

**Sibley Memorial Hospital Expansion:
Medical Office Building**

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BY SIBLEY MEMORIAL HOSPITAL

**PRE-HEARING STATEMENT TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
CONSOLIDATED REVIEW AND APPROVAL OF A
PLANNED UNIT DEVELOPMENT
AND ZONING MAP AMENDMENT IN
CASE NO. 05-42**

June 9, 2006

**ZONING COMMISSION
District of Columbia**

CASE NO. 05-42

EXHIBIT NO. 41

**ZONING COMMISSION
District of Columbia
CASE NO. 05-42
EXHIBIT NO. 41**

DEVELOPMENT TEAM

APPLICANTS:

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Deaconesses and Missionaries
c/o Sibley Memorial Hospital
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CERTIFICATION OF COMPLIANCE WITH SECTION 3013 OF THE ZONING REGULATIONS

Lucy Webb Hayes Training School for Deaconesses and Missionaries, doing business under the name Sibley Memorial Hospital (“Sibley Memorial Hospital”), hereby certifies that this pre-hearing submission, twenty copies of which were filed with the Zoning Commission on June 9, 2006, complies with the provisions of Section 3013 of the Zoning Regulations as set forth below, that the application is complete, and that no further changes to the project are expected to be submitted prior to the public hearing on this application.

Sibley Memorial Hospital also certifies that certain modifications and refinements have been made to the project and materials provided to the Zoning Commission since the original submission in response to comments raised in meetings that have been held with members of the neighboring community, the Office of Planning, and in response to the comments of the Commission members at the April 20, 2006 public meeting. These modifications include: (i) a detailed description of the proposed uses of the Medical Office Building, (ii) an analysis of hospital campuses in the D.C. metropolitan region that include medical office buildings, (iii) a description of potential community benefits and amenities to be included in the project, (iv) elimination of the proposed Metrobus relocation and improvements to the existing Metrobus layover, (v) an updated, final transportation and parking analysis prepared by Gorove/Slade Associates, Inc., the Traffic and Parking consultant on this project, (vi) updated landscaping plans, (vii) updated stormwater management plans, and (viii) updated design drawings.

Finally, the map amendment requested by Sibley Memorial Hospital has been changed at the request of the Office of Planning. The Applicant originally requested an amendment to the Zoning Map for the SP-1 District. In its April 10, 2006 Setdown Report and at the April 20, 2006 public meeting, the Office of Planning recommended that the PUD be set down for public hearing with a map amendment to the SP-2 District, in order to accommodate the proposed 90-foot height without using Section 400.9 (which allows institutional buildings to achieve a 90-foot height regardless of setbacks) to supersede the height limits of the PUD regulations. Accordingly, the Zoning Commission voted to set down the PUD with a map amendment to the SP-2 Zone District to accommodate the proposed height only. In all other respects, the project is the same as filed on December 22, 2005.

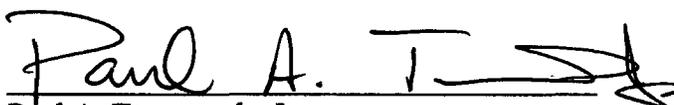
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3013.1(a) Information Requested by the Commission: Additional Information, Reports or Other Materials Which the Applicant Wishes to Introduce	Pre-Hearing Submission, Exhibits H, I, J, K
3013.1(b) List of Witnesses	Pre-Hearing Submission

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3013.1(c)	Summary of Testimony of Applicant's Witnesses and Reports for the Record: Outline of Testimony of Applicant	Exhibit L
	Outline of Testimony of Project Architect	Exhibit L
	Outline of Testimony of Traffic Engineer	Exhibit L
3013.1(d)	Additional Information, Reports or Other Materials Which the Applicant Wishes to Introduce	Pre-Hearing Submission; Exhibits H, I, J, K
3013.1(e)	Reduced Plans	Exhibit B
3013.1(f)	List of Publicly Available Maps, Plans and Other Documents	Exhibit G
3013.1(g)	Estimated Time Required for Presentation of Applicant's Case	1 hour
3013.2	Two Sets of Full Size Plans	Submitted Herewith
3013.3 and 3013.6(a)	List of Names and Addresses of All Property Owners within 200 Feet of the Subject Site and Names And Addresses of the Owners of the Property to be Rezoned	Exhibit D
3013.4	Proposed First Source Employment Agreement with Department of Employment Services and Proposed Memorandum of Understanding with the Office of Local Business Development	Exhibit K
3013.6(b)	List of Leaseholders	N/A

Respectfully submitted,
PILLSBURY WINTHROP SHAW PITTMAN LLP



Paul A. Tummonds, Jr.



David M. Avitabile

**LIST OF WITNESSES AND ESTIMATE OF TIME REQUIRED TO
PRESENT CASE**

WITNESSES:

Jerry Price, Chief Operating Officer, Sibley Memorial Hospital

Dwight Fincher, Project Architect, Wilmot Sanz Architects and Planners – TO BE PROFFERED
AS AN EXPERT WITNESS IN THE FIELD OF ARCHITECTURE

Lou Slade, Traffic Engineer, Gorove/Slade Associates – TO BE PROFFERED AS AN EXPERT
WITNESS IN THE FIELD OF TRAFFIC ENGINEERING

ESTIMATED TIME REQUIRED TO PRESENT CASE:

