



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



FORM 140 - PARTY STATUS REQUEST

Before completing this form, please review the instructions on the reverse side.  
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.**  
(Please see reverse side for more information about this distinction.)

Pursuant to 11 DCMR §§ 3022.3 or 3106.2, a request is hereby made, the details of which are as follows:

Name:	Erin Drouin		
Address:	1692 31st St NW		
Phone No(s):	917-373-5490	E Mail:	erin_r_mccann@yahoo.com
I hereby request to appear and participate as a party in Case No.:		21143	
Signature:	Erin Drouin	Date:	7/5/2024
Will you appear as a(n)	Opponent	Will you appear through legal counsel?	No

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

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

**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 (*Zoning Commission only*);
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 (*Zoning Commission only*); and
4. The total amount of time being requested to present your case (*Zoning Commission only*).

**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.

**Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.**

## **ERIN DROUIN PARTY STATUS CRITERIA AND SUMMARY**

Erin Drouin, along with her husband Francois Drouin, are owners of 1692 31<sup>st</sup> Street NW and near neighbors of 3100 R Street. The home is within 200 feet of 3100 R Street.

My interest is as the owner of a private, residential property historic property (1692 31<sup>st</sup>) in a historic residential neighborhood (Georgetown).

In the spring of 2021, we were planning our move to Georgetown and actively watching the residential sales market. At the time, 3100 R Street was also for sale, and it is our understanding that the seller received offers from several interested parties before selling 3100 to the current owner. To be clear, we did not consider this property, but were aware of its sale status, as several Georgetown residents alerted us to its availability. At the time, it was a coveted residential property.

We moved into our home in the summer of 2021 and in that time have not seen any occupants of 3100 R Street. However, we have witnessed excavation work in the basement, debris piled in the driveway, overgrown front garden spaces, etc. Work seemed ongoing for some time, yet recently the only activity seems to be use of the gated driveway spaces.

Learning that after 3 years of ownership, and coinciding with the construction and building projects currently undertaken by Dumbarton Oaks on S Street, was a surprise. Those projects cause frequent – and at times daily – disruption to driving in the neighborhood, with blocked streets and oversized vehicles parked in the lanes of traffic (causing the street to become one way and not two ways, as it should be). Often, this disruption coincides with busy times of day (morning commute). Given current projects, there are questions about Dumbarton Oaks/Harvard University deciding to undergo another construction project at 3100 R Street. Also, the impact on those of us who park in the alley and need unobstructed entrance and exit from this street, a turn that is already dangerous given the speeding and frequent failure of drivers to stop at stop signs at 31<sup>st</sup> and 32<sup>nd</sup> streets. The Department of Transportation has been alerted to this existing safety concern.

There are additional impacts to my family. First and foremost, safety. The house currently looks abandoned; there is no attempt to maintain the property, install lighting, clean outdoor spaces, etc as there is no attempt to maintain the sister property a few doors down that was vacated last year. We had a home intruder this spring – who stole expensive property – and if the homes on the alley entrance were well lit and occupied it would keep our block safer. 3100 R Street is not on the alley, but has the same owner, who has not exhibited consideration for neighbors. Hence, concern with proposed plans for 3100 R Street. There is little reason to believe an office building would be good neighbors.

An additional concern is economic (value of property and neighborhood) – we live in a residential neighborhood, a very well-known and recognized residential neighborhood, where there are no commercial offices. There are plenty on Wisconsin Avenue – and

available for rent – that are within a block of Dumbarton Oaks properties and are available for immediate commercial use.

A third concern is environmental. 3100 R Street has been in a state of disrepair for 3 years. Some demo work has been undertaken. The gutter is sealed shut with garbage/overgrown weeds. The overgrown, dying hedges do not seem representative of Dumbarton Oaks and its gardens just across the street. Further, the disrepair and overgrown outdoor spaces raise concerns about rodent infestations.

Parking is also an issue, as is use of the alley.

Georgetown is a residential neighborhood. There is no compelling reason to convert this private residence to a business. At time of purchase the buyer knew it was purchasing a single-family home in a residential neighborhood and zoned as such. Further, it would likely not be a hardship to owner to sell if unable to use as a residence.

## CERTIFICATE OF SERVICE

BZA Application No. 21143

Pursuant to the requirements of Subtitle Y § 404.7, I certify that a copy of the **Form 140 - Party Status Request** and all accompanying documents have been served upon:

- (a) **The applicant: Trustees for Harvard University:**
  - a. **Yota Batsaki, Executive Director, Dumbarton Oaks:** [batsakiy@doaks.org](mailto:batsakiy@doaks.org)
- (b) **The applicant's representative or counsel:**
  - a. **Leila Batties, Partner, Holland & Knight:** [Leila.batties@hklaw.com](mailto:Leila.batties@hklaw.com)
- (c) **The ANC:**
  - a. **ANC 2E Office/ANC2E Executive Director:** [2E@anc.dc.gov](mailto:2E@anc.dc.gov)
- (d) **The ANC SMD:**
  - a. **Gwen Lohse, Acting on behalf of SMD 2e07 Commissioner Daniel Chao:**  
[2e06@anc.dc.gov](mailto:2e06@anc.dc.gov)
  - b. **Daniel Chao, Commissioner 2E07:** [2e07@anc.dc.gov](mailto:2e07@anc.dc.gov)

Service was made on July 5, 2024 by email, to the following:

1. Yota Batsaki, Exec. Director: Dumbarton Oaks  
[Batsakiy@doaks.org](mailto:Batsakiy@doaks.org)
2. Leila Batties, Partner: Holland & Knight  
[Leila.Batties@hklaw.com](mailto:Leila.Batties@hklaw.com)
3. ANC2E Executive Director: 2E@anc.dc.gov
4. ANC 2E Chairperson: Gwen Lohse & ANC 2E07 Commissioner: 2e06@anc.dc.gov;  
[2e07@anc.dc.gov](mailto:2e07@anc.dc.gov)

Signature: \_\_\_\_\_

