

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 > 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: Massachusetts Avenue Heights Citizens Association (MAHCA)
Address: 2707 36th St., NW, Washington, DC 20007
Phone No(s): 202 415 4026; 202 375 1300 E-Mail:

I hereby request to appear and participate as a party in Case No.: 19751
Signature: [Signature] Date: September 12, 2008

Will you appear as a(n) Proponent Opponent Will you appear through legal counsel? Yes No

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

Name: Andrea Ferster
Address: 2121 Ward Court, NW, 5th Floor, Washington, DC 20037
Phone No(s): 202 974-5142 E-Mail: aferster@railstotrails.org

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.

**Before the Zoning Commission or Board of Zoning Adjustment
of the District of Columbia
FORM 140 - Party Status Request**

ATTACHMENT

BZA case number 19751 (MED Developers, LLC)

Name: Massachusetts Avenue Heights Citizens Association (MAHCA) on behalf of certain residents listed as within 200 feet of the proposed facility in MED Developers, LLC's application (please see (1) MACHA Secretary's Certificate certifying that Paul Cunningham, as the President of MAHCA, has authority to act on behalf of MAHCA, and (2) Authorization of Representation documents attached hereto)

Address: 2707 36th Street, NW, Washington, DC 20007

Phone Nos.: (202) 415-4026 (Paul Cunningham, MAHCA President)
(202) 375-1300 (Anita Crabtree, MAHCA Zoning Coordinator)

Email: pac@harkinscunningham.com
anitaliviamitra@yahoo.com

I hereby request to appear and participate in Case No.: 19751

Signature: Paul A. Cunningham

Printed Name: Paul Cunningham

Date: September 11, 2018

Will you appear as a(n) Proponent Opponent
Will you appear through legal counsel? Yes No

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

Name: Andrea Ferster

Address: 2121 Ward Court, NW, 5th Floor, Washington, DC 20037

Phone No(s): (202) 974-5142

E-mail: afenster@railstotrails.org

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

Impacted neighbors and community members including:

- William Brownfield
- Anita Crabtree (MAHCA Zoning Coordinator)
- Paul Cunningham (MAHCA President)
- Thomas Henneberg
- Kristie Kenney

Expert witnesses: To be determined as MAHCA is able to locate experts for issues raised by the applicant's new proposal made and presented to the public August 29, 2018, fewer than ten (10) business days ago.

2. A summary of the testimony of each witness

Impacted neighbors and community members will speak about the adverse impact the proposed facility would have on them, their families and their properties.

Expert witnesses will testify about the economic sustainability of the applicant's proposal, the adequacy of the plan for the operation of the facility, and the neighborhood impacts including environmental and traffic/parking impacts.

Since the new proposal was announced on August 29, 2018, fewer than ten (10) business days ago, we have been soliciting experts with specific knowledge of the above-listed topics and will further inform the Board and the applicants as they are retained.

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

Background

Although the developer applicant filed the application in March 2018, the applicant did so without having an operator, which is not typical when planning a project for a memory care facility, as the operator would normally be intimately involved in the project from the beginning. The applicant did not introduce the operator of the proposed facility to the impacted community until August 29, 2018. Even after the applicant found an operator, neither the applicant nor the operator amended the application, even as plans have continued to be changed. The applicant's first and only "community meeting" was on August 29, 2018 and was unilaterally scheduled by the applicant and his counsel at the end of August 2018 before Labor Day when the applicant and his counsel knew many impacted neighbors would still be away on vacation. The impacted neighbors and the impacted community members who were able to attend the meeting then saw, for the first time, building plans and learned that the purpose of the facility changed from assisted living, as set forth in the applicant's March 2018 application, to exclusively memory care. At the meeting, only an onscreen PowerPoint presentation was used and no materials were disseminated. The meeting was to be webcast, but the presenters refused to attempt basic troubleshooting of the webcast when it did not function at the start of the meeting (because the

presenter was signed-in to two separate accounts and was attempting to broadcast from the wrong one of the two). Many community members had planned to attend via this webcast because the developer had committed to its availability, so this failure to provide the webcast impacted expected community engagement.