1.0 HOUR

EXHIBITS

<u>DESCRIPTION</u>	<u>EXHIBIT</u>
Zoning Map of the Subject Property and Surrounding Area	A
Plans, Sections, Elevations of the Proposed Project	B
Tabulation of Development Data	C
List of Owners of Property within 200 feet of the Subject Site	D
Compliance with Consolidated PUD Requirements	E
Environmental Analysis	F
List of Publicly Available Maps	G
Final Traffic Impact Analysis by Gorove/Slade Associates, Inc.	H
List of Hospital Campuses that Include Medical Office Buildings	I
Letter from Washington Aqueduct Noting No Objection to the Proposed Stormwater Management Plan	J
Draft First Source Employment Agreement with the Department of Employment Services and Memorandum of Understanding with the Office of Local Business Development	K
Outlines of Witness Testimony	L

PREFACE

This statement is submitted by the Lucy Webb Hayes Training School for Deaconesses and Missionaries, doing business under the name Sibley Memorial Hospital, to the Zoning Commission in support of an application for the consolidated review and approval of a Planned Unit Development and a related amendment to the Zoning Map of the District of Columbia for the property known as Square N-1448, Lot 26, to allow the construction of a medical office building and accompanying parking facility, in order to improve the quality and efficiency of health care provided by the hospital.

At a public meeting on April 20, 2006, the Zoning Commission voted 5-0 to schedule this application for a public hearing. At that meeting, the Commission members requested the following plans: revised plans and elevations reflecting the proposed penthouse structures, a grading plan for the affected portion of Sibley's campus, and enhanced landscaping and stormwater management plans. These plans are included as part of Exhibit B. Further, the architects have updated the plans to include details, such as finishes and brick color; again, revised plans depicting these updates are included in Exhibit B. Finally, pursuant to the requests of the Office of Planning and the Zoning Commission, the Applicant provides more detail on the community amenities package, a completed traffic study, which has been forwarded to DDOT for analysis, a calculation of the percentage of pervious to impervious areas of the campus, and proposed stormwater management controls.

The Applicant has met with representatives of the Office of Planning, Advisory Neighborhood Commission 3D, and numerous neighbors. The Applicant has also made four formal presentations to ANC 3D and three formal presentations to the Palisades Citizens' Association regarding the proposed application.

This PUD and Zoning Map Amendment application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 12-275, 10 DCMR (Planning and Development) § 100 et seq. (1998) (the “Comprehensive Plan”), as well as numerous goals and policies of the District of Columbia. This project will benefit the District by allowing the Applicant to upgrade and expand its facilities so that it may provide its patients with the best possible care. The medical office building will attract top physicians to Sibley and provide patients and doctors alike with a convenient, efficient structure that logically complements the hospital’s mission and attracts doctors to the District. The medical office building will also provide Sibley’s patients with an array of integrated outpatient service alternatives, consistent with similar MOB’s at other area hospitals. As D.C. doctors continue to leave the city, the District must make it a priority to allow the remaining medical care facilities to make necessary competitive improvements to provide the highest level of care for their patients.

This pre-hearing statement, as well as the materials submitted with the initial application, meet the filing and processing requirements for a PUD and Zoning Map Amendment application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

This pre-hearing statement supports the application of Lucy Webb Hayes Training School for Deaconesses and Missionaries, doing business under the name Sibley Memorial Hospital (“Applicant”, “Sibley” or “Hospital”), to the Zoning Commission of the District of Columbia (“Commission”) for the review and approval of a Planned Unit Development (“PUD”) and a corresponding amendment to the Zoning Map for the site. The project site is Lot 26 in Square N-1448 (the “Subject Property”). The Subject Property is located north of the Kent neighborhood of Ward 3 in Upper Northwest and consists of approximately 20.48 acres of land area within the R-5-A Zone District. The Applicant’s PUD project proposes to modernize and expand the medical services provided on the Subject Property to meet the continuing medical needs of the surrounding community and the District. The Applicant seeks consolidated review and approval of the construction of a new medical office building (“MOB”) and a new five-level, 750 space parking garage (“Parking Garage”).

The Subject Property is currently zoned R-5-A. The Applicant requests a Zoning Map amendment for a portion of the Subject Property from the R-5-A District to the SP-2 District to accommodate the height and use of the proposed development plan.¹ The Zoning Map amendment will allow for the new uses of the MOB (which is not permitted in the R-5-A District) and the Parking Garage (which is permitted in the R-5-A District only with special exception approval) as well as the additional height and density essential for the provision of

¹ Originally, the Applicant requested a Zoning Map amendment for a portion of the Subject Property from the R-5-A District to the SP-1 District. At the request of the Office of Planning, the Applicant amends its request to the SP-2 District in order to accommodate the MOB’s 90-foot height. The Applicant will not increase the density of the development beyond what was requested in its original application.

efficient modern health care services. Rezoning a portion of the site to the SP-2 District is consistent with the overarching goals and policies of the Comprehensive Plan of the District of Columbia, as discussed in detail herein.

B. The Applicant

Sibley is a private, non-profit, full-service community hospital that has served the residents of the District for over a century. The Applicant has had a significant presence along Loughboro Road, N.W. since 1961. Also on the property is Grand Oaks, an assisted living residence with a residential Alzheimer's unit. Grand Oaks opened in 2000 with 137 living units, and will soon be expanded to add 36 new units. The medical center also houses Sibley Renaissance, which includes the Center for Rehabilitation Medicine and Sibley Senior Services, a 44-bed skilled nursing home.

