ANC 3F Forest Hills/North Cleveland Park/Tenleytown

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June 20, 2002

Geoffrey Griffis, Chairman
Board of Zoning Adjustment
441 4th Street, NW
Suite 210
Washington, DC 20001

Re: Board of Zoning Adjustment (BZA) Application 16836
The Washington Home

Dear Mr. Griffis:

The Washington Home is housed in a non-conforming structure in an R-1-B residential zone and is seeking a special exception for construction of an addition to this structure and expansion of the parking lot. An initial BZA hearing on the referