

**3804 Alton Place NW
Washington, DC 20016**

November 11, 2018

Honorable Frederick L. Hill, Chairperson,
Honorable Anthony J. Hood, Chairperson, Zoning Commission
Honorable Lesyllee M. White
Honorable Lorna John
Honorable Carlton Hart, National Capital Planning Commission Designee
Board of Zoning Adjustment
441 4th Street, NW, Suite 200S
Washington, DC 20001

RE: BZA Case No. 19823, Wisconsin Avenue Baptist Church - Sunrise Senior living, 3920 Alton Place NW

Dear Chairperson Hill and Members of the Board:

I am writing to oppose the request for six different types of zoning relief sought by Wisconsin Avenue Baptist Church (WABC) and Sunrise Senior Living in this case.

I have lived on the 3800 block of Alton Place, roughly one block from the proposed project at 3920 Alton Place, since 1985. It's a wonderful neighborhood. Alton Place is a quiet, tree lined street that is narrower than many of the nearby cross streets. It is a lightly trafficked street, which is not used by drivers as a cut through between Wisconsin Avenue and Connecticut Avenue, primarily because Alton Place doesn't intersect with either one of those main arterials.

WABC has been in the neighborhood longer than I have, and I certainly understand why it would like to stay. I also have no objections to for-profit senior living facilities, which I think serve a useful purpose. There's already a large Sunrise facility quite nearby on Connecticut Avenue, and I always thought it was an attractive-looking place. Certainly, if I lived in an apartment or condo on Wisconsin Avenue, I wouldn't be upset if a Sunrise facility was one of my neighbors.

But of course I don't live in an apartment building on Wisconsin Avenue. My entire block of Alton Place is zoned R-1B for single-family housing, as is the entire block of 3900 Alton Place – including the WABC property -- (except for a piece fronting Nebraska Avenue that is National Park Service land). The neighboring blocks on the east side of Nebraska Avenue also are zoned R-1B.

The proposed project is completely out-of-scale for this single-family neighborhood and much too large for the site. Within feet of the existing neighboring single-family homes, applicants want to build an 86-unit residential building (housing over 100 residents and scores of on-site staff) **PLUS** a church with a capacity for 250 persons. The proposed building will occupy 58% of the lot rather than the 40% permitted for this use, and it will consist of 4 stories rather than the 3 permitted by the zoning. If this is permitted as an "adjustment" to the current zoning, then the protections provided to homeowners by the District's zoning laws will be exposed as virtually worthless.

**Board of Zoning Adjustment
District of Columbia
CASE NO.19823
EXHIBIT NO.111**

Of the many arguments WABC and Sunrise make for deserving special treatment, I wish to address two in particular.

First, they note that WABC is a church, and that the zoning regulations provide for greater lot occupancy and height requirements for churches than for other uses. The problem with this argument, of course, is that Sunrise Senior Living is not a church. And **roughly 85-90% of the building that is being proposed here is going to be occupied by Sunrise, and all of the zoning variances and special exceptions sought are needed to accommodate Sunrise's business model** – that is, to make the project economically viable for Sunrise. WABC does not need a building of this size; if it did, it wouldn't be agreeing to end up with only 10-15% of the space. The church has operated in its building at this site for over 60 years without needing these extensive zoning variances and special exceptions.

Second, the applicants suggest that this site shouldn't be thought of as part of the single-family home neighborhood but as part of the Wisconsin Avenue commercial corridor. In fact, the property is wholly within the long-established R-1B zone; it is bordered on three sides by single-family homes, and on the fourth side by National Park Service land. Applicants say that the project "will serve as a buffer between Wisconsin Avenue, N.W., and the adjacent single-family neighborhood." (Applicants' Pre-Hearing Statement at p. 16.) In fact, a wonderful buffer already exists between my R-1B neighborhood and Wisconsin Avenue – it's the National Park Service land on both sides of Nebraska Avenue that leads up to Wisconsin Avenue and Tenley Circle. What applicants want to do is to build their large, for-profit project on the wrong side of the current buffer – the neighborhood side, immediately adjacent to small single-family homes. Instead of an open view of the green space provided by the NPS land, nearby residents will now have their view blocked by this massive building whose perimeter extends nearly to the lot line on all sides.

Finally, I would like to point out an odd omission from the DDOT memorandum submitted in this matter. As I've learned from decades of driving in this neighborhood (and, in the years before GPS, from often having to give directions to delivery and service vehicles looking for my house), it's surprisingly difficult to get to Alton Place if you're coming from the northeast or northwest, or especially from the north on Wisconsin Avenue; you first have to make a left turn on some other cross street and make your way to Nebraska Avenue, then make a sharply angled right turn onto Nebraska and a sharply angled left turn onto Alton Place. (Alternatively, you can enter Tenley Circle going south, weave your way almost entirely around the circle, and then come out going northeast on Nebraska Avenue before making a very quick angled turn onto Alton Place.) Although the DDOT report in this matter failed to comment on this, if this project is approved, the many delivery trucks and passenger vans servicing this facility will quickly encounter this difficulty, adding to the already dangerous traffic conditions in the Tenley Circle vicinity.

The proposed facility is simply much too large for this site, and will substantially harm the quality of the immediately surrounding neighborhood. I urge you not to grant the applicants' numerous requests for zoning relief.

Thank you for your consideration.

Sincerely,

Richard Levine

Richard Levine