As noted in its Mission Statement: “The mission of Sibley Memorial Hospital is to provide quality health services and facilities for the community, to promote wellness, to relieve suffering, and to restore health as swiftly, safely, and humanely as it can be done, consistent with the best service they may give at the highest value for all concerned.” Sibley serves a critical need in the community as one of the few full-service hospitals in the District. The hospital features state of the art surgery, orthopedic, obstetric, and oncology services, and a 24-hour Level II emergency room. It also provides significant uncompensated health care; in 2005 it provided about \$7.12 million in free health care.

C. Area-Wide Medical Office Buildings

The current financial climate in the healthcare industry is pushing hospitals, especially community hospitals, to locate medical office buildings in close proximity to the hospital.

Indeed, the medical office building is now an integral component of a modern health care facility. A review of hospital centers in the District of Columbia and surrounding suburban jurisdictions, with a description of any associated medical office buildings, follows below.

DISTRICT OF COLUMBIA

Georgetown University Medical Center: Pasquerilla Healthcare Center/Gorman Building

The Georgetown University Medical Center includes the Pasquerilla Healthcare Center which includes physicians' offices, and the Gorman Building, which provides outpatient services. These facilities are located on the southeast portion of the medical center's campus, near the center of the Georgetown University Main Campus. The Georgetown University Medical Center and the surrounding residential community are located in the R-3 Zone.

The George Washington University Medical Center: Medical Faculty Associates

The GWU Medical Center features the Medical Faculty Associates building, which hosts the largest multi-specialty physician practice in the District. The MFA Building is located at the eastern intersection of Pennsylvania Avenue with Washington Circle, approximately one block east of the GWU Medical Center. The MFA is split zoned: the northern portion is in the C-3-C Zone (along Pennsylvania Avenue), and the southern portion is in the R-5-D Zone (along Eye Street). Surrounding property to the west and south (much of which is incorporated in the George Washington University Campus Plan) is in the R-5-D Zone and surrounding property to the north and east is in the C-3-C Zone.

The Washington Hospital Center: Physician Office Buildings

The Washington Hospital Center features two physician office buildings, located on the eastern part of the hospital campus adjacent to the hospital. The entire hospital campus is subject to a series of PUDs:

- Z.C. Order No. 784 approved a PUD and Zoning Map Amendment for the portion of the medical center on which the POBs sit; the land was rezoned to SP-1, from R-5-A. In that case, the Commission cited an Office of Planning finding that the proposed zoning change was “consistent with the designation of the site as Institutional on the Generalized Land Use map of the Comprehensive Plan.”
- Z.C. Order Nos. 14, 606 and 609 approved a PUD (with modifications) and Zoning Map Amendment for the portion of the medical center known as the Children's Hospital Center; the land was rezoned to SP-2, from R-5-A.
- Recently, Z.C. Order No. 02-43 approved a PUD and zoning map amendment for the rest of the medical center to the SP-2 and SP-1 Zones.

The property that was the subject of all three PUDs was originally in the R-5-A Zone. The McMillan Reservoir site to the south is in the R-5-B Zone and the residential community to the west is in the R-4 Zone.

Howard University Hospital

It is our understanding that the Tower Building on the Howard University Campus includes medical office space and outpatient services. The Tower Building, along with the Howard University Hospital, is located in the C-M-3 Zone.

Providence Hospital

Based on prior work at Providence Hospital, Sibley’s architects, Wilmot Sanz, provided information regarding two medical office buildings (the DePaul Building and the medical office building) on the hospital campus. The Providence Hospital Campus is located in the R-5-A Zone and is surrounded by the R-2 Zone.

Greater Southeast Community Hospital

The Greater Southeast Community Hospital has a medical office building. It is in the R-5-A Zone District and is adjacent to land also in the R-5-A zone and the Oxon Run Parkway.

SUBURBAN LOCATIONS

A list of medical campuses in suburban Washington, DC that include medical office buildings is attached as Exhibit I. Additionally, recent articles in the Washington Business Journal (from the February 17-23, 2006 edition and the March 3-9, 2006 edition, also attached to Exhibit I) have discussed the need for additional medical office building space at the Inova Fair Oaks Hospital in Fairfax County, Virginia and at Montgomery General Hospital in Montgomery County, Maryland.

As indicated on the chart in Exhibit I, the Inova Mount Vernon Hospital in Virginia does not have a medical office building. It is the Applicant's understanding that the Inova Healthcare system owns a medical office building in Springfield, VA that provides office space for doctors that typically utilize the Mount Vernon Hospital. The Applicant is not aware of any other full service hospitals in the area that do not have an associated medical office building.

II. THE PROJECT SITE

A. Site Location

The Subject Property is generally bounded by MacArthur Boulevard on the west, Loughboro Road on the south, Dalecarlia Parkway on the east, and Little Falls Road on the north. The Subject Property currently contains the Sibley Memorial Hospital at its center, the Grand Oaks Assisted Living Facility in its southwest corner, and the Renaissance Skilled Care Nursing Facility between the Hospital and Grand Oaks. Surface parking lots fill the northwest, east, and southeast ends of the Subject Property. To the south are the Kent and Palisades residential neighborhoods. The rest of the Subject Property is surrounded by land associated with

the Dalecarlia Reservoir. The reservoir itself lies to the north, straddling the Maryland-D.C. border.

As previously stated and shown in the Zoning Map, included as Exhibit A, the Subject Property is located within the R-5-A District. The southern portion of the Subject Property is located in the Institutional land use category as shown on the District of Columbia Generalized Land Use Map. The northern portion of the property is located in the Parks, Recreation, and Open Space category; at the time that the Generalized Land Use Map was last revised, this portion of the property was owned by the Washington Aqueduct. The Kent and Palisades neighborhoods to the south are located in the Low Density Residential land use category. The Dalecarlia Reservoir land to the west, north, and east is located in the Parks, Recreation, and Open Space land use category.

