

April 30th, 2014

To: District of Columbia Zoning Commission.

From: Miriam Gusevich,
Principal, Gusevich-Miles Studio, LLC
Professor, School of Architecture and Planning,
The Catholic University of America.

RE: District of Columbia's proposal for **McMillan Slow Sand Filtration Plant**

Dear distinguished members of the Zoning Commission:

As our stewards for our common lands in our beautiful City and National Capital, I urge you to protect McMillan Park as our heritage for present and future generations. Vote against the District of Columbia's PUD proposal to destroy to McMillan Park because it fails to fulfill the following PUD evaluation standards:

2403.9 (a) Urban design, architecture, landscaping, or creation or preservation of open spaces;

- The PUD Master Plan does not create a coherent campus.
- The PUD plan does not respect the three part organization of the site into center, north and south and instead divides it into four. The center section is subdivided into two arbitrary sections of uneven size, with no relationship between them.
- The PUD plan fragments the historic Olmsted Walk and reduces it to private front yards.
- The architectural design guidelines for the proposed buildings in the PUD are conventional boilerplate and destroy the unique character of this historic landmark.
- The row-houses do not make any effort to repurpose the vaults underneath. They are standard issue EYA housing that could be built in any parking lot.
- The high-rise buildings are out of scale with the neighborhood. They are out of context and look like an invasion of alien downtown office buildings.

- 2403.9 (b) Site planning, and efficient and economical land utilization;**
- The VMP plan destroys the unique irreplaceable historic fabric to impose an arbitrary street pattern that goes nowhere.
 - The historic courts are reduced to dead-end driveways.
 - The transit hub will create a traffic jam at Michigan Avenue.

- 2403.9 (c) Effective and safe vehicular and pedestrian access and transportation management measures to mitigate adverse traffic impacts;**

TRAFFIC:

- The transportation study included with the PUD acknowledges that Michigan Avenue, North Capitol and 1st Street are currently not capable of addressing the current traffic loads.
- This is a serious life and death issue for the hospital complex.
- North Capitol is almost impossible to cross by pedestrians, it has no bike lanes and in some areas it has less than 2 feet sidewalks. It is not handicapped accessible.
- Their proposed traffic lights barely address major issues of pedestrian safety.
- The District of Columbia owes the community and the district a proper traffic study of the whole area, including the needs of the hospital.

- 2403.9 (d) Historic preservation of private or public structures, places, or parks;**

Fails to fulfill HISTORIC COVENANTS and the US Secretary of Interior Standards.

McMillan Slow Sand Filtration Plant is recognized as a National and District of Columbia Historic Landmark because of its demonstrated architectural, civic and landscape values. Exhibit 1 shows the historically significant features. These include the two courts with the silos, brick regulator houses and sand pumping equipment. The two courts divide the site into three zones: north, south and center. These zones have a split-level ecology, with 20 acres of green roof above, the largest of its era, and below are 20 one acre cells with a unique sand-filled concrete vaults. Exhibit 2: shows the VMP Plan.

- The PUD Master Plans fails to fulfill the U.S. Secretary of the Interior Standards for Historic Preservation for buildings and cultural landscapes as required by law.
- The VMP Master Plan does not respect the historic design intent of the original Olmsted Plan.
- Counter to the Secretary of the Interior Standards, their Master Plan destroys

real significant historic fabric and replaces it with pseudo historic buildings.

- The VMP Master Plan destroys 19 out of 20 cells or 95% of the underground historic cells.
- ✓ Our alternative People's Plan fulfills the covenants and the Secretary of the Interior Standards; it preserves and repurposes 12 of the one acre sites and creatively recycles the rest as an urban beach.
- ✓ Our new proposed buildings allow the continuity of the green roof and are inspired by the architecture of the site, especially, the vaults of the entrances.

2403.9 (h) Environmental benefits, such as:

- (1) Storm water runoff controls in excess of those required by Storm water Management Regulations;
- (2) Use of natural design techniques that store, infiltrate, evaporate, treat, and detain runoff in close proximity to where the runoff is generated;

FAILS TO FULLFILL EPA standards for sustainable Best Management Practices for STORM WATER .

- Currently the site provides 20 acres of storm water storage. Both the green roof and the cell underneath contribute to this storm water capacity.
- The Bloomingdale neighborhood has suffered significant flooding episodes costing millions of dollars in damages and creating a health hazard despite having this resource.
- DC Water is using one of the 20 cells to store storm water and hopefully alleviate future flooding in Bloomingdale. DC-Water's use of the site proves that it continues to serve a public purpose and that there are cells in good structural condition.
- The proposed VMP Plan will eliminate the 20 acres of cells that provide storm water storage and replaces the green roof with 75% impervious surface.
- Destroying this storm water storage capacity with injudicious development is unwise; it is premature to assume that there will be no need for additional storm water storage in the future.
- ✓ Our alternative People's Plan can fulfill these Best Management Practices; by preserving 14 acres of green roof and using the other seven as an urban beach we actually increase the storm water storage capacity of the site.