Though neither the applicant's application nor the pre-hearing statement acknowledges *any* issues for the impacted neighbors or the wider impacted community, there are many issues of grave concern and there are many issues the impacted neighbors and community have had no opportunity to ask the applicant about. Even those present at the community meeting (August 29, 2018) were cut off from questions, and the applicant has not followed-up with answers it was unable to provide that evening.

The applicant states in Section VI of the prehearing statement that it has "conducted significant community outreach, including four community meetings." This is false.

There was one Ward 3-wide meeting held outside the affected neighborhood on August 29, 2018. The presentation at that meeting was superficial, with no data (numbers or labels on drawings), and only on-screen diagrams (no hand-outs to study). The applicant has labeled ANC 3C's Planning and Zoning (P&Z) Committee meetings as community meetings, which is misleading, as the community has no opportunity to ask any questions or raise concerns at those meetings. One of those P&Z Committee meetings was in early May 2018 when the applicant had not yet found an operator and was not able to answer any questions as to the operation of the facility; the applicant then also identified a different use of the facility. The applicant also misleadingly includes among "four community meetings" a future ANC meeting to be held on September 17, 2018. These misleading characterizations illustrate how the applicant and his counsel have consistently operated in connection with the proposed development of this property over the last three years, during which time they have proposed at least three different uses for a large, non-conforming building with practically the same design. They unwaveringly repeat the same claims that the proposed facility will not have an impact on the adjacent neighbors and community.

Witnesses to be Offered

MAHCA will offer expert witnesses to address the impacts on the surrounding neighbors and wider neighborhood including impacts related to traffic/parking, environmental impacts, and the apparent financial and operational infeasibility of the proposed business use of this property in a residential zone that is intended to provide areas predominantly developed with detached houses on moderately sized lots. These will include experts in traffic/parking, light and shadow issues, environmental quality, memory care facility design, construction and operation, and real estate finance.

MAHCA will submit the names of experts and further information about their testimony as soon as they are engaged.

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

Two hours.

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?**

The proposed non-conforming facility would have a significant adverse impact on the immediate neighbors of the proposed facility, as well as on the wider community for the reasons set forth below, though not limited to those reasons. The applicant has the burden of proof to demonstrate that there will not be any adverse impact in what is designated a residential zone. In the application and in the pre-hearing statement, the applicant merely states that the building and operation of the proposed facility and all that it brings with it will not have an adverse impact on the adjacent neighbors and wider neighborhood, but the applicant does not provide any reasoning or analysis as to why there is no adverse impact. The applicant has, therefore, not met its burden, and because of the nature of the proposed facility, cannot meet its burden.

* Please note that neither the application nor the pre-hearing statement meaningfully addresses any of these issues and we have not been given the opportunity by the applicant to ask about many of these issues.

Among the impacts that concern the immediate neighbors and the wider community are the following:

Parking

- **Incorrect parking standard is being applied:**
 - o The CCRC special exception language in the code has been updated within the last two years to include six conditions for the granting of a CCRC special exception (Subtitle U §203.1(f)(1)-(6)). The fourth of those conditions for the granting of the CCRC special exception is that “[T]he use and related facilities shall provide sufficient off-street parking spaces for *employees, residents, and visitors.*” DC lawmakers, very recently, specifically added the parking condition for any CCRC special exception (Subtitle U §203.1(f)(4)). Why should the applicant simply be able to ignore that condition and apply the “residential standard” of one (1) parking space for every two (2) units, which is a very low standard for what will instead be a very commercial and institutional facility?
 - o The applicant should provide enough off-street parking for all staff (which the applicant estimates will be eighteen (18) staff during the day, though that is a low number given that the applicant touts what a great staff/resident ratio the proposed facility will have), for all vendors/contractors who will on a regular basis come to work at the facility (physical therapists, beauticians, personal aids, reading companions, physicians, facilitators for all the resident activities described by the applicant, etc.), and for reasonably expected visitors.
 - o It is not permitted for the applicant to rely on residential parking for this facility. All the parking in MACHA’s residential, R-1-B neighborhood is RPP parking, limited to two (2) hours. ANC 3C has requested additional information regarding parking from the applicant’s parking expert.

- Too few parking spaces proposed: The applicant is proposing to provide only nine (9) parking spaces, at least one of which must be a handicapped parking space, perhaps even two if a staff member requires a handicapped space, and these handicapped spaces will have to be wider than regular spaces. Seven (7) or eight (8) regular spaces would not be sufficient. A majority of the staff will likely commute from far away, e.g. Hyattsville, Gaithersburg, Wards 7 and 8 and would have journeys, according to our careful calculations, of longer than ninety-five (95) to one hundred and twenty (120) minutes if they were to take public transportation, so it is highly likely that they will drive instead, requiring daily parking (an especially heavy load at shift changes). While DDOT may force the applicant and operator to offer incentives to employees not to drive, the operator cannot afford to have employees showing up late for shifts. We have spoken to individuals at other similarly located facilities, i.e. on bus routes, but not on the metro, and virtually no employees take public transit. There is nothing to change that trend here.
- If, for some reason, the residential parking standard were to apply, given that the applicant is proposing to provide nine (9) parking spaces, it would only be entitled to build an eighteen (18) unit facility. If the applicant is only able or willing to provide nine (9) spaces, why should the applicant be entitled to increase the size of the facility it is permitted to build by almost 100%? If there is no room for more than nine (9) spaces, perhaps the applicant should reassess the size of facility it is trying to cram onto two residential, R-1-B lots.
- The applicant saying that employees will be incentivized to take public transit will not make it show. Where is the evidence? And, if the applicant discriminates against potential employees because they would drive to work, that is commuter discrimination.

Traffic and Safety

- No accurate estimate of traffic to the facility: Unlike Sunrise, in connection with its proposed development of an assisted living facility in Tenleytown, the applicant has not provided answers to frequently asked questions, including about traffic to the facility and deliveries to the facility, e.g. average number of visits per week/month by ambulances, fire trucks, UPS, FedEx, uniform service, etc. This may well not be possible for the operator to provide since it has no experience operating a memory care facility and no experience operating any independent living or assisted living facilities in Washington, DC. Sunrise, while perhaps not the ideal operator, has a track record and is always intimately involved in its projects from the start, as are most operators. It is highly unusual for an operator not to have a say in the application or in the design and to join a project at the eleventh hour. This is and should be viewed as a red flag.
- Overuse of the alley: The applicant proposes that ALL traffic to and from the facility use the narrow roughly fourteen (14) foot wide alley to access the facility. There would be a loading dock right next to a home and directly across the narrow residential alley from other homes. There would also be a parking lot with an insufficient number of parking spaces, which will cause staff and visitors seeking parking to pull into the alley and into the small parking lot to look for a parking space and if they do not find one, to turn around in the small parking lot, to the extent that will be possible, and then to drive through the alley back onto either one of the one-way streets which border the alley on each side. The proposed use of the alley for all traffic to and from the facility and for all loading and waste pick-up would be undue overuse of the alley, would substantially and unduly interfere with neighbors' use of the alley to access their garages and to come and go from their homes on foot via their back gates, and is a major safety hazard. Even though DDOT supports use of alleys, without doing site visits and by opining based on looking at Google maps, this is not about DDOT's misguided philosophy. This is about safety.

MAHCA will provide evidence of the safety issues that will arise if the applicant is permitted to have all traffic to the facility come and go from the alley, which will amount to the applicant and operator co-opting the alley and using it as their private road.

