SUPPLEMENTAL STATEMENT SUPPORTING PREVIOUSLY FILED FORM 140

District of Columbia Board of Zoning Adjustment
Case No. 21518 - Application of Ran Xu
3919 Watson Place NW | Square 1806, Lot 25
Submitted by: Edna “Neda” Pahlavani and Richard Tynes
Co-owners of 3917 Watson Place NW
Date: November 1, 2026

Dear Members of the Board:

We submit this statement to supplement Edna “Neda” Pahlavani’s previously filed request for party status in opposition and to identify Richard Tynes as her husband and a co-owner of the adjoining home. It clarifies our responses to the Form 140 criteria and provides witness information. It supplements, rather than replaces or withdraws, the earlier statement. We respectfully request that the Board consider both submissions together.

1. How our property would be affected

We own and live at 3917 Watson Place NW, immediately adjoining the applicant’s property at 3919. The proposed fence and accessory building would directly affect our household’s existing route between our backyard gate, the public alley, and our parking space. Our parking arrangement is offset, with the space we use located one position over behind the neighboring property. We are concerned that the proposal would leave a narrow passage and turn, making everyday access and movement of large trash and recycling bins substantially more difficult.

2. Our legal interest in the affected property

We are co-owners and residents of 3917 Watson Place NW. Our interest concerns the use, access, safety, and enjoyment of our home. We are not asking the Board to determine disputed property ownership or declare an easement through this party-status request.

3. Distance from the subject property

3917 and 3919 Watson Place NW are immediately adjoining properties, with no intervening property. The proposed rear improvements would therefore be next to the rear area our household uses.

4. Likely environmental, economic, and social impacts

The impacts we are concerned about include restricted rear access, difficulty moving bins to and from collection, and the expense of modifying our metal gate to open into my backyard. We are willing to relocate our own storage unit, which has been in place for more than six years. Our concern is whether practical access would remain after it is moved. We also request review of whether the remaining route would allow safe emergency escape and access by emergency responders; we are not asserting that a code violation has already been established.

Condominium parking spaces face the project across the alley, and vehicles reverse into the alley to leave those spaces. Large garbage trucks also use the alley. We are concerned about maneuvering clearance around the proposed fence and accessory building. These concerns warrant review of the actual dimensions and public alley boundary. We are also concerned that reduced access and functionality could diminish our property’s market appeal and value; We have not obtained an appraisal establishing a loss.

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5. Other relevant matters

Based on our understanding of the boundary, the applicant's existing storage unit and four trash bins are entirely on our property, while our own storage unit extends a few inches onto hers. We recognize that the precise boundary must be established by appropriate documentation. The proposal should not assume continuing use of our property for the applicant's storage or bins. We request a dimensioned plan showing bin storage and the collection route without blocking our gate, the remaining passage, or travel through the public alley.

Edna "Neda" Pahlavani has received information from a neighboring property owner that the rear area historically served as shared parking for three homes. This history has not been independently verified. Relevant original plans, deeds, or agreements may help clarify the arrangement; we are not asserting that historical use alone establishes a legal right of access.

Before approval, we request clear, dimensioned drawings showing the proposed fence and gates, accessory building, property and public alley boundaries, remaining access route, and the relationship to adjoining properties. Our concerns should be assessed against the actual proposed layout rather than an assumption that the rear area is used only for parking.

6. Why our interests differ from those of the general public

Our household uses the adjoining backyard gate, rear passage, bins, and parking arrangement in daily life. The proposed improvements would directly affect those activities and may require changes at our own property and expense. These are specific effects on an immediately adjoining home, rather than a general objection to neighborhood development. For these reasons, our interests would be more significantly, distinctively, and uniquely affected than those of the general public.

Party witness information

Witnesses: Edna "Neda" Pahlavani and Richard Tynes.
Summary of testimony: Both witnesses will describe our household's existing rear access and parking arrangement, gate and storage configuration, trash collection needs, and the proposed project's effects on those uses. Each witness will distinguish their own personal observations from matters requiring boundary, engineering, or agency verification.
Expert witnesses: None are currently proposed. We are offering factual testimony as adjoining owners and residents, not expert opinions on engineering, appraisal, or code compliance.
Presentation time requested: Approximately 20 minutes, subject to the Board's allocation.

We respectfully request party status in opposition so that we may present our testimony, question witnesses as permitted by the Board, and address the project's specific effects on our home. This supplement does not depend on adopting another neighbor's allegations or technical conclusions.

Respectfully submitted,
Edna "Neda" Pahlavani
Richard Tynes
Co-owners
3917 Watson Place NW
Washington, DC 20016
Checkurgrill@gmail.com | 202-294-9400