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3051 Chancellor's Way NE  
Washington, DC 20017

2015 OCT 28 PM 12: 17

23 Oct, 2015

Chairman Anthony J Hood  
Washington DC Zoning Commission  
441 4th Street NW Suite 200S  
Washington, DC 20001

Re DC Zoning Commission Case 15-02

Dear Chairman Hood,

I am writing to oppose the planned townhouse development on 7<sup>th</sup> Street NE by the Applicant. There are several reasons why I oppose this development.

**1. Loss of existing green space with mature trees.**

The property, as it currently stands, contains 10 Special trees (circumference of 55" or greater) not including the 7 Special trees that are street trees and are maintained in the Applicant's current plans. According to Keith Pitchford, ISA Certified Arborist, these trees likely date from the mid 1930s (same time as the Holy Redeemer building's construction), except the 2 sweetgums and the elm which are volunteers. The 10 special trees include 4 Pin Oaks (*Quercus palustris*), 1 Chinese Chestnut (*Castanea mollissima*), 2 Sweetgums (*Liquidambar styraciflua*), 1 Holly (*Ilex aquifolium*), 1 Saucer Magnolia (*Magnolia soulangiana*) and 1 Elm (*Ulmus americana*). While some of the trees, notably 3 of the oaks, are in fair condition, the rest of the trees are healthy. Both Mr. Pitchford and another ISA certified arborist, Carol Herwig who inspected these trees, said that the magnolia was one of the best specimens they have ever seen. What a shame to just pay the current UFPA fine of \$35/in. and tear it out! This is existing green space with diverse, healthy, mature trees in a neighborhood where such are rapidly disappearing.

**a) The Sustainable DC Plan**

**([http://sustainable.dc.gov/sites/default/files/dc/sites/sustainable/page\\_content/attachments/DCS-008%20Report%20508.3j.pdf](http://sustainable.dc.gov/sites/default/files/dc/sites/sustainable/page_content/attachments/DCS-008%20Report%20508.3j.pdf))**

This plan sets out several goals to achieve in order to make Washington, DC "the healthiest, greenest, and most livable city in the United States." Among these goals were the following two:

- *Protect and expand tree cover and green landscapes, creating an integrated District-wide ecosystem*
- *Enhance access to parks and open spaces for all residents*

The current development plans put forth by The Applicant not only do not protect and expand tree cover, they will greatly reduce it. Further they do not enhance access to parks and open spaces.

NoMa is currently desperately searching for lots on which to create green space as it did not provide for this when undergoing development. We do not want Brookland/Edgewood to encounter the same problem in the future because of shortsighted planning.

**b) 7<sup>th</sup> Annual Tree Report Card for Washington, DC (2014) issued by Casey Trees**  
**([http://caseytrees.org/wp-content/uploads/2015/04/TreeReportCard\\_Final.pdf](http://caseytrees.org/wp-content/uploads/2015/04/TreeReportCard_Final.pdf))**

According to the 7<sup>th</sup> Annual Tree Report Card for Washington, DC (2014) issued by Casey Trees, the District received a grade of C for preventing the removal of healthy trees. In part, this is due to the fee for removing Special trees, which has not increased since it was first passed in 2002. This fee is now less effective at discouraging the removal of healthy Special trees

According to Casey Trees, Inc

D.C 's tree canopy is on the decline In 1950 D C 's population was 800,000 and its canopy was approximately 45% Today that population is 600,000 and the canopy is 35%. Independent assessments of D C 's Urban Forest Preservation Act (UFPA) of 2002 conducted by the D C Auditor's Office and Casey Trees shows many failings with the administration of that law including thousands of trees that should have been planted but were not Finally, D C 's MS- 4 Stormwater Discharge Permit, passed this October, calls for increased efforts to increase D C 's canopy and protect existing trees for the stormwater benefits trees provide

Removing the healthy trees currently growing on the Holy Redeemer property, both Special and smaller trees, will exacerbate the stormwater problem and not help Washington DC advance towards its goal of a 40% tree canopy by 2032

**c) Comparison to Chancellor's Row community**

It seems that the Applicant uses the adjacent Chancellor's Row development as a reference for many of the decisions made in the design plans However, this comparison seems to be selective. In any event, since several additional local developments with relief from DC zoning requirements, have been or are in the process of completion; it should be plain that what may have been sufficient to satisfy green space and infrastructure requirements in 2008 may no longer be anywhere near sufficient going forward Such logic would eliminate future green space and infrastructure concerns from ever being reasserted and would prevent achievement of essential goals of the Comprehensive Plan

