


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.dco.dc.gov](http://www.dco.dc.gov) > 1215 > Participating in an Existing Case > Party Status Request for Instructions.  
Print or type all information on or in the indicated information commission, 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:  | Paula Van Lare  |                                   |  |
| Address:   | 429 N St SW   |                                   |  |
| Phone No(s):   | 202-251-9828  | E-Mail:                           | president@tiberisland.com  |
| I hereby request to appear and participate as a party in Case No.: | 11-03J  |                                   |  |
| Signature:   |  | Date:                             | 10/19/17   |
| Will you appear as a(n)  | <input checked="" type="checkbox"/> Proponent                                     | <input 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: **November 2, 2017**

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?  | See attached letter  |
| 2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)  | President of the Board of Directors for Tiber Island Cooperative Homes |
| 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.)                           | Approximately 75 feet  |
| 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?       | See attached letter  |
| 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.                        | See attached letter  |
| 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. | See attached letter  |

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## Tiber Island Cooperative Homes, Inc.

429 N Street, S.W. □ Washington, D.C. 20024 □ (202) 554-4844 □ (202) 488-7742 (Fax)

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October 26, 2017

Ms. Donna Hanousek  
Zoning Commission of the District of Columbia  
441 4<sup>th</sup> St. NW  
Washington, DC 20001

Re: Case No. 11-03J

Dear Ms. Hanousek:

I hereby certify that on this date I served notice to Norman Glasgow, counsel for Wharf Phase 3 REIT LLC, and to Andy Litsky, Chairman of ANC 6D, of my intent to seek party status for Tiber Island Cooperative Homes in Case Number 11-03J. I have forwarded by email the application and supporting attachment that I submitted to your office on October 19.

I apologize for this late service, and thank you for your assistance in bringing this lapse to my attention. I hope this letter serves to complete my application.

Warm regards,

Paula Van Lare  
President



**TIBER ISLAND**

# **Tiber Island Cooperative Homes, Inc.**

429 N Street, S.W. □ Washington, D.C. 20024 □ (202) 554-4844 □ (202) 488-7742 (Fax)

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October 19, 2017

Zoning Commission for the District of Columbia  
441 4<sup>th</sup> St, NW  
Washington, DC 20001

Dear Sir or Madam:

I am President of Tiber Island Cooperative Homes (TICH), located in the block bordered by 4<sup>th</sup> and 6<sup>th</sup> Streets, SW, and M and N Streets, SW. This location at the southeast edge of the Phase II Wharf development will result in TICH bearing disproportionate impacts from both the construction and the operation of this development. I am hereby requesting party status for TICH in Case No. 11-03J, which will come before the Commission for hearings on November 2, 6, and 9.

I have attached Form 140 as required. The space for providing the requested information on the form itself is limited, so I am providing additional information below.

## Party Status Criteria

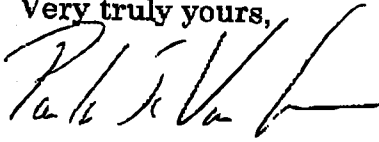
TICH is generally supportive of the development, which will provide services and opportunities to neighborhood residents. However, the development also will cause significant traffic disruption, noise, and dust during construction, and also will cause ongoing traffic and parking congestion, noise, vehicle emissions, trespassing, and other nuisances to Tiber Island residents during operation. Phase II of the Warf development will significantly increase the demand for street parking, the relative scarcity of which is already a major source of concern for residents. It will also significantly increase the number of nonresidents crossing through TICH property, which in turn reduces the security of our residents. I believe that these impacts, combined with our location less than 100 feet from the southeast edge of the development, clearly meet the party status criteria delineated in Form 140.

## Party Witness Information

Tiber Island Cooperative Homes has a significant interest in minimizing the detrimental effects of this development. I would like to testify on TICH's behalf, for no more than five minutes, on November 2, to request that all possible means of abating parking, security, traffic, and noise impacts be required and enforced both during and after construction of Phase II of the Warf. In particular, we wish to foreclose any option for the District or the owners of the Wharf to allow tour buses to use 6<sup>th</sup> Street or Water Street. TICH will not be offering any expert testimony, nor will we be represented by counsel.

Thank you for this opportunity to represent Tiber Island's interests before the Zoning Commission.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paula Van Lare". The signature is stylized with large, flowing letters and a long horizontal stroke at the end.

Paula Van Lare  
President

Cc: Derek Torrey, Secretary  
Allan Irwin, General Manager  
Andy Litsky, Chairman, ANC-6D