In support of the attached Party Status Application Form, Julia Schiller and Lowell Schiller wish to join the pending application for party status by Joseph Seller and Laurie Davis (collectively, the "Neighbors") request party status pursuant to Subtitle Y § 404.3 and submit the following information:

Party Witness Information

1. *A list of witnesses who will testify on the party's behalf and a summary of their testimony;*

- **Julia Schiller – Owner and Resident, 2323 Porter Street NW**

Ms. Schiller may testify regarding her property's proximity to the existing tennis court for which expansion and intensification is proposed, the proposed new padel courts, the new pedestrian/bike entrance, pedestrian safety on the gravel road, existing residential conditions, and the anticipated effects of the proposed use, including noise, traffic, lighting, privacy, access, and outdoor activity, on the use and enjoyment of her property, as well as the sufficiency of proposed mitigation measures to address these impacts.

- **Lowell Schiller – Owner and Resident, 2323 Porter Street NW**

Mr. Schiller may testify regarding his property's proximity to the existing tennis court for which expansion and intensification is proposed, the proposed new padel courts, and the new pedestrian/bike entrance, pedestrian safety on the gravel road, existing residential conditions, and the anticipated effects of the proposed use, including noise, traffic, lighting, privacy, access, and outdoor activity, on the use and enjoyment of his property, as well as the sufficiency of proposed mitigation measures to address these impacts.

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

60 minutes (to be presented jointly with Joseph Sellers and Laurie Davis).

Party Status Criteria

1. *How will the property owned or occupied by the person, or in which the person has an interest, be affected by the action requested of the Board;*

The requested approval would replace the existing residential use of Greystone with a membership-based recreational private club operating throughout the day and into the evening. For the neighboring owners seeking party status, that change would bring recurring recreational activity, member and guest arrivals, employee traffic, and service activity into the immediate setting of their homes. Noise from the proposed pools, new and expanded tennis and padel courts, and gathering areas, together with increased lighting and activity, would interfere with their privacy and ability to enjoy their home and outdoor spaces. Associated changes to landscaping, screening, and site improvements would also affect the residential setting of their property. Additionally, the proposed operation would intensify use of the shared gravel access path serving the adjoining properties, including for member pickup and drop-off, employees, and deliveries. That increased

Board of Zoning Adjustment
District of Columbia
CASE NO. 21510
EXHIBIT NO. 125A

use would directly affect the Neighbors' daily access and use of the road, which provides the only pedestrian and vehicle access to and from their property. These impacts arise from the requesting parties' immediate proximity to the proposed private club and access route and would be experienced at their homes on a continuing basis.

2. *The legal interest each person has in the property;*

Julia Schiller and Lowell Schiller own and reside at 2323 Porter Street NW. Each has a direct ownership and possessory interest in the property that would be affected by the requested approval.

3. *The distance between the person's property and the property that is the subject of the application before the Board;*

2323 Porter Street NW, owned by Julia Schiller and Lowell Schiller, directly abuts the subject property. The distance between their property and the subject property is therefore zero feet.

4. *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 Board is approved or denied;*

The following is a list of impacts to the Neighbors that would result if the Board grants the Applicant's requested change in use.

(a) Noise and Privacy of Use and Enjoyment

The proposed change in use would expose the Neighbors to recurring noise from recreational activities, outdoor gatherings, and events near their homes. Activity throughout the day and into the evening would interfere with ordinary residential activities, including working from home, resting, and spending time outdoors. Restrictions on amplified sound would not address the cumulative noise generated by participants, guests, and simultaneous use of the facilities, which would include the repetitive, percussive sound of padel. The Neighbors would also experience increased pedestrian activity and lighting near their property boundaries. New circulation routes and gathering areas, together with changes to vegetation and screening, would diminish the separation and privacy their home currently enjoys. Without clearly defined limits on attendance, outdoor activity, events, and lighting, the proposed restrictions provide insufficient assurance that these impacts would remain compatible with the adjoining residential uses.

(b) Traffic

The proposed operation would increase traffic on the shared access road through member and guest arrivals, pickup and drop-off activity, employee trips, deliveries, and rideshare services, creating congestion and access concerns for the Neighbors. The Applicant's projected reliance on walking, bicycling, and transit may overstate actual use given the site's topography, seasonal conditions, and families traveling with children and recreational equipment. Realistic travel assumptions and enforceable operating restrictions are therefore necessary to prevent traffic from exceeding projected levels. The proposed operation would also materially intensify the use of the portions of the shared access road owned by the Neighbors.

(c) Operations

The proposal leaves unclear how daily Club activities would be managed, including limits on attendance, guests, gatherings, deliveries, outdoor music, and lighting. The proposed trash operation would also require staff to move heavy refuse containers along the proposed steep, winding stone path to Porter Street, creating noise and practical concerns, while collection trucks could obstruct traffic on the narrow roadway near Beach Drive.

Additional paving, grading, construction, and changes to landscaping, fencing, access routes, recreational facilities, or service areas could worsen drainage, reduce screening, and alter the historic residential setting. Because later plan revisions could intensify these effects, the Neighbors seek clear operating parameters and coordinated plans that can be evaluated before a comprehensive submission can be provided.

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

The Neighbors contend that the proposed use is a private club, rather than a private community center eligible for the requested special exception. Under the Applicant's classification, the Neighbors maintain that the Applicant has not met its burden of demonstrating compliance with the applicable special exception standards. The Neighbors contend that critical information is missing from the application making evaluation of the proposed use challenging. These arguments will be developed further in the Neighbors' statement in opposition.

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

The Neighbors property directly abuts the Subject Property, placing their home and outdoor living areas immediately beside the proposed private club. They would experience the resulting noise, lighting, loss of privacy, traffic, safety, and potential drainage impacts at their own properties on a recurring basis. The Neighbors would bear the immediate consequences of the proposed operation where they live, work, and spend time outdoors. Their interests arise from direct exposure to the proposed use and its effects on their adjoining property, rather than a generalized concern about development in the neighborhood.