

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.dcoz.dc.gov > IZIS > Participating in an Existing Case > Party Status Request for instructions. Print or type all information unless otherwise indicated. All information must be completely filled out.

PLEASE NOTE: YOU ARE <u>NOT</u> REQUIRED TO COMPLETE THIS FORM IF YOU SIMPLY WISH TO TESTIFY AT THE HEARING. COMPLETE THIS FORM <u>ONLY</u> IF YOU WISH TO BE A <u>PARTY</u> 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:		Square 643 Associates LLC											
Address:		700 Delaware Avenue SW											
Phone No(s).:						E-Mail:							
I her	eby request to a	ppear and participate as a party in Case No.:					1945	i1					
Signa	iture:	Lugd J. Jord				Date:							
Will	you appear as a(n) 🗖	Proponent	∆ x	Opponent	Will you	appear thro	ough legal counsel?	¢,	Yes		No	
If yes, please enter the name and address of such legal counsel.													
Name:		Lloyd J Jordan & Motley Waller LLP											
Address:		1155 F Street NW, Suite 1050											
Phone No(s).:		202-559-8827				E-Mail:	il: Iloyd.jordan@motleywaller.com						
ADVANCED PARTY STATUS CONSIDERATION PURSUANT TO: Subtitle Y § 404.3/Subtitle Z § 404.3:													
l her	eby request adva	ance Party S	tatus considerati	on at	the public mee	tings schec	luled for:	March 1, 2017					
PARTY WITNESS INFORMATION: On a separate piece of paper, please provide the following witness information:													
 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.	4. The total amount of time being requested to present your case.												
<u>PARTY STATUS CRITERIA:</u> Please answer <u>all</u> of the following questions referencing why the above entity should be granted party status:													
1.													
	the Commission/Board?												
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)													
3.													
	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?									ion			
5.	Describe any other relevant matters that demonstrate how the person will likely be affected or aggrieved if the action requested of the												
6.		Commission/Board is approved or denied. Explain how the person's interest will be more significantly, distinctively, or uniquely affected in character bokindoby the grouposed ent										ent	
	•	han that of other persons in the general public. District of Columbia									nbia		

Square 643 Associates LLC

Attachment to Party Status Application in BZA Application No. 19451 District of Columbia seeking multiple variances and special exceptions to construct a building for operating an emergency shelter.

A. Party Witness Information.

1. A list of witnesses who may testify on the Association's behalf.

Stephen M. Tanner- Square 643 LLC Ian Callender- Blind Whino SW Arts Club, Inc. Museum of Alternative Arts Association Board Member

David T. Haresign, or designee Bonstra | Haresign Architects

2. A summary of the testimony of each witness.

a. Steve M. Tanner will testify to the impact on the requested relief on the use and operation of the Applicant's property 700 Delaware Ave SW.

b. Ian Callender- will testify on the cultural use and importance of the 700 Delaware operation, the cliental of 700 Delaware and the impact of the application.

c. Bonstra |Haresign Architects-testify on the historical significance, use and design of 700 Delaware and the impact of the design of the applicant's property.

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;

a. Ian Callender- will testify about event management and the importance of the 850 Delaware's proposed use on the ability of 700 Delaware to draw the events presenting utilizing the property.

b. Bonstra |Haresign Architects-testify on the historical significance, use and design of 700 Delaware and the impact of the design of the applicant's property; the relief and its effect on the present zoning classification

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

Square 643 LLC request one (1) hour for its presentation to the Board.

B. Party Status Criteria:

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?

The owner, tenants, and invitees to 700 Delaware may be affected economically, environmentally and socially if the Board allows 850 Delaware use as a homeless shelter over the 15-person limit. As discussed in the responses to the questions below, the application fails to discuss how 850 Delaware will be operated to protect the health, safety, and welfare of the occupants and invitees to 700 Delaware. During its announcement of the proposed use of 850 Delaware as a homeless shelter, the applicant announced that it would present a "Good Neighbor Agreement" to the surrounding "community to set forth expectations and commitments regarding facility and landscape maintenance, safety and security, mutual codes of conduct and respect, and clear and expedient process for communication and problem solving." The Applicant has not provided the Agreement to the owner of 700 Delaware. Square 643 is concerned with the welfare of its property.

2. What legal interest does the person have in the property?

Square 643 LLC owns the property at 700 Delaware Ave NW.

3. What is the distance between the person's property and the property that is the subject of the application before the Commission/Board?

From property line to property line, there are approximately fifty (50) feet separating the property. Square 643's property is the most impacted occupied property to the applicant's property.

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?