Privacy

- **Loss of Privacy:** The proposed facility would tower over neighboring buildings, something which the applicant's architect has failed to accurately depict on the plan shown at the "community meeting" on August 29, 2018. The need to provide natural light to all thirty-six (36) memory care patients of the proposed facility is in direct conflict with the preservation of the privacy of the nearby homes. Since the proposed facility will be so tall and will be a continuous wall of windows from one end of the lot to the other, there will be direct lines of sight into neighboring homes, including bedrooms and bathrooms.

Environmental

- **Loss of light; air and noise pollution:** There is an enormous difference to having three single family homes built on that lot, which would each have sixteen (16) feet between them, and having the proposed facility built there, which will be a barricade spanning virtually the entire width and depth of the lot, especially because of the screened penthouse on top of the tall facility. The applicant has not provided any information on how the proposed design will mitigate loss of light for neighboring properties and how air and noise pollution (e.g. sirens, facility alarm whether for emergencies or routine testing) will be mitigated given the significant increase in mechanical equipment on the lot and traffic, including commercial traffic, on the lot and in the narrow, residential alley which the applicant proposes to co-opt as its private road for the proposed facility.
- **Back-up generator:** At the community meeting, an impacted community member inquired whether the back-up generator for the facility will be on the roof and the applicant's team stated that it will be. There has been no information provided on what this generator will run on – gas, oil, etc., how it will be refilled and why it will not be a hazard to the proposed facility or neighboring buildings.
- **Mechanical penthouse; noise:** The applicant proposes housing all mechanical units, HVAC, back-up generator, back-up water supply, etc. on the roof of the proposed facility and covering up the equipment with a screen to create a tall penthouse. There has been no information provided on how much noise all the equipment will generate and how much of that noise will be heard by impacted neighbors. Neighbors are concerned that the noise from the mechanical penthouse will exceed permitted noise levels in an R-1-B zone.
- **Non-permeable surface on developed lots; water run-off:** There will be virtually no permeable ground on lots 44 and 812 following construction of the proposed facility (which was designed to take up every possible square inch of the lot without requiring a variance), but according to the applicant's own surveyor, water run-off on that site is a major problem and concern, especially since the property slopes down toward the neighboring house (2617 Wisconsin Avenue) and because the property slopes down towards the alley. Has the applicant even thought about how to manage water run-off?

- Exhaust from commercial laundry facility on-site: The laundry facility on-site will be a commercial laundry facility since the laundry for all thirty-six (36) residents, the on-site catering facility, and the rest of the proposed facility would be processed there. There has been no information provided on how the venting of that laundry facility will be handled and whether any vents will face the residential home next to the facility. There is concern that there will be noise, fume, vent issues.
- No effort to make the building green: It does not appear as though the applicant is making any effort to make the building green, e.g. no green roof, etc. By contrast, Sunrise has stated on its website about its proposed facility in Tenleytown (<https://www.sunriseseniorliving.com/tenleytowndevelopment.aspx>) that it would build that facility to LEED standards.
- No environmental study has been conducted: Since the lot has not been developed for decades, it is not known what lies beneath. Oddly, a portion of the lot is paved over, though not nearly as much as will be paved over if the proposed facility were to be built. The applicant has not conducted an environmental study, even with all the water run-off issues. As the applicant's surveyor stated, "they are really concerned with water run-off on that lot."

No experience building or operating memory care facilities:

- Applicant has no experience building or managing independent living facilities or assisted living facilities, let alone memory care facilities, so there is no track record to look to.
- The operator, Guest Services, Inc. ("GSI"), was not identified until late July 2018 even though applicant submitted its application in March 2018. GSI has no experience building or operating memory care facilities. GSI blatantly misrepresented its experience both at the "community meeting" on August 29, 2018 and at the P&Z Committee meeting on September 4, 2018.
- At both meetings, GSI stated it currently operates two assisted living facilities and suggested that it operates memory care facilities. However, one of those two facilities, The Pineapple House at Sapphire Lakes in Naples, Florida, is at best in construction, so is not yet in operation (<https://www.guestservices.com/news/2018/07/17/pineapple-house-sapphire-lakes-press-release/>). As the website states, "set for fall 2019 grand opening." The community corrected the operator at the community meeting and the operator quickly qualified his statement, but then made the same false statement about currently operating two assisted living facilities to the P&Z Committee on September 4, 2018.
- The other facility cited by GSI is the The Cove at the Marbella, which appears to be an assisted living facility within an independent living retirement community, but which is not a memory care facility (<http://www.marbellapelicanbay.com/>). GSI has not shown that it has any experience building or operating a memory care facility, so, like the applicant, has not track record.

