November 24, 2002

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D.C. OFFICE OF ZONING
2002 NOV 26 PM 2:26

Boarding of Zoning Adjustment
For the District of Columbia
441 4th Street N W
Suite 210-S
Washington, DC 20001

Re: Board of Zoning Adjustment Application Number 16836, The Washington Home

Dear Members of the Board:

I want to call your attention to a large loophole in the Washington Home proposed parking lot expansion plan. If you do not close this loophole, the Board will inadvertently allow an opening for noncompliant expansion of the Washington Home parking lot, assuring a repeat of the situation the Board and the community now face.

A LOOPHOLE LARGE ENOUGH FOR 24 ILLEGAL PARKING SPACES

THE PLANS. In both the Site Plan for parking lot expansion submitted to the BZA date 10/26/01 and the plan for 155 spaces presented and withdrawn in the October, 2002 hearing, there is a major omission in the area along the 37th Street entrance.

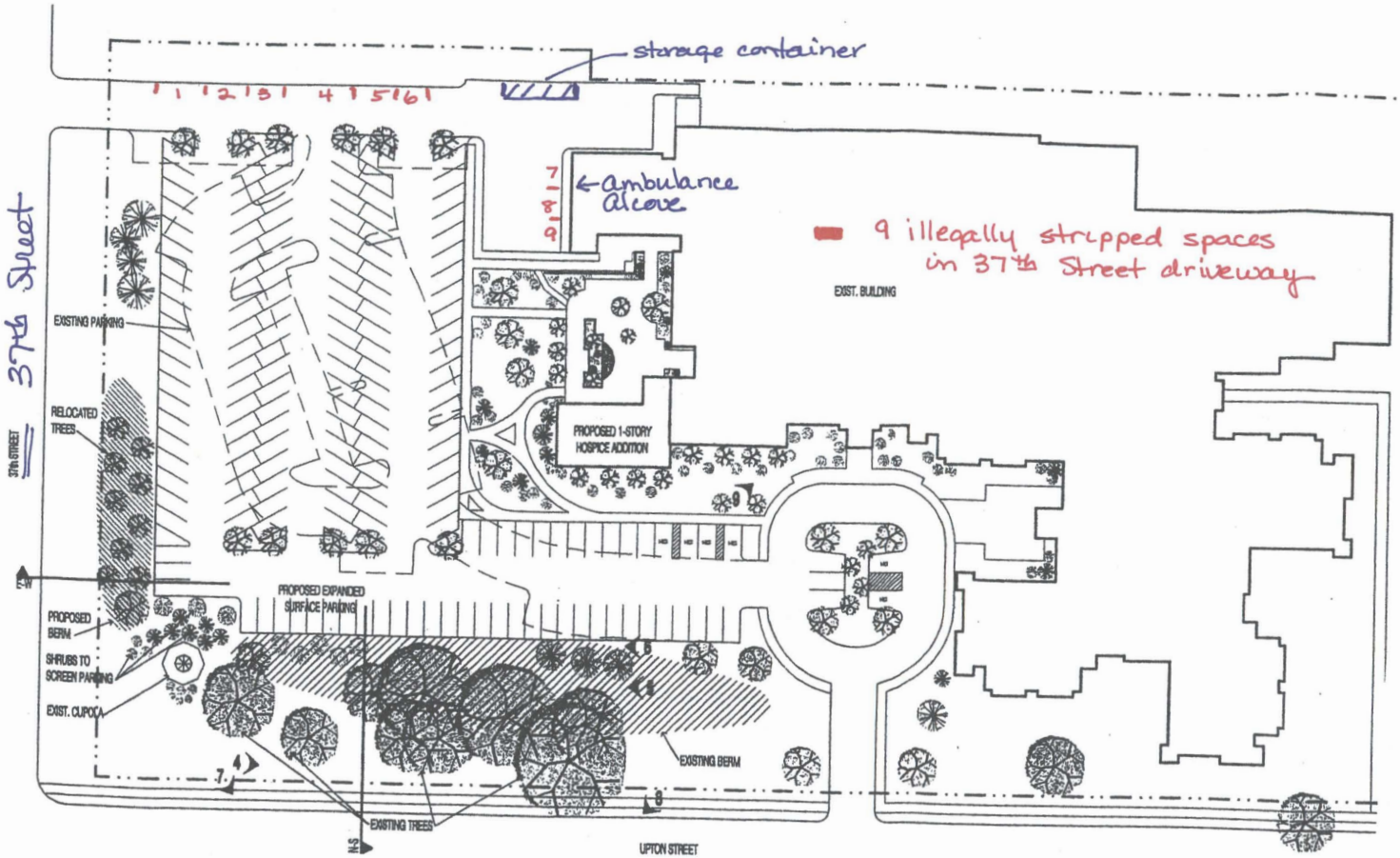
Please look carefully at the Site Plan. At the back entrance to the Home off 37th Street, the Existing Conditions Plan is hard to read because of the overlay of various storm water and water mains. Careful examination shows 6 parallel parking spaces long the south side of the driveway.

