

October 22, 2007

**VIA HAND DELIVERY**

Mr. Anthony Hood, Chairperson  
District of Columbia Zoning Commission  
Office of Zoning  
441 4<sup>th</sup> Street, NW, Room 210  
Washington, DC 20001

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**Re: Sibley Memorial Hospital (“Sibley” or the “Applicant”)  
Consolidated PUD and Zoning Map Amendment Application  
in Zoning Commission Case No. 05-42  
Supplemental Submission and Proposed Revisions**

Dear Chairperson Hood and Members of the Commission:

At its March 12, 2007 Public Meeting, the Zoning Commission deferred action on the Applicant’s proposal to construct a medical office building on the Sibley Memorial Hospital campus. Members of the Commission stressed the need for the Applicant to reduce the “intensity of use” of the proposed medical office building. Members of the Commission also expressed concern regarding the sufficiency of the community amenities package, and the Applicant’s responsiveness to community requests regarding the bus routes and relocation of its helipad.

In response to the Commission’s request, Sibley will remove one floor of the medical office building. The revised PUD project will now include a medical office building with office space for **62 physicians** with a measured building height of **65 feet**. The parking garage will continue to provide approximately **750 parking spaces**. Sibley has recalculated the Return on Investment (“ROI”) for this project and has determined that this reduction will still result in a positive ROI. However, if the Zoning Commission does not approve the proposed smaller medical office building, Sibley will not go forward with this project. The proposed design revisions and responses to other concerns of the Commission are addressed in detail below.

Sibley has endeavored to work with its neighbors, Advisory Neighborhood Commission (“ANC”) 3D, local civic and neighborhood organizations, the District of Columbia Office of Planning (“OP”), and the District of Columbia Department of Transportation (“DDOT”) in creating an appropriately located and sized medical office building and associated parking garage on the Sibley Campus. A chart attached to this document as Exhibit A, shows that Sibley has made numerous changes to the PUD

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project, including significant reductions in the size of the medical office building, in response to issues raised by these groups.

**A. Proposed Building Height/“Intensity of Use”**

As shown in the revised elevations attached as Exhibit B, Sibley will remove an additional floor of the medical office building, so that the building will now have a maximum measured building height of 65 feet. The remaining floors each provide floorplates of approximately 17,580 square feet of rentable office space (19,090 square feet of gross floor area). Sibley will remove an additional 7,580 square feet of space on one of the remaining floors that would otherwise be available for rent as physician office space. Instead, this 7,580 square feet of space will be used by existing hospital operations that are currently located in Hayes Hall (on the Sibley Campus), similar to the type of uses that are proposed for the ground floor level of the MOB. Therefore, this 7,580 square feet of space will not generate additional vehicular trips to Sibley’s campus, as the people that will utilize this space already travel to Sibley’s campus. Sibley is prepared to allow the Office of Zoning’s Compliance Officer and representatives of ANC 3D access to the medical office building to confirm the allocation of uses in the medical office building.

The medical office building will now include a total of approximately 62,740 net rentable square feet (68,113 square feet of gross floor area) for 62 physicians. (See floor plan and FAR Build-out Summary attached as part of Exhibit B). **This further reduction in the size of the medical office building results in a 20% decrease in the number of vehicular trips expected to be generated by this project, compared to the number of vehicular trips anticipated in the original proposal.** (See Exhibit C, a vehicular trip generation chart prepared by Grove Slade Associates.)

Sibley notes that the PUD project, as revised, is generally consistent with the recommendations of ANC 3D. In its October 5, 2006 Report, ANC 3D indicated that it voted to approve the PUD conditioned on four recommendations to reduce the project to: (1) a height of 65 feet; (2) 60 physicians; (3) 525 parking spaces; and (4) SP-1 zoning. As noted above, the revised medical office building is 65 feet tall, contains 62 physicians, includes 750 parking spaces, and seeks a Zoning Map Amendment to the SP-1 Zone District. The only differences between the revised PUD project and ANC 3D’s

recommendations are: (i) office space in the medical office building for two more physicians; and (ii) approximately 153 parking spaces.<sup>1</sup>

Sibley believes that the impact of two additional physicians will have no perceptible impact on the intensity of use of the medical office building. In regard to the amount of parking spaces provided, Sibley notes that it is more efficient to build an additional level of parking at this time. Moreover, the additional level of below-grade parking serves as a sustainable alternative to surface parking and is consistent with other low-impact development features of the PUD. The addition of 153 parking spaces more than what ANC 3D recommends will not cause adverse traffic or parking impacts on the surrounding neighborhood. Sibley believes that there is virtually no difference between the revised PUD project now before the Zoning Commission and the PUD project that ANC 3D supports.