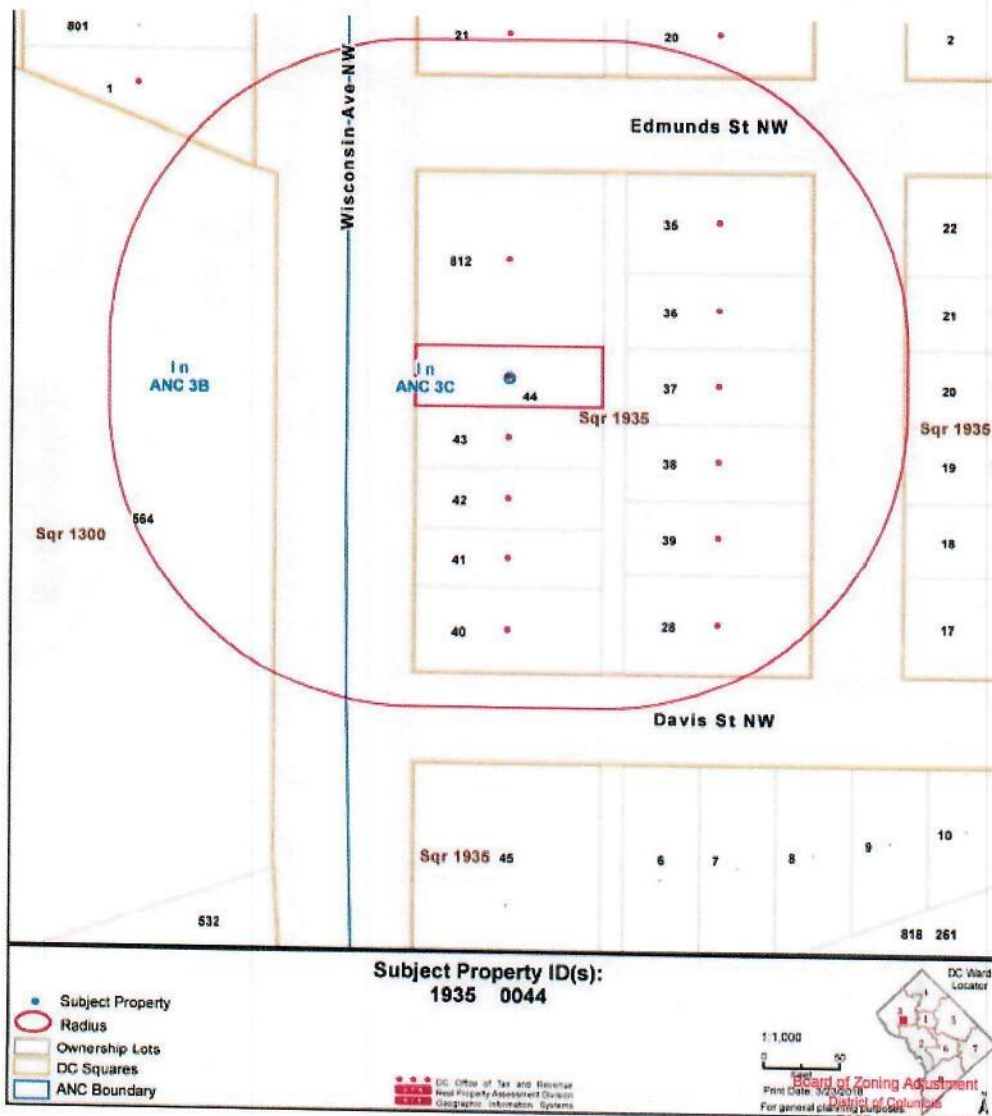
Proposed facility is poorly designed:

