center and 115-unit residential building will compound existing problems of noise, traffic, and parking, and will create an unbearable situation for the surrounding community.

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

Loss of Greenery

Furthermore, this Project will result in the loss of greenery, sunlight, and considerable airspace that adds to the character of the surrounding neighborhood.

**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?**

Beekman Place Condominium Association and its owners and residents will be the primarily disadvantaged party if this project is allowed to proceed, primarily because of the proposed Motor Court. The Motor Court will be the project's only vehicular point of ingress and egress, and its proposed location directly across from the entrance to Beekman Place will create congestion and safety issues. These issues will primarily impact Beekman Place residents, but will also create difficulties for anyone who uses Belmont Street to access the neighborhood.

Beekman Place will also be uniquely aggrieved by traffic, congestion, noise, and overall inconvenience during the construction process, due to the fact that all staging will occur outside the entrance to Beekman Place.

# Jawahar (Joe) Mehra, P.E. PTOE

President, MCV Associates, Inc

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## Education

- MS/1972/Industrial Engineering
- BS/1969/Mechanical Engineering

## Registration/Certification

- Professional Engineer: TX, VA, MD, DE
- PTOE

## Affiliations

- Fellow, Institute of Transportation Engineers
- Member, Transportation Research Board

## Summary

Mr. Mehra has over forty years of experience in the areas of project management, traffic engineering and transportation planning. He has managed numerous traffic engineering/operations studies including traffic analysis, impact studies and data collection. He has managed several traffic engineering studies in the Washington DC including the K Street Busway Study, the EISF preparation for Logan Circle residential development, EIS for PEPCO Project, The Bus rapid Transit Study, TIS for various land uses, traffic data collection projects for DDOT, Klingle Road Traffic Study, Field School Traffic Impact Study, etc. He has testified as an expert witness for several projects in Washington, DC and these include Georgetown University, George Washington University, Hine Jr. High PUD, American University, Shadow Night Club, Skyland Development, Sanctuary 21, St. Patrick School, Edmond Burke School, Field School, Tilden Street Residential Development, etc.

## Relevant Experience

**Traffic Engineering.** He has managed several traffic engineering studies with extensive experience in traffic simulation models such as Synchro, CORSIM and TRANSYT-7F. He managed the traffic analysis study for Fort Meade that used the CORSIM Model to evaluate roadway improvements to accommodate security measures implemented after September 11, 2001. He was also the Project Manager for a three year transportation planning “on-call” contract with VDOT for Region 2. As part of this contract the Tysons Corner area was analyzed using the Synchro model. Approximately 40 signalized intersections were analyzed for the existing conditions and future conditions. CORSIM Model was also used on several other projects to evaluate corridors such as the Route 207 corridor in Caroline County, the Eisenhower Avenue corridor for the Patent and Trademark Office in Alexandria, etc. Other traffic engineering studies that he has managed include the Route 58 (Pennington Gap Bypass) Traffic Engineering Study for VDOT, Route 1/123 Interchange Study, etc.

**Transportation Planning/Forecasting.** He was the Project Manager for the Dulles Corridor Metrorail Project - Station Traffic Circulation Study For Preliminary Engineering Extension To Dulles Airport / Route 772 to validate the station layouts and the traffic forecasts as they relate to station access issues for the Metrorail Extension. He has conducted statewide, regional, corridor and subarea planning studies in Washington, DC, Fauquier County, Warren County, Fairfax County, Loudoun County (using COG’s Version 2 Model and VIPER that resulted in the County’s Comprehensive transportation plan), Chesterfield County, Richmond area, Hampton Roads, Tri-Cities, Prince William County, etc. in Virginia; Montgomery County, Baltimore County, St. Mary's County, Charles County, Prince George's County, Germantown, Silver Spring, etc. in Maryland; York County, Pennsylvania; St. Louis, Missouri; Denver, Colorado; New York City, Connecticut, etc. using MINUTP, TMODEL2, EMME/2 or QRSII. He has managed multimodal planning studies for a broad range of clients. He was the Project Director for the New Approach Study for Integrating Transportation and Development in the National Capital Region using the MINUTP model. He was the Principal Investigator of a FHWA study on Analysis and Use of Trip Generation Rates resulting in S.I.T.E. Handbook and updated NCHRP 187 trip rates. He was MCV's Project Manager on a multi-disciplinary team to prepare the Georgetown Branch Transitway MIS in Maryland. He managed the Charles Town Circulation Study and the Leesburg Downtown Courts Transportation Study. Corridor EIS, etc.





BEEKMAN PLACE CONDOMINIUM ASSOCIATION, INC.  
1600 BELMONT ST, NW  
WASHINGTON, DC 20009

May 29, 2018

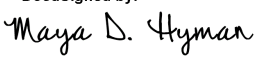
Sara Bardin, Director  
D.C. Office of Zoning  
Board of Zoning Adjustment  
441 4<sup>th</sup> Street, N.W. Room 210  
Washington, D.C. 20001

**Re: BZA Application No 19689 (Application of MIC9 Owner LLC on behalf of Meridian International Center)**

Dear Ms. Bardin:

On March 27, 2018, at a duly noticed Board of Directors meeting of the Beekman Place Condominium Association, with a quorum of the Board being present, the Board of Directors voted unanimously to participate as a party in opposition to Meridian's Board of Zoning Adjustment application, and to retain and authorize legal counsel to represent the Association, which authority includes the power to bind the Association in the proceeding.

Sincerely,

DocuSigned by:  
  
3225373524C54C2...  
Maya Hyman

Secretary, Beekman Place Condominium Association





BEEKMAN PLACE CONDOMINIUM ASSOCIATION, INC.  
1600 BELMONT ST, NW  
WASHINGTON, DC 20009

May 29, 2018

Sara Bardin, Director  
D.C. Office of Zoning  
Board of Zoning Adjustment  
441 4<sup>th</sup> Street, N.W. Room 210  
Washington, D.C. 20001

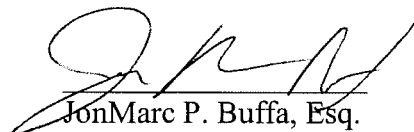
**Re: BZA Application No 19689 (Application of MIC9 Owner LLC on behalf  
of Meridian International Center)**

Dear Ms. Bardin:

Attached hereto is a letter from the Board Secretary evidencing a vote by the Board of Directors of the Beekman Place Condominium Association authorizing Beekman Place Condominium Association to participate as a party in opposition to the above-referenced action.

Please be advised that Andrea C. Ferster and Cornish F. Hitchcock are authorized to represent the Beekman Place Condominium Association Board of Directors in the above-referenced zoning proceeding, including the power to bind the Association in this proceeding.

Very truly yours,



JonMarc P. Buffa, Esq.

President, Beekman Place Condominium Association

CERTIFICATE OF SERVICE

I certify that on May 30, 2018, copies of this Form 140 and supporting materials were served electronically upon the following:

David S. Avitabile  
Goulston & Storrs  
1999 K Street, NW, Suite 500  
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District of Columbia Office of Planning  
c/o Jennifer Steingasser  
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Washington, DC 20024  
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Cornish F. Hitchcock