

July 19, 2017

Mr. Anthony Hood, Chairman  
District of Columbia Zoning Commission  
441 4<sup>th</sup> Street NW  
Suite 210S  
Washington, DC 20001

Walter Borek  
4833 Alton Place NW  
Washington DC 20016

RE: Case Number 16-23, Proposal for Design Review and Development by Valor Development, LLC,  
Square 1499, Lots 802, 803, 806, 807

Mr. Hood and Members of the Zoning Commission

My name is Walter Borek. My family and I live at 4833 Alton Place within American University Park and have done so for the last twenty-nine years. We live 372 paces, less than 3 minutes, and less than .2 of a mile from our front door to the site.

I have practiced architecture in Washington DC, Maryland, and Virginia for the past forty-five years.

This “stack and pack” development is ill-conceived, poorly designed, grossly out of scale and context, and violates a long standing, well established residential neighborhood’s structure and character.

This development fails almost every basic principle of urban design.

We resolutely and vigorously object to this project and to granting this Rezoning and we ask you please deny this application for the following reasons:

**Density**

There are 2,700 households in American University Park. Valor’s proposal will add 220 more residential units. This is an increase in density in AU Park by 8.2%.

This is a seven story box on one quarter of a city block. It is the tallest building in AU Park and would tower over the existing neighborhood.

This seven story mixed use development is incompatible with two-story, Colonial style, single-family, detached homes in a residential neighborhood. It could not be be more alien.

### **The Comprehensive Plan**

The proposed development's seven story massing and scale is contrary to and ignores the DC Comprehensive Plan. Chapter 23, Chapter Rock Creek West Area Element, Section Policy RCW-1.1.1: Neighborhood Conservation explicitly states:

“the need to protect stable residential neighborhoods west of Rock Creek Park, and that future development in both residential and commercial areas must be carefully managed to address infrastructure constraints and protect and enhance the existing scale, function, and character of these neighborhoods.”

This development satisfies neither.

### **Neighborhood Character**

Any definition of Neighborhood Character must include that a building's design contribute to the architectural and visual qualities of the neighborhood, that a building's scale must be compatible with surrounding buildings, that a building must help create a Sense of Place, and that the building not obstruct light, air, and views nor deteriorate the physical and psychological well being of the neighborhood.

This development meets not one of these criteria.

### **Supermarket**

Regardless of either the Developer's misreading of retail food market trends for the past two years or the Developer's lessening of the supermarket's square footage as a bargaining chip in negotiations with Commissioners of ANC3E, this supermarket is a “Want not a Need”. The area is already well served by major grocery stores; within a nine minute drive there are nine major supermarkets.

This does not preclude a small neighborhood Market, e.g a Trader Joe's, Mom's, Roots, Dawson's, Fresh Farms, etc; an idea certainly worthy of consideration.

Whatever category of supermarket/market is proposed, it will still be a destination retail use affecting traffic, parking, pedestrian safety, creating noise, emissions from idling diesel trucks, and low level vibration from truck movement which affects physical structures as well as psychological well being.

### **Schools**

This development of 220 residential units can generate an additional 110 school aged children; one child per two units. Dividing this number into thirds, 37 students, would reflect the number of students in each of the three levels of education.

Janney School's published ratio of 22 students to one class, generates 2 new classes. This development forces onto an already overcrowded and burdened Janney, the unacceptable solutions of constructing new classrooms, redrawing boundaries, or leasing trailers.

Janney just underwent a multi-million dollar construction project to address this exact issue.

### **Transportation - Metro**

This AU Park site is ill-served by the irregularly operating N Bus which runs on Massachusetts Avenue, the border between the AU Park and the Spring Valley Neighborhoods.

The only way this site could be adequately served by MetroBus is to reroute the N Bus to 46th Street between Massachusetts Avenue and Western Avenue. This option, as in the past, would be an extremely, extremely controversial project.

Both the Friendship and the Tenleytown Metro stations are approximately one mile from the site. “Human Traffic” studies show that 1/4 mile is the standard measurable distance for “walkability” to public transportation.

And yes I counted ridership on the N Buses on Massachusetts Avenue, between Ward Circle and Westmoreland Circle, outward bound, in January and February of 2017, between

5:45pm and 6:45 pm; both the number of buses and ridership. The number of buses operational was maybe 2 - 3 per hour, or one operational and one out of service, one outbound and two inbound, etc. Ridership was always less than twenty, usually in the low teens, and frequently in the single digits.

### **Parking**

On July 14th, we were alerted to the Developer's communication to ANC3E, dated June 28, 2017, **now** stating that the Developer will provide 370 parking spaces including 236 spaces required to satisfy the American University Parking Easement requirement. This difference leaves a balance of 134 spaces for 220 Residential Units and 20,000 SF of Retail. Based on the current DC Zoning Regulations, the Developer is required to provide 73 spaces for the residential and 23 spaces for the commercial uses, leaving an excess of 38 spaces.

