

Zoning Commission of the District of Columbia
District of Columbia Office of Zoning
441 4th St., NW, Suite 200
Washington, DC 20001

April 29, 2014

Stronghold Civic Association

**Re: Zoning Case No. 13-14 (Vision McMillan Partners, LLC, & DC
Deputy Mayor
for Planning & Economic Development, joint applicants,
application for
Map Amendment, First-Stage PUD, Consolidated PUD)**

Dear members of the Zoning Commission,

Attached please find documents that the Stronghold Civic Association (SCA) wishes to submit as testimony for Zoning Case 13-14. The Stronghold community is directly east of the McMillan site across North Capitol Street and will be directly and immediately affected by the character of any development of the site. The attached documents describe consistent Stronghold concerns about the height, density, mass, and setback of the proposed development for the site.

The SCA has a long history of great concern about any development of the McMillan site and has actively and enthusiastically participated in the process of finding ways to revitalize the site for the community's benefit. The SCA has featured presentations on many aspects of proposed development ideas for the McMillan site for a long time and publicly announces each of these meetings with flyers delivered by hand to each household in Stronghold, seeking both to invite the participation of all residents and let everyone know the issues and concerns at each step. All SCA positions on the McMillan development are the result of long, careful, consensual discussion and debate, in committee and in the committee of the whole, presented to the voting membership for acceptance. We are proud of the consensus that we have been able to build on this matter.

The enclosed documents are:

September 12, 2012, Stronghold Civic Association position on development of McMillan Park (to Mayor Gray)

January 6, 2013 Stronghold Civic Association Position Statement on the Vision McMillan Partners' October 2013 revised development plan for the McMillan Sand Filtration Site

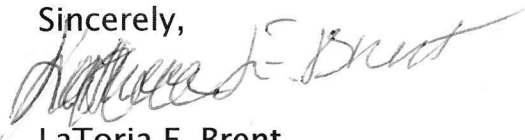
April 1, 2013, SCA cover letter to the HPRB Testimony concerning Vision McMillan Partners revised proposed development plan for the McMillan Sand Filtration Site

April 4, 2013, SCA Testimony ((to the HPRB)) concerning Vision McMillan Partners revised proposed development plan for the McMillan Sand Filtration Site

December 2013, SCA Position Statement on Vision McMillan Partners' October 2013 Revised Development Plan for the McMillan Sand Filtration Site (to Councilmember Kenyan McDuffie)

December 2, 2013, Stronghold Civic Association objections to and request to rescind the November 19, 2013 ANC 5E Letter of Support for the DMPED/VMP McMillan Project

Sincerely,



LaToria E. Brent

President

Stronghold Civic Association

Kirby Vining
16 Franklin St., NE
Washington, D.C. 20002-1008 202 213 2690, nulliparaacnestis@gmail.com

September 2012

Mayor Vincent Gray
1350 Pennsylvania Ave., NW, Suite 402
Washington, DC 20004

Re: Stronghold Civic Association position on development of McMillan Park

Dear Mayor Gray,

As Director of Planning for the Stronghold Civic Association, (SCA) I have been directed to provide your office with the enclosed formal SCA position on the development of McMillan Park.

Thank you.

Sincerely,

Kirby Vining, for
Ann Brooks
President
Stronghold Civic Association

Cc: Chairman Mendelson, Suite 402
CM Cheh, Suite 108
CM Catania, Suite 404
CM Brown, Suite 406
CM Orange, Suite 107
CM Graham, Suite 105
CM Evans, Suite 106
CM Bowser, Suite 110
CM Wells, Suite 408
CM Alexander, Suite 400
CM Barry, Suite 102
CM McDuffie, Suite 410
HPRB Chair, 1100 4th St, SW, Suite E650, 20024
Congresswoman Norton, 2136 Rayburn HOB, 20515
Congressman Darrell Issa,, 2347 Rayburn HOB, 20515
Ms. Iris Gestram, NAOP, 1111 16th St. NW, Suite 310, Wash. DC 20036
Ms. Rebecca Yarbrough, NTHP, 1785 Massachusetts Ave., NW, 20036
Mr. Peter Harnik, Center for City Park Excellence, the Trust for Public Land,
660 Pennsylvania Ave. SE, Suite 401, 20003
Mr. Anthony Williams, CEO, Federal City Council, 1156 16th St NW, #600, 20005