In the ZONING COMMISSION ORDER NO 07-27, Nov 10, 2008 (Regarding Chancellor's Row) (<http://dcoz.dc.gov/orders/07-27.pdf>), there were several mentions of the green space provided

*17 The Project will provide a significant amount of open and green space Open space accounts for 126,504 square feet (2.9 acres) or 28% of the site area. The overall building lot occupancy (which includes decks) is 31% (Exhibit 16, Exhibit B, p C-48 )*

*18 The central open space provided in the project is the large Corner Park, which includes a total of 14,000 square feet, is intended for non-organized, passive and active recreational use The southeast corner of the Corner Park will include a plaza with stadium style seating The park will be a mostly level expanse of lawn punctuated by shade trees and surrounded by masonry seat walls and retaining walls, benches, and mixed border plantings (Exhibit 16, p 16)*

Since the Applicant's townhouse development borders Chancellor's Row, they should be held, at a minimum, to the same standards for green space, notably 28% of the site area, not including the grand lawn in front of Holy Redeemer, which would not be public space If the new development is held to the same standards as Chancellor's Row, as they should be, there would be 0.76 acres of public green space (0.28 \* 2.73 acres). In the current plans, the green space of the pocket park and the mews are equivalent to 3.4% of the total acreage, not 28%!

The Applicant has developed plans for a "pocket park" on the corner of 7<sup>th</sup> and Jackson St NE which,

according to their drawings is approximately 24 ft by 54 ft This represents less than 0.03 acre, which is insufficient as a play area for children In addition, the location of the “pocket park” at the corner of 7<sup>th</sup> and Jackson Sts is hardly is hardly conducive for children as that is a busy intersection

The Office of Planning wrote in their June 19, 2005 Memorandum to the DC Zoning Commission

*The Applicant also should ensure that sufficient space is provided at the mews in the southern portion of the site The 28-foot separation may not be adequate to provide a usable open space for the residents **Families with children who may reside in the development would have limited outdoor space for children to play.** The closest playground is located at Edgewood Recreation Center which is just over a half mile from the Property Furthermore the introduction of the bio-retention facilities and retaining walls along with the drive aisles, separate the townhomes from the lawn of the Holy Redeemer building and **do not encourage community use of open space.** (Emphasis added)*

The multiple mews that exist in Chancellor's Row are just under 36 ft wide The single mews as proposed by the Applicant, which is 28 ft wide, also serves as the entrance to the front doors of the houses that face the mews There are small sidewalks that lead from the central sidewalk to each house. There is insufficient space for children to play and it is unlikely that in such close proximity to other people's front doors, neighbors will gather This means that the single mews is not really a green or open space for the community either

While Edgewood Recreation Center may be one half mile away, the 2 tot lots and the green space at the corner of Chancellor's Way and Regent Place in Chancellor's Row are very close These are all maintained by the Chancellor's Row HOA, which means that the residents of Chancellor's Row pay for their upkeep While I am not opposed to sharing these amenities with the larger neighborhood, I am opposed to the residents of Chancellor's Row paying the costs of maintaining these spaces if they are to be available to the public The Applicant should not be allowed to destroy **existing** green space and increase density, forcing additional child play activity into the neighboring Chancellor's Row recreation areas. In that case, the District of Columbia should take over their upkeep I ask that the Zoning Commission consider carefully the consequences of allowing the Applicant to destroy the existing green space and further burden the minimal remaining spaces

The Applicant has not sufficiently addressed the issue of open space and play space in the current plans. There is a lack of quality green space in the plan. Two park benches and some trees, sprinkled through the development, do not satisfy the green space requirement.

