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2617 Wisconsin Ave NW
Washington, DC 20007

September 15, 2018

Board of Zoning Adjustment
441 4th Street, NW, Suite 200S
Washington, DC 20001

Dear Chairman Hill and fellow members of the Board of Zoning Adjustment:

Subject: Letter in Opposition to Case Number 19751 (Application of MED Developers, LLC)

We are submitting comments in **opposition** to the proposed application for a memory care facility at 2619 Wisconsin Ave NW (Case number 19751).

We live at 2617 Wisconsin Ave NW, immediately adjacent to the site of the proposed facility, strongly oppose the proposed application and urge you not to support the application for the reasons below.

The proposed facility would significantly invade the privacy of neighboring homes. The proposed facility would be nearly two times the height of our home and sit at the highest point of the block. Because of the height of the building, all the windows on the south and east side of the building will have direct line of sight (over the fences and garages) into the bathrooms, bedrooms, and backyards of the neighboring homes.

The loading dock and service area will be our backyard and limit our use of it. According to the proposed plans, the loading dock (where service trucks will parallel park to make deliveries and pick up trash) will be where the existing garage is and adjacent to our backyard where we grill and enjoy our outdoor sitting space. The laundry ventilation will also be on the same side as the loading dock. Pollution, noise, and both commercial trash volume/odor and commercial laundry exhaust will make it unhealthy and impractical to enjoy our own yard. The volume of traffic and noise in the alley will at least triple.



The heavy lot coverage will exacerbate existing flooding and surface runoff. The proposed plans show nearly complete site coverage except for the front and side setbacks and no plans to add additional landscaping or retaining walls to address the changes in grading that contribute to surface runoff. The adjacent homes already face disproportionate water runoff and the proposed facility will exacerbate this problem for the adjacent neighbors and others. The photos below are of the current water runoff and several inches of standing water on the side of our house between the narrow passage way (10 feet) between our home and the proposed site.



Loss of light during the day and light pollution at night. The significant size of the proposed would tower almost two floors above our home steal light during the day, beyond what would be expected of a neighboring single family home. In order to provide for the safety of the residents, the proposed facility would need to employ complete external lighting to provide visibility around the entire perimeter during the night. This would add an exorbitant amount of light that would shine into surrounding homes at night.

The applicant's parking plan is inadequate; not providing sufficient on-site parking will negatively affect both the surrounding neighborhood and staff/residents of the facility. Only 9 parking spaces -- at least 1 handicapped space and 8 others -- is wholly inadequate and will be burdensome to the neighborhood that already has several parking demands from the nearby churches, business, and apartment buildings. The developer states that they calculated at least 18 spaces would be required for a facility of this size. Despite special exemption regulations applying to CCRCs, which require them to provide enough off-street parking for residents and visitors to the facility, the developers plan to have visitors use on-street Residential Permit Parking (RPP) (with 2-hour limits) within a few blocks of the facility, and move their cars as necessary. Relying on RPP parking is not a reliable parking plan.

Moreover, the incentive plan proposed by the applicant to encourage staff to take public transportation is also not reliable as they cannot mandate employees use the incentives and therefore cannot guarantee a high portion of their staff will take the bus.

A memory care facility is likely not a viable use of this property. MED Developers is seeking a zoning exception to build a CCRC facility that will be operated in partnership with Guest Services Inc. Neither Guest Services nor MED Developers have experience operating a specialized dementia care facility of this size and in this region. When asked, Guest Services Inc. will offer two examples of memory care facilities that they current operate, but these are 100+ unit facilities over several acres in Florida, one of which is currently under construction and not open yet. Guest Services Inc. told the community during our meeting that national assisted living providers “wouldn’t touch” a project smaller than 50-60 units and that they themselves weren't interested in the project at first. MED Developers also has no experience with assisted living or memory care projects as their focus has been on multi-family residential apartments and condominiums. Because the special exception is linked to specific use of the property and the applicant cannot demonstrate reasonable business experience, than this special exception should not be granted.

As a community, we have repeatedly tried to engage MED Developers to both identify a mutually-agreeable development plan for these lots and to provide constructive feedback on their current proposed plans.

Thank you for considering these comments. **We strongly urge you to oppose the proposed application.**

Regards,

Adam & Amiee Aloï