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August 2, 2011

BY HAND

Meridith Moldenhauer, Chair
Board of Zoning Adjustment
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Reference Number
030919.00005

Re: Application of District of Columbia Public Library
BZA Case No. 18240
Applicant's Post-Hearing Supplemental Materials

BOARD OF ZONING ADJUSTMENT
District of Columbia
CASE NO. 18240
EXHIBIT NO. 53

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Dear Chairperson Moldenhauer and Members of the Board:

At the conclusion of the hearing on the above-referenced matter on July 19, 2011, the Board closed the record in this case except for certain limited information specifically requested of the Applicant which was to be filed on or before today's date. The Applicant hereby respectfully submits the requested supplemental materials, which consist of the following documents:

1. Elevations of the building.

Elevations from the rear and south depicting the size and scale of the Proposed Addition are included as Exhibit A hereto.

2. Sun Studies.

Sun Studies showing the Mt. Pleasant Library and Proposed Addition and the surrounding buildings are included as Exhibit B hereto. One sheet for each season (July, October, January, and April) is included, and each season's study includes views from early morning, noon, and late afternoon. The Sun Studies show that the impact of the Proposed Addition on the surrounding neighborhood is negligible at best, given the positioning of the Mt. Pleasant Library to the north and east of neighboring apartment buildings. In fact, the Mt. Pleasant Library receives a significant amount of shading from the buildings to the south.

3. Cooling Tower Data and Sound Info.

At the end of the public hearing in this case, Commissioner Turnbull requested additional information on the equipment mounted on the roof of the Proposed Addition and any noise impacts generated by such equipment. We have included cut sheets from the manufacturer of the GENBUS/817259.2

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equipment proposed to be installed, which include sound data and information on the sound attenuation features of the unit. We have also included an excerpt from the District of Columbia Regulations governing noise generated from mechanical equipment, which states that “noise resulting from the use or operation of any air-conditioning, refrigerator, heat pump, fan, swimming pool equipment, or other mechanical equipment, regardless of location, shall be prohibited in excess of 60 dB(A) when measured at the property line or as close to the property line as practical if there is an obstruction.” 20 DCMR § 2801.2. The proposed equipment falls well below this level. See Exhibit C attached hereto.

4. Library Building Program Details.

The Board requested that the Applicant submit greater detail regarding its required building program than had previously been submitted into the record. As stated at the public hearing, the Library Building Program for the Mt. Pleasant Library is a result of the 21st Century Capital Projects Program¹, which was created in 2006 when the Mayor and City Council approved capital funds for rebuilding nearly all of DC’s neighborhood libraries. In accordance with the budgets and timetables authorized by Mayors Williams, Fenty, and Gray, as well as annually by the City Council, the Library Board and Staff developed the Neighborhood Libraries Building Plan, and specifically the Mt. Pleasant Neighborhood Library Building Program, which appears as Exhibit D hereto², and responds to the Mayor and Council’s mandate to provide neighborhood libraries that will service the City for fifty years or more.

Though the Library Building Program is a mandate for making successful new libraries that will provide for the cities needs long term, it is designed to factor in unique conditions such as neighborhood demographics and library usage for each existing neighborhood library. Demographic data shows that the neighborhoods immediately surrounding the Mt. Pleasant Library (Mt. Pleasant and Columbia Heights) have a large percentage of young families and children with a higher percentage of young children in these neighborhoods over the District of Columbia as a whole. The median age of residents in this neighborhood is also younger compared to the District as a whole (See Exhibit D, pp. 9-11). Moreover, the average household income of these neighborhoods is lower than the District as a whole, while the average household size is larger. Based on the demographic information and the history of use of the Mt.

¹ The 21st Century Capital Projects Program includes renovations or replacement of existing neighborhood library facilities. This Program does not include co-location of library facilities with school facilities as directed by the Office of Public Education Facilities Management (“OPEFM”) at the Deanwood and Northwest One locations, nor does it include public-private partnerships that include construction of libraries, such as being undertaken at the West End, which will include a new, developer-funded and constructed West End Library.

² Because of the large size of this document, the Applicant has omitted pages that are not relevant to the case before the Board or that have already been submitted into the record in the Applicant’s previous filings.
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Pleasant Library (See Exhibit D, pp. 12-16), which together suggest a greater need for library services than exists in the more affluent neighborhoods of the city, it is important to have spaces that can accommodate lots of programs for young families such as a 100-person meeting room and children's program room, as both are expected to be in heavy use.