**d) The Comprehensive Plan for the National Capitol, (<https://www.ncpc.gov/compplan/>)**

### **Upper Northwest Element**

The proposed project is inconsistent with the Comprehensive Plan, Upper Northeast Element The Planning and Development Priorities, as well as the Policies for Neighborhood Conservation point to enhancing and creating new community parks

#### **Planning and Development Priorities**

*f. Although seminaries, cemeteries, and institutions provide much greenery, and the community is ringed by the National Arboretum, the Anacostia River, and the Fort Circle Parks, **much of Upper Northeast is starved for public parkland More active recreational areas, playgrounds, athletic fields, and traditional neighborhood parks are needed. Better connections to the Arboretum and Anacostia River are needed There are also concerns that the large institutional open spaces—particularly the great lawns and wooded glades of the area's religious orders—may someday be lost to***

**development. These properties are important to the health of the community and should be considered as opportunities for new neighborhood and community parks (as well as housing) if they become available. They are the "lungs" of the neighborhood.**

#### **Guiding Growth and Neighborhood Conservation** 2408

**Policy UNE-1.1.1: Neighborhood Conservation** Protect and enhance the stable neighborhoods of Upper Northeast, such as Michigan Park, North Michigan Park, University Heights, Woodridge, Brookland, Queens Chapel, South Central, Lamond Riggs, and Arboretum. The residential character of these areas shall be conserved, and **places of historic significance, gateways, parks, and special places shall be enhanced.** 2408.2

**Policy UNE-1.2.7: Institutional Open Space** Recognize the particular importance of institutional open space to the character of Upper Northeast, particularly in and around Brookland and Woodridge. **In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces.** Connections between Upper Northeast open spaces and the network of open space between McMillan Reservoir and Fort Totten also should be pursued. 2409.7

#### **Conserving and Enhancing Community Resources** 2409

**Policy UNE-1.2.8: Environmental Quality** Improve environmental quality in Upper Northeast, with particular attention given to the reduction of emissions and particulates from trucks and industrial uses in the area. 2409.8

**Action UNE-1.2.A: Parkland Acquisition** Address the shortage of parkland in the Planning Area, placing a priority on the areas with the most severe deficiencies. According to the 2006 Parks and Recreation Master Plan, these areas include Edgewood, Ivy City, the Carver/Langston area, and the southwest part of Brookland. 2409.9

These policies state that enhancement of parks as well as the creation of new ones is important for the Upper Northeast and specifically mentions Edgewood and Brookland for parkland acquisition. The grassy lot to the south of the Holy Redeemer building is a de facto existing park space and would fulfill the action requirement above. Approving the Applicant's proposal would not only go against the Comprehensive Policy by not creating new park space in Edgewood and Brookland, it destroys de facto park space. Further, the policy on Institutional Open Space clearly indicates that new parks and open spaces are to be prioritized for institutional open space. This project, as it currently stands, goes against all of these policies.



View of the Site, with Chancellor's Row in the background.



Here is the street view from Google maps.

## **Parks, Recreation, and Open Space Element**

The overarching goal, as stated in the Comprehensive Plan is:

*Preserve and enhance parks and open spaces within the District of Columbia to meet active and passive recreational needs, improve environmental quality, enhance the identity and character of District neighborhoods, and provide visual beauty in all parts of the national capital.* 801.1

***Policy PROS-4.2.1: Institutional Open Space*** Encourage local institutions, such as private and parochial schools, colleges and universities, seminaries, hospitals, and churches and cemeteries, to allow the cooperative use of their open space lands for the benefit of District residents. 818.3

The project, as it currently stands will maintain part of the grand elevated lawn in front of the Holy Redeemer building (as a requirement to obtain Historical Landmark status), although this will remain private and the public is not encouraged to use it. The Applicant is not complying with the Comprehensive Plan by allowing cooperative use of open space lands for the benefit of District residents.

## **Environmental Protection Element**

According to the Environmental Protection Element, one of the critical environmental issues facing the District of Columbia is "restoring the city's tree canopy and green infrastructure"

***Policy E-1.1.2: Tree Requirements in New Development*** Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance. 603.5

***Action E-1.1.F: Urban Tree Canopy Goals*** Determine the extent of the District's tree canopy at a sufficient level of detail to establish tree canopy goals for neighborhoods across the city. Such goals have recently been developed by the USDA and tested in other cities as a way of evaluating the existing tree canopy and setting specific goals for its restoration. 603.13

***Policy E-1.3.2: Grading and Vegetation Removal*** Encourage the retention of natural vegetation and topography on new development sites. Grading of hillside sites should be minimized and graded slopes should be quickly revegetated for stabilization. 605.3

**Policy E-1.4.1: Conservation of Steep Slopes Strongly discourage development on steep slopes (i.e., greater than 25 percent), such as those found along stream valleys in Upper Northwest and Southeast DC. Planning and building regulations should ensure that any construction on such slope**

