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January 2, 2018

VIA IZIS

Zoning Commission of the
District of Columbia
441 4th Street, N.W., Suite 210S
Washington, D.C. 20001

**Re: Z.C. Case No. 16-23
Valor Development, LLC – Applicant’s Opposition to Party Status Request
from Milton Buchler II**

Dear Members of the Zoning Commission:


Applicant hereby opposes the party status request captioned above, as further set forth below. The request for party status was served upon Applicant’s counsel on Saturday, December 23, 2017. Therefore, per 11-Z DCMR, Sec. 404.9 and 204.3, this response is timely filed.

The Commission has already granted party status to Citizens for Responsible Development (CRD), which includes (upon information and belief) a number of neighbors who also live on the same 4700 block of Windom Place, NW as Mr. Buchler’s house. In granting party status to the members of CRD, the Commission of necessity found that the interests of CRD’s members are “more significantly, distinctly, or uniquely affected in character or kind...than those of other persons in the general public”. 11-Z DCMR, Sec. 404.1(h)(5). For the Commission to now grant party status to Mr. Buchler, the Commission would need to conclude that his interests are “more significantly, distinctly, or uniquely affected” than those of his neighbors who are members of CRD. In addition, having multiple parties to this action whose neighboring properties are on the same block of Windom Place would result in duplicate testimony on duplicate issues. The Applicant suggests that Mr. Buchler join with CRD, which is already a party in opposition.

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For the above reasons, party status should not be granted. However, the Applicant has no objection to Mr. Buchler joining with Citizens for Responsible Development, which has already been granted party status in this application.

Respectfully Submitted,

HOLLAND & KNIGHT LLP

Christopher H. Collins

CHC:jma

#54838852_v1

CERTIFICATE OF SERVICE
Z.C. Case No. 16-23

I HEREBY CERTIFY that on January 2, 2017, a copy of the attached Applicant's Opposition to Party Status from Milton Buchler II was served by email on the following:

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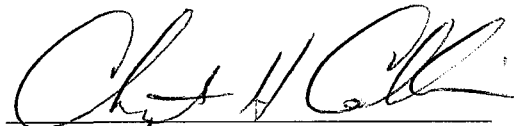
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