As discussed in the Building Program, a significant driver of the renovation (and the need for the Proposed Addition) was the need to provide a single, ADA-accessible entrance to the facility. While previous renovations to the Mt. Pleasant Library included adding secondary accessible entrances for disabled patrons, the current ADA guidelines and the mandate of the Mayor and Council call for a *single* entrance to serve both able-bodied and handicapped library patrons. Because of the historic character of the Mt. Pleasant Library, the ability to provide ramps and accessible doors on the primary building façade (at the apex of the intersection of 16th and Lamont Streets) is extremely limited.³ Thus, the main entrance to the building was moved to the hyphen between the Proposed Addition and the existing library building. The hyphen provides not only a separation between the new elements and the historic building, but also circulation space to bring patrons through this single entrance and into the library. Shifting the Proposed Addition to the north by reducing the size of the hyphen so that it is immediately adjacent to the existing building, is not feasible because it would eliminate the critical function of this space to provide a main entrance to the building and a passageway through the circulation areas. Moreover, eliminating this space would require entry into the main library block prior to entering the meeting room, and separate entry is a key building requirement in order to provide free community space (by reservation) for use beyond the hours that the library is open.⁴

There was much discussion on the record at the public hearing regarding the meeting facility provided in the existing building. While that space did at times accommodate up to 100 patrons (and sometimes more), its location and size did not meet code requirements for that

³ In fact, the Commission of Fine Arts (and Historic Mt. Pleasant) rejected a plan that called for a ramp in the front of the building to provide a single point of access through the historic main library doors as having too great an impact on the historic primary façade of the building. Indeed, the *Secretary of the Interior's Standards for Rehabilitation* require that (1) "removal of historic materials or alteration of features and spaces that characterize a property shall be avoided," (2) "distinctive features, finishes, and construction techniques ...that characterize a property shall be preserved," (3) and "new additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be distinguished from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." 36 CFR § 67. Generally, alterations to the primary façade are permitted only where a necessary element of construction cannot be accommodated on a secondary, non-character-defining façade of a building.

⁴ Given the District's current budget constraints, library hours have recently been shortened, making it all the more important to provide space that can be accessed beyond the library's normal operating hours, which end at 5:30 p.m. Tuesday, Thursday, Friday, and Saturday and do not begin until 1:00 p.m. on Mondays and Wednesdays. GENBUS/817259.2

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occupant load. The previous meeting room was located on the lower level of the existing library building and was approximately 917 square feet. The space was dimly lit, provided only a single point of egress, had poor air circulation, and did not have sufficient ceiling height to accommodate the audio/visual equipment requirements of the Library Building Program.

As shown in Schemes A and F on the attached Exhibit E, alteration of the existing space to meet code and Library Building Program Requirements could not be accomplished without excavating beneath the existing historic building and creating a second required egress. This would be only cost prohibitive, but also ill-advised given the historic significance of the building, and the fact that doing so would not have met neither the occupancy load requirements for a 100 person space nor the library's requirement to provide separate access for use after regular operating hours of the library. The Applicant thus determined that Scheme F did not meet the Library's Program Standards.

Scheme G shown in the attached Exhibit E was derived from a series of community meetings hosted by or coordinated by Councilmember Jim Graham⁵ and eliminates the hyphen between a proposed addition and the existing building, which in turn eliminates circulation through the main entrance, and requires that the meeting room be located on the lower (Terrace) level. As stated above, this scheme would require excavation in order to maintain the required clear ceiling height for audio/visual equipment installation, would not maintain separate egress for use after operating hours, and does not provide clear visibility for all users; therefore, the Applicant determined that Scheme G does not meet the Library's Program Standards.

Finally, we note that this Board has reviewed other applications for variances filed by the District of Columbia Public Library which were similarly based on the need to satisfy programmatic requirements of the agency on severely-constrained existing library sites.⁶ Specifically, this Board has previously determined that the very same Library Building Program adopted under the 21st Century Capital Projects Program and the need to satisfy the requirements therein constituted an exceptional condition of the property from which arises practical difficulties in complying with the Zoning Regulations. *See*, BZA Case No. 17973, pp. 9.

⁵ Schemes B, C, D, and E were considered and rejected by the Commission of Fine Arts.

⁶ This Board has previously reviewed applications for variances or special exceptions for the Benning Road, Shaw (Watha T. Daniel), Washington Highlands, and Tenley-Friendship libraries.
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In conclusion, we believe that this filing addresses all of the requests for additional information and that the record supports approval of the requested rear yard variance. We look forward to the Board's decision on September 13, 2011.

Sincerely,



Kinley R. Bray

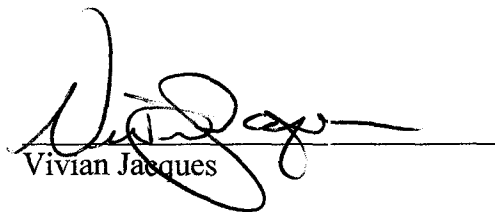
Cc: Advisory Neighborhood Commission 1D (via electronic mail and US Mail)
Commissioner Gregg Edwards, ANC 1D06 (via electronic mail and US Mail)
Jeff Bonvehio, DCPL (via electronic mail)
Archie Williams, DCPL (via electronic mail)
Chris Wright, DCPL (via electronic mail)
Matt Jesick, DC Office of Planning (via electronic mail)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was mailed, first class, postage pre-paid, to the following persons or organization on this 2nd day of August, 2011:

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