These spaces are part of the 14 illegally striped spaces. Illegal because they exceed the 75 parking limit in the current BZA order. The Home has not challenged the community's assertion of illegal striping. These 6 spaces are de facto expansion spaces and must not be considered by the BZA as part of the base of 75 spaces.

Attachment One is a schematic plan of these additional stripped spaces in the back driveway area.

BZA
Case No. 16836
Exhibit No. 110

Board of Zoning Adjustment
District of Columbia
CASE NO.16836
EXHIBIT NO.110



SITE PLAN

0 20 40 80

PARKING SUMMARY

EXIST. MARKED SPACES:	75
PROPOSED ADDITIONAL SPACES:	98
TOTAL:	173 (INCL. 6 HC SPACES)

KEY

EXISTING BERM:

PROPOSED BERM:

PHOTOGRAPH #: 3

ATTACHMENT ONE

The Washington Home
&
The Hospice of Washington

10-26-01

ACTUAL USE. These illegally stripped spaces do not represent the actual use of this driveway area by the Home, it's employees or guests. Actual use is shown in Attachment Two.

Specifically, twenty-one (21) spaces are used on a daily basis, all of which are exceeding the current BZA order.

9 vehicles parallel park along the south boundary portion of this driveway, 6 using the illegally stripped spaces

8 vehicles, including the Home's shuttle bus, park in the ambulance "alcove"

4 vehicles park either side of the loading dock, which seem to vehicles of the maintenance and engineering staff

In addition, if Home were to remove the semi-trailer sized storage container along the back south wall near the loading dock, a minimum of 3 more vehicles could park in this area of the lot.

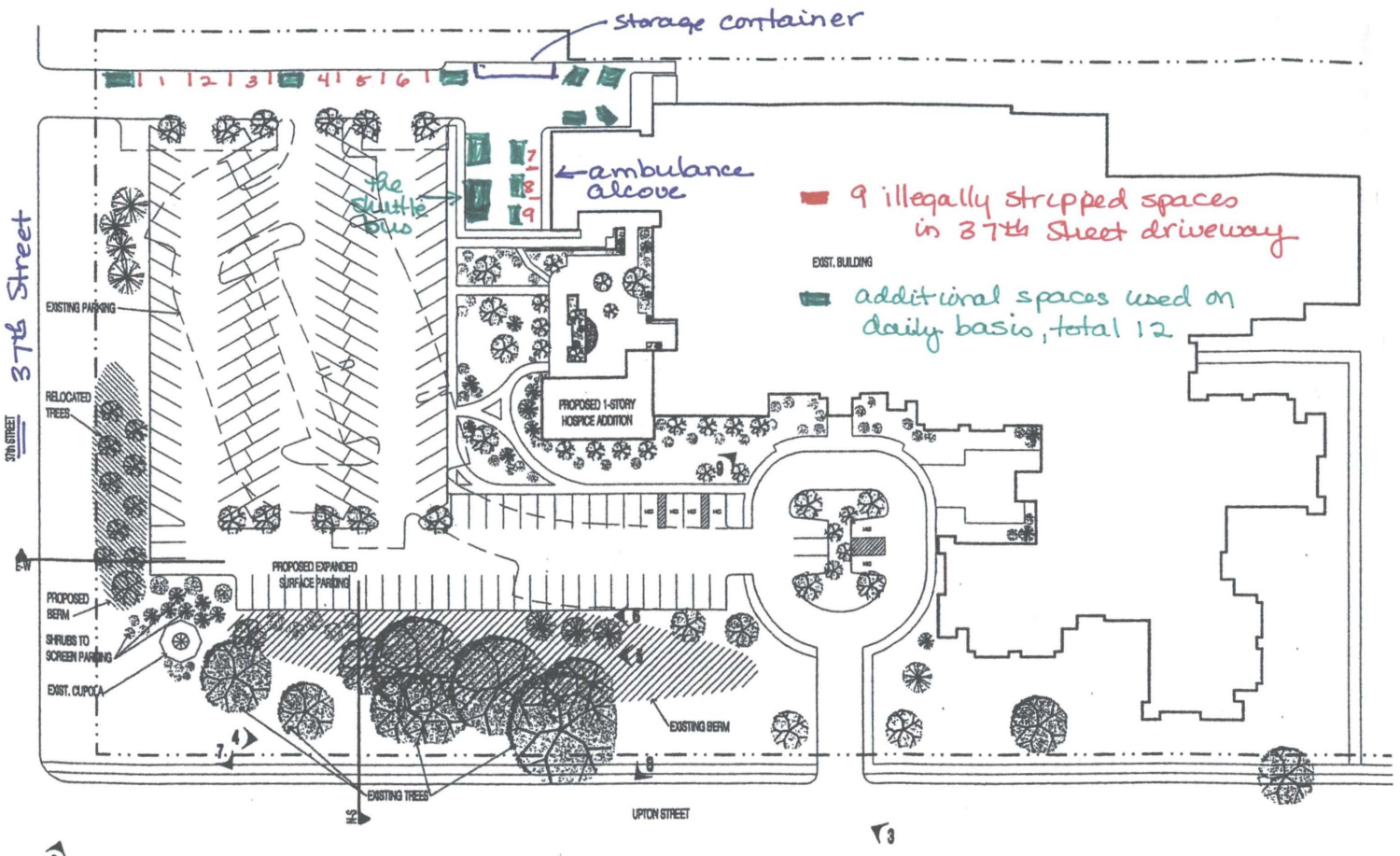
(In the Site Plan for 155 spaces that was submitted and withdrawn by the Home on October 15, they have made minimal consideration of this area. They "shaped" the parking area along the south wall, showing 6 parking spaces, which is the number of spaces currently illegally lined here. Possibly with this shaping one or two spaces might be eliminated under this plan. But, creative parking would probably override the "shaping" effort.)

