

**3456 Newark Street, N.W.
Washington, DC. 20016**

July 28, 2020

Frederick Hill
Chairman
District of Columbia Board of Zoning Adjustment
Washington, DC

RE: BZA Case 20266 – 3400 Connecticut Ave., N.W.

Dear Chairman Hill and Members of the Board:

The Applicant for a proposed residential and retail development at 3400 Connecticut Avenue and Newark Street seeks a special exception for relief from all parking requirements of the DC zoning regulations and for other relief, but has not met its considerable burden for a special exception. For this and the reasons below, we respectfully oppose granting the special exception.

First, we endorse fully the reasons set forth in Leila Afzal's letter to you in opposition to the special exception. As the former ANC commissioner for the single member district in which the Macklin is located, Ms. Afzal is both very knowledgeable and credible on the issues and challenges of the site and the significant, adverse impact of granting the special exception on nearby residents and local businesses.

Second, the Applicant has already benefited from existing relief in the zoning regulations that has reduced the amount of required off-street parking by 50 percent because of the Cleveland Park Metro stop several blocks away. The Applicant should not now be able to "double-dip" by citing the Metro to eliminate all on-site parking entirely, when the facts demonstrate that there is strong, unmet demand for parking in the area, notwithstanding public transportation.

As others have noted, the study of the Cleveland Park commercial district prepared for the Deputy Mayor for Economic Development (October 2016) found that 86% of local businesses identified the lack of available parking as the number-one impediment to their businesses, twice that of any other challenge cited. This finding was made notwithstanding the availability of the Metro, but before the recent closing of the service road across from the Macklin site and the loss of 28 metered parking spaces, which some advocate to make permanent. It was before the Applicant's planned elimination of all 15 existing parking spaces on the Macklin site today. And it was before the increased demand for parking resulting from

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the addition of 34 new residences (each potentially with multiple drivers) and more commercial space on the site. As the Applicant's traffic engineer acknowledge at the ANC's recent Planning and Zoning Committee meeting, today "there is very little (street) parking, if any. There are no parking spaces, to be frank." In light of the DMPED study and Applicant's expert's admission, the Applicant's position that its project will have no or minimal impact on parking demand is simply not credible.

Third, it is clear that the Applicant is trying to fit too much "program" into an already constrained site. Some of the constraints, like the Applicant's elimination of an existing loading and delivery area on the site, are of the Applicant's own making. To service more residences and commercial space, the Applicant seems to rely on a hodge-podge of assumptions, each of which is limited: (1) alley access from Ordway street that is very narrow and does not accommodate larger trucks and a loading dock that is too small to meet zoning regulations; (2) creation of a dedicated loading zone on the Connecticut Avenue major arterial, which is dedicated to through traffic during a significant part of the business day; and (3) on the site's southern frontage, a narrow, winding, uphill street with blind spots, which causes DDOT today to prohibit parking and standing for safety reasons.

Despite conclusory assertions by the Applicant and its partners that granting a special exception to dispense with all on-site parking and loading will somehow mitigate climate change, it will do nothing of the sort. In fact, the result will be additional vehicles circling adjacent streets to compete even fewer parking spaces than exist to today and more trucks idling without a coherent loading management plan. And it is neither equitable nor inclusive if the new residences, by eliminating all parking, are designed serve only a younger, more mobile demographic while effectively excluding older, more vulnerable residents and those with medical conditions who cannot use public transportation and are therefore depend more on having private vehicles.

The BZA should reject the Applicant's unconditional special exception for relief from all onsite parking and loading requirements. Thank you for your consideration.

Respectfully,

Rick Nash
MaryAnn Nash