Via e-mail: ANC 5C07, 5C04, 5C03, 1B10, ANC 5C Chairman

Stronghold Civic Association

September 2012

Subj: Stronghold Civic Association opposition to McMillan Park development plan

At the June 4, 2012 meeting of the Stronghold Civic Association (SCA), members heard a briefing on initial results of a door-to-door survey of Stronghold residents concerning their desires for development of McMillan Park, also known as the McMillan Sand Filtration Site. Over half the households in Stronghold have been contacted directly so far, while the survey continues, and the briefing is based on these initial results. Attempts continue to try to reach the remaining households. The site borders the Stronghold neighborhood on the west side across North Capitol Street. The SCA general body has accepted this data and wishes to share the results of this survey with our elected officials. One of the SCA's objectives in conducting the survey is to represent the people of this community. The survey questions and responses are available for review.

According to details of the survey, 85% of Stronghold residents polled indicated that they want at least 50% of the site to remain contiguous parkland in any development scheme, with about half that number wishing for more than 50% park space. The survey respondents also indicated their overwhelming interest in keeping the underground caverns at the site for potential repurposing. There was also strong interest in preservation of space at the site for its historical value.

The current development proposal now being considered by the District, based on the most current copy of the plan available to us, includes less than 50% contiguous park space of the 25 acres of existing surface park, and, according to the copy of the proposed plan available to us, calls for demolishing 18 of the 20 underground caverns. There seems to be a clear disconnect between the current proposed plan and the desires of our Stronghold neighbors, in what the SCA believes to be the first ever community poll on this subject. Therefore, the Stronghold Civic Association formally opposes the plan as it has been presented, based on the results of this door-to-door survey.

An important detail drawn from the results indicates that the Stronghold community is not opposed to development of the site. In fact, it appears from the data that most people want the site thoughtfully developed. The interviewers discovered that most people have very definite ideas about what is beneficial to our community. At your earliest convenience please contact us to come before the SCA to explain the process, your thoughts on development, and what we have discovered in talking with our neighbors. I look forward to hearing from you soon.

(Signed)

President, Stronghold Civic Association

Testimony of the Stronghold Civic Association concerning the Vision McMillan Partners newest proposed development of the McMillan Sand Filtration Site scheduled for presentation to the Historic Preservation Review Board on April 4, 2013.

The Stronghold Civic Association (SCA), representing the Stronghold community located directly across North Capitol Street from the McMillan Sand Filtration Site, presents the following testimony concerning the newest Vision McMillan Partners (VMP) proposed plan for developing that site to the Historic Preservation Review Board (HPRB) hearing concerning that plan scheduled for April 4, 2013. This testimony is subsequent to letters from the Stronghold Civic Association concerning VMP plans to develop the site presented to the HPRB in March, April and September 2012, letters which were cited in the Bloomingdale Civic Association Resolution on the McMillan Sand Filtration Site and Advisory Neighborhood Commission 5C in November 2012 which voiced concern that the ANC 5C Resolution in Support of the State One PUD Application of VMP failed to adequately include the concerns of surrounding communities. Copies of these earlier letters of testimony available upon request.

The current VMP proposal for developing the McMillan Site is of grave concern to the Stronghold community for two primary reasons:

- The current plan proposes building heights of 75' to 130' along North Capitol Street from Douglas Street to Michigan Avenue, blocking entirely the historic and panoramic views designed by Frederick Law Olmsted, Jr., of Howard University, the McMillan Reservoir, and the Washington skyline beyond. These views are of not only historical value, but of great personal value to many residents of Stronghold, both Howard graduates and otherwise.
- The current plan destroys all the historical features of the site documented in the National Register of Historic Places listing for the McMillan Park Reservoir Historic District, which is ironically currently the "feature place" on the National Register web site (<http://www.nps.gov/nr/feature/places/13000022.htm>), except for the perimeter Olmsted Walk and the sand-washing silos and service courts.

