

FORM 140 - PARTY STATUS REQUEST

Before completing this form, please review the instructions on the reverse side.

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.
(Please see reverse side for more information about this distinction.)

NAME: Last First Middle I.
Friends of McMillan Park

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I hereby request to appear and participate as a party. Signature Date
April 24 2014

Will you appear as a(n) Proponent Opponent Will you appear through legal counsel? Yes No

If yes, please enter the name and address of such legal counsel.

NAME: Last First Middle I.
Pozen Thorn

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WITNESS INFORMATION:

On a separate piece of paper, please provide the following witness information:

1. A list of witnesses who will testify on the person's behalf;
2. A summary of the testimony of each witness (Zoning Commission only);
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 (Zoning Commission only); and
4. The total amount of time being requested to present your case (Zoning Commission only).

PARTY STATUS CRITERIA:

On a separate piece of paper, 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?
2. What legal interest does the person have in the property? (i.e. owner, tenant, trustee, or mortgagee)
3. What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission/Board? (Preferably no farther than 200ft.)
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?
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.
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.

Except for the applicant, appellant or the ANC, to participate as a party in a proceeding before the Commission/Board, any affected person shall file with the Zoning Commission or Board of Zoning Adjustment, this Form 140 not less than fourteen (14) days prior to the date set for the hearing.

Zoning Commission Case No. 13-14

Vision McMillan Partners LLC and the District of Columbia – First Stage and Consolidated PUD and Related Map Amendment at 2501 First Street, N.W. (Square 3128, Lot 800).

Party Status Request of Friends of McMillan Park

Attachment to Form 140

April 24, 2014

Introduction

Pursuant to 11 DCMR §3022.3, the Friends of McMillan Park (“FOMP”), a nonprofit membership organization dedicated to preserving, restoring, and adaptively reusing historic McMillan Park in Washington, D.C., hereby petitions to appear at the Zoning Commission (the “Commission”)’s May 8, 2014, hearing as a party in opposition to the above-referenced application by Vision McMillan Partners LLC and the District of Columbia (through the Office of the Deputy Mayor for Planning and Economic Development (“DMPED”) (collectively, the “Applicant”). The Applicant is seeking approval of a First Stage and Consolidated Planned Unit Development (“PUD”) and Related Map Amendment at 2501 First Street, N.W. (Square 3128, Lot 800) (“Proposed Development Site” or “McMillan Park”).

Although FOMP seeks party status for the May 1, 5, and 8, 2014, hearings and at any other scheduled hearings in this case, FOMP continues to be troubled by the suggestion that the impacts of the development will only be addressed on a parcel by parcel basis without any attention to the overall impacts. Given that this is a consolidated PUD application for most of the parcels, an overall assessment of impacts is imperative.

Summary

FOMP incorporates by reference the Party Status Requests dated April 17, 2014 and April 21, 2014, it filed with, and which have both been publicly posted on their Website by, the Office of Zoning into each of the answers included with this Form 140 attachment. FOMP now supplements those answers and materials with the following, specifically related to the May 8 hearing on the healthcare facility portions of the Applicant’s application housed on Parcels 1 and 3 of the Proposed Development Site.

I. The PUD Application Makes Unsupported Employment Claims

Although the PUD application’s many flaws and its inability to meet the District’s PUD requirements regarding traffic, open space, the environment, and historic properties (*see* FOMP’s prior submissions) are equally pertinent to Parcels 1 and 3 (*see* Section II, below), this portion of the application is

particularly vulnerable regarding the employment claims that this proposed development project will produce. As a party in opposition, FOMP will present witnesses and testimony that demonstrate that the plans in the Applicant's PUD application specifically for Parcels 1 and 3 of the Proposed Development Site make claims of jobs created that are unsupported.

These claims are unsupported, in short, because the Applicant offers no data to prove the numbers offered. This lack of data is most glaring regarding the most important set of jobs claimed in the application, the permanent jobs in the healthcare facilities. Although the Applicant claims that the project will create over 1,300 jobs in the medical profession, *see* Statement of Applicant, at 30, the Applicant offers no basis for this figure. It is totally hypothetical as it likely is derived in large part from the hypothetical number of offices the Applicant hopes to carve out of the buildings devoted to health care. The word "*hopes*" is most apt here.

