

May 7, 2014

Zoning Commissioners

District of Columbia Office of Zoning

441 4th Street, NW, Suite 200-S

Washington, DC 20001

RE: Case #13-14

Dear Commissioners:

I am a homeowner residing on the 100 block of Adams Street, NW in Bloomingdale. My home for the past five years is located approximately .3 miles from the McMillan Park Historic District, the development of which is currently before this Commission.

Pursuant to Zoning Regulation 11-2403, "The impact of the project on the surrounding area and the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project." Although I am not opposed to the development of this site, nor am I carte blanche opposed to all aspects of the Vision McMillan Partners' (VMP or "the Applicant") master plan or its component parts, I do find certain aspects of the proposed plan *unacceptable*, and wish to file these comments in opposition to the proposed development submitted by the Applicant.

Housing

The Applicant's current "affordable" housing plan appears to be the bare minimum needed to obtain approval for this development. It is my understanding that 80% of the Area Median Income (AMI) for the region is an income of approximately \$90,000 per year. Households earning this amount are not the individuals or families desperate for access to quality, safe, affordable housing in our city and our neighborhoods. The standards for affordable housing should be dropped so that all of the proposed 31 affordable housing apartments proposed are provided to individuals and families earning 30% (or less) of the AMI for our community. Further, the Applicant has failed to provide information with regard to the breakdown for the size and occupancy of the units that will be included in the multi-family buildings, particularly the affordable units. Will the affordable apartments and condominiums be large enough to accommodate families, or will the development simply provide one bedroom units and studios that address the housing needs of no more than two citizens per unit, rather than providing apartments suitable for families of three persons or more? I understand that it is financially more attractive to relegate the number of promised low-income units to seniors, whose square footage needs are far less than that of a family, but our city and our community are desperate for affordable housing for families. The current overflow situation in our family shelters is direct evidence of this need and more must be done to address this dire condition.

Retail/Grocery Store

I support a small grocery store within the development of the Historic District. It is incumbent upon this project to provide convenient access to healthy, affordable foods and sundries, so as to replace current reliance on a number of corner stores scattered throughout the neighborhoods. Further, the grocery store is an opportunity to provide living wage employment with benefits to neighborhood residents, something I support fully. My concerns with regard to the retail and grocery space relate to traffic, potential vacancy, and the types of retail associated with this component of the Applicant's current plan.

My hope is that this segment of the development is done in a thoughtful way so as to reduce the disruptive impacts of heavy traffic, particularly when entering and leaving the development. Additional concerns exist with regard to deliveries to the retail space, the loading docks, and the introduction of large trucks and delivery vehicles to the area.

Additionally, I am concerned that the current development plan has the potential to leave the neighborhood with vacant retail space. It is my understanding that a grocer is not currently committed to the site, nor have other retail proprietors been identified to occupy the additional non-grocery retail space. The only thing worse than a fenced-off, unusable park space within the Historic District, would be an unsightly development, empty or under-utilized.

Finally, the current development plan should commit to preventing "undesirable" retail from entering our neighborhood. In particular, Bloomingdale is not in need of another liquor store, additional convenience stores, or bars that do not also serve food. Thoughtful development should focus on

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positive additions to the neighborhood, not just the bottom line.

Medical Office Building

The proposed medical office building is the behemoth of this development design. It is large and unattractive, yes, but it is my understanding that it presently does not have any committed tenants. A space this massive in an area that already provides office space for the medical professionals that are currently associated with the nearby hospitals is at great risk for a large number of vacancies.

Also, the Applicant should be committed to providing a community medical clinic on the site. At this time, the only sources for urgent care within the immediate area are the emergency departments at the Washington Hospital Center and Children's National Medical Center. Additionally, there are few low-cost or no-cost medical clinics available for citizens of the District of Columbia. The addition of such a clinic would be extremely beneficial to the families, seniors, and other citizens residing in the adjacent neighborhoods and beyond, and would be a positive use of the large medical office space proposed by the Applicant.

Further, should the space be filled, the current studies indicate that employees of the complex and the visiting patients and guests will be the greatest source of traffic increase in the neighborhood. Traffic in this area is already quite heavy and often dangerous, and the proposed "improvements" to address this increase in volume do little to alleviate traffic concerns on North Capital, and serve to add to already heavy traffic on the residential arterial of First Street, NW.

A smaller, more thoughtful approach to the development of this segment of the plan would be more reasonable - ensuring higher occupancy, and reducing traffic impacts.

Recreation Center

The recreation center is only a single structure within the massive proposed development of the Historic District that is intended, with little or no profit, to benefit that citizens that live nearby. Yet, the space and size of this effort is dwarfed by the profit-generating structures in a manner that is disproportionate to the population the development is intended to serve. The structure is extremely small and the planned amenities seem quite limited in their offerings, greatly in contrast to the needs of the neighboring citizens. Additionally, the current plans do not provide for this center to be integrated within the District of Columbia Department of Parks and Recreation, instead leaving management to a private entity associated with the developer. As a citizen, I am extremely concerned that privatizing a center that is intended to benefit the community, built on city property and with community tax dollars, could lead to exclusionary rules, fee-for-service use, and other limitations that would, in effect, turn this community center into a small, private club for those accepted by the developer, or for those who are willing and able to pay to use the facilities. A community center must be for all of the citizens of the adjacent communities and must provide amenities and services that benefit neighbors of all ages and many interests.