Square 643's property will be affected by the applicant's use of 850 Delaware. Square 643's property is an art and cultural event location. Its invitees include persons and entities from across the world who come to 700 Delaware to view its artistic façade and to attend events. As stated in section 6, the use of 850 Delaware directly affects the operations and use of 700 Delaware. The applicant's proposed use of operating a homeless shelter over the regulatory limit of 15 people, can have a substantial impact on the economic and environmental use of 700 Delaware. The applicant is requesting to go over the limit by 151 people. The applicant fails to provide how the safety and the security of occupants and invitees of 700 Delaware will not be affected by its use of 850 Delaware as a homeless shelter. Particularly, unlike any other property, entry to 700 Delaware is most affected by 850 Delaware. The application fails to define how the cleanliness of the area will be maintained with this huge increase of people, who have no vested interest in the property. 700 Delaware due to its unique building façade has been designated internationally as a place to see in the District of Columbia. Tourist from around the world and those who utilize the property are attracted to 700 Delaware because of its decorative façade.

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.

As described in the responses to questions 1, 4, and 6, Square 643, its tenants and invitees are likely to be affected by the operations of 850 Delaware as a homeless shelter over the 15-person limit. The safety, security and environmental interest of 700 Delaware may be negatively affected by the proposed use of 850 Delaware.

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.

Square 643's property is the most impacted and nearest occupied property to the applicant's property. 850 Delaware sits as the front door to 700 Delaware Ave. Uniquely, any access to 700 Delaware requires its occupants and invitees to enter to the front or rear of the applicant's property. The 700 Delaware Avenue property to its west dead ends on Delaware. 700 Delaware is the only occupied building that immediately abuts the applicant's property. To the east, 700 Delaware dead-ends at H Street, where it abuts the applicant's property. To the north, 700 Delaware, there is no access to 700 Delaware. Any access to 700 Delaware requires access from its south; its occupants and invitees must enter to the east or west of the applicant's property.

The applicant's proposed use of operating a homeless shelter over the regulatory limit of 15 people can have a substantial impact on the economic and environmental use of 700 Delaware. The applicant is requesting to go over the limit by 151 people. The applicant fails to provide how the safety and the security of occupants and invitees of 700 Delaware will not be affected by the 850 Delaware use as a homeless shelter. 700 Delaware is most affected by 850 Delaware, because, the entry to 700 Delaware depends on 850 Delaware. The application fails to define how the cleanliness of the area will be maintained with this huge increase of people, who have no vested interest in the property.

Square 643's property is uniquely affected by the application. No other occupied property is bounded by the applicant's property Square 643 will be most affected by the relief requested., more than the general public.

February 14, 2017

Board of Zoning Adjustment 441 4th Street N.W. Suite 210S Washington, DC 20001

Re: Application 19451

Honorable Members of the Board:

I, Stephen M. Tanner, managing member of Square 643 Associates LLC, owner of the property at 700 Delaware Avenue SW, Washington, DC. This letter serves as notice that Lloyd J. Jordan, and Motley Waller LLP are my authorized agents for the party status, and our position regarding Application 19451 before the Board of Zoning Adjustment.

Sincerely yours,

Step M. Tanne

Stephen M. Tanner

Bonstra Haresign

KEY PERSONNEL

David T. Haresign, FAIA

Partner Bonstra | Haresign ARCHITECTS

David Haresign, FAIA is a foudning partner in Bonstra Haresign ARCHITECTS. David is a specialist in large-scale, complex projects, leading project teams and organizations with conceptual clarity, meticulous detail and a commitment to design excellence, social responsibility and the profession. He implements diverse project typologies with challenging entitlements, large integrated teams, and tight fiscal constraints. David engages the public through outreach and pro-bono activism, developing alliances and recruiting through leadership at the AIA and the academy, and exposing the results through awards, publication and presentations. His integrated project delivery achieves iconic design, technical innovation, restoration and re-purposing of old fabric that re-invigorates neighborhoods. Committed to smart growth planning and preservation, David is a socially responsible architect charting a sustainable future. He promotes affordable housing as a basic right and cornerstone of smart growth - retaining less affluent residents in old neighborhoods and housing them in new ones. His outreach extends to boards of related professional organizations including an alumni advisory committee, a nationally recognized real



estate development graduate program, and community organizations. His projects are widely recognized with over 100 national, regional and local design awards, and in international and national publications including Urban Land, residential architect, Inform, Architecture DC and the Washington Post. He mentors and inspires young architects with individual guidance. David is a sought-after design critic, and a frequent lecturer and panelist on current architecture and practice at noted regional universities and public conferences. He is a registered architect, completed his architecture degree at the University of Virginia in 1976, and studied graduate planning. David has served the American Institute of Architects as the Washington, DC Chapter president and board member, chairman of the Honors Committee, and co-chair of the AIA|DC Design Excellence Committee.David recently served as co-chair of the Host Chapter Committee and Design Leadership Committee Chair for the AIA 2012 National Convention and Design Exposition in Washington, DC, and was elevated to the College of Fellows, the AIA's highest honor. He is a member of the Cosmos Club in Washington DC, and a director of its Historic Preservation Foundation.

