



**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:	Chetan Chandra and Meghann Teague		
Address:	417 T Street NW, Washington, D.C. 20001		
Phone No(s):	703-217-5324; 773-621-3854	E-Mail:	cgchandra3@gmail.com; mteague@cooley.com

I hereby request to appear and participate as a party in Case No.:	20290
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Signature:		Date:	10/1/2020
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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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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If yes, please enter the name and address of such legal counsel.

Name:			
Address:			
Phone No(s):		E-Mail:	

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:	October 7, 2020
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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 by the proposed zoning action than that of other persons in the general public.

Submitted by the Proponent
 District of Columbia
 CASE NO.20290
 EXHIBIT NO.34

ZONING REGULATION FORM 140 ATTACHMENT

BZA Application No. 20290

Address of Application Property: 421 T St NW Washington DC 20001

Proper Owner Information: Vitis Investments, LLC

Parties Requesting Status: Chetan Chandra & Meghann Teague

Parties' Previously-Submitted Opposition: Exhibit 14.

PARTY WITNESS INFORMATION

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

- Chetan Chandra
- Jason Bello
- John Garland
- Leah Oliver-Vass
- David Gelles
- Emily Eig

2. A summary of the testimony of each witness.

- Chetan Chandra will testify regarding the effects on the adjacent property of the proposed project and zoning requirements for relief.
- Jason Bello will testify about design aspects and how they should be weighed against the applicant's alleged burden.
- John Garland will testify about the unique nature of the LeDroit Park neighborhood and how it connects to zoning regulations.
- Leah Oliver-Vass will testify regarding her decades-long residence in and deep understanding of the LeDroit park neighborhood, LeDroit Park's concerns, and the negative effects that the project will have on the neighborhood.
- David Gelles will testify regarding the requirements for zoning relief.
- Emily Eig will testify regarding architectural aspects of the project and the issues caused by aspects tied to the applicant's requested relief.

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 at this time.

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

Approximately 45 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?

Our home at 417 T Street NW is immediately adjacent to the proposed project which requires zoning relief to be converted to a commercial apartment building with a more than 4x increase in resident density. Moreover, the proposed project includes an oversized addition and a number of apartment units which greatly departs from the per-unit-density limitations and height restrictions for an RF-1 zoned property.

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

Chetan Chandra and Meghann Teague are the owners and residents of 417 T Street NW, which is immediately adjacent to the subject property (421 T Street NW).

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.).

4.5 feet or fewer.

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?

The proposed project will negatively impact us and our property at least with respect to privacy, light, noise, water runoff, rodent control, and usability of the small, shared public alley. The project may cause structural damage to our home. The negative social impact is evidenced by resounding opposition from the community (a petition with over 60 signatures from the surrounding homes will be submitted into the record before the hearing). *See also* Exhibit 14, "Corrected Comments in Opposition from Chetan Chandra and Meghann Teague".

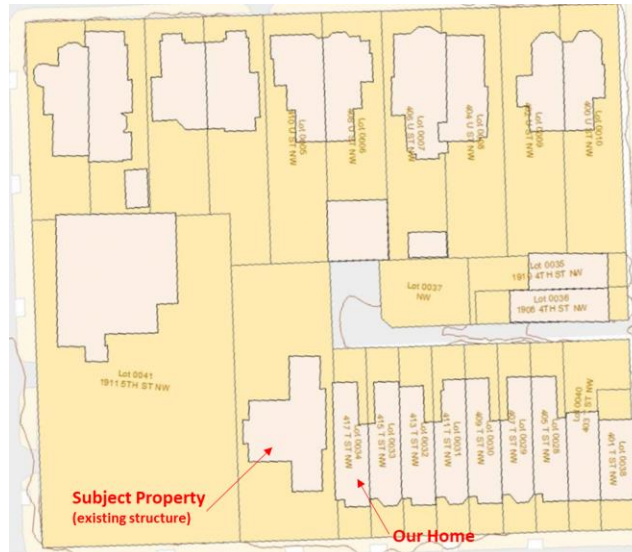
5. Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the Commission/Board is approved or denied.

We and other community members are opposed to the proposed project in part because it is entirely in conflict with the historic character of the neighborhood. The HPRB expressed the same concerns in their most recent meeting concerning the project on September 24, 2020.

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.

As the immediately adjacent neighbors - and the only neighbors whose house is within 50 feet of the proposed structure - we would be most affected with respect to all negative impacts of the proposed project, including the environmental, economic, and social impacts noted above. In other words, we are the most affected party because we are by far the closest to the

property. All other impacted homes within 200 feet of the property either back to the subject property or are on the opposite side of our home (see image below).



In addition, the proposed project includes several structural plans that, if zoning relief is granted, would directly affect our property. Several of these plans were added after initial review by the ANC and LeDroit Park Civic Association (LPCA). These additional plans were not reviewed or approved by the ANC or LPC and present serious intrusions into our property. Furthermore, the applicant has not reached out to us, at any point, to discuss their plans or impacts on our property.

Respectfully submitted,

Chetan Chandra and Meghann Teague
Owners and Residents of 417 T Street NW.

CERTIFICATE OF SERVICE

BZA Application No. 20290

Pursuant to the requirements of Subtitle Y §§ 404.6 and 404.7, I certify that a copy of the **request for party status** has been served upon:

- (1) The Applicant; and**
- (2) The affected ANC**

Service was made on October 2, 2020 by email to the following:

- (1) Marty Sullivan, Representative of Vitis Investments, LLC

Marty P. Sullivan
msullivan@sullivanbarros.com

- (2) ANC 1B

ANC 1B Office
1b@anc.dc.gov

ANC 1B ZPD
ZPD@anc1b.org

James Turner
ANC 1B Chairperson
1b09@anc.gov

Anita Norman
SMD
1b01@anc.dc.gov

Respectfully Submitted,



Chetan Chandra