The Applicant can only hope for this many jobs because it has no clear knowledge as to how many people may work at the health care facilities. And it does not know how many may work there because the Applicant has no clear knowledge about who will actually utilize these facilities. As of the spring of 2014, the Applicant has no contract with any health care provider to lease any of the proposed space. In fact, it does not even have a relationship with any health care provider that might actually find use for the space. Thus, what the Applicant proposes to build on Parcels 1 and 3 is speculative office space.

Therefore, with no data to back up its employment projections and no taker lined up to fill the over 1,000,000 square feet of health care facilities (more than half of the project's total square footage), the Applicant's figures for permanent medical jobs are most definitely unsupported.

Beyond the lack of support for its claims, the Applicant's claims for the number of jobs created are extravagant. This extravagance extends to the softness of the numbers of jobs created. But more critical perhaps than all of those is the competitive problem the Applicant's office will face from the Armed Forces Retirement Home ("AFRH") project one block north of the Proposed Development Site.

The AFRH is in the process of constructing a much larger office complex and much larger project overall than the Applicant's speculative office space. This 6,000,000-plus square foot AFRH project puts enormous competitive pressure on the number of jobs that the Applicant claims for its speculative venture in three ways. First, the AFRH project is about *three times* the size of the Applicant's project, making it a more attractive location for many users. Second, the AFRH office space is located just across Irving Street from the north side of the Washington Hospital Center complex (and one block away from the McMillan site). Third, the AFRH project will be ready for occupancy long before anything is completed at McMillan. The AFRH completed the required regulatory processes in 2007 (the 2008 economic downturn, which depressed land rents in the area, caused the AFRH to put its project on hold). But according to AFRH Chief Operating Officer Steven G. McManus, the AFRH's renewed request for proposals should be published in the coming weeks. Even if the new RFP means the AFRH has to revisit any of its regulatory processes, given the smooth process it had before, it should break ground long before the Applicant's proposed project. The Applicant needed 18 months alone before the Historic Preservation Review Board finally denied the Applicant's plan. That denial forces the Applicant to have this project reviewed by both the Mayor's Agent and the federal Advisory Council on Historic Preservation. The Applicant is just now starting the zoning process. It still has to convince the Council of the District of Columbia to vote to surplus and dispose of the McMillan Park property.

And the project has to survive a huge change in personnel when the new Mayor takes over on January 2, 2015. The timeline to getting the Applicant's project to a groundbreaking is long, despite the Applicant's continued protests to the contrary (eight years and counting in the design and regulatory phases of the project). The AFRH project faces none of those hurdles. Thus, its office space will likely have a huge lead time to find tenants before any office space is finally built at the Proposed Development Site. This very stiff competition really calls into question the accuracy and strength of the forecasted number of jobs that the Applicant is claiming and certainly whether the numbers can hold up if the market for medical office space in this area of the city dries up after going from zero square feet to 3,000,000 square feet (combined Applicant and AFRH projects) in just a few years.

In addition to the competition problem that the Applicant's job estimates face, those numbers are "soft" in that the bulk of the jobs are either of short duration or ill defined.

A limited life span plagues the largest subset of jobs that the Applicant lists: those related to construction. Although these jobs account for more than 50 percent of the total number of jobs that the project will allegedly create directly, *see* Statement of Applicant, at 30, this huge subset of jobs will disappear in just a couple of years. Such is the nature of construction jobs, but to merit the Commission approving this PUD application, these construction jobs would have to be providing a benefit that exceeds the costs and significantly exceeds any such benefit that would result merely from matter-of-right construction (11 DCMR § 2403.6). But given the speculative nature of the permanent jobs, the problems with the other jobs the Applicant claims, and the overall problems with this application discussed elsewhere, this short-term job creation cannot be justified.

As untenable as the Applicant's "direct" job numbers are, the other type of jobs that the Applicant claims are even softer. The Applicant claims that over 500 "indirect" jobs will be created. It does not explain what these jobs are, where they will come from, who will hold them, or what exactly "indirect" means. It could be a totally made-up number. But more critically, to avoid being a vague throwaway line, the Applicant must offer a basis for this number that is meaningful. Right now it is more padding than proof.