Professional Registrations

NCARB, DC, MD and VA

Professional Affiliations

- American Institute of Architects AIA|DC Washington Chapter of the AIA Honors Committee Chair, Past President, Officer and Director, Past Design Excellence Committee Chair; Past Host Chapter 2012 National AIA Convention Committee Co-Chair; Unassigned Member Northern Virginia + Potomac Valley Chapters
- Baltimore City Planning Department Urban Design and Architecture Review Panel
- University of Virginia, School of Architecture Regional Advisory Committee
- University of Maryland, School of Architecture, Real Estate Development Curriculum, Council of Advisors
- National Building Museum Capital Society Member
- DC Preservation League
- Cosmos Club, Historic Preservation Foundation Board
- National Trust for Historic Preservation
- Lambda Alpha International George Washington Chapter, Past Director and Chair of the Committee on Architecture, Landscape Architecture and Civil Engineering
- Urban Land Institute Advisory Services Panelist and Speaker
- DC Building Industry Association
- DC | MD National Association of Industrial and Office Parks, DC Leadership Council
- U.S. Green Building Council

Education

University of Virginia, Graduate Planning Studies, 1978-1979 University of Virginia Bachelor of Science, Architecture, 1976 Ian Keith Callender 16105 Edenwood Drive Bowie, MD 20716 (301) 613-4389 ianeyecan@gmail.com

Education: Drexel University, Philadelphia, PA Bachelor of Science in Information Systems and Technology Minor in Business Administration: Background in Computer Engineering

DeMatha High School, Hyattsville, MD; 1999 Graduate

Computer Experience:

Software: Windows 2010+ Server, SQL/Exchange Server, Windows 2000+ (XP/Vista/7+), Microsoft Office, Maple, Adobe Creative Suite 4 (Flash, Dreamweaver, Photoshop) Swish Max+, Exceed, Clarify, Director 8, Visual Basic 6.0, Visual C++, Test Director, DOORS, Visio, vb.net (More on request)

Work Experience:

• <u>Shoe City (ESCO):</u> Director of Information Technology; Assistant Marketing Consultant Baltimore, MD (June 2007 – Present)

<u>Current role:</u> Provides administrative leadership, technical support management, and strategic marketing and branding consulting for \$50 million/year regional apparel/footwear retailer with over 500 employees in over 32 locations throughout the Washington DC, Baltimore, Richmond, Tidewater Virginia Regions. Responsible for managing complete information systems infrastructure; corporate office, warehouse, and store location equipment peripherals including all cash wrap, traffic counters, scanners, switches, routers, etc; also maintains and administrates network internally and externally and the connectivity of LAN/WAN 24/7 via secured virtual private networks. Lead a full technical refresh of over 28 store level sites; upgraded software/hardware and head office to store communication channels. Reorganized business processes and placed departmental procedures to enhance productivity. New store technical installations and complete networking in a terminal server environment. Provides key marketing initiatives to Marketing department to further increase Shoe City brand loyalty to our customers; introduced special event partnerships and market relevant community events.

<u>Automotive Rhythms Communications, LLC:</u> Special Projects & Strategic Brand Integration Silver Spring, MD (January 2006 – Present)

<u>Current Role:</u> Educates potential auto buyers on new vehicles and corresponding product technologies, while simultaneously strategizing with automotive manufacturers interested in diversifying their target markets. Provides corporate marketing solutions through tactical promotional efforts within the automotive industry via test drives, product placements, shuttling services, and special events. Creates unique targeted events bringing the urban consumers awareness level within the mission of the automotive business leaders. Served as the Sports and Entertainment specialist for the 2007 Washington DC Auto Show; Coordinated talent and special promotions and productions during the 5-day convention. Helps bridge knowledge and understanding gap to the everyday community via the urban automotive experience. <u>Reference:</u> Kimatni Rawlins (President/Publisher of Automotive Rhythms)

• <u>The Sneaker Suite:</u> Founder/Owner Mitchellville, MD (August 2005 – Present)