2403.9 (3) Preservation of open space or trees.

DESTRUCTION OF EXISTING PARK

- The proposed PUD destroys a unique park with a split-level ecology. It has 20 acres of green roof above, the largest of its era, and below are 20 one acre cells with a unique sand-filled concrete vaults.
- ✓ Our proposed People's Park protects this unique two level park and develops an upper level green park and an urban beach, recycling the sand.

VIEW CORRIDORS

- Currently the site is an open park with extraordinary panoramas of the United States Capitol, the Washington Memorial, the Shrine of the Basilica, Howard, Catholic and Trinity Universities. Under the VMP plans, these view corridors will be eliminated.
- ✓ Our alternative People's Plan preserves all these historic view corridors.

PROPOSED PARK:

- ✓ The southern quadrant the site has been identified as a "public park".
- ✓ Although not explicitly stated, maintenance of their "public park" will be provided by a condominium fee, raising a question about how long it will be publically accessible, hours of operation, etc... which have not been defined.
- ✓ Their "public park" is not visible from the street because it is hidden by the large berms.
 - ✓ In contrast, our proposed People's Park takes advantage of the grade change to reveal the park level from the street. It uses the vaults to frame the park and also allow visibility from the street, making it safer and more truly publically accessible.
- ✓ The proposed "healing gardens" on the north side face the Michigan Avenue traffic. It is set in a transit hub in the midst of noise, pollution and the year long shadow of the high-rise buildings.
- ✓ In contrast, our proposed People's park will provide

WARD 5 MOST UNDERSERVED WITH PUBLIC PARK.

- ✓ A 2012 study by Peter Harnik of the Trust for Public Lands compared 50 cities in the US. DC scored very high in general, but Ward 5 was the worst of the wards for public park access.

- ✓ Our proposed People's Park will provide a significant public park for both passive and active recreation with soccer field, baseball diamonds, and sand volleyball and a major indoor community facility with an Olympic sized pool, wading pools for children, two tennis courts and a basketball court.

WILDLIFE HABITATS.

- ✓ The PUD has not done an environmental impact study of the site and no counts of existing habitats.
- ✓ Our alternative People's Plan protects the current park as a habitat corridor between the McMillan Reservoir and the Cemetery and enhance the range of habitats by adding wetlands along the urban beach.

2403.9 (i) Uses of special value to the neighborhood or the District of Columbia as a whole;

SUPERMARKET.

- ✓ The PUD destroys the brilliant historic vaults to build a banal ordinary supermarket.
- ✓ The new Wallmarts, Whole Foods, Trader Joe's, etc, which are being built in the District, there is a need for an updated market study to assess demand and whether there is justification for the extensive demolition.
- ✓ Our alternative People's Park proposes to repurpose six of the one acre vaults in the center of the site as a unique market zone. This could include a supermarket, typically one acre) plus restaurants, wine bars, shops, boutiques, galleries and artist studios,

(j) Other public benefits and project amenities

- ✓ The PUD does not offer any museum or exhibit space as agreed with the community.
- ✓ Our alternative People's Plan repurposes the vaults to create a new Museum which could be an art museum, or a Children's museum across from the Children's hospital, etc...

2403.3 *The impact of the project on the surrounding area and the operation of city services and facilities*

NEIGHBORHOOD IMPACTS:

The VMP plan has been designed as if it is the only site open for development in the whole city and there is nothing else being planned. It does not take into consideration the over 12 million square feet of development that have been approved or proposed in the immediate area.

Exhibit 5 shows that there are

SOLAR IMPACTS. Exhibit 4.

- The proposed PUD has a negative solar impact.
- Michigan Avenue would be in shade almost all the time, including a
- All the side streets for the housing will also be in shade almost all the time.

McMillan Park is a publically owned historic landscape with a vital public purpose. The District of Columbia should protect this historic site and proceed with due diligence to consider alternative proposals. There should be an impartial cost-benefit analysis evaluating this PUD vs. a creative plan for repurposing the site.

Our alternative People's Plan for McMillan Park will fulfill:

- The covenant of the land transfer
- The United States Secretary of the Interior Standards.
- The EPA standards for sustainable Best Management Practices for storm water

- It will promote economic opportunity for the 21st century.
- It is wise business and cost effective.
- It will increase tax revenues and local property and would give the residents more wealth in their increased equity.
- It will be more sustainable economically, socially and environmentally

Protect Historic McMillan Park. Vote against this PUD. In the memorable words of Joni Mitchell, it will *"pave paradise and put up a parking lot"*.

Thank you in advance for your consideration and for your great public service.

Sincerely,

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PS/ To see our creative People's Plan, go to www.McMillanPark.com.

See the Washington Post.

http://www.washingtonpost.com/local/group-has-alternative-vision-for-disputed-mcmillan-redevelopment-site/2013/06/18/df939894-d776-11e2-9df4-895344c13c30_story.html