

GEORGE H.F. OBERLANDER, AICP

**On behalf of
The SIBLEY NEIGHBORS for RESPONSIBLE
GROWTH
On
A Consolidated Planned Unit Development & Map
Amendment
For a Medical Office Building on
The Sibley Memorial Hospital Site (Sq. N-1448,
Consolidated Lot 26)**

**5255 Loughboro Road, NW, Washington, D.C.
(DC Zoning Case No. 05-42)**

**Before the
Zoning Commission for the District of Columbia
February 1, 2007**

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George Oberlander, AICP

- Statement deals with why PUD & Map amendment are contrary to planning principles and policies of the Comprehensive Plan and Zoning Regulations**

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NEIGHBORHOOD SETTING & ZONING

- **With exception of Sibley Hospital site (R-5-A low height and density), entire section of this part of the City is zoned R-1-B and R-1-A, lowest residential density one-family housing.**
- **Hospital has obtained several ZC& BZA approvals (beyond Hospital use) amounting to total of 541,508 sq. ft. GFA.**
- **The existing R-5-A zoning standards, currently in place, have already been exceeded by the previously granted approvals.**

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NEIGHBORHOOD SETTING & ZONING

- **Certain approval conditions of BZA Order 16654 (Jan. 16, 2001) have not been complied with. (Including Bus rerouting)**
- **Memo from DDOT indicate “substantial compliance” but “Several of the elements in the zoning Order are addressed ...(in) pending Case”.**
- **Request compliance before any additional development.**

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OBJECTIONS TO APPLICANT'S PROPOSAL

- To achieve proposed development density and height, applicant requests a Map change to SP-1 or SP-2.
- Granting such a zone change, in this location, would be contrary to the original intent and purpose of the SP classification.
- Section 500.1, "The SP district is designed to stabilize those areas adjacent to C-3-C and C-4 districts..."

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OBJECTIONS TO APPLICANT'S PROPOSAL

- Section 500.2, "The major purpose of the SP district shall be to act as a buffer between adjoining commercial and residential areas."
- An "Office Building" in SP Districts ONLY by Special Exception (Section 508/3104).
- Applying SP-1 to site would be contrary to the SP transition zone purpose & Section 2400.4 which prohibits PUD's from being "used to circumvent the intent and purpose of the Regulations".
- No SP zoning near this part of the City.

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PROPOSED PUD SITE

- **20 acre Hospital site completely built up.**
- **Application justification based on examples at other locations.**
- **Examples cited are in very different portions of City, not low density.**
- **“Financial climate” not grounds for re-zoning.**

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PUD PROPOSAL

- **Office building 111,123 sq. ft. GFA**
- **Garage 155,028 sq. ft. (750) vehicles**
- **Adding proposal to previous BZA Order 16654 amounts to 807,659 GSF**
- **Such an increase will overcrowd the site.**
- **Increasing the building mass on the site is contrary to Ward 3, Comp. Plan policy to “protect and maintain the low density, high quality character of the ward”.**

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PUD PROPOSAL

- **The traffic analysis needs to assure that patient and visitor scheduling, pharmacy visits and auditorium visitors are accounted for in the trip generation numbers.**
- **The magnitude of the now proposed buildings/activities and any subsequent intensification, will make the adjoining area less desirable.**

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OFFICE OF PLANNING REPORT

- **OP recommendation is “subject to DDOT’s traffic mitigation measures”.**
- **OP admits that PUD’s generated activities are damaging to low density areas without additional mitigation.**
- **Yet DDOT has not committed to undertaking or requiring applicant to put in place previously required traffic mitigating “conditions”.**
- **Location of park adjacent to bus layover raises use questions.**

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OFFICE OF PLANNING REPORT

- The density and height requested stretches the PUD flexibility provisions considerably.
- Exceeding the height limit can only be granted “provided the increase is essential to the successful functioning of the project...” (Sec. 2405.3)
- The 77 ft. high building will be seen directly from houses on Loughboro Rd. Watson Street, Partridge and Palisades Lanes. (Not addressed in Report).
- The two OP Reports provide an inadequate basis for the claim that the height of Office Bldg. and the 750 space garage are compatible with area.

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COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL

- Generalized Land Use Map shows Sibley Hospital as institutional use.
- A commercial office building is inconsistent with that designation.
- Generalized Land Use Policy Map silent on any intensification or expansion on site. Ward 3 *specific* policies apply and guide any possible intensification.
- There are several *general* policies promoting economic development, maintaining public and institutional health.
- No specific language regarding expansion of Hospital in Ward 3 portion of Plan.

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COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL

- A commercial Office Building in predominantly low density residential areas is inappropriate and incompatible.
- Sections 1400.2, 1400.2(2), 1400(b) (2) of the Ward 3 element, all address protecting and maintaining the residential neighborhood.
- No significant land use changes are indicated or proposed in Plan which could support SP zoning.
- Ward Plan contains caution statements regarding development adjacent to Park land. (Sec. 1400.2(c) (1)).

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COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL

- Federal Open Space Element states “Encourage local jurisdictions to plan and zone development...not visible from parkways”. (Page 127 Fed. Elmt.)
- Section 1406.5(b) (3) “Commercial use should not be introduced to areas where none is now present”.
- Section 1409.1(f) specifically deals with Sibley Hospital. “The compatibility ...must be maintained, expansion carefully controlled, changes to neighborhood related uses encouraged, and conversion to other nonconforming uses prevented”. (Emphasis Added)

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REASONS WHY PUD /MAP AMENDMENT SHOULD BE TURNED DOWN

- Page 7 and 8 of statement list numerous reasons why the application should be denied.
- SP zoning is inappropriate.
- Contrary to Sec. 2400.5 PUD mechanism being “used to circumvent intent and purpose of Regulations.”
- Financial climate not basis for re-zoning.
- No “Certificate of Need” or any evidence of community need provided.
- Granting PUD violates Sec. 2400.2 dealing with overall goal of “protecting/advancing the public health and safety, welfare, and convenience.”