Submitted on behalf of the Stronghold Civic Association by SCA President Ann Brooks following approval at the SCA meeting on Monday, April 1, 2013.

April 1, 2013

To: Historic Preservation Review Board (Washington, D.C.)

From: Stronghold Civic Association

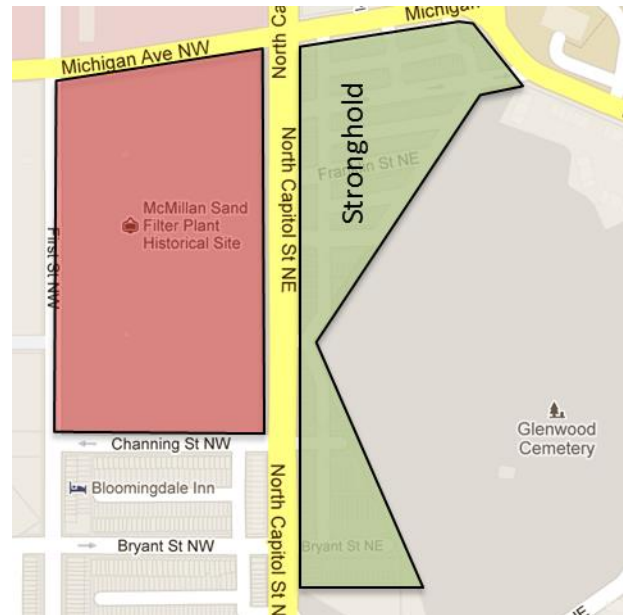
RE: Testimony concerning Vision McMillan Partners revised proposed development plan for the McMillan Sand Filtration Site

Dear Chairwoman Buell and other members of the Historic Preservation Review Board (HPRB):

The Stronghold Civic Association (SCA) is the community group that represents the Stronghold neighborhood located directly across North Capitol Street from the McMillan Sand Filtration Site. We are a community of over 260 homes located on unit block streets and with 90% of our residents located within one block of the planned McMillan site development (see map insert).

SCA submitted letters in March, April, and September 2012 concerning prior VMP development plans. These SCA letters were cited in the ‘Bloomingdale Civic Association Resolution on the McMillan Sand Filtration Site and Advisory Neighborhood Commission 5C in November 2012’ which voiced concern that the ANC 5C Resolution in Support of the State One PUD Application of VMP failed to adequately include the concerns of surrounding communities. Copies of these earlier letters of testimony are available upon request.

This letter is presented as SCA testimony regarding VMP’s March 2013 revised McMillan development proposal. SCA has the following grave concerns regarding the revised site development plan’s lack or limited attention to elements of McMillan’s historic preservation that led to its local and now national status as a Historic Site¹



¹ National Register of Historic Places is currently featuring the McMillan Park Reservoir Historic District on the National Register web site (<http://www.nps.gov/nr/feature/places/13000022.htm>).

Preservation of Sense of Place and Historic Vistas:

We continue to raise concerns about the scale and density of the planned development. In order to not dwarf the existing historic structures (silos, regulator houses, service courts) in relation to surrounding areas within the site as well as the surrounding communities, SCA strongly advises against the increase in height of the buildings in the northern part of the site, especially the almost doubled height of the commercial space for the grocery store and a much decreased set back off of North Capital Street as described below:

- Original PUD: building listed as 40 feet high with about a 100 feet set back from North Capital before increasing in height
- Revised PUD: Same building now proposed to be 75 feet high with less than half the distance of the prior set back

The McMillan site affords multiple panoramic views of many of the District's historic landmarks including the Capital Building, the Washington Monument, the Solder's Home, Howard University, and Catholic University. The revised plan proposes building heights of 75 feet to 130 feet along North Capitol Street from Douglas Street to Michigan Avenue, blocking almost entirely most of these historic and panoramic vistas. These views are of not only historical value, but of great personal value to many residents of Stronghold, both Howard graduates and otherwise. SCA strongly supports maintaining these important vistas to a more significant extent and incorporating these vistas into multiple areas that open to the public for all to enjoy.