The plans currently proposed by the Applicant do not conform to these policies. In the current plans, all trees on the property will be removed, except the 7 street trees along 7<sup>th</sup> St (2 of which are badly diseased/dying and will have to be removed). The trees that are currently growing at the western edge of the property, between the project property and Chancellor's Row are all scheduled for removal, including 2 healthy Special trees which are native (an Elm and a Sweetgum) as well as 4 mature, healthy, native trees, of approx 10-12" diameter, which are growing on the steep slope between Chancellor's Row and the property to be developed, helping to stabilize the slope. These trees include 2 Willow Oaks (*Quercus phellos*), one Red Maple (*Acer Rubrum*) and one Catalpa (*Catalpa speciosa*) tree. Their removal will increase erosion and the instability of the slope until the proposed newly planted trees take root, not to mention the removal of their important role as habitat, in greenhouse gas reduction as well as stormwater management.

In the Memorandum of June 19, 2015 from the Office of Planning to the DC Zoning Commission, the OP writes:

*The Property is adjacent to Chancellor's Row Development and the Applicant should be mindful of the interaction between the proposed units at the western edge of the site and the adjoining development.*

By leaving the large, healthy, native trees on the steep slope, this would help reduce the interaction between the site and the Chancellor's Row development, both visually and by stabilizing the steep slope.

## **2. Loss of grand elevated lawn on which HR sits**

Currently, the Holy Redeemer building, constructed in 1934, sits on a grand elevated lawn. In their June 19, 2015 memorandum to the DC Zoning Commission, the Office of Planning wrote:

*"While OP recognizes that the Applicant must meet the District's strict stormwater management standards, the introduction of the bio-retention facilities and the resultant change in grade and use of retaining walls, proposed to separate the bio-retention facilities from the new townhomes is concerning. The lawn panel is emblematic of the historic Holy Redeemer building and the proposed retaining walls, which reach to the property line in the southern portion of the site, disrupt the natural grade of the site and alter a character-defining feature of the site."*

This grand elevated lawn panel would be further disrupted by the creation of the pocket park on the corner of 7<sup>th</sup> and Jackson St. which would necessitate the removal and regrading of the northeast corner of the panel. This change would greatly detract from the front aspect of the Holy Redeemer building as seen from 7<sup>th</sup> St.



The proposed pocket park would extend slightly past the second tree from the left and to approximately the middle of the mature Bottlebrush Buckeye (*Aesculus parviflora*) on the grand elevated lawn (upper center-right of photo), destroying this outstanding specimen of a native plant. This park would require that a portion of the grand elevated lawn be removed and the rest regraded. The picture below illustrates the area that will be damaged under the Applicant's current plans.



In addition to the destruction of the front of grand elevated lawn (and probable need to regrade), there is also the destruction and regrading of the side of the grand elevated lawn due to the retaining walls around the bio-retention facilities. The letter from Christine Roddy of Goulston & Storrs to the DC Zoning Commission on Aug 21, 2015 (Exhibit 16) replies that the plans have been reviewed and no changes can be made for various reasons. In effect, the concerns of the office of planning about the change in grade and the destruction of the grand elevated panel on which the Holy Redeemer building sits remain unanswered.

While the Applicant proposes to retain the Holy Redeemer building, there is a clear degradation of it's environs, by altering the grand elevated lawn in front and on the side. Will this impact the possibility of getting historic landmark designation??

### **3. Loss of view shed of Holy Redeemer from Jackson Street NE**

The Holy Redeemer building is a distinctive neighborhood landmark. The current development plans propose to preserve the Holy Redeemer building and the front lawn so as to preserve the aspect of the building as seen from 7<sup>th</sup> St. On the other hand, the entire view shed of the north side of Holy Redeemer, including 4 large stained glass windows, would be lost to the neighborhood through the construction of the 13 townhouses on the north side of the property, fronting Jackson St.

In the Comprehensive Plan, Policy UNE-1.1.1 Neighborhood Conservation (see above) states that *places of historic significance, gateways, parks, and special places shall be enhanced*. While the Holy Redeemer building will remain standing, eliminating the entire side view from Jackson St. will not enhance this "special place" of "historical significance". The project as proposed by the Applicant does not support the Comprehensive Plan Policy UNE-1.1.1.

### **4. Increased parking congestion in and around 7<sup>th</sup> St and Jackson St. NE**

The current plan proposed by the Applicant has no on-street parking in the townhouse development, although 10 houses have 2 car garages and 29 houses have 1 car garage. Although the spaces in the Holy Redeemer lot were used to calculate the number of parking spaces per house, this is incorrect as the Holy Redeemer lot will be gated and not available for use to the residents of the townhouses.

