

3051 Chancellor's Way NE
Washington, DC 20017

May 8, 2018

bzasubmissions@dc.gov

Re: Letter in opposition to BZA Case 19377: The Boundary Companies and The Missionary Society

Dear BZA Chairman,

I am writing to strongly oppose the planned development of the Paulist property on 4th St, NE. There are several reasons why I oppose this development.

Paucity of Green Space in Upper NE, Especially in the Edgewood community

Our city has adopted various legislation aimed at assuring that preserving green space is a centrally important consideration for the future. One example of this is the Comprehensive Plan for the National Capital (<https://www.ncpc.gov/compplan/>), the District's strategic plan for future development, which specifically prioritizes converting institutional property in Edgewood into park space. The goals set forth in that plan will be unattainable if existing parcels of green space are individually picked off for development. In Dec 2016 the Zoning Commission approved the development of the Holy Redeemer property on 7th and Hamlin St, NE, also in Edgewood. Now the BZA is considering the approval for development of another Edgewood property, the Paulist property on 4th St NE.

The city is aware of the lack of green space in Upper NE and has prioritized the development/maintenance of community parks. “. . . much of Upper Northeast is starved for public parkland. More active recreational areas, playgrounds, athletic fields, and traditional neighborhood parks are needed. . . There are also concerns that the large institutional open spaces—particularly the great lawns and wooded glades of the area's religious orders—may someday be lost to development. These properties are important to the health of the community and should be considered as opportunities for new neighborhood and community parks”.

The city has also prescribed a plan for accomplishing this: “In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces.” More specifically Action UNE-1.2.A Parkland Acquisition states that the city should “Address the shortage of parkland in the Planning Area, placing a priority on the areas with the most severe deficiencies. According to the 2006 Parks and Recreation Master Plan, these areas include **Edgewood** . . . “(Comprehensive Plan for the Nation's Capitol)

Development of the Paulist property should not be approved when Edgewood is specifically named in the Comprehensive Plan as deficient in green space and where acquisition of institutional properties such as the Paulist property should be prioritized and not lost to development.

Loss of Tree Canopy

Science has shown that green spaces are key to a sustainable future and community health, especially in urban areas where the existing green spaces are historically limited. Green spaces improve the psychological and social health of residents. Trees reduce particulate pollution and CO₂ in the air, thereby improving air quality as well as reducing stormwater runoff.

According to Casey Trees there are only 3 other wards in the District which have less tree canopy than Ward 5, in which the Edgewood community is located. We cannot afford to eliminate the portion of the tree canopy which already exists on the Paulist property. Elimination of the canopy will not help the city achieve it's goal of 40% tree canopy by 2032.

The developer, has proposed to leave the Heritage (trunks more than 100" in circumference) and Special trees. However, the massive amount of regrading of the property which will be necessary to install utilities and comply with stormwater management, suggests that these trees will not survive in a healthy state. The roots of these trees extend 2-3 times the diameter of the crown of the tree. The plans, as shown by the developer will not protect these trees from damage. It will take years for the damage to be done, but the roots for trees of this size are so extensive that the amount of building proposed by the applicants cannot be effectively done without injuring the tree roots.

As a resident of Chancellor's Row, I have experienced the decline in the large trees that the developer, EYA, built around. These large trees, on the common green space, have been in decline since I moved into my house (Phase II, Feb 2013). EYA used these large trees as a selling point for the community. According to the landscape maintenance consultant that the Chancellor's Row Board of Director's has retained, these trees should to be severely pruned immediately to remove dead branches and will likely have to be removed in the not too distant future. The homeowners of Chancellor's Row, not the developer, will have to pay for the removal of these large trees. Based on the current plans for development of the Paulist property, the same situation is likely to occur with the mature trees on that property.

The BZA should require that the applicant structure the project to protect the long-term survival of 100% of the heritage trees and to protect more trees overall.

The testimony of Casey Trees at the April 25th BZA hearing was incomplete

During the BZA hearing on 25 April, the representatives from Casey Trees admitted that they are not fully aware of the underground construction planned for the site, such as storm water management and utility lines. The applicant needs to provide Casey Trees with a full explanation of the significant work that they intend to perform so that Casey Trees can provide a meaningful analysis. In the meantime, Casey Trees testimony should be viewed as pending. Casey Trees also did not account for heritage trees on the site, which is a new DC requirement.

The testimony of Casey Trees should be disregarded until they include Heritage tree assessments and can fully address the impact of underground work on these trees.

Penalization of the District's Poorer Residents

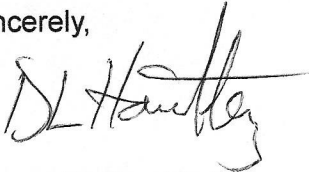
Making up for the loss of these existing green spaces in a manner that doesn't disproportionately affect poorer neighborhoods like Edgewood is not in consideration. Poorer neighborhoods in the District already suffer from less tree canopy than richer neighborhoods (https://www.washingtonpost.com/local/environmentalists-face-challenges-trying-to-plant-in-less-green-neighborhoods/2013/04/25/21294968-ad27-11e2-a198-99893f10d6dd_story.html?utm_term=.0cd8c9149da1). Therefore, if these projects proceed, Edgewood will be placed yet further behind in efforts towards becoming a healthy sustainable community.

Development Consideration Out of Context

It is important that in all aspects of local government, the goals set out to permit development and protect green space not be overridden at the zoning level. Neighborhoods must be considered in their entirety, and not just parcel-by-parcel. Yet unrestrained piecemeal development is threatening the very limited existing green space in Edgewood and in Ward 5 generally. All existing green spaces must be considered in their local context, or entire communities will lose access.

I urge the Zoning Commission to oppose the development of the existing Paulist green space with its numerous magnificent Heritage and Special Trees, and assure that the Comprehensive Plan is followed. Let's continue to advance toward the District's Tree Canopy goal and support our poorer neighborhoods with nearby green spaces as provided for in the District's strategic plan for development. This will have a positive impact on the city's residents far into the future.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hartley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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