



**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:	Thomas Sheeran and Theresa Harrison		
Address:	311 10 th St, NE, WASHINGTON, DC 20002		
Phone No(s):	1-609-915-9658	E Mail:	TAAHARRISON@yahoo.com
I hereby request to appear and participate as a party in Case No.:	20382		
Signature:		Date:	Feb 8, 2021
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

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: **FEBRUARY 24, 2021**

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.

February 8, 2021

Chairperson Frederick L. Hill
Board of Zoning Adjustment
441 4th Street, NW
Suite 210S
Washington, DC 20001

Regarding

- **Application No. 20382 (Haider Haimus and Jessica Bachay) (the “Applicants”) of 308th 11th Street, N.E. (the “Applicant’s Structure”).**
- **Party Status Application in Opposition from Thomas Sheeran and Theresa Harrison, homeowners directly behind the Applicant’s Structure.**

Chairperson Hill and Honorable Members of the Board,

Thomas Sheeran and Theresa Harrison, homeowners and residents of 311 10th St, N.E. (“Sheeran Residence”), respectfully request party opposition status in the above-referenced case. The hearing is scheduled for February 24, 2021.

The Applicant is seeking special exception relief to allow: a 4th level addition and roof deck to an existing 3-level rowhouse in the Capitol Hill Historic District; and a second-story addition to an existing detached garage located in RF-1 Zone.

Party Witness Information

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

Thomas Sheeran and Theresa Harrison will testify individually and they reserve the right to add witnesses at the time of the hearing.

2. A summary of the testimony of each witness;

Thomas Sheeran and Theresa Harrison will testify, collectively or individually, that the Applicant’s proposed additions will substantially and adversely impact the privacy, airflow, openness, noise levels, and light available to the Sheeran Residence; that the growth of the 50 foot+ magnolia tree will be impeded; that the view from the backyard will be excessively compromised; and that the proposed development is out of character with the neighborhood including the seven adjacent row houses that line the alley.

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

Thomas Sheeran and Theresa Harrison reserve the right to provide information pertaining to witnesses or, supplement the record, at a date prior to the hearing.

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

Thomas Sheeran and Theresa Harrison will present their case in 15 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?

As will be outlined at the hearing, the Applicant's requested special exception will substantially and adversely impact the privacy, airflow, openness, noise levels, and light available to the Sheeran Residence. The Sheeran Residence, which is located directly behind the Applicant's Structure, will experience significant and adverse affects from the proposed development and relief being requested. The Applicant's Structure will impede the growth of a 50 foot+ magnolia tree due to the obstruction of airflow, light, openness; it will disrupt a view of seven historic adjacent row houses; and it will bring added noise and loss of privacy to the Sheeran Residence.

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

Thomas Sheeran and Theresa Harrison are the homeowners and residents of record of the property at 311 10th St, NE, directly behind 308 11th St, NE.

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.)

The Sheeran Residence is located 10 feet directly behind the Applicant's Structure and shares the common alley.

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?

If the requested relief is approved the Sheeran Resident will be subject to environmental, economic, and social impacts, including but not limited to adverse impact the privacy, airflow, openness, noise levels, and available light.

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.

Thomas Sheeran and Theresa Harrison reserve the right to supplement the record to include additional evidence on the matter. The proposed structure will have significant adverse impacts on their 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.

The Sheeran Residence is located directly behind Applicant's Structure. Because of this, Thomas Sheeran and Theresa Harrison's interest will be more significant, distinctively and uniquely affected than others in the general public. The Applicant's proposed additions will result in significant and irreparable reduction of privacy, airflow, openness, noise levels, and available light to the Sheeran Residence. Thomas Sheeran and Theresa Harrison respectfully request that the Board of Zoning Adjustment grant their request for party status in opposition. Thank you for your consideration and attention to this matter.



Thomas Sheeran

311 10th St, NE, 20002



Theresa Harrison

311 10th St, NE, 20002

2/8/21
Date

February 8, 2021
Date

Certificate of Service

I hereby certify that on February 9, 2021, I served a copy of this Party Status request in opposition via e-mail to the following:

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