Taken all together, the lack of data or explanation for the numbers offered, the lack of any lease or letter of intent for over 50 percent of the project's total square footage, the strong competition the Applicant's speculative office space will face from the AFRH's bigger and likely sooner-to-the-market office space, the short duration of most of the jobs, and other factors demonstrating the softness of the Applicant's job figures, add up to claims for jobs that are unsupported. The suggested employment opportunities, the vast majority of which are short-term construction jobs, do not constitute sufficient "employment and training opportunities" (11 DCMR § 2403.9(e)) that outweigh the adverse impacts of the project as a whole. The Applicant neither substantiates the "520 indirect jobs" that will be allegedly created by the PUD project nor attempts to explain how these jobs will be "measurable" and "quantifiable," as required by the PUD regulations, *id.* § 3403.7. And the ultimate danger of those weak numbers is that the surrounding neighborhoods could be looking at hulking buildings filled with empty offices because the Applicant decided to engage in speculative development.

II. The Plans for Parcels 1 and 3 of the PUD Application Will have Serious Adverse Effects on Traffic, Open Space, the Environment, and Historic Properties

The negative impacts of the Applicant's plans for Parcels 1 and 3 on the surrounding community are significant.¹ On Parcels 1 and 3, the Applicant calls for 875,000 square feet and 173,000 square foot health care facilities, both with ground-floor retail. Parcel 1 fronts along Michigan Avenue, Northwest; Parcel 3 fronts along First Street, Northwest, south of Parcel 1.

As a party in opposition, FOMP will present witnesses and testimony that demonstrate that the plans in the Applicant's PUD application specifically for Parcels 1 and 3 of the Proposed Development Site, will dramatically increase traffic congestion and traffic delays, eliminate open space and viewsheds, destroy the vast majority of the historic structures on the Proposed Development Site, degrade the environment, and, in so doing, significantly worsen the quality of life for FOMP members and supporters, the majority of whom live within a mile of the Proposed Development Site (many within 200 feet of the site). FOMP will demonstrate that these adverse impacts far outweigh the vague "public benefits" and amenities that will purportedly be offered on the site.

Traffic. Even though FOMP has credibly shown above that the Applicant's job creation numbers do not withstand close scrutiny, if they are taken at face value, the development plans for these parcels will significantly contribute to the traffic concerns noted in FOMP's earlier Party Status Requests, more than any other part of the Applicant's plans. More than half of the actual built square footage in Applicant's plan is in the health care facilities on Parcels 1 and 3. The traffic generated by the staff and patients going to and from these facilities will make up the lion's share of the anticipated new 6,000-plus daily vehicle trips that will result from the Applicant's plans overall.

Two facts support what may actually be a higher number of vehicle trips than the Applicant's consultant claims. First, medical office space generates more vehicle trips per day than typical Class A commercial office space because of the number of patients coming and going to appointments all day long. As with so many parameters that should have gone into the Applicant's transportation planning, this factor does not appear to have been considered. Second, several traffic engineers have reviewed the Applicant's traffic studies and have concluded that in those studies, whenever a range of choices was appropriate based on the methodology used, the Applicant's consultant, more often than not, chose the rosier end of the range, which any professional will admit is not a solid way to do a good traffic analysis. Thus, the health care facilities may in fact contribute more vehicle trips than the Applicant is claiming.

Beyond the unacceptably high number of vehicle trips generated by the health care facilities, the traffic related to those facilities will be particularly hampered by the extremely poor transportation infrastructure attendant to the Proposed Development Site. The infrastructure is so poor that the McMillan site presents a smart growth nightmare.

The bedrock tenet of smart growth is that dense residential, retail, and commercial development should occur around robust transportation modals so that people will walk more and make ample use of public

¹ Please see FOMP's attached Party Status Requests dated April 17 and April 21 for a full recitation of the harms to the surrounding community regarding the increase in traffic, loss of open space, degradation to the environment, and the destruction of historic and culturally significant structures and resources.

transportation. In contrast to that tenet, the transit infrastructure around McMillan is so lacking that any attempt to build using a smart growth principles is bound to fail. What is missing? Three things:

- No Metro station directly serves the area surrounding the Proposed Development Site and four Metro stations are more than a mile away. Note that the Washington Hospital Center is already the second largest employment center in the District without Metro rail service.
- The area is not served by a grid pattern on streets. Only two streets go past the McMillan site traveling north-south: North Capitol Street and First Street, Northwest (and First Street, Northwest, ends at Irving Street, Northwest, a block north of Michigan Avenue). And only one street travels east-west past the site: Michigan Avenue. The site is, therefore, hemmed in from most directions. To the west and southwest, Howard University, Howard Hospital, and the McMillan Reservoir Water Treatment Plant cut off the street grid. To the north, the Washington Hospital Center and the Armed Forces Retirement Home cut off the street grid. To the northeast and east, Catholic University of America and the huge cemetery complex east of North Capitol Street cut off the street grid. Without a street grid, autos have no options for alternative routes and buses must be kept on the couple of through streets.
- No street car is contemplated for the area.

Beyond the paucity of transit options around McMillan, seven other traffic-related concerns must also be considered:

- First Street, Northwest is already congested at or beyond capacity several times each day.
- Based on Department of Transportation standards, the intersections around the McMillan generally receive failing or next-to-failing grades under existing conditions.
- Additional buses are mentioned in the application, but given the limited street grid, those extra buses will likely just be stuck in traffic.
- Even if additional buses are put on line, they will have very limited impact on two key groups: commuters coming to work at the Applicant's medical facilities and patients coming to the Applicant's medical offices. Regarding commuters, right now, the lack of true transportation infrastructure means that the workers at the four hospitals across from McMillan overwhelmingly commute to work each day and primarily from Maryland. The Applicant's plan offers nothing for those commuters and all the new commuters that the Applicant's plan claims it will generate through new jobs. Thus, rush-hour traffic through the Bloomingdale and Stronghold neighborhoods will likely intensify greatly. Regarding patients, sick people, the elderly, and pregnant women will not likely take the bus in large numbers to see their doctors if they have a personal automobile available. Thus, the health care facilities are likely to generate a much higher number of car trips than other types of office space and than the Applicant's consultant posits.
- The proposed supermarket, which fronts North Capitol Street, will require daily a large number of trucks to supply it. Because of First Street's residential character, truck traffic along First is

forbidden today and is quite light along North Capitol. If trucks are regularly entering and exiting the McMillan complex to supply the supermarket and thus crossing the many lanes of North Capitol Street to do so, that special type of traffic will seriously choke overall traffic flow in the area, adding significant noise and pollution to the area.

- With the large number of underground parking spaces integrated into the Applicant's plan, the Applicant has made clear that this development is no longer pretending to be a smart growth project. By building densely around transportation modals, smart growth works to get people out of their cars, but the Applicant and its consultants tacitly acknowledge the dearth of transit options around McMillan² by offering such large parking facilities, so big that the Applicant hopes to "help relieve the parking shortages at the medical centers north of" McMillan. Statement of Applicant, at 13.
- The AFRH project has First Street crossing Irving Street into the AFRH property, which will put thousands of more vehicles on to First, which, for much of its length, is a two-lane residential street.

A taste of the impact that Applicant's proposed plan would have on the surrounding communities has been experienced recently because of construction projects along First Street, which have diverted an equivalent of about 2,000 vehicle trips per day to North Capitol Street. The result has been that the latter street running past the McMillan site has encountered gridlock any number of times, which has made leaving the Stronghold neighborhood directly across North Capitol Street from McMillan extremely difficult for those residents. If just 2,000 extra trips are having such an immediate impact in the area, 6,000—or perhaps as many as 9,000—additional vehicle trips daily will be catastrophic.

And the Applicant offers nothing more than traffic lights to mitigate the damage to the adjoining neighborhoods. But no matter how many traffic signals the Applicant adds to the intersections around McMillan, the damage to Stronghold and Bloomingdale to the south of McMillan from considerably more bumper-to-bumper traffic will be severe. The Applicant tries to claim that the streets it wants to run across the McMillan site enhance the street grid; it goes so far as to boldly proclaim that the "redevelopment introduces a system of internal streets and blocks that connects the VA/Washington Hospital Center to the north with Bloomingdale neighborhood to the south." *Id.* at 18. The falseness of this claim is quickly revealed by the facts that every street created on the Proposed Development Site goes exactly nowhere. On the west, any new street runs into the Reservoir and on the east into the cemetery complex. Not one of the proposed new streets connects the hospitals to Bloomingdale in even the remotest way.³

² In contrast, see the DC USA complex in Columbia Heights where planners have learned from experience that the large parking deck sits largely empty because of the rich transit options available that area for shoppers to choose from.