B. Project Description

The plans, elevations, and drawings of the proposed PUD project are attached as Exhibit B. The Applicant intends to enhance the Hospital's medical campus with the construction of the MOB and Parking Garage on the northeast portion of the Subject Property which is currently used as a surface parking lot. The Applicant has sited these structures on the Subject Property so as to maintain a large buffer area from the existing homes on Loughboro Road. The MOB will consist of offices for physicians, a data center (which houses computer servers, HVAC services for the servers and IT Department space), and associated outpatient services on the ground and first floors. The proposed outpatient services include:

- an outpatient surgery center (providing such services as cosmetic procedures, micro hand surgery, and breast surgery);
- accessory medical retail space;

- a diagnostic center (providing services such as outpatient CT scans and CT ultra sounds); and
- a deli-type eating facility.

These services, combined with the presence of the doctors themselves, will greatly expand the health care options for Sibley's patients. They will also provide convenient, quality medical care opportunities for the residents of Northwest, DC. The MOB will also include a new auditorium to replace the existing Ernst Auditorium on the Subject Property. The replacement auditorium will include seating for 271 people.

As shown in the site plan included in Exhibit B, the MOB will be seamlessly integrated with the rest of the medical campus. The 90-foot height of the MOB is commensurate with the existing buildings on the Subject Property, such as the patient tower and Hayes Hall, that have heights of 83.4 feet and 79.5 feet respectively. The exterior design character of the MOB and Parking Garage will be sympathetic with existing campus architecture. On the proposed facades, brick colors, bond patterns, and pre-cast concrete horizontal banding treatments used on existing campus buildings will be used to help create a cohesive continuity of design in the campus infill. A combination of aluminum curtain wall and windows will be used to add a contemporary quality to the façade compositions. Horizontal window fenestration patterns borrowed from the existing patient tower will also be utilized.

The Parking Garage is designed to blend in with the rest of the campus and surrounding green space. In response to community concerns about the sufficiency of parking provided in this project, the Parking Garage includes 750 spaces on five levels. On the south elevation, most visible to the public, special attention will be paid to develop an attractive façade, borrowing brick colors, precast accent banding, and fenestration opening patterns from the new MOB and

create an articulated streetscape face. Moreover, the Parking Garage will utilize brick veneer and spandrel walls with punched openings to add architectural interest and minimize the visual impact of the garage and parked automobiles. Additional boulevard street tree plantings and upper deck level planter screening will further screen the garage face from the neighboring properties across Loughboro Road.

The Applicant will improve the existing entrance to the Hospital off Dalecarlia Parkway and will create a beautifully landscaped entry to the Campus. Extensive landscaping will enhance the open space buffer between the MOB and the Hospital's neighbors to the south. As part of this improvement, the Applicant will create a park at the southeast corner of the Subject Property, near the intersection of Loughboro Road and Dalecarlia Parkway. The proposed park will be located on Sibley's property as well as public space. The Applicant will enter into a landscaping and maintenance agreement with appropriate District agencies to assure that the park area is appropriately maintained.

Currently, WMATA Metrobuses and Maryland Ride-On buses have stops at a bus stop located on Loughboro Road on the same side of the street as Sibley Hospital and on the opposite side of the street. A number of residential neighbors along Loughboro Road have complained that the current bus stop location is undesirable. In June of 2005, the District Department of Transportation conducted a study to assess the feasibility, impacts, cost and benefits associated with rerouting buses currently using Loughboro Road as a bus stop, to Little Falls Road. Based on a number of factors, including high construction costs and potential significant delays associated with helicopter landings on Little Falls Road, DDOT did not recommend rerouting the buses to Little Falls Road.

At the request of the residential neighbors along Loughboro Road, Sibley offered to make a financial contribution to the proposed improvements on Little Falls Road that would allow for the rerouting of buses to Little Falls Road. However, in its initial report on the proposed PUD, DDOT once again opposed the relocation, based on findings in its Little Falls Road Transportation Study. As an alternative, DDOT recommends eliminating the bus stop on the south side of Loughboro Road (the side of the street that includes the residential neighbors) and moving the bus stop on Sibley's side of Loughboro Street further east, towards the intersection of Dalecarlia Parkway and Loughboro Road. As shown on the site plan included in Exhibit B, the Applicant has created a attractive bus stop/layover area near the location of the proposed park. The bus stop/layover area will be located on Sibley Property. The Applicant believes that this relocation and enhancement of the bus stop and bus layover area is a significant benefit to the residential neighbors across Loughboro Road and to the general community.

The Parking Garage will include approximately 750 parking spaces. However, the location of the Parking Garage on the site of existing surface parking spaces results in a net gain of approximately 421 parking spaces. Additionally, the Hospital currently has an inventory of approximately 360 unused spaces. Therefore, a total of approximately 781 parking spaces will be available to the physicians, staff, and patients of the MOB, at a ratio of 6 spaces per 1,000 square feet of gross floor area. The Applicant's traffic consultants, Gorove/Slade Associates, have prepared a Traffic Impact Study, attached as Exhibit H, to address the impacts that the MOB and Parking Garage will have on traffic and parking in the area. In addition, the Traffic Impact Study also addresses the appropriateness of the new vehicular entrance/exit location on Dalecarlia Parkway.

C. Development Parameters Under Existing and Proposed Zoning

The Subject Property is located in the R-5-A Zone District. The R-5-A District, as a matter of right, permits a maximum building height of 40 feet², a maximum FAR of 0.9, and a maximum lot occupancy of 40%.