Preservation of Underground Cells:

The underground cells, key to the function of the sand filtration process for water purification, were constructed with vaulted ceilings supported by robust pillars. The cells bring a truly unique character to the overall experience of the McMillan Site. The differences between the original and the revised site plans are listed below:

- Original PUD: two of the underground cells were being preserved and/or repurposed. There were signs of creative incorporation of the cells elements as part of the underground portion of the community center and perhaps as parts of planned buildings (e.g., entrance to the grocery store, etc.)
- Revised PUD: there is no longer a specific plan that any of the underground cells will be preserved or reused. Cell 14 is listed but there is a high likelihood that it will not be in a condition for restoration or reuse after serving as DC Water planned storm water storage site until 2022. And Cell 28, near the new community center site and already known to have significant damage, is listed for *partial* reuse *if* feasibility studies permit.

So in the end, the community may end up with a handful of partial columns unearthed as part of the landscaping around the community center ... a sad graveyard-like reminder of the grand structures underneath the entire site that will likely be completely destroyed if the revised site plan is ultimately developed. That leaves future generations to rely on pictures and their own imaginations to envision what the current generation did not fight for because of a lack of imagination!

SCA strongly advocates that multiple additional underground cells be preserved or repurposed. There are many possible uses for these architecturally unique structures: elementary school, museum exhibit space, performance space, restaurant, church, trade school, Eastern Market-like commercial venue, library, artisan studios... the only limit of potential uses is one's own imagination and determination. Repurposing the underground cells into unique destination points would go a long way in providing much needed revenue and opportunities to the surrounding communities.

Preservation of Sense of Purpose

Part of the McMillan Site's historic designation was the element of clean water production as a major component of the site. SCA strongly advises that the McMillan Site's sense of purpose by including credible monuments, memorials, plaques, and educational exhibits throughout the site documenting the historical elements, function, and influence of the site. Thus far, these type of details have yet to be formally developed and specifically included in the development plan.

Preservation of Space and Existing Above Ground Structures:

SCA appreciates that the VMP plan states that all above ground structures (e.g., silos, regulatory houses, service courts, sand washers, etc.) will be preserved. SCA's hope is that, as the development plan is further amended, these structures will play a more prominent role in anchoring the feel of the site.

Likewise, SCA appreciates that the new site plan has a larger green park space and that Olmsted's perimeter walk will be almost completely intact. In addition, the now preservation of the plinth and burms help to preserve the site's current sense of space, at least in the park area. An unfortunate by-product of the larger park space is the now increased building density in the northern part of the site (see concerns described in *Preservation of Place and Historic Vistas* above).

Submitted on behalf of the Stronghold Civic Association by SCA President Ann Brooks following approval at the SCA meeting on Monday, April 1, 2013

CC:

Ward 5 Councilmember McDuffie (kmcduffie@dccouncil.us)

DC Council Chair Phil Mendelson (pmendelson@dccouncil.us)

Ward 1 Councilmember Graham (jgraham@dccouncil.us)

ANC 5E Chair/MAG Chair Dianne Barnes (dianne_brns@yahoo.com)

ANC 1B Chair/MAG member Tony Norman (tony_norman@yahoo.com)

ANC 5C Chair/MAG member Ronnie Edwards (ronnieedwards.5c11@gmail.com)

Stronghold Civic Association

December 2, 2013

Re: Objections to and request to rescind the November 19, 2013 ANC 5E Letter of Support for the DPMED/VMP McMillan Project

Dear Commissioner Barnes (info all other ANC 5E Commissioners),

On Tuesday, November 19, 2013, the Advisory Neighborhood Commission (ANC) 5E passed, with a vote of 5-2, a resolution to send a letter of support on the Historic Preservation Review Board's (HPRB's) Recommendations for the McMillan Project to move forward to the Mayor's Agent. The planned unit development (PUD) filed on November 22, 2013, by DMPED and VMP, states on page 30 that "On November 19, 2013, ANC 5E voted 5-2 to support the PUD redevelopment." To our knowledge, there was no discussion of the PUD during ANC 5E debate on this issue.