- The facility is not resident driven, e.g. most such facilities have circular drives at the front so that patients can be driven up to the door or readily escorted there. Will cars have to stop in front of the bus stop on Wisconsin to drop off residents or block the alley at the back?
- The facility is not well thought through.

- The facility is not commercially viable based on feedback from every expert we have spoken with and the applicant has not provided any evidence that the proposed use, which is the sole ground for the special exception, is a viable one.

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

Please NOTE: Some individuals/homeowners within 200 feet of lot 812 (also known as lots 33 and 34) WERE NOT included in the application since the applicant neglected to include lot 812 as a subject property in Exhibit 8 of its application "List of Names and Mailing Addresses of Property Owners within 200 Feet." As a result, these missing individuals/homeowners did not receive the required notice from the BZA of the case and the BZA hearing. The application is, therefore, deficient and should not have been accepted by the BZA. The application must be corrected and resubmitted. Once the application has been amended to include all individuals within 200 feet of lot 812 and the BZA provides the requisite notice to such individuals, MAHCA reserves the right to amend this application for party status to include individuals within 200 feet of lot 812.



All individuals who signed Authorizations of Representation designating MAHCA their representative in this case are homeowners within 200 feet of lot number 44 who were included in the application, as required, and who received notice from the BZA. Individuals/homeowners within 200 feet of lot 812 (also known as lots 33 and 34) WERE NOT included in the application and did not receive the required notice, as stated above.

- (1) Adam Aloï: 2617 Wisconsin Avenue, NW, Washington, DC 20007
- (2) Jonathan Brock: 2607 36th Place, NW, Washington, DC 20007
- (3) Andrew Cooper: 3643 Davis Street, NW, Washington, DC 20007
- (4) Anita Crabtree: 2608 36th Place, NW, Washington, DC 20007
- (5) Lester Edmond: 2602 36th Place, NW, Washington, DC 20007
- (6) Marc Granger: 3615 Edmunds Street, NW, Washington, DC 20007
- (7) Kristie Kenney: 2604 36th Place, NW, Washington, DC 20007
- (8) Dana LePere: 3610 36th Place, NW, Washington, DC 20007
- (9) Peregrine Roberts: 2609 36th Place, NW, Washington, DC 20007
- (10) Christopher Sipes: 2609 36th Place, NW, Washington, DC 20007
- (11) Susan Tannenbaum: 2606 36th Place, NW, Washington, DC 20007
- (12) Asako Yamamoto: 2605 36th Place, NW, Washington, DC 20007

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.)**

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 Commission/Board is approved or denied?**

Please see number 1 above.

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 number 1 above.

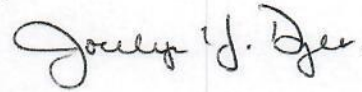
6. **Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.**

The general public will not have to live in the shadow of this institutional facility, which in many ways will be akin to a minimum security prison.

**MASSACHUSETTS AVENUE HEIGHTS CITIZENS ASSOCIATION
SECRETARY'S CERTIFICATE**

Secretary's Certificate

I, Jocelyn Dyer, do hereby certify that I am the duly elected and qualified Secretary and keeper of records of the Massachusetts Avenue Heights Citizens Association (MAHCA), that Paul Cunningham is the duly elected President of MAHCA and that he is authorized to act on behalf of MAHCA in any and all respects in connection with BZA Case 19751.



