

October 29, 2018

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

Attention:

Honorable Frederick L. Hill, Chairperson,  
Honorable Anthony J. Hood, Chairperson, Zoning Commission  
Honorable Lesyllee M. White  
Honorable Lorna John  
Honorable Carlton Hart, National Capital Planning Commission Designee

**RE: BZA Case No. 19823**

Wisconsin Avenue Baptist Church - Sunrise Senior living, 3920 Alton Place, NW

Dear Chairperson Hill and Members of the Board

I live directly across Yuma Street from the proposed Wisconsin Avenue Baptist Church – Sunrise Living site. I am writing to request that you not approve the zoning special exceptions and variances requested for the WABC/Sunrise development in my neighborhood which is zoned R-1-B. I love my neighborhood which is convenient to the businesses and restaurants I use on Wisconsin Avenue yet clearly delineated and protected by the greenspace of Tenley Circle and National Park property on Nebraska Avenue. The proposed development would be a massively oversized structure for the lot which fronts only on narrow Alton Place and Yuma streets.

The property targeted for this development borders National Park Service which separates it from Nebraska Avenue just north and east of Tenley Circle. The entire North East Side of Tenley Circle consists of open green space providing a special character to Tenleytown marking a transition and gateway to the residential neighborhood where I live. The DC Comprehensive Plan recognizes the economic value of such neighborhoods to the City and the need to protect them. The very first policy of the plan for this part of DC is, verbatim, to, “Protect the low density, stable residential neighborhoods west of Rock Creek.” If a National Park property doesn’t serve as a bright line for this residential neighborhood beyond which development inappropriate to R-1-B zoning should be carefully guarded against, what does?

R-1-B Zoning restrictions work to protect this neighborhood by making a Continuing Care Retirement Community a strict exception. Sunrise’s argument for that exception is to compare their proposed facility to structures with many hundreds of feet of street frontage directly on Wisconsin and Nebraska Avenues. Why, because they can never demonstrate that the proposed facility is appropriate in the actual neighborhood where the site is located.

The project is just too big for the lot in our neighborhood zoned for single family residences.

- Sunrise is asking not only for an exception to allow a Continuing Care Retirement Community to locate on a residential lot but also:

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- For 58% lot occupancy (when only 40% is allowed for a business such as Sunrise).
- For 4 stories when no one is allowed more than 3 stories, not even a church. Plus, they plan a penthouse that doesn't count as a story.
- For elimination of a required 8-foot side yard setback, which will result in their building sitting on the property line that they share with the National Park Service. This park should not be allowed to become Sunrise's front yard.
- For a 13 foot PLUS retaining wall, when only 4 feet is allowed for a retaining wall in a residential zone.
- And no parking plan has been offered to show how the 250-seat church and the 121 residents plus 70 staff will share the 66 spaces being proposed. A further parking concern is the elimination of parking space on Alton Place and Yuma Street which will no doubt be necessary to accommodate the church's new main entrance and the truck traffic turning in and out of the proposed 12 foot wide ramp.

Sunrise says it has not explored other sites and insists they must have 121 people in 86 units and no less to make the development viable. This does not seem reasonable.

According to Sunrise 20 trucks will visit the site every week, including a 7-ton shuttle multiple times a day and several 28-ton food and linen delivery trucks. This traffic cannot be accommodated without impact to resident use of 30 foot wide Alton Place and 34 foot wide Yuma Street given the current development plan.

Wisconsin Avenue Baptist Church, the owner of the property, has not established a need for the exceptions and variances or a need to expand beyond its current facility. The church has few congregants and cannot show that it is expanding. Furthermore, WABC has also not shown a need for more space for religious activities. As proposed, WABC will occupy only approximately 10% of the building.

Somewhat cynically in my view, Sunrise would literally wrap their wholly owned commercial for-profit facility in the cloak of the church to take advantage of scaling guidelines intended for churches. Approving the proposed massive commercial structure on this site is a mistake and will harm our residential neighborhood. Approving it under guidelines intended for churches when, for example, even the 50 to 60 foot high wing housing the church will contain two floors of residential rental units not owned by the church - is just not right.

Sincerely,



David Crenshaw  
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Washington DC 20016