The SP-2 District, as a matter of right, permits a maximum height of 90 feet, a maximum FAR of 3.5 for nonresidential permitted uses, and a maximum lot occupancy of 80% for residential use. In the SP District, construction of a new office building and a parking structure are only permitted if approved by the Board of Zoning Adjustment (“BZA”) as a special exception. The PUD guidelines for the SP-2 District allow a maximum height of 90 feet, a maximum FAR of 4.5 for non-residential uses, and a lot occupancy of 80% for residential use.

E. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require the approval of the BZA. The Applicant requests relief from the roof structure requirements of Sections 537 and 411 that: all roof structures be located in a single enclosure; that all roof structures be setback from all exterior walls a distance at least equal to that height above the roof; and that all roof structures be the same height.

In this case, pursuant to Sections 506.1 and 508.1 of the Zoning Regulations (Parking Garages (SP) and Office Uses (SP), respectively), special exception approval is necessary for the proposed uses of the Parking Garage and the MOB. Additionally, the PUD project will be built

² Institutional buildings “may be erected to a height not exceeding ninety feet (90 ft.); provided, that the building or structure shall be removed from all lot lines of its lot a distance of not less than one foot (1 ft.) for each foot of height in excess of that authorized in the district in which it is located.” See 11 DCMR § 400.9.

on a single record lot with multiple buildings. Pursuant to Section 2516.4 of the Zoning Regulations (Exceptions to Building Lot Control (Residence Districts)), multiple buildings are permitted on a single record lot as a matter-of-right, provided that each building satisfies applicable zoning requirements (such as use, height, bulk, and open spaces around each building). Both the MOB and Parking Garage satisfy the applicable SP-2 District zoning requirements. In order to locate the multiple structures on the Subject Property as proposed in this PUD project, it is necessary to obtain special exception approval pursuant to Section 2516.1 of the Zoning Regulations. The Zoning Commission has the authority to grant approval of both special exceptions pursuant to Section 2405.7 of the Zoning Regulations. The Zoning Commission is not required to apply the special exception standards normally applied by the BZA (see Section 2405.8 of the Zoning Regulations).

III. PLANNING ANALYSIS

A. Land Use Impact

The proposed PUD project will expand and enhance the Hospital's ability to provide high quality care for an array of medical needs in an efficient and affordable manner. The height and massing of the MOB is consistent with other buildings on the Subject Property. This preserves the development buffer with neighbors to the south. On the proposed SP-2 portion of the Subject Property, the MOB and Parking Garage will have an FAR of 2.7; the rest of the Subject Property will have a FAR of 0.89. Please note the tabulation of development data attached as Exhibit C.

B. Zoning Impact

The proposed Zoning Map Amendment application can be granted without affecting nearby and adjacent Zone Districts. The proposed SP-2 Zone District is consistent with the

Institutional land use designation for the majority of the Subject Property, and the site plan maintains the Hospital's strong relationship with the surrounding residential and institutional uses. Moreover, the rezoning of only a portion of the Subject Property to SP-2 preserves the R-5-A Zone District classification of the rest of the site. As noted in OP's set-down report, the proposed SP-2 District is necessary to accommodate only the height of the proposed MOB.

C. Environmental Impact

As more specifically detailed in Exhibit F, no adverse environmental impact will result from the construction of this project. The project's proposed stormwater management and erosion control plans will minimize impact on adjacent properties and existing stormwater systems.

As shown on page 17 of Exhibit B, three bio-retention areas are proposed for stormwater quality control. The bio-retention systems are designed to absorb and filter water through evapotranspiration and soil filtering mechanisms; they mimic natural hydrologic processes that occur in woodland areas as plant materials and soils successfully filter pollutants out of water. The bio-retention system consists of three layers: (1) ground cover, featuring 6 to 12 inches of ponding stormwater (this will only be formed during storms and will dry out a few hours after the storm ends) and 4 to 6 inches of mulch and planting trees and shrubs; (2) 2.5 to 4 feet of planting soil; and (3) an underdrain system buried in a gravel/sand layer. A DC sandfilter is also proposed for both stormwater quality and quantity control. Note that the PUD project will only increase the amount of impervious surface on the Subject Property by 3.37% (see p. 18 of Exhibit B).

At the Zoning Commission's April 20, 2006 public meeting, the Applicant was requested to obtain input from the Washington Aqueduct as to whether they had any concerns regarding

stormwater management impacts as a result of this project. Attached as Exhibit J is a letter from the General Manager of the Washington Aqueduct which states: “We have reviewed the plans and find that the mitigation [Sibley] propose[s] will satisfactorily control storm water runoff so that it would have no effect on Washington Aqueduct operations and have no objections to the proposed storm water management plan.”

D. Facilities Impact

The proposed project will not have an adverse impact on the public facilities that it will rely on for service. Indeed, it will result in the relocation of the Metrobus and Ride-On bus stop to a location on the Subject Property that mitigates impacts of bus traffic and usage on the residential owners along Loughboro Road while maintaining an effective and accessible location for bus riders.

IV. EVALUATION STANDARDS

A. Public Benefits and Project Amenities

Section 2403.9 of the D.C. Municipal Regulations, Title 11, provides categories of public benefits and project amenities for review by the Zoning Commission. The application will achieve the goals of the PUD process by improving patient services at Sibley on a planned campus that yields significant public benefits to the community and the District within the context of a sensitive, neighborhood-oriented design.