Again, that is 73 spaces for 220 Residential Units, 3 Residential Units to one automobile. Assuming 2 adults per unit means 6 people per automobile. Children not included.

By way of example, the average number of registered automobiles per household in Washington DC is 1.9 spaces. Applying the 1.9 number would yield 418 residential spaces required. The commercial use at 3.5 spaces per 1,000 SF, a more typical ratio for supermarkets, would yield 70 spaces. Residential use at 418 spaces and Commercial use at 70 spaces requires 488 parking spaces. Adding the AU Easement requirement for 236 spaces would require 724 spaces, a deficit of 354 spaces.

These numbers do not reflect the effect of apartment dwellers typical reluctance to rent parking spaces within a development, Zone 3 Parking restrictions, the ease of obtaining Zone 3 Parking stickers, nor the problem of which DC agency enforces those restrictions. With respect to developers' agreements with ANCs regarding parking restrictions on renters, I am not sure which DC Law allows private policing of parking violations on Public Property, a legal method of enforcement, and Public Parking use contracted between private entities.

If my understanding of the Zoning Regulations is correct, the new Regulations were implemented, in theory, to diminish automobile use and to force reliance on readily accessible Public Transportation in residentially dense development. The Regulations are demonstrably erroneous when applied to this site because this project is isolated, no Public Transportation, and is the **only** dense residential development in AU Park.

As stated above, the site is ill-served by the irregularly operating N Bus on Massachusetts Avenue and two Metro Stations, each approximately 1 mile away thereby precluding the use of Public Transportation.

There seems to be no other conditions in the Regulations, e.g. new project distances of .25 and .5 mile distances, which would grant relief.

### **Traffic and Pedestrian Safety**

Each day this development will generate several thousand vehicular trips both by automobile, by 55' tractor trailers, and by the many additional truck deliveries by direct-store vendors.

Traffic movement will be on two Residential Secondary streets. Traffic will enter and exit the development by means of Residential Secondary streets and alleys at two points. This volume and type of traffic cannot be accommodated utilizing only those two entrances, one curb cut entrance and one alley entrance. Yuma Street and the mid-block alley are more than frequently blocked by tractor trailers and trucks delivering to Spring Valley Shopping Center.

Existing tractor trailer and other large delivery truck turning movements already impede traffic movement. These turning movements are incompatible with the dimensions of these Secondary Residential streets and their associated intersections. For example, on 49th Street the Spring Valley Center's full movement entrance is 40' from the already impacted intersection of 49th and Massachusetts Avenue.

The added traffic, including the extremely well used American University Shuttle, will add to the overload.

Automobile movement onto and off Massachusetts Avenue from the Spring Valley Center, the AU Parking Garage, the bank's entrance and drive-thru window, the alley between AU and the bank, partially encroaches on the northbound outside travel lane of Massachusetts Avenue. This movement causes traveling vehicles in that outside lane to stop, swerve or collide.

The AU shuttle bus system system utilizes 48th Street and 49th Street for pick up, discharge, and travel. Already the repurposed former AU Law School Building blocks Massachusetts Ave due to daily truck deliveries by FedEx, UPS, W.B. Mason Office Supplies, beverage products etc...

Additional traffic will increase both DC and Maryland cut-through traffic, truck noise, queuing, backups at entrances, etc.

But most importantly it threatens pedestrian safety.

There are fourteen existing Points of Intersection between vehicles and pedestrians surrounding this site:

- seven on Massachusetts Avenue
- two on 49th Street
- four on 48th Street
- and one on Yuma Street.

Additional traffic will increase the severity of those 14 Intersections.

Adequate structural modifications to these Points of Intersection, e.g. at 49th Street and Massachusetts Avenue, would be impossible to construct.

### **Historic Preservation**

This development creates an eighty-eight foot tall billboard on Massachusetts Avenue, an elegant portal to our Nation's Capital, and in the process destroys the character-defining features of a Historic building, the Spring Valley Shopping Center.

### **Other Development**

None of the above takes into account the approximately 2,000 residential units currently planned for AU Park/Tenleytown.

Nor does it consider the increased traffic caused by any Miller development.

The Developer's Traffic Study was promised several times over several months, prior to ANC meetings. To date, July 19, 2017, despite repeated requests, it has not been made available to either the ANC, local residents, other concerned citizens, and groups like Citizens for Responsible Development, its Attorney, or its Traffic Consultant to allow enough reasonable time to study, understand, and respond to their Traffic Engineer's findings and conclusions.

For any or all of these reasons this application must be denied.

Respectfully, I ask you to do so.

Thank you

Walter Borek