Motor Vehicles, Parking, and Traffic

One of the most disturbing aspects of the Applicant's current plan is the almost doubling of the required number of parking spaces for this development. The more spaces provided, the more individuals will drive, and the more traffic will be flowing into and through the residential neighborhoods adjacent to the Historic District. I have resided in northern of Bloomingdale for 5 years. I do not own a car, and I work outside of my home. Through the use of my bike, walking, mass transit, cabs, car services, and car sharing services, I am able to take advantage of all our region has to offer without putting another vehicle on the road or utilizing additional space for parking. Any development of the Historic District can and should promote a reduction in the number of vehicles in our neighborhood, not encourage an increase. Multi-use developments across this city are reducing the number of parking spaces offered. VMP should do the same. Two-car garages in the town homes are unnecessary in this region, especially so close to mid-city. There must be a better use of the space allotted to this massive amount of parking, or at least a means to bring down the costs of the property or an increase in the amenities by offering less parking.

Additionally, the transportation emphasis of all modern development projects should be placed on alternative and mass transport. Currently, the developer does not have concrete guarantees from WMATA that mass transit options to and from this development will be provided expeditiously. In speaking with individuals representing Circulator this weekend, I inquired about the addition of a route between the Woodley Park Metro station and the Brookland/CUA Metro station. Although the proposal exists, it does not appear within their top 5 priorities list. Additionally, the plans for

increased buses 80 buses and an 80X are in the works, but no confirmation from WMATA has been received. Finally, the H Street street car development is instructive as to the cost and complexity of such a project, as well as the difficulties of getting a street car system on line. Reliance on such a plan is foolhardy and misplaced as a solution to the traffic needs to serve the development at the Historic District. More effort needs to be made to ensure that, should this development be approved, constructed, and completed, people will have easy access to the site by means other than cars.

According to the Applicant's proposal, the roads to be developed within the Historic District are intended to be private. This arrangement poses questions as to who has jurisdiction over parking and driving on these roads. Who will be responsible for enforcing traffic laws? Who will be responsible for issuing tickets? To whom will fines be paid? Who will benefit financially from the payment of these fines? Private roads are apparently uncommon in the District of Columbia, thus it is difficult to find information on the form and function of this type of arrangement. My concern is that this could go one of two ways: over-enforcement run amok, or lax enforcement and little regulation. It would be helpful to receive more details with regard to these roads and receive a better understanding with the community as to logistics of the proposal.

Environmental Impact and LEED Standards

In 2014, LEED Silver is not good enough for our neighborhood, our city, our nation, or our planet. Vision McMillan Partners' failure to utilize many reasonable and desirable green building options is not only disappointing, but reckless. Green roofs provide beauty, reduce carbon, and assist in the reduction of storm water run-off, yet not a single green roof is included in the Applicant's plan for this Historic District. The Historic District receives direct sunlight nearly all day, every day and is a perfect location for the installation and utilization of solar panels that would help offset the costs of powering the development, as well as put energy back into the local power grid to benefit the region. Similarly, the Historic District's location atop a hill makes it a prime location for micro-wind energy generation. In my review of the Applicant's proposal, I did not come across a single reference to charging stations for electric vehicles; amenities that are common in parking garages and in other locations throughout our city. Additionally, the LEED worksheet included in the PUD application indicates that the development will not utilize recycled materials in the building of the project, a practice that should be adopted in all modern construction and development. District of Columbia land and District of Columbia funds should be used to provide the very best for District of Columbia residents - and that is a development with extremely high standards for sustainability and efficiency. This is not such a development.

General Design and Appearance

My first reactions in reviewing the mock-ups of the development were that of extreme disappointment. The architecture and proposed materials are dated, resembling a great number of the contemporary multi-use projects that have recently popped up throughout the landscape of the lovely and historic District of Columbia. The design is neither in keeping with the existing structures of the Historic District, nor with the timeless architecture of the surrounding communities of Bloomingdale and Stronghold, arguably two of the most beautiful neighborhoods in our city. It is disappointing to envision a stark, modern, generically-designed and blindingly white development planted atop the hill of our lovely, historic community.

Thank you for the opportunity to express my concerns with regard to this proposed development that is essentially in my backyard. I encourage the Commission to give thoughtful analysis to the Applicant's proposal, and hope that you will approach your approval process as if McMillan was in your own backyard. Our citizens deserve to see our land and our tax dollars put to the best possible uses, benefiting all of our citizens, not just developers.

Please feel free to contact me with any questions or concerns.

Sincerely yours,

/S/

Michelle N. Webster

Submitted on 5/7/2014 by:

Michelle N. Webster

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