1. Urban Design and Architecture

Section 2403.9(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. The MOB features high quality design that creates an attractive

addition to the Hospital in a campus-like setting on the Subject Property. The Parking Garage replaces unattractive surface parking with a sensitively landscaped structure that ensures ample parking onsite. The project also includes the creation of a landscaped park and relocated bus stop and layover that will provide aesthetic benefits to the neighborhood.

2. Site Planning

Pursuant to Section 2403.9(b) of the Zoning Regulations, “site planning and efficient and economical land utilization” are public benefits and project amenities to be evaluated by the Zoning Commission. The Applicant has sited the new structures at the back of the Subject Property to minimize the impact on the surrounding neighbors and maintain the development buffer along Loughboro Road. At the same time, the Hospital is a logical site for a physicians’ office building that promises increased efficiency and expanded care options, particularly for outpatient services. The proposed site plan complements the Hospital’s advanced medical facilities yet minimizes its impact on its residential neighbors.

3. Effective and Safe Vehicular and Pedestrian Access

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities of a PUD project. The Gorove/Slade Traffic Impact Study provides an exhaustive analysis of the traffic and parking impacts of the proposed MOB and parking garage. The Traffic Impact Study ultimately concludes that the

[T]he Medical Office Building expansion at Sibley Memorial Hospital will not have a negative impact on the surrounding roadway network. The addition of the Medical Office building traffic does not have significant impact as these additional trips can be accommodated by the current roadway configuration. See Gorove/Slade Traffic Impact Study, Exhibit H, p. 34.

The Traffic Impact Study finds that the proposed PUD project will generate additional vehicular trips to the Subject Property that are only 6% of the total vehicular traffic in the AM peak hour, 9% of the vehicular trips in the PM peak hour and 8% of the daily total vehicular trips on the surrounding roadway network. The Traffic Impact Study also notes that the studied intersections operate at acceptable conditions in the AM and PM peak hour periods. However, significant delays do currently exist at the signalized intersection of MacArthur Boulevard and Loughboro Road and the Stop Sign controlled intersection for cars making left-hand turns from Dalecarlia Parkway onto Loughboro Road.

The Traffic Impact Study notes that the delay at the intersection of MacArthur Boulevard and Loughboro Road can be mitigated with adjusted signal timings. The Traffic Impact Study also notes that the turning movement from Dalecarlia Parkway onto Loughboro Road is not related to Sibley, as this movement is primarily commuter traffic. As part of the community amenities package for this PUD application, the Applicant is proposing to have Gorove/Slade Associates prepare an engineering redesign of the Dalecarlia Parkway/Loughboro Road intersection in order to lessen some of the constraints currently experienced at that intersection.

The Traffic Impact Study also states that the amount of parking provided by this application exceeds the most conservative estimates for what will be required. As noted previously, after the construction of the parking garage and based on an analysis of the number of parking spaces currently on the Sibley Campus that are underutilized, the PUD project will be able to provide 781 parking spaces for the MOB. This is equivalent to a ratio of 6 parking spaces for every 1,000 square feet of medical office space. This ratio certainly exceeds the industry standards of ___ to ___. In order to further mitigate any adverse parking impacts that may result

from the MOB, the Applicant has agreed to include a provision in all leases that employees of each doctor's office provide onsite parking for their employees.

Attached as a final chapter to the Traffic Impact Study is an addendum that answers numerous questions that have been raised by members of the community and ANC 3D commissioners regarding the traffic and parking impacts of the PUD project. In particular, concerns were raised regarding the adequacy of the sight-line distance along Dalecarlia Parkway for cars entering and exiting the Sibley Campus. As discussed in detail in the Traffic Impact Study (see pages 41 and 42), the vehicular entrance/exit to the Sibley Campus exceeds the AASHTO recommended standards for line of sight distance.

4. Social Services/Facilities

The Zoning Regulations, pursuant to Section 2403.9(g), include the provision of social services and facilities as public benefits and project amenities. The project provides a host of social services to the community and the District as a whole. Primarily, the MOB enhances the quality of ambulatory care that the Applicant may provide to its patients. It helps draw and retain top-quality physicians and strengthens the financial position of the Hospital. It also provides an integrated set of outpatient services that will provide alternatives to hospitalization. In addition to adding neighborhood physicians, it also adds amenities such as medical retail space that will provide convenient services to the surrounding community. As detailed above and in the attached Exhibit I, other District and suburban hospitals have similar physician office structures and outpatient services. These medical office facilities, like the Applicant's proposed structure, expand the quality of services available at a locus of advanced health care activity while remaining sensitive to the institutions' residential neighbors.

The Applicant currently provides a host of amenities to the surrounding community and city. Foremost is the amount of free medical care Sibley provides to those who need it most; in 2005, the Hospital provided \$7.12 million in uncompensated care. That number is projected to be \$8.8 million for 2006. Sibley is a Catholic Charities partner; it gives more outpatient surgery and diagnostics than any other D.C. Hospital, and is second in the amount of inpatient care that is given. The Hospital is also affiliated with other District clinics, such as Community of Hope and Healthcare for the Homeless.

Additionally, the hospital promotes its fitness and wellness programs to the neighborhood through ads in the Northwest Current and in quarterly and monthly publications. In particular, Sibley serves as a home for Ward 3's senior community, through its 8,000 member Sibley Senior Association. Membership in the Senior Association gives access to free parking; health screening for glaucoma and flu shots; health services such as blood pressure checks and pharmacy consults; support groups for cancer, diabetes, Alzheimer's, Parkinson's, and widowed persons; and exercise and recreation programs.

