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April 15, 2002

Geoffrey Griffs, Chairman
Board of Zoning Adjustment
441 4th Street NW, suite 210
Washington, D.C. 20001

Dear Sir:

I am writing to urge delay in consideration of The Washington Home application. Like others in the community, I respect the work of The Washington Home. However, BZA consideration of this application must not be swayed by the services provided by The Home, but, rather, the details of their application.

At The Washington Home, the closest parking space to the entrance is reserved for "Employee of the Month". Using a parking space as reward illustrates the underlying perceptual problem at The Home.

The Home's policy stance on parking is very suburban. Parking is a right and a benefit similar to health insurance for The Home employees. A parking space is a reward mechanism.

This close held and unexamined perspective about parking at The Home runs counter to the realities of the residential and urban setting in which The Home is located, It prevents creative solutions to urban problems. The viewpoint undermines community and governmental initiatives to implement "smart growth" initiatives that protect our neighborhoods and the environment. Further, it contributes to the reliance on the automobiles even in The Home's ideal urban setting with 3 Metro stops and various bus lines within walking distance.

The Washington, D.C. region is currently in "serious" non-attainment of the Clean Air Act and may well find that in the next evaluation cycle we will be rated as in "severe" non attainment. With health threatened by high levels of pollution and non-attainment of Federal law, zoning authorities, such as the BZA must carefully evaluate any request for

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EXHIBIT NO.42

additional parking spaces. The BZA must require applicants to demonstrate that all every traffic reduction measure have been implemented, including incentives for use of mass transit.

Recently, the BZA heard another case in which it's decision supported the community and smart growth planning. This was finding on the application by Edmund Burke School and it's proposal to expansion on to Connecticut Avenue. The BZA denied the application because it was not in harmony with the general purposes and intent of the Zoning Regulations and Maps. Specifically, the BZA found that the proposed "expansion is likely to become objectionable to adjoining and nearby property because of traffic impacts associated with the proposed increase in the number of students and staff."(page 7) In an attachment, I have outlined the parallels of the Burke School and the Home applications.

I believe that the finding on Burke School sets a precedent by which the BZA should be guided in the evaluation of The Home application, as it currently reads. And, thus, the BZA should reject the plan because of associated traffic impacts.

Additional car trips generated by the Burke proposal was less than 9,000 per annum. Though The Home has not presented the community with it's figures, the additional car trips possible through uncontrolled use of the requested new spaces might be in the range of 80,000 to 90,000 per annum, or 10 times that associated with the Burke School request.

The Washington Home carries the burden of proof to the BZA and the community that the proposed project will be in harmony with the existing residential neighborhood. They have yet to do so. Information currently not available to the community includes:

1) Delineation of practices adopted by The Home to reduce automobile traffic and demand for additional parking spaces as well as incentive mechanisms to encourage employee use of mass transit options. Description of future plans for traffic reduction must incorporate enforcement mechanisms.

2) A traffic study which delineates for the community the existing and new traffic flow that will be generated by new parking spaces and how these fits into the cumulative traffic flow in the area, and overflow due to lack of ample parking along the commercial section of Wisconsin Ave. This study

must incorporate any known expansion plans on the board, including proposed nearby new projects including expansion of the Hearst Elementary School on 37th Street and the American University Theater at Wisconsin and Van Ness.

3) Such a traffic study should be reviewed and commented upon by the DPW, as in the Burke School case.

The community is working in a good faith effort to develop an acceptable plan with The Washington Home. We hope that this will be generated and a solution agreeable to all will be the outcome. The Home needs to work with the community in a good faith effort. But, until traffic issues are addressed, I do hope that the BZA will delay consideration of this application.

Cordially,



Barbara Beelar

3505 Tilden Street, NW
Washington, D.C. 20008

COMPARISION OF THE EDMUND BURKE SCHOOL AND THE WASHINGTON HOME APPLICATIONS BEFORE THE BZA

Setting:

An existing non-profit institution located in a densely populated residential neighborhood

Current traffic congestion and traffic safety problems are present and negatively impact residential use.

Neighborhood traffic problems are exacerbated by older narrow streets and an incomplete street grid layout which were not designed to handle existing high level of traffic congestion.

Immediate area surrounding the project is already saturated by establish non-profit institutions which bring into the residential area traffic congestion and create parking shortage.

Proximity to commercial development and lack of ample parking at these businesses which in turn generates additional unacceptable traffic and parking problems in the residential area.

Request:

An addition to existing physical plant in order to extend services.

Proposed increase in services will result in increase in staff and, it is assumed an increase in traffic associated with the site.

Increase in parking spaces to meet ample parking standards

Community concerns:

Any addition of already intolerable traffic congestion and parking problems is unacceptable.

Existing green space controlled by the non-profit institution may be compromised.