In the Zoning Commission Order No. 07-27 of Nov 10, 2008, the Advisory Neighborhood Commission Report states that the ANC Commissioner for 5C09, Silas Grant "stated that many citizens are concerned that the project will decrease the availability of on-street parking in the neighborhood." Since 2008, the 237 townhouses of Chancellor's Row have been built and occupied. Even though all townhouses in Chancellor's Row have either 1 or 2-car garages, the 85 spaces provided for visitors are full by 8 p.m. most nights and residents then park on Hamlin, Jackson and 7<sup>th</sup> St.

The Applicant has provided no parking spaces for visitors. If the Applicant were held to the same standards that Chancellor's Row already has, then for the 39 townhouses he would be required to build 14 visitor spaces ( $39/237 * 85$ ). While this will not solve the parking issue, it would go a long way towards a solution. Otherwise, where will the residents park their second car? Where will visitors park?? Some of the homes in Chancellor's Row are rented to students. A 3-bedroom house has 3 student occupants and each usually has a car. Even with a 2-car garage, that's at least 1 extra car on the street. It is likely that some of the townhouses will be rented to students as well. Where will the extra cars park??

At the presentation that the Applicant made to Chancellor's Row residents on Wednesday, 14 Oct, it was stated that they, the builder, would ensure that the residents of the developments did not get RPPs. However, neither Jackson St nor 7<sup>th</sup> St require RPPs.

It is very clear that the builder has not proposed a workable solution for parking. Just crossing your fingers and hoping that residents will take the subway is not sufficient.

### **5. Increased traffic congestion on 7<sup>th</sup> St and on Franklin St.**

A transportation study was done for some streets in the area prior to the construction of Chancellor's Row although it is not in the public domain as it was undertaken by a traffic and circulation expert employed by the developer (EYA). However, in the Zoning Commission Order No. 07-27, of Nov 10, 2008 it was noted that



41. By resolution dated September 16, 2008, ANC 5C voted to oppose the PUD because the community and the Applicant could not agree on the components or value of the community benefits package and because **the residents continued to have concerns about construction traffic and commuter traffic on the proposed ingress and egress streets.** (Exhibit 41.)

Since 2008, the number of residents in the surrounding neighborhood has increased greatly due to new developments, creating much higher density. Chancellor's Row, containing 237 townhouses was built off of Jackson, Hamlin and 7<sup>th</sup> Sts. Bozutto is currently building 45 townhouses on 7<sup>th</sup> St, between Kearney and Lawrence Sts. for delivery in the first half of 2016. The 562 apartments of Monroe St. Market are located between Michigan Ave, Monroe St and 7<sup>th</sup> St. The lot on 7<sup>th</sup> and Monroe (currently the sales office for Bozzutto's townhouses) is planned for mixed use development with 156 apts.

Before permission is granted for another 39 townhouses on 7<sup>th</sup> between Jackson and Irving, a transportation study needs to be undertaken, one which would be available to the public afterwards. Franklin St. between 7<sup>th</sup> and 4<sup>th</sup> is already very encumbered at peak hours. Seventh St is a bus route as well as feeder road for Franklin and Monroe Sts. While there is public transportation nearby, if Chancellor's Row is any indication, there will be at least 1 car per household in the new development and 2 in many cases which will be an additional burden on area traffic.

## 6. Impact on existing homes.

The Office of Planning, in their 19 June Memorandum to the DC Zoning Commission stated

The Property is adjacent to the Chancellor's Row Development and the Applicant should be mindful of the interaction between the proposed units at the western edge of the site and the adjoining development.

My house is in Chancellor's Row, on the western edge of the proposed development by Madison Homes LLC. I selected the lot for my house based on the view from the dining room window (2<sup>nd</sup> floor) over the grassy field and the healthy mature chestnut tree to the south of the Holy Redeemer building. At the time I signed the contract for my house (July 2012), it was explained to me that the grassy lot was all part of Holy Redeemer College, and had been there for more than 75 years. It was not until 2014 that I learned that the property was for sale and that it had been bought by a company who planned to develop the space into town houses. If the Commission approves the Applicant's plans, my neighbors and I will suffer personal loss and home value as well as the degrading impact on the environment for the whole community.