<u>Current Role:</u> Provides everyday consumers, with purchasing power, an opportunity to experience products and brands that may or may not be readily available in their respective markets. By way of brand awareness, we create unique, strategic lifestyle events covering any and everything with a splash of an energetic eclectic environment. Provides event design through a fusion of fashion, footwear, music, and art, with a blend in the automotive and entertainment industries respectively; through this formula the corporate entities and consumers are able to develop reciprocal, social and business oriented relationships; all resulting in positive impressions for future growth in brand loyalty. Event planning and coordination are strong points. Previous corporate activations include Scion, CIROC, Land Rover, Porsche, Nike, Shoe City, DTLR, EA Sports, Heineken & more. The Sneaker Suite boutique event firm was created only after the Washington Post ran a front page cover story in the Style section about the sneaker culture featuring the Founder/Owner; in particular the "Sole of the Sneakerhead" – April 21, 2005). Produced over 150+ tactical events for corporate partners, local organizations, government officials, and more.

• <u>AXG, LLC:</u> Vice President (Information Technology), Webmaster & CO-Host Philadelphia, PA/Mitchellville, MD (August 2006 – August 2008)

Provided technical solutions to the independent sports marketing and consulting firm that best address the urban consumer through short and feature stories as well as video on sports, sport culture, music, and the sneaker/fashion industries. Maintained website for all updates: articles and video uploads via web software. Edited website dynamically to reflect new revisions. Produced special sneaker segments highlighting the latest footwear products and presenting brands to a large target audience for consumer feedback (enhanced focus groups via event branding). <u>Reference:</u> Anthony Gilbert (Currently EKIN (Philadelphia) with Nike, Inc)

- <u>Technology, Automation & Management (TeAM), Inc:</u> Information Assurance & Security Engineer Falls Church, VA (September 2004 June 2006)
 - <u>Department of Defense (DoD)</u>: Resources Information Technology Program Office (RITPO) Security Clearance: NACLC: ADP-II (IT-II) (November 2004)

Managed compliance reporting for RITPO managed Military Health Systems across Military Treatment Facilities. Technical Information Assurance (IA) lead on a number of DoD systems including Defense Medical Human Resources System (DMHRSi) and Expense Assignments System IV (EAS IV). Managed and maintained processes within the IA group specifically tracking, scanning, documenting, planning, and scheduling for each supported system. IA Support included technical documentation in the Certification & Accreditation (C&A) process, Site Level Accreditation procedures and DoD Information Technology Security Certification & Accreditation Process (DITSCAP) processes. Evaluated system design specifications to ensure compliance with DoD standards and commercial best practices.

• <u>Technology, Automation & Management (TeAM), Inc:</u> Systems Engineer (Drexel Co-Op) Greenbelt, MD & Falls Church, VA (September 2001-2003)

Created and integrated a suite of commercial of the shelf tools for an end-to-end requirements traceability process for business applications. Proctored web development and modernization initiatives specific to ensure government websites were section 508 accessible and compliant. Served as proposal production manager for 90% of TeAM's submitted government contract proposals. Organized a structured proposal template for future bidding purposes. Assisted with TeAM's in-house Knowledge Management Tool (TeAMLinkexpTM) and was appointed technical lead for high profile demos to top government officials. Assisted in developing CMM processes and ISO business standards for corporate branding via certification.

 <u>Cable & Wireless:</u> DMS Switch/Voice Network Engineer 1 (Summer Internship – Drexel Co-Op) Vienna, VA, (2000-2001)

Learned protocols and call processes for Interexchange Carriers (DMS 250). Manually tested call lines on several call process systems (Via SAGE 930A, TURBO-7 - FASTEST automated system). Checked the status of Frame Relay, ATM, and inter-working networks. Learned test procedures for call processing features and protocols (FGD, FGB, SS7 Call types on a DMS 250 switch). Created and completed test cases with an SPM Echo Canceller Box.

Recognition:

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National Society of Black Engineers Telecommunications Chair – Website of the Year (2003) Sole Collector Magazine – Drexel Black History Fashion Show (2004) Washington Post Style Section Cover Story – Sole of the Sneakerhead (2005) Shoe City – Manager of the Year/Employee of the Year (2007) WKYS 93.9fm Top 30 under 30 Award Recipient (2009)

More available on request

Recommendations and References: Available on request

Certificate of Service

I declare under penalty of perjury that the foregoing is true that a copy of the foregoing Request for Party Status was provided on February 15, 2017 to:

ANC 6D 1101 4th Street SW, Suite W130, Washington, DC 20024 office@anc6D.org Mr. Christopher Collins Attorney at Law Holland & Knight LLP 800 17th Street, NW, Suite 110 Washington, DC 20006 <u>chris.collins@hklaw.com</u>

Llugd J. Jord