



COUNCIL OF THE DISTRICT OF COLUMBIA  
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**Mary M. Cheh**

Councilmember, Ward 3  
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Jeff Marootian, Director  
District Department of Transportation  
55 M Street, SE, Suite 100  
Washington, DC 20003

Dear Director,

I understand that DDOT has issued a report to the Board of Zoning Adjustment in case No. 19823. Residents of the area, having reviewed that report, have forwarded to me several concerns with the analysis and the conclusions drawn therefrom. I repeat those concerns below and ask that you respond to them directly and specifically. The best form for those responses would be an addendum to the agency's October 10, 2018 report, which could then also be reviewed by the BZA when it takes up the case on November 14, 2018.

Regards,



Mary M. Cheh

cc: Frederick L. Hill, Chairperson, Board of Zoning Adjustment

Questions

1. How much traffic would be generated by a 24/7 facility housing 121 individuals with a 75-person staff plus a 250-seat church? The applicant has stated that there will also be 20 trucks coming to the site every week and there will, undoubtedly, be the need for ambulances. How many visitors does the agency estimate will visit the 121 residents? Do these counts include guest to events at Sunrise, such as the concerts that are organized at other Sunrise facilities?

2. The CCRC special exception being sought requires that six conditions be met, including sufficient parking to accommodate parking for all residents, staff and visitors, which should be an analysis independent of whether they meet the residential parking required by 11-C DCMR § 701.5. That means off-street parking in the garage. The developer is providing 66 spaces. In its traffic report, however (Traffic Report, Exhibit 53A at p. 13), the applicant notes that it will "provide information on alternative parking locations for Church attendees and Sunrise visitors on its website, instructing drivers to park in on-street meters and/or nearby parking garages and not residential spaces. This information will be sent to attendees of any events held on site." This concession would appear to suggest that more parking is required for residents, staff, and visitors than will be provided on site. How can

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the agency conclude that the parking being proposed actually accommodates all the needs of the facility?

2. The applicant states that it will make every effort to direct their traffic to use only Alton Place and Yuma Street. The agency's report, however, largely concentrates on 39th Street. There does not appear to be adequate consideration of traffic on Alton and Yuma.

3. The DDOT Report expresses concern about turn rotations for the 7-ton shuttle maneuvering on Alton Place, a 30-foot wide street with two-way traffic and parking on both sides, in other words 7 feet on each side devoted to parking and 8 feet wide lanes in both directions. The report (exhibit 52A at p.11) makes no mention of the 30-foot box trucks that would be using Alton and making a right turn on to the truck ramp. Nor does the report consider the trucks leaving the truck ramp and turning on to Yuma Street, which is only 34 feet wide and is a two-way street with parking on both sides. Why was this not part of the analysis?

4. Sunrise is providing a "lift" that is being cited to fulfill the requirement for a loading platform, which "shall consist of one horizontal level" and be 100 SF including it must be 8 feet wide. Does the lift meet these requirements? 11-C DCMR § 905.4(a).

5. The "service delivery space," which is located inside the garage parallel to the space for the shuttle, is required to be "accessible at all times" and be "usable and accessible by the vehicles that it is intended to serve." 11-C DCMR §904.1 and 11-C DCMR §904.5. How do the trucks use this "service delivery space" inside the garage and next to the 7-ton shuttle? Does the service delivery space have a clearance of ten feet as required by 11-C DCMR §905.3?

6. What is the height of the garage entrance opening? What trucks can enter, with particular concern regarding the 30-foot box trucks, 28-ton trucks, garbage trucks and shuttle?

7. The driveway cannot have a slope steeper than 12% (a 12-foot drop over 100 feet). The truck ramp drop is more than 13 feet based on the height of the retaining wall, which is being measured starting at the first-floor level at several feet below grade. Will Sunrise also have an open roll-off container in this area, as they do at other Sunrise facilities, which will occupy substantial space? And, taken together, is there, in fact, sufficient room for a driveway no steeper than 12% slope?