

Dear Board of Zoning Adjustment Members:

**I am writing to express my OPPOSITION to the proposed application** for a Memory Care Facility at 2619 Wisconsin Avenue, NW (Case number 19751). I, along with my wife, am the owner of 2615 Wisconsin Ave. NW. one house away from the planned facility.

I ask you to **oppose this application** for the following reasons:

1. **The proposed development will adversely impact the surrounding neighborhood. A development that conforms to the residential zoning standards will have none of these adverse effects:**
  - The proposed development will greatly increase the non-permeable land footprint and cause major problems with water runoff, pollution and drainage:
    - The adjacent residence is already deluged with high volumes of rapidly-flowing water, and this construction will remove existing retaining wall, worsening this problem;
    - Experts involved with this development stated designers have explicitly expressed concerns over water drainage issues.
  - The proposed development will greatly reduce natural light to the surrounding residential properties.
  - The proposed development will greatly reduce the privacy of the surrounding residential properties.
  - The proposed development will greatly increase pollution to the surrounding residential properties. Air, noise will greatly increase because of the commercial vehicular traffic that will occur to service the facility.
  - The proposed development will further effect the surrounding residential community:
    - Waste: Commercial volumes of waste storage within residential infrastructure
    - Other Environmental impacts: added lighting/wiring, traffic, noise, waste storage / rodents, heat vents from laundry into sideyard of adjacent residence, and more
    - Safety: use of residential alley by families including children
2. **Special Exemption requests are not tenable:**
  - Vehicular Parking [Subtitle C § 703.2]
    - The developer is applying for an INCORRECT / INAPPLICABLE SPECIAL EXCEPTION. This area is an RPP zone.
    - Parking and transportation:
      - This proposal lists 9 parking spaces available for staff and visitors, when GSI, Inc says there will be 18 staff members on site. Most of these staff will drive to work. Street parking

in this neighborhood is already clogged by the apartments across Wisconsin Ave, the non-conforming Glover Park Hotel, and the local religious institutions.

1. MED Developers paid for a parking study that was only conducted on a total of two days – one Thursday and one Saturday. Another study should be considered: one conducted on multiple days over a period of time by a third party to eliminate any appearance of bias.
  2. The transportation study seems to acknowledge that the employees will obviously be parking in neighborhood spaces that are allocated for the residents and these employees will simply move their cars periodically to avoid tickets. This is simply unacceptable.
- Clearly there will be more than the 18 “staff” that GSI claims. The plan has dining and on-site laundry facilities, hair salon, “marketing” room, gym, office/copy facilities and more. It appears there will be many more contractors, service providers or staff to provide these services than the 18 GSI accounts for. Plus there will be delivery of food, of other services, medical care, physical therapists and ambulances going to and from facility. The 9 spots are supposed to support all of this as well as any visitors to the development. This simply cannot be realistic. The development would need to provide far more parking for this plan to be realistic.
  - We are not near a Metro stop, so those using public transportation would have to rely on an unreliable bus schedule.
  - Continuing Care Retirement Community (CCRC) Use [Subtitle U § 203.1(f)]
    - No demonstrated shortfall for CCRCs within region to outweigh existing zoning (R1B) standards. There are already several preexisting CCRC facilities in region, all of which have mandated parking as well as proximity to hospitals, public transport, and other preferred attributes that complement business viability.
    - Intent is NOT merely for a CCRC, but a memory care CCRC, which has much higher operational and viability burdens.
3. **Inviabile business model, leaving stranded, unused, non-conforming structure within several years, requiring finding new use after this business model fails:**
    - Developer admits business plan is so fragile that it hinges on freeloading on local residential parking, even as they understate their parking need with deceptive intent to overflow once constructed. The existing parking mandate exists for a reason, and

there is no demonstrated greater good that justifies waiver of that reasonable mandate.

- Developer admits building designs, and operational plans, are not finished, which renders unbelievable their insistence that the business plan is viable.
- They currently plan not to have a dedicated medical director, absence of a best-practice that would turn away many prospective customers seeking to place their loved-ones.
- Rare for application for CCRC, let alone a memory care CCRC, wherein operator has NOT been intimately involved from beginning of development as a partner of the project
- Unprecedented application for such a small CCRC facility of this nature – far below minimum viable commercial practice financially.
- Lack of experience commensurate with such unprecedented micro-scale within this industry (such unprecedented small scale would require extreme industry experience to break new ground of business efficiencies):
  - Owner has zero experience with such facilities;
  - Operator only currently, and ever, operated one such memory care CCRC, and that one has a much larger scale, significantly easing financial viability, and is in a significantly different regulatory regime (Florida), despite misrepresenting themselves as experienced (e.g. claiming credit for projects merely proposed, but not yet constructed/operational);
  - Developer does not own the property and has never built a memory care CCRC
  - Same developer proposed previously-denied homeless shelter, and has not substantially modified plans from that proposal. It IS NOT the case that the standards for a memory care CCRC are the same as for a homeless shelter, the latter of which would be unlikely to house memory-disabled elders.
  - Small spaces for daily activities, supported by only one elevator, unlikely to attract residents willing to pay high fees proposed to make this venture financially viable.
  - Applicants'/projects' inability to qualify for federally-backed financing further reduces project viability.

Thank you in advance for your thorough review of my concerns. **Please oppose this application.**

Sincerely,

Christopher Delaney  
2615 Wisconsin Ave. NW  
(Two houses away from property)