The picture above shows 5 of the 10 Special trees. From left to right an Oak, Holly, Magnolia, Chinese Chestnut (center of picture) and Sweetgum (far right). These trees, along with this view shed, will be destroyed by the Applicant's plans.

My house, and the one across the mews from it, 3041 Chancellor's Way, are connected by a retaining wall. Both my neighbors and I have had settling problems with the retaining wall, causing cracking in the facades of our houses as well as in the retaining wall. Some of the bricks in the facades have cracked, due to the movement of the retaining wall, and had to be replaced.

The hill at the bottom of the retaining wall drops off sharply to the grassy field of Holy Redeemer. In between the bottom of the retaining wall and the field, there is a steep slope, the bottom half of which is covered with native vegetation, trees and shrubs. None of the trees is a "Special" tree (i.e. 55" or greater in circumference) but none the less, these plants help stabilize the hill. The Applicant's plans include removing all the vegetation currently on the slope and replanting with small trees. The removal of the current vegetation is likely to cause erosion on such a steep slope, resulting in further movement of the retaining wall and further damage to the facades of our houses. Again, approving the Applicant's application as it stands will likely harm existing residents.

Policy E-1 3.2 Grading and Vegetation Removal of The Environmental Protection Element of the Comprehensive Plan (see above) addresses this. The policy encourages the retention of natural vegetation. Madison Homes should comply with this policy.

## **Conclusion**

For all the above and more, I strongly urge the Commission to reject the plans the Applicant has submitted. They do not support the policies of the Comprehensive Plan for the National Capitol, nor do they conform to Sustainable DC Plan. I am surprised that the Office of Planning has not noted the discrepancies between the proposed project and the Comprehensive Plan.

The Comprehensive Plan specifically calls for more parks in Edgewood and in Brookland. Approving the Applicant's plan as is must be seen as a rejection of both the Sustainable DC Plan and the Comprehensive Plan. The property in discussion has ten Special trees that are more than 75 years old, not including the "street" trees. This de facto park fulfills several policy requirements of the Comprehensive Plan. What a shame to destroy the beautiful mature trees and park setting, to look for land elsewhere where new trees can be planted and which can be shaped into a park in Edgewood and Brookland.

The mature trees on the site serve to absorb rainwater (stormwater management), absorb CO<sub>2</sub> from the environment (greenhouse gas reduction), provide canopy for the city and provide noise reduction for neighbors. They provide increasingly rare habitat for animals and birds. Removing these healthy, mature, native trees to plant new, much smaller ones, which cannot be guaranteed to survive, does not make sense. Everyone has seen examples of the dead and dying newly planted trees in the area. There is no serious effort at mitigation of the extent of this damage in the existing plan.

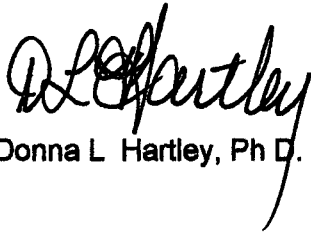
It is one thing to build infill housing. It is another to create a sustainable development where access, parking, green spaces and the quality of life for future residents as well as current neighbors are all thoughtfully designed. The Applicants current plans do not address this. Instead, these plans are about building as many houses as possible on the available land. There is insufficient parking in the "garage only" approach. There is insufficient green space and nothing that can be considered adequate play area for children. There is the destruction of parts of the grand elevated lawn that is, in

the words of the OP “emblematic of the historic Holy Redeemer building”. There is the complete obstruction for the community of the entire north view shed of the Holy Redeemer building It also destroys the view shed of existing neighbors to the west

It is incumbent on the Zoning Commission to look not just at the details of any one plan in isolation, but to evaluate how that plan will impact the surrounding neighborhood and what type of precedent the approval of those plans will set One may already ask what the point of DC zoning regulations are, since nearly every new development asks and receives rezoning to a less stringent standard as well as variances to parking and yard size requirements Those regulations are on the books for a reason If they are no longer adopted, then we, the citizens of the District, should change the rules Continuing to grant rezoning and variances is not acceptable

I urge the DC Zoning Commission to NOT approve these plans as they currently stand

Sincerely,

A handwritten signature in black ink, appearing to read "D. Hartley". The signature is fluid and cursive, with the first letter of the first name being a large, stylized 'D'.

Donna L. Hartley, Ph.D.

Cc Council Kenyan McDuffie, Ward 5  
Debbie Steiner, ANC Commissioner, 5E01