³ For another example of the Applicant's overreach, see page 1 of the Statement of Applicant: "The project . . . has been reviewed and approved by the Historic Preservation Review Board ('HPRB') . . ." Although the quoted language serves the Applicant well, it is false. The HPRB, while complimenting aspects of the Applicant's final design, denied the Applicant's request: "the [State Historic Preservation Officer] concludes that the project does not meet the *Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* and advises the District to forward the plans to the Advisory Council [on Historic Preservation] for comment." Historic Preservation Review Board Master Plan Review, McMillan Reservoir, October 31, 2013 at 4.

Other aspects of the Applicant's traffic difficulties include the driveway in front of the medical office building, which is "in the future envisioned to be a transit hub." But the Applicant offers no viable plan to specify the nature of the transportation services to be provided at that hub, or when, or what part of the strain of the anticipated 6,000 additional vehicle trips per day to the adjacent intersection this envisioned hub would eliminate. Elsewhere in the application the hub is described thusly: "The applicant envisions that the site could be a 'transit hub' and accommodate the Circulator Bus or Streetcar." See Statement of Applicant, at 19. This language is too vague and non-binding to support a PUD application and offers no substantial mitigation of specifically proposed traffic impacts.

Therefore, despite the Applicant's repeated claims that the project's impact on traffic conditions are acceptable, *Id.*, they are legally unacceptable. Under 11 DCMR § 2403.3, "the impact of the project on the surrounding area and the operation of city services and facilities shall not be found to be unacceptable" Because of the unmitigated (in all senses of the word) damage that the application as presented would have on the surrounding neighborhoods and the operation of city services because of the gridlock it would create, approving this PUD is "unacceptable."

Viewsheds. Beyond traffic, the proposed development on these Parcels will severely impact the historic viewsheds that are currently an integral part of the communities surrounding the Proposed Development Site. The proposed buildings on Parcel 1, rising to 130 feet, would obscure for anyone not on the site, to the west and southwest all views of the National Cathedral, the Howard University skyline, and the reservoir; to the south, all views of the Washington Monument, Old Post Office, and the Capitol; and to the east, Catholic University of America and the Basilica of the National Shrine of the Immaculate Conception. The existing row houses, by comparison, in the adjacent Stronghold and Bloomingdale communities are two to three stories and 25 to 40 feet tall. These hulking buildings also will overwhelm the above-ground historic structures located on the Proposed Development Site (sand storage silos and regulator houses) that the Applicant says it will retain (even though it has offered no plan for their adaptive reuse). The preserved structures' proximity to the health care buildings and the plan's overall altered landscape near those retained structures mean that the preserved structures will have no historical context and no connection to the redeveloped landscape, one which puts a road around the structures that had never been. The Applicant's proposed plan turns preservation on its head by turning those structures into "fish out of water."

Sewer system impact. Although the Applicant notes that it has a stormwater management plan, which may limit the impact of the proposed project on the area's overburdened sewer system,⁴ it says nothing about the impact of all of the new sewer hookups from the proposed health care offices (as well as the residences) on the sewer system. Given the pain and suffering experienced by Bloomingdale and LeDroit Park residents as a result of sewage backups these last several years alone, the Applicant should be made to explain how the sewer hookups will not negatively impact the existing combined stormwater-sewer system.

Finally, the size and scale of the health care facilities proposed for Parcels 1 and 3, when combined with the mass, size, and scale of the development proposed by the Applicant for the other parcels, contributes significantly to the additional harms related to open space loss, environmental degradation, and historic

⁴ But consider that the Applicant's system is designed only to meet EPA standards. The problem with downstream sewer backups in Bloomingdale stem from rain events that have been far in excess of EPA standards.

structure demolition noted above and described in greater detail in FOMP's April 17 and 24 Party Status Requests.

III. The Applicant Has Not Satisfied Its Burden of Demonstrating That the Relative Value of the Public Benefits and Amenities Outweigh the Adverse Impacts of its Plans for Parcels 1 and 3.