WHY THE 24 CAR LOOPHOLE SHOULD BE OF CONCERN TO THE BOARD

These 21 to 24 illegal spaces are not incorporated into the total of additional spaces the Home is requesting in its expansion plans. Yet, these spaces are currently being used by employees and guests and will be used in whatever future parking lot configuration is approved by the Board. On what basis can I make this assertion?

1. PARKING PREFERENCES. Some current employees and guests prefer the 37th Street entrance to the one on Upton Street. This area is used by employees working in maintenance and engineering because it is closest to their work and also by nursing staff because of the proximity to the back entrance of the complex. These spaces are also used by guests arriving at the site from 37th Street. And, with the anticipated expansion of the 4 hospice rooms, located near to the 37th Street entrance, we can only assume this area will also be preferred by employees in this new wing.

2. ADEQUATE SURFACE AREA CURRENTLY EXISTS FOR UP TO 24 VEHICLES. The daily parking of 21 vehicles plus the large container in this area does not deter use of the loading dock by very large trucks making



SITE PLAN 0 20 40 80

ATTACHMENT TWO

PARKING SUMMARY	
EXIST. MARKED SPACES:	75
PROPOSED ADDITIONAL SPACES:	98
TOTAL:	173 (INCL. 6 HC SPACES)

KEY

EXISTING BERM:

PROPOSED BERM:

PHOTOGRAPH #: 3

The Washington Home
&
The Hospice of Washington

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deliveries. These deliveries occur daily without any need to relocate illegally parked cars. The only way to control use of this area for parking would be to reduce the paved surface area. Neither of the plans submitted proposes to do this reduction.

3. ABSENCE OF PARKING LOT CONTROLS THAT WOULD PREVENT USE. As the community and our consultants have emphasized, a major problem in the management of the parking lot at the Home is the lack of controls and effective enforcement. Nothing to date suggests that the management of the Home will act to control illegal parking in this driveway area. Further, everything discovered in this application review process suggests that the Home will take advantage of extra parking lot space for additional parking, as they have done with the original BZA order.

CONCLUSION: In any determination of actual number of parking spaces to be considered for Washington Home parking lot expansion, the Board must assume that up to 24 additional spaces will be used in the driveway area ABOVE AND BEYOND the figures presented by the Washington Home for the proposed expansion. They have already taken 24 extra spaces. The number count must be adjusted to reflect this de facto expansion.

I urge you to address this issue directly before any determination is made. Please do not allow this loophole to stand because it would enable the Home to circumvent the BZA orders again. The community really does not want to be fighting the Home, however, their actions have left us no choice.

Cordially,

Barbara Beelar

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Washington, DC 20008