As a benefit of the PUD, the Applicant will partner with Iona Senior Services, a local organization that provides assistance to the elderly, to enhance services available to senior citizens in the surrounding neighborhoods. The Applicant, Iona Senior Services and members of community organizations (such as the Palisades Citizens Association) are working towards the creation of a Palisades neighborhood focused senior care program. The Applicant will have the complete details of this program well in advance of the public hearing in this case.

5. Uses of Special Value to the Neighborhood or the District

According to Section 2403.9(i), "uses of special value to the neighborhood or the District of Columbia as a whole" are deemed to be public benefits and project amenities. Foremost, the

MOB brings a comprehensive set of on-site primary care physicians, specialists, and outpatient services that makes Sibley a true full-service community medical center of special value. The MOB's proposed ground-level amenities further enhance the value of this facility. Sibley serves as a community center as well, and the construction of the replacement auditorium adjacent to the MOB will allow community groups, such as the ANC, to hold their meetings in a more comfortable setting. The accompanying Parking Garage increases the number of available parking spaces while replacing unattractive surface parking lots.

As a result of discussions with neighborhood organizations and ANC 3D, the Applicant has identified the following opportunities to further support the neighborhood:

- Contribution to Iona Senior Services for a neighborhood focused senior care program;
- Contribution to DDOT's construction of a pedestrian and bicycle path along Dalecarlia Parkway;
- Preparation of an engineering design for the realignment of Dalecarlia Parkway / Loughboro Road intersection; and
- Creation of a public park at Loughboro Road and Dalecarlia Parkway, adjacent to the enhanced and relocated bus stop and layover.

6. First Source Employment Program

Again, according to Section 2403.9(e), "employment and training opportunities" are representative public benefits and project amenities. Therefore, the Applicant will voluntarily enter into an agreement to participate in the Department of Employment Services ("DOES") First Source Employment Program to promote and encourage the hiring of District of Columbia residents. The Applicant has attached a draft agreement as Exhibit K.

7. Local Business Opportunity Program

Pursuant to Section 2403.9(e), the use of local firms in the development and construction of the project is a representative public benefit and project amenity. Therefore, the Applicant will

enter into a Memorandum of Understanding (“MOU”) with the Office of Local Business Development (“OLBD”) to use the resources of the OLBD to utilize local business enterprises in the development of this project. The Applicant has attached a draft agreement as Exhibit K.

8. Comprehensive Plan

According to Section 2043.9(j), public benefits and amenities include ways in which the PUD advances the “major themes and other policies and objectives of any of the elements of the Comprehensive Plan.” As described in greater detail in Section V below, the PUD is consistent with and furthers many elements and goals of the Comprehensive Plan.

9. Public Benefits of the Project

Sections 2403.12 and 2403.13 require the Applicant to show how the public benefits offered are superior in quality and quantity to typical development of the type proposed. A Zoning Map amendment is needed to establish a medical office building on a portion of the current R-5-A zoned site. There is no matter-of-right option. As discussed in detail in this statement, approval of this PUD and Zoning Map amendment application provides significant benefits to the surrounding community and the District of Columbia as a whole. Sibley needs a medical office building in order to stay competitive with other area hospitals and continue to serve the District as an award-winning community hospital. Other benefits include the preparation of the engineering design for the realignment of Dalecarlia Parkway at its intersection with Loughboro Road, the development of a landscaped park and enhanced bus layover near that intersection, contribution to the creation of a pedestrian and bicycle path along Dalecarlia Parkway, and contributions to Iona Senior Services.

V. COMPLIANCE WITH COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies enumerated in the Comprehensive Plan.

The purposes of the Comprehensive Plan are to:

(1) Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development; (2) Guide executive and legislative decisions and matters affecting the District and its citizens; (3) Promote economic growth in jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in conservation, stabilization and improvement of each neighborhood and community in the District (D.C. Code § 1-245(b) (1994 Supp.)).

The proposed project significantly advances these purposes by furthering the social and economic development of the District through the improvement of a major institutional provider of health care services. The Applicant will strengthen the District's number of on-site physicians through the construction of the MOB. This project allows the Hospital to strengthen and build upon a century's worth of health care services to the District while preserving a mutually beneficial relationship with its neighbors.

A. Compliance with Major Themes

Three major themes that are applicable to this project were adopted as part of the Comprehensive Plan. The Applicant's proposal is consistent with these themes as follows:

1. Stabilizing the District's Neighborhoods

According to Section 102.3 of the Comprehensive Plan, "[m]any city neighborhoods also include integral commercial and institutional uses that contribute to their character. Neighborhood businesses, schools, park and recreational facilities, churches, and other public facilities all add to the liveability of our communities. These uses too must be protected, stabilized, and improved." This PUD application increases the stability and strength of the

Hospital. The MOB will add comprehensive and integrated outpatient services to the medical campus, making Sibley a true full-service community hospital. This improved level of care benefits the surrounding community by providing a convenient and efficient physician presence adjacent to the hospital. Again, most hospitals in the District, and in neighboring jurisdictions, feature a major ambulatory care component.

2. Respecting and Improving the Physical Character of the District

This PUD project features a design that matches the architectural style, height, and massing of other hospital buildings on the Subject Property, yet also demonstrates compatibility with the residential community. The Parking Garage's design and landscaping also make that structure appropriate to its surrounding residential neighbors. The MOB and Parking Garage are located at the rear of the Subject Property, away from neighboring residential properties. The new park along Loughboro Road expands and enhances the buffer between the Hospital and surrounding residents as well as the proposed bus stop and layover near that intersection. Finally, the Applicant will create an engineering design for the realignment of the intersection of Dalecarlia Parkway with Loughboro Road. Together, the planned construction and transportation circulation improvements shift hospital operations to the back of the Subject Property, and preserve and enhance Sibley's development buffer with its neighbors.

