

PARTY WITNESS INFORMATION

1. **A list of witnesses who will testify on the party's behalf;** Aubrey Stephenson and/or Jeanett P. Henry, Esquire.
2. **A summary of the testimony of each witness;** witness(es) will testify about the adverse impact of the proposed project on Mr. Aubrey Stephenson's property located at 460 and 462 K Street, NW, consistent with the information to support party status set forth below.
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;** none
4. **The total amount of time being requested to present your case.** 15-20 minutes.

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?**

The construction proposed by Kline Operations will adversely affect Mr. Stephenson's use of his property at 460 and 462 K Street, NW in several respects – (a) increased noise, dust and traffic from construction and operations will impact tenant operations; (b) loading dock activity at the planned hotel will block access to garbage canisters in alley; (c) potential damage to the physical structure and integrity of the buildings and resultant repair costs; and (d) depressed property value.

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

Mr. Aubrey Stephenson is the owner of 460 and 462 K Street, NW and his company, Federal Management Systems, Inc. is one of the tenants occupying the buildings.

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 220ft.)**

Mr. Stephenson's property is approximately 6 feet from the property that is the subject of the application and the distance narrows to approximately 4-1/2 feet at the northerly edge.

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?**

Environmental impact – the noise and dust from the construction will necessarily affect building tenants and their guests, and cause more frequent reliance on cleaning services to keep the buildings habitable. Trash canisters are currently stored outside the back door of 460 K Street. It is expected that the loading dock proposed by Kline will be in active use with large trucks loading or unloading in a very narrow strip, thereby impeding alley access for collection of trash/garbage on a regular basis. The likely result will be rodent infestation of Mr. Stephenson’s buildings and the surrounding area.

Economic impact – with the close proximity and the height of the proposed project, Mr. Stephenson anticipates structural damage to his buildings. When the condominiums were constructed on the opposite side of Mr. Stephenson’s buildings a few years ago, his buildings incurred damages of over \$150,000.00. Other anticipated costs are for cleaning services to handle the dust and debris, as well as loss of revenue if tenant(s) have to re-locate their operations temporarily during construction.

Social impact - From past experience, the noise and dust could become so disruptive that FMS and other tenants may have to re-locate their offices temporarily from the buildings. FMS’s workers currently occupy the back office on each of the 3 floors to 460 K Street. The current view from each office window are walls on one side and some open space on the other. If the project were approved then the view from these offices would be further constrained by more bare walls in closer proximity, and natural lighting in these offices will be further compromised.

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.

Mr. Stephenson’s property is listed as a historic site and as such there are constraints to changing the buildings. With condominiums already on one side of Mr. Stephenson’s property, construction of a hotel on the other side will adversely affect the value of Mr. Stephenson’s properties, which will end up being located between two hi-rise structures and further constrain his future plans for sale of his property.

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.

Mr. Stephenson’s property is the closest to the proposed project and will be adversely affected as set forth in answers to Nos. 1, 4, and 5 above.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the Form 140 was served on this 30th day of April, 2018 on the following interested persons as follows:

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