FOMP does not believe that, as presented, and as required by 11 DCMR § 2403.3, the Applicant has satisfied its burden of proving that the impacts of the project contemplated by its plans for Parcels 1 and 3 are outweighed by the public benefits and amenities presented. In addition to what FOMP has indicated in its April 17 and April 21 Party Status Requests are unacceptably vague and inadequate public benefits focused on the Master Plan as a whole, the public benefits focused on Parcels 1 and 3 are equally insufficient.

IV. The Applicant's Proposals for Parcels 1 and 3 are Inconsistent with the District's Comprehensive Plan.

The Applicant's plans for Parcels 1 and 3 contribute significantly as well to the overall Master Plan's inconsistency with the District's Comprehensive Plan. In particular, the loss of open space and destruction of historic buildings on Parcels 1 and 3 contradict the multiple portions of the Comprehensive Plan discussed in FOMP's April 17 and April 21 Party Status Requests. Accordingly, FOMP believes that the portion of the Applicant's development in these parcels that contributes to the loss of open space and destruction of historic structures on the Proposed Development Site leads to the overall inconsistency of the development with the Comprehensive Plan.

Many portions of the Comprehensive Plan are not respected in this proposed development.

- “LU-1.2.7: Protecting Existing Assets on Large Sites: Identify and protect existing assets such as historic buildings, historic site plan elements, important vistas and major landscape elements as large sites are redeveloped.” The Applicant's proposed plan disregards this land use element of the Comprehensive Plan, demolishing a park built by one of the founders of American Landscape Architecture on a site chosen for majestic views of downtown Washington on a par with those from President Lincoln's cottage on the AFRH grounds. This was in fact the Central Park of Washington.
- The Application similarly does not respect “PROS-3.3.1: North-Central Open Space Network: Protect and enhance the historic open space network extending from McMillan Reservoir to Fort Totten” as well as “MC-2.6.1: Open Space on McMillan Reservoir Sand Filtration Site: Require that reuse plans for the McMillan Reservoir Sand Filtration site dedicate a substantial contiguous portion of the site for recreation and open space. . . . Consistent with the 1901 McMillan Plan, connectivity to nearby open spaces such as the Armed Forces Retirement Home, should be achieved through site design.”

Witness Information

Pursuant to 11 DCMR §3022.3(e), FOMP provides the following list of witnesses who will testify at the May 8 hearing on its behalf. FOMP reserves the right to supplement this list of witnesses and the scope of their testimony as FOMP has the opportunity to review and consider in more detail the Applicant's pre-hearing submissions, including the documents just recently filed. See Exhibit C of FOMP's April 17 Party Status Request (filed with (and publicly posted by the Office of Zoning on April 17, 2014) for the resumes of our proposed expert witnesses.

1. Anne Sellin.

Ms. Sellin will testify as an expert in historic preservation. She will address the Applicant's plans for Parcels 1 and 3's inconsistency with the PUD standards, and historic preservation requirements.

2. Miriam Gusevich, Professor, The Catholic University of America, Gusevich-Miles Studio LLC Founding Principal.

Ms. Gusevich will testify as an expert in architecture and urban design and will address divergence of the Applicant's plans for Parcels 1 and 3 with both PUD and historic preservation requirements.

3. Tony Norman, Chairman, McMillan Park Committee.

4. Joe Mehra, President and Founder, MCV Associates.

Mr. Mehra, will testify as an expert and an authority on traffic engineering and planning. He will discuss the inadequate efforts of the Applicant's plan to mitigate traffic flows exacerbated by the proposed plans for Parcels 1 and 3.

5. Parisa Norouzi, Executive Director, Empower D.C.

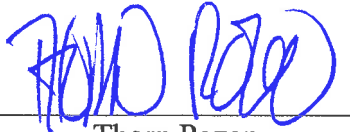
6. John Salatti, Board of Directors, Friends of McMillan Park

Total time requested: 60 minutes

Party Status Criteria

For purposes of this request for party status for the May 8 hearing, FOMP incorporates by reference the answers it has provided in its attached April 17 Party Status Request for the May 1 hearing to the six party status criteria questions in Form 140.

Respectfully submitted,



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