Name: Jocelyn Dyer

Title: MAHCA Secretary

Date: September 12, 2018

Adam Aloï
2617 Wisconsin Avenue, NW
Washington, DC 20007

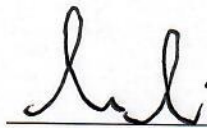
September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Adam Aloï, reside at 2617 Wisconsin Avenue, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.

9/11/18



Adam Aloï

Jonathan Brock
2607 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Jonathan Brock, reside at 2607 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.



Jonathan Brock

Andrew Cooper
3643 Davis Street, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

we *& Debra*
I, Andrew Cooper, reside at 3643 Davis Street, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent *us* *ies* me as a named party in BZA case number 19751.


Andrew Cooper


Debra Cooper

Anita Crabtree
2606 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Anita Crabtree, reside at 2608 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.


Anita Crabtree

Lester Edmond
2602 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Lester Edmond, reside at 2602 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.



Lester Edmond

Marc Granger
3615 Edmunds Street, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Marc Granger, reside at 3615 Edmunds Street, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MACHA) to represent me as a named party in BZA case number 19751.

A handwritten signature in blue ink, appearing to read 'Marc Granger', is written over a horizontal line.

Marc Granger

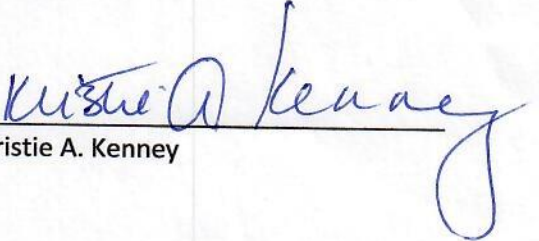
Kristie Kenney
2604 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Kristie A. Kenney, reside at 2604 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.


Kristie A. Kenney

Dana J. LePere
2610 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Dana J. LePere, reside at 2610 36th Place NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.



Dana J. LePere

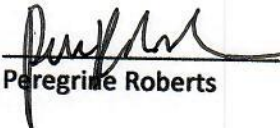
Peregrine Roberts
2609 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Peregrine Roberts, reside at 2609 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.


Peregrine Roberts

Christopher Sipes
2600 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Christopher Sipes, reside at 2600 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.



Christopher Sipes

Susan Tannenbaum
2606 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Susan Tannenbaum, reside at 2606 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.

A handwritten signature in black ink, appearing to read "Susan Tannenbaum", written over a horizontal line.

Susan Tannenbaum

Asako Yamamoto
2605 36th Place, NW
Washington, DC 20007

September 11, 2018

Board of Zoning Adjustment
441 4th Street, NW
Suite 200S
Washington, DC 20001

Authorization for Representation

I, Asako Yamamoto, reside at 2605 36th Place, NW, Washington, DC 20007, which is within 200 feet of the lots at issue in BZA application 19751, and hereby authorize the Massachusetts Avenue Heights Citizens Association (MAHCA) to represent me as a named party in BZA case number 19751.

Asako Yamamoto

Asako Yamamoto

BZA Case No. 19751 (MED Developers, LLC)

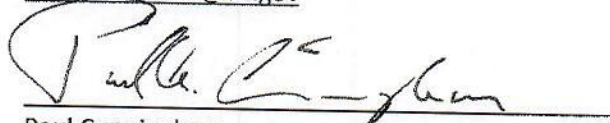
AFFIDAVIT OF SERVICE

I hereby certify that on September 12, 2018 a copy of the foregoing Request for Party Status was served via e-mail to the following:

Counsel for Applicant
Meridith Moldenhauer
1200 19th Street, NW
Washington, DC 20036
MMoldenhauer@cozen.com

ANC 3C
Chair Nancy MacWood
3417 Woodley Road, NW
Washington, DC 20016
nmacwood@gmail.com

DC Office of Planning
Joel Lawson
Brandice Elliott
1100 4th Street, NW, Suite E650
Washington, DC 200024
Joel.Lawson@dc.gov
Brandice.Elliott@dc.gov


Paul Cunningham
President
Massachusetts Avenue Heights Citizens Association