3. Preserving and Ensuring Community Input

Sibley has made numerous presentations to both ANC 3D and the Palisades Citizens' Association. The Applicant has also met with both community leaders and individual neighbors on many occasions to assess their reactions and solicit their suggestions for the project. Their comments have been integrated into the design for the proposed campus, the decision to rezone only a portion of the Subject Property, and the decision to add an additional level to the parking garage. As envisioned by the PUD process, the Applicant will continue to engage the community as it goes forward with this PUD and Zoning Map Amendment application.

B. Compliance with Major Elements

The Comprehensive Plan also contains 11 major elements. The proposed project furthers the objectives and policies of several of these elements as follows:

1. Transportation Element

This project improves the transportation system around the Subject Property in four ways. First, it improves the entrance closest to the MOB off Dalecarlia Parkway to allow for a more efficient traffic flow. Second, it creates the proposed bus stop and layover near Loughboro Road and Dalecarlia Parkway for the terminating Metrobus D3 and D6 lines. Third, it will create an engineering design for the realignment of the Dalecarlia Parkway / Loughboro Road intersection. Fourth, a financial contribution for a pedestrian and bicycle path along the east side of Dalecarlia Parkway is a component of the community amenities package.

2. Urban Design Element

Again, this project presents a site plan and appearance consistent with contemporary design standards. The height and massing of the MOB and Parking Garage are consistent with

the existing hospital buildings. The enhanced entrance creates a tree-lined urban boulevard that physically and architecturally links the new MOB and Parking Garage to the rest of the medical campus. Additionally, the concentration of development at the back of the site enhances the campus feel of the Subject Property while preserving—and indeed improving—the residential character along Loughboro Road. In particular, the new park in the southeast corner of the medical campus along Loughboro Road will enhance the open space buffer between the Hospital and the community.

3. Generalized Land Use Map

The Comprehensive Plan sets the following policy goal for land use:

- “Recognize the specialized land needs and unique economic and human development opportunities presented by colleges, universities, and other institutional users of large tracts and require the development of detailed master plans, if none exist, that incorporate all land and facilities currently in use or currently owned by the institutional and anticipated for future use.” (10 DCMR 1115.1(j)).

The Applicant has gone to great lengths to create a project and vision that improves both the Hospital and the community that borders it. The Applicant seeks consolidated review and approval of its proposed MOB and Parking Garage. The MOB and its array of ambulatory services are a logical complement to Sibley’s emergency care, surgery, and other traditional inpatient services. They are an efficient set of improvements that enhance the competitiveness and quality of care at Sibley, consistent with similar structures at other area hospitals.

4. Human Services Element

The Comprehensive Plan sets forth the following policy goals for health care as an essential human service:

Health care:

- “The District must pursue every available opportunity to improve efficiency and effectiveness and to target its resources most appropriately.” (10 DCMR § 1000.4)

Health care cost containment:

- **“Improve the efficiency of health service and initiate all appropriate actions to contain the costs of health care, thereby providing quality services at the lowest possible cost.”** (10 DCMR § 1003.2(a));
- **“Support the development of appropriate alternatives to inpatient hospital care . . . and avoid duplication of expensive services and equipment.”** (10 DCMR § 1003.2(b)).

Health care delivery:

- **“Refocus the health care system from one of crisis response to one that emphasizes preventing disease and promoting health and well-being by enhancing client capabilities to make informed choices about life styles and health practices, by avoiding disease, disability, and stress, and by establishing local health policies directed at increasing individual responsibility for health.”** (10 DCMR § 1004.2(a)).

The addition of the MOB to the Hospital continues the Applicant’s efforts to create a medical campus that attends to the health care needs of all District residents at every stage of life. The MOB increases the availability and quality of outpatient services and therefore improves the preventive care options in the District. Its location at the hospital efficiently and synergistically takes advantage of common resources and facilities. Furthermore, the PUD’s amenities package includes a contribution to Iona Senior Services, which provides services and assistance to the District’s elderly population.

5. Ward 3 Goals and Policies

The Ward 3 section of the Comprehensive Plan notes that Sibley is a “major institutional activity” (10 DCMR § 1401.2(c)) and is a primary private provider of human services (10 DCMR § 1408.1(e)). (Iona Senior Services is also noted in Section 1408.1(e) as playing a “major role” in assisting Ward 3’s significant elderly population.) The Applicant has designed its site plan and proposed community benefits program to improve Sibley’s provision of essential health care services to the District. The Applicant has chosen to use the PUD process to work with its residential neighbors and District agencies so that it may fully integrate the transportation improvements and public benefits that the project will yield, and involve those parties throughout the planning process. As the Applicant moves forward, it will continue to shape the

PUD project into one that will continue Sibley's mission of service to the District of Columbia for the next century.

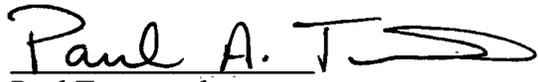
VI. CONCLUSION

For the foregoing reasons, the Applicant submits that the consolidated PUD and the Zoning Map amendment request meets the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, and safety and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD application and Zoning Map amendment should be approved and adopted by the Zoning Commission.

Accordingly, the Applicant respectfully requests the Zoning Commission approve this PUD and Zoning Map amendment application.

Respectfully submitted,

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