This ANC 5E action was taken without the support of the Stronghold Civic Association (SCA) and without even advising the SCA that this vote was to take place. Stronghold has a history of concerns that have been documented in previous letters to the HPRB over the years (examples attached below). The SCA has not yet seen the contents of this letter of support, and objects both to the misrepresentation of Stronghold and the denial of an opportunity for Stronghold to see and discuss the contents of that letter.

The Stronghold Civic Association strongly objects to this misrepresentation of the Stronghold community and thus requests that ANC 5E rescind the letter of support.

Sincerely,

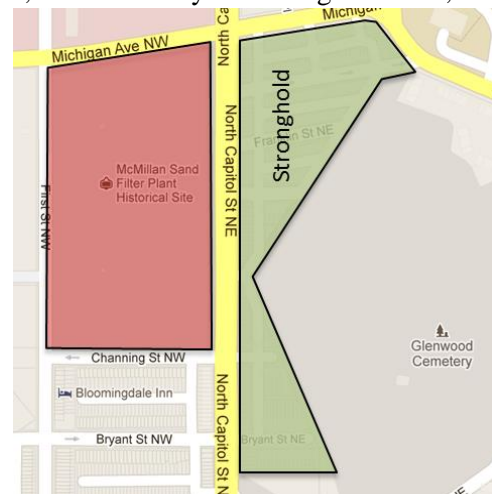


Ann Brooks
President, Stronghold Civic Association

**The Stronghold Civic Association’s Position Statement on Vision McMillan Partners’
October 2013 Revised Development Plan for the McMillan Sand Filtration Site**

April 7, 2014

The Stronghold community has continued significant and serious concerns regarding the October 2013 revised development plan for McMillan. As a community of over 260 homes with 90% of residents living within one block of McMillan (see map insert), Stronghold, more than any other neighborhood, will be negatively impacted by vast increases in vehicular traffic, building heights, and multi-year construction activities. More importantly, the soul of our entirely residential, close-knit family will be irrevocably transformed into to a “Columbia Heights but without a metro” should McMillan be developed to the scale and density as proposed in the revised plan. Our homes, in fact, were first constructed to offer residents close proximity to McMillan, a value which is no less important now than when the homes were built in the early 1900s. The neighborhood has deep roots with many homes occupied by the same family for up to five generations. New residents are also coming into the community for the same reason people moved here 100 years ago: for quality, brick-built homes, spectacular views, beautiful green space, and seclusion from the more urban parts of the city.



We believe the revised plan remains imbalanced in a way that is more detrimental than beneficial to our community. We, as a whole, are not against development, but are strong advocates for thoughtful, data-driven, smaller scale changes that bring in some needed community amenities without destroying the fabric of the existing communities. Below are specific concerns and recommendations for mitigation:

- 1. Conduct updated development impact studies:** Stronghold challenges the validity of previously conducted impact studies since they are multiple years out of date, do not reflect the current economic environment, are not specific to the current plan proposal, and do not take into account additional ongoing/planned development in the immediate vicinity¹. We specifically ask that DDOT conduct a thoughtful, thorough, and complete traffic analysis of this area, with all of these planned developments, to determine the transportation needs of our communities. Before more PUDs are approved with limited, project-only focused studies, we expect that the District implement the identified transportation needs (metro, street cars, circulator buses, etc.) in a pro-active manner.
- 2. Traffic Mitigation:** Since North Capital is the only means of egress for most of our residents (i.e., all but one of our streets are dead end), traffic is a huge concern to Stronghold. To date, the development plan has yet to produce a realistic and satisfactory strategy for mitigating the traffic congestion caused by the estimated minimum of 6,000 additional vehicle trips a day to/from McMillan. With neighboring development plans in the works, the traffic congestion will turn our streets into “parking lots” not only during peak hours as occurs at present, but for larger and larger

¹ Including: development of Soldier’s Home; North Capital Clover Leaf; Monroe Street Market; Washington Health Center and VA Hospital expansions; and Catholic, Trinity, and Howard University expansions.

periods of each day. In the absence of an adequate traffic mitigation strategy, the only solution remains to be substantial reduction in the number of planned residential and commercial spaces.

