

D.C. OFFICE OF ZONING
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Request to Participate as a Party in Case No. 08-15

(a)(b)(c) The Wisconsin-Newark Neighborhood Coalition (WNNC), an ad hoc, informal association of Cleveland Park residents who have banded together to analyze the impact of the proposed Planned Unit Development on our neighborhood, requests the right to appear and participate as a party in opposition in Case No. 08-15 (Friendship-Macomb SC Inc. – Consolidated PUD Approval & Related Map Amendment – Square 1920, Lot 813 and Square 1920-N, Lots 1 and 2), on which a Zoning Commission public hearing is currently scheduled for February 19, 2009. For purposes of communications with the WNNC, please contact John O'Sullivan, 3410 Newark St., NW, Washington, DC 20016; daytime telephone number (202) 974-5610 and fax number (202) 974-6710.

(d) Although several of us are admitted to practice law in the District of Columbia, we will appear in our own names and on our own behalf and will not appear through outside legal counsel.

(e)(f) The individuals whom we currently expect to testify on our behalf, and the subjects of their testimony, are as follows:

Eleni Constantine, Margaret Lenzner, or Diane Olsson -- Impact of zoning and overlay changes on local residents;

John J. Korbel – Impact of parking included in PUD proposal;

John B. O'Sullivan – Traffic Impact of PUD proposal on the neighborhood, and particularly on the east-west side streets; and

Ann Hamilton on phasing of construction and protection against non-completion.

(g) Although two of our witnesses have a great deal of pertinent experience in analyzing data, and they will submit resumes along with their written testimony, none of our witnesses is proffered as an expert.

(h) We understand from the pre-hearing submission that the Applicant will be requesting 90 minutes to present its case. We request 30 minutes to present ours, in the event that all parties in opposition are allowed the same amount of time as applicant.

(i) WNNC should be granted party status because all members of the WNNC are owners of residential property within three blocks of the proposed PUD, well within the one-mile radius of

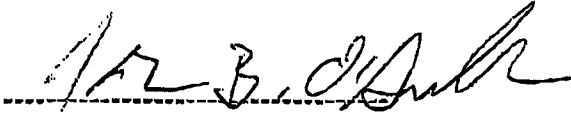
ZONING COMMISSION
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the PUD that is the appropriate source of business for a neighborhood-serving commercial area, and some are within 200 feet. Our property values, as well as the quiet enjoyment of that property, will be adversely affected by the Applicant's proposal in its present form. One of our members has lived in Cleveland Park for 57 years, others for over 30 years, and a number for over 25 years. Others of our members are more recent residents, some with younger children. We all love Cleveland Park, and feel fortunate indeed to be able to live and raise our children in this village within a city, a village that has unique characteristics, as do other neighborhood villages throughout Washington. We fear that the very nature of our neighborhood is jeopardized by the proposal.

We all favor a new and larger grocery store and the revitalization of the space where G. C. Murphy's, Moon Palace, the paint store, and Shemali's once operated, and do not oppose appropriate development on both blocks. But the streets on which we live (especially Macomb, Newark, Norton, Ordway, Porter, 35th and 36th) are already heavily impacted by the fact that there are 11 schools, enrolling approximately 4500 students, within a mile radius, and by the fact that many of these streets are essential east-west connectors between Connecticut, Wisconsin, and Massachusetts Avenues and Reno Road. We believe that the PUD will have traffic effects in the neighborhood, but particular adjacent streets are likely to be affected in different ways. For example, Newark Street east of Wisconsin Avenue, where many of our members live, is classified as a "local" (residential) street. Newark already has a serious through traffic problem from non-resident drivers using this local street, which we have brought to DDOT's attention. DDOT also has a petition signed by more than a majority of households between 34th Street and Wisconsin asking DDOT to undertake a traffic audit/traffic calming study based on current traffic levels. Newark Street in the blocks surrounding the PUD will be particularly affected because it is the continuation of the commercial spine of the PUD, on which the primary entrances of the north and south block parking structures are also located. Newark would connect the PUD with the 34th Street/Reno Road corridor, directly to the east, and the increased traffic and parking demand from the PUD will have a distinct and significant impact on Newark. First, the very proximity of the project to our homes will result in impacts that are more significant and unique than impacts to the general public. The former nursing home site at Wisconsin and Newark is also being developed into an additional 100 residences, which is a matter-of-right development, which will have a further cumulative impact on this local street, which the Comprehensive Plan requires be considered by the traffic studies and mitigation plans for the PUD. In short, we are concerned that adding the traffic and parking impact of a very large grocery store, shopping center, and residential complex, however, in this small commercial area would threaten the very livability of the wider neighborhood, all in a manner that is inconsistent with the Comprehensive Plan, which calls for the lowest commercial and residential density for this area.

Finally, our members have collectively spent hundreds of hours studying the application, and discussing it among ourselves, with our neighbors, and with representatives of the District and of

the applicant. We have attended every public meeting and taken every advantage of opportunities to learn about the project and give our views. We have collected almost 200 signatures on a petition expressing concern about some aspects of the project. We believe that we can assist the Zoning Commission in reaching better decisions. We therefore respectfully request party status.



John B. O'Sullivan

On behalf of the Wisconsin-Newark Neighborhood
Coalition

February 5, 2009