

November 3, 2016

VIA IZIS

Anthony Hood, Chairperson
D.C. Zoning Commission
Office of Zoning
441 4th Street, NW, Suite 210
Washington, DC 20001

Re: Zoning Commission Case No. 16-09 Opposition to Party Status Request and Submission of Expert Resume and Loading Management Plan

Dear Chairman Hood and Members of the Commission:

On behalf of the Applicant in the above-captioned case, we respectfully oppose the granting of party status to the Union Market Neighbors (For Better Planning) (“Neighbors”). As the Commission is aware, an entity requesting party status in a contested case has to clearly demonstrate that a member’s interests would be more significantly, distinctively or uniquely affected by the proposed zoning action than that of the general public. Neighbors does not identify any specific property interest that may be affected in a unique manner; nor does it even identify a particular property that may be affected in a significant, distinctive or unique manner. Neighbors does not distinguish its interests from those of the general public and has not listed, with any specificity, any impact that the proposed zoning action might have on their respective property interests. Accordingly, the Applicant asks that the Commission deny their request for party status.¹

The Applicant would also like to submit the resume for Trini Rodriguez, who has been accepted previously as an expert in landscape architecture. The Applicant will proffer her as an

¹ The Applicant notes that it was not served with the party status request, as required under Subtitle Z, Sections 404.7 and 404.8.

expert witness in its presentation this evening rather than Craig McClure, who was previously identified as the witness.

The Applicant is also filing a copy of its loading management plan, which was generated in response to a comment in DDOT's hearing report. DDOT requested a commitment to prohibiting trucks greater than 40 feet in size from utilizing the loading facilities. The Applicant submits the attached loading management plan as evidence of its commitment.

Finally, under separate cover, the Applicant simultaneously files the power point presentation it will present this evening.

Very truly yours,

A handwritten signature in cursive script that reads "Allison Prince" followed by a small flourish.

Allison Prince

A handwritten signature in cursive script that reads "Christine Roddy" followed by a small flourish.

Christine Roddy

I hereby certify that I sent a copy of the foregoing document to the following addresses on November 3, 2016, by Hand Delivery or first class mail:

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Christine Roddy