

April 20, 2018

VIA IZIS

D.C. Board of Zoning Adjustment
441 4th Street, NW
Suite 200, South
Washington, D.C. 20001

Re: Board of Zoning Adjustment Case No. 19377
The Boundary Companies and the Missionary Society of St. Paul the Apostle (the "Applicant")
3015 4th Street, NE (Square 3648, Lots 1070 and 1071) (the "Application")

I am opposed to the Application because I believe it will affect adversely the schools located directly adjacent to the project site in the old St. Paul's College building. My children attend Lee Montessori PCS, one of the schools. The proposed project blocks future pedestrian and vehicular access to the school, and completes the encirclement of the school building with private development accessed only through "private streets" where public access (including access by students and parents of the school) is not permitted. Fortunately, these adverse effects can be at least partially mitigated by the conditions listed in DDOT's report, and I hope that if the Board takes the report and its recommendations seriously.

I think it would be helpful to the Board if it referred to the Site Plan submitted by the Applicant when considering these issues. The Site Plan can be found at Ex. 64A5, Sheet B-3 ("Site Plan"). I have attached a copy for your convenience. I believe the DDOT report in the record did a good job of explaining the nature of the problem in the "Site Design" portion of its March 9, 2018 report. (Ex. 73).

I've copied it below for ease of reference:

Site Design

- The Applicant proposes two access points on 4th Street NE;
- While the proposed northern curb cut will function more like a street than a driveway, it should be narrowed in width from 26-feet to 24-feet to meet DDOT standards (DEM 3L.5.2);
- The access points open into a series of private streets offering limited vehicular, pedestrian, and bicycle connectivity;
- The community directly east of the site contains a private street network, which will be gated and will prevent east-west access between 4th and 7th Street NE;
- The proposal is missing a logical connection linking the existing and proposed private street networks (see Figure L below); and
- Together, the existing private street network in the adjacent community to the east and the private street network proposed through this application significantly limit connectivity and reduce potential options for traffic dispersion for all modes.

(Ex. 73, DDOT Report at 1-2).

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I want to add to this list an explanation of how the proposed system of “private streets” will affect the school adversely, in a manner contrary to the public good.

If the Applicant is allowed to construct its system of “private streets” it can, and likely will, restrict access to its residents and their guests, and will prohibit access on the “private streets” to the school students and their parents¹. For example, a person attempting to access the school from the north or east, cannot access the school from 4th Street using the proposed “private street” shown on the Site Plan that meets 4th Street (adjacent to the (D) shown on the Site Plan). Instead that person would be forced to access the school using only the circuitous driveway shown on the Site Plan further to the south (adjacent to the new Paulist Building labeled with the (B) on the Site Plan). Not only is this route inconvenient, but it forces pedestrians and cars to share the same access point.

Another adverse effect of the Project is that it completely encircles the school so that the only vehicular access is via the existing driveway (with a relocated and widened entrance). While this continues the status quo, there is a tremendous opportunity here to implement a more reasonable traffic pattern for access to the school building by allowing a public access easement for traffic on the “private street” shown on the Site Plan adjacent to the (D). The current driveway creates a dangerous traffic situation when vehicles and pedestrians are forced to access the school through the same choke point. The design of the driveway is a legacy of the encirclement of the School by the existing EYA/Chancellor’s Row development that was approved as a PUD about ten years ago. I urge that the Board not make the same mistake² again.

Finally, given DDOT’s comments regarding East-West connectivity, one wonders why the Applicant’s site Plan chose to locate “The Prospect” (adjacent to the (F) on the Site Plan) in what is the obvious location for a continued roadway making a potential East-West connection with Regent Place. It appears this was calculated to prevent use of Regent Place for exactly the kind of east-west connectivity between 4th and 7th Streets that DDOT calls for in its report.

For these reasons, I believe the Applicant failed to meet its burden of showing that several required elements of the zoning relief requested have been met, including:

- Variances from 11-C DCMR §§ 305.1 and 305.3: the Applicant has not shown that there is no substantial detriment to the public good;
- Special exceptions under 11-C § 305, 11-U § 421: the Applicant has not shown that the Project will not tend to affect adversely the use of neighboring property.

¹ This is not idle speculation. The EYA/Chancellor’s Row development surrounding the school to the north, east, and south has done precisely that, with the exception of allowing a pedestrian only easement on Jackson Street.

² In at least one way this would be an even more critical error if the Board made the same mistake. At the time the EYA/Chancellor’s Row was approved, the Paulist Fathers still occupied what is now the school building, and had fewer traffic and access needs than the school that now occupies the building. We now know what the access needs of the school building are, and will likely be in the future. So the issue presented is not a theoretical “what if” type of question as it was previously before the schools moved to the building.

I think two of the mitigations recommended by DDOT in its report are critical to allow necessary pedestrian and vehicular access to the school. They are:

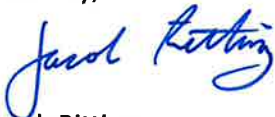
- Provide 6-foot wide sidewalks adjacent to all private streets, including the driveway extending from 4th Street NE to Regent Place NE; with adequate landscape strips and/or pedestrian buffers, subject to DDOT's approval;
- Provide public access easements spanning the extent of all private streets and associated sidewalks;

(Ex. 73, DDOT Report at 2).

I wanted to emphasize that the OP report states that it “supports inclusion of the eight conditions recommended by DDOT in its March 9, 2018 report”. (Ex. 89, OP Report at 8).