3. Buildings

- **Scale/Height:** The scale and height of the buildings is incompatible with the site's existing structures and surrounding 2-3 story row homes. We strongly recommend that the development plan abide by DC's Comprehensive Plan for McMillan for moderate density commercial (less than 5 stories).
- **Zoning:** The site should be zoned with distinct residential and commercial areas as was proposed in the Stage One PUD (2/24/12). Land covenants should be put in place that state no further increase in building heights or changes to the exteriors be allowed without community and historic preservation approval.
- **Design/Materials:** The plan's current architecture is incompatible with the character, quality and beauty of the McMillan area. For consistency with neighboring row homes, brick exteriors (front, side, back) should be the primary building material for the new row homes and the larger buildings should include brick and a compatible color palette (creams, rusts, tans, blues, browns).
- **Setbacks:** We recommend increasing the set-backs for the grocery/apartment building off of North Capitol to 100 feet as put forward in the original development plan. The Olmsted Walk should also follow the site's original path. Increase set-backs off of Olmsted Walk to allow for green space in front of town homes to reflect design and beauty of surrounding neighborhoods.

4. **Senior/Affordable Housing:** 20% of all residential units should be allocated for affordable housing. We support VMP's amendment to this PUD to make 100% of the senior housing units affordable. We strongly recommend that the number of affordable senior housing units be increased to 150 and include handicap accessible row homes. Given proximity to hospitals and other places of employment, both affordable and affordable senior housing designations should *not* expire after 15 years of occupancy, but remain affordable for the next 100 years.

5. **Pedestrian/Cyclist Access and Safety:** The plan should include: cross-walks across North Capitol with pedestrian right of way; elevator in the Community Center and exterior ramps throughout the site to ensure pedestrian safety and access for persons of all ages and disabilities; divided paths for cyclists and pedestrians on Olmsted Walk; and a network of bike lanes to the area to support the Transportation Impact Studies support and reliance on bicycle transportation as one of its mitigation strategies.

6. **Park Space/Community Recreation Center:** The park space still lacks much needed recreation and gathering spaces. To this end, we recommend that the loop road on the South Service Court be removed as currently planned and replaced with a loop extension off of the southern end of ¼ Street (allowing access, drop-off/pick-up for the Center). We strongly advise the inclusion of the following outdoor amenities: children's playground, dog park, outdoor and indoor performance spaces, skate/board park, and designated spaces for community activities (farmer's markets, holiday events, art shows, etc.). The Community Recreation Center should have indoor basketball and volleyball courts in addition to the planned swimming pool.

7. **Sand Filtration Cells:** We remain disappointed that the revised plan continues to lack specifics regarding these architecturally awe-inspiring structures. We strongly encourage the inclusion of two additional cells along with Cells 14 and 28, for preservation and/or repurposing (especially since Cells 14 and 28 may not be suitable for complete reuse based on feasibility studies). Since the cells are historically significant and distinguishingly unique, we also strongly recommend more creative commercial and community uses for these spaces (e.g., unroofing parts of a cell to create an open-air courtyard with surrounding restaurants/performance spaces).

Conclusion and Recommendation: Stronghold is still unable to support the latest revision of the McMillan development plan. Community concerns that were raised early on in the planning process

(dating back to 2007) still remain unaddressed although the development plan has undergone multiple revisions. As the one community which is most directly and negatively affected by the development of McMillan, we look forward to working with the District and VMP to further amend the McMillan development plan to address the above listed concerns.

Voted and unanimously approved at the April 2014 Stronghold Civic Association meeting.

CC:

Ward 5 Councilmember McDuffie (kmcduffie@dccouncil.us)

DC Council Chair Phil Mendelson (pmendelson@dccouncil.us)

Ward 1 Councilmember Graham (jgraham@dccouncil.us)

ANC 5E Chair/MAG Chair Dianne Barnes (dianne_brns@yahoo.com)

Anne Corbett, VMP Project Manager (alc@envisionmcmillan.com)