**B. Additional Community Amenities**

At the March 12, 2007, Public Meeting, members of the Commission also raised concerns about the sufficiency of the Community Amenities package component of this application. Sibley believes that the Community Amenities package it has proffered is entirely consistent with, and significantly greater than, similar PUDs. In particular, as detailed in the document attached as Exhibit D, the value of the revised PUD's amenities package substantially exceeds the value of amenities package for similar PUDs approved by the Commission for the Washington Hospital Center ("WHC").

Indeed, in Z.C. Order No. 784 (WHC I), the Commission approved a physicians' office building and parking structure at the WHC that is significantly larger than the medical office building Sibley is now proposing. The amenities package associated with that PUD was composed solely of WHC's commitment to continue to provide amenities and benefits that it already provided to the community. In Z.C. Order No. 02-43 (WHC II), the Zoning Commission approved a substantial increase in the amount of medical office space that could be created on that site. In WHC II, the only community amenity that was provided was \$1,475,000 for engineering and construction of roadway improvements. Based on the comments of the Zoning Commission on March 12, 2007, there is a question as to whether any amount of that financial contribution should be counted as a "community amenity" or whether it is more appropriately deemed to be "mitigation of traffic impacts."

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<sup>1</sup> ANC 3D explicitly indicated on page 2 of its October 5, 2006 report that any loss of parking due to the helipad relocation should be added into the new garage. The relocation of the helipad (discussed herein) results in the loss of 72 parking spaces on the Sibley Campus.

As noted during the public hearing process, Sibley provided over \$10 million in free medical care to the District in 2006, and offers fitness and wellness program as well as programs tailored to senior's needs in the Ward 3 community. In this PUD application, Sibley's benefits and amenities package is in addition to the millions of dollars of medical care and well-being and outreach programs that it provides to the community and will continue to provide regardless of PUD approval. Nevertheless, in response to the Commission's concerns, Sibley has supplemented the Community Amenities package by making a contribution of \$30,000 to the Friends of Palisades Park. These funds were used for the installation of benches along the northern sideline of the new artificial turf soccer field at Palisades Park. Attached as Exhibit E is a letter from the Friends of the Palisades Park confirming that the financial contribution from Sibley was used for the installation of benches in Palisades Park.

**C. Re-Routing Metrobuses/Relocation of the Helipad**

Sibley has never opposed re-routing Metrobuses to Little Falls Road behind the existing buildings on the Sibley Campus. To facilitate this relocation, Sibley agrees to relocate the helipad, which is currently located in the Little Falls Road travel lane, to an existing surface parking lot on the Sibley Campus near the Emergency Department entrance. A site plan showing the relocation of the helipad is attached as Exhibit F. The relocation of the helipad will result in a loss of 72 parking spaces, which will be offset by the construction of the MOB parking garage. Sibley notes that Little Falls Road must first be upgraded in order to accomplish the re-routing of Metrobuses. Sibley will upgrade approximately half of Little Falls Road during the construction of this project. It is Sibley's understanding that the Army Corps of Engineers will upgrade the other half in their upcoming project.

Through the relocation of its helipad and its commitment to upgrade half of Little Falls Road, Sibley has done everything in its power to help facilitate the re-routing of Metrobuses in and around the Sibley Hospital Campus. Ultimately, WMATA and DDOT will have to agree to relocate the Metrobuses.

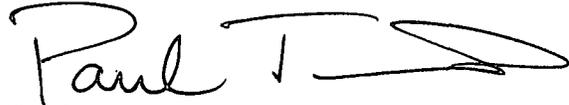
**D. Conclusion**

Sibley believes that the reduced height and size of the medical office building, as well as the other information provided in this submission, fully satisfy the issues raised at the March 12, 2007, Zoning Commission Public Meeting. The Applicant notes that OP and DDOT recommended approval of the larger medical office building. Therefore, the Applicant believes that these agencies will have no additional concerns regarding the revised PUD project.

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Sibley believes that the proposed project fully satisfies all requirements and standards of the DC Zoning Regulations and respectfully requests that the Zoning Commission take proposed action to approve this PUD and Zoning Map Amendment application at its November 19, 2007 public meeting.

Sincerely yours,

A handwritten signature in cursive script that reads "Paul Tummonds". The signature is written in black ink and is positioned above the printed name.

Paul Tummonds

A handwritten signature in cursive script that reads "David Avitabile". The signature is written in black ink and is positioned above the printed name.

David Avitabile

Enclosures

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of this letter and enclosure were delivered by hand or first-class mail to the following on October 22, 2007.

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ANC 3D  
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Palisades Station  
Washington, DC 20016

Leonard S. Spector  
Sibley Neighbors for Responsible Growth  
5224 Loughboro Road, NW  
Washington, DC 20016.

Rachel Thompson  
Commissioner, ANC 3D04  
5835 Sherier Pl.  
Washington, DC 20016

  
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David M. Avitabile