Thank you for considering my comments. I look forward to discussing them with the Board at the hearing.

Sincerely,

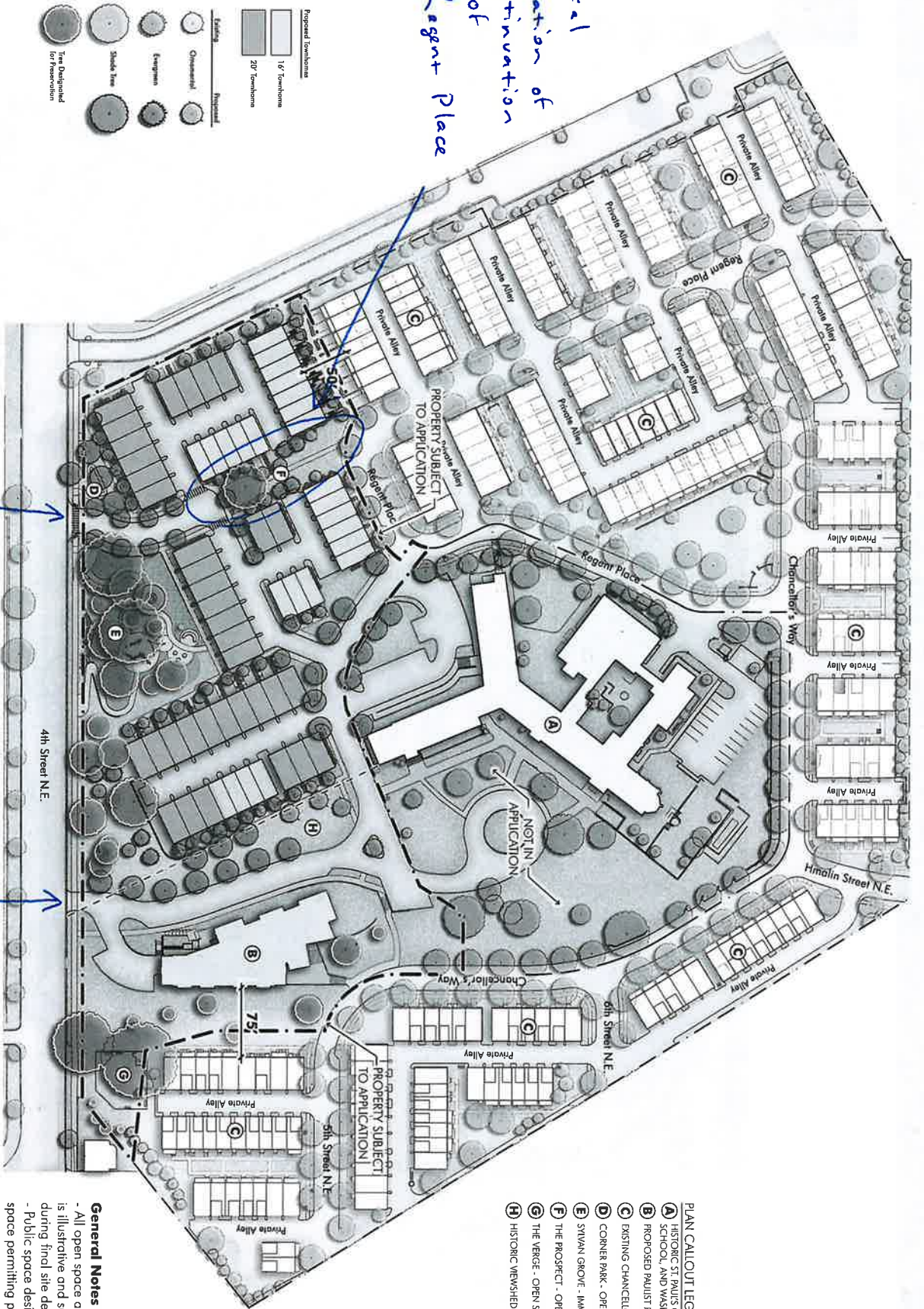


Jacob Ritting
1312 Randolph Street, NE
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Attachment 1:

Ex. 64A5, Sheet B-3 (“Site Plan”)

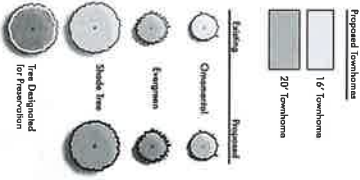
Logical
Continuation of
of
Regent Place



St. Paul's Townhomes
Site Plan
"Private Street"

School driveway entrance

PROPOSED SITE PLAN, FEBRUARY 9, 2018



- PLAN CALLOUT LEGEND**
- A HISTORIC ST. PAUL'S COLLEGE, I.E. MONTESSORI SCHOOL, AND WASHINGTON LEADERSHIP ACADEMY
 - B PROPOSED PAULIST FATHERS BUILDING
 - C EXISTING CHANCELLOR'S NOW NEIGHBORHOOD
 - D CORNER PARK - OPEN SPACE
 - E SWAN GROVE - IMMERSIVE RECREATION
 - F THE PROSPECT - OPEN SPACE
 - G THE VERGE - OPEN SPACE
 - H HISTORIC WENSHED - OPEN SPACE

General Notes

- All open space and landscaping shown is illustrative and subject to change during final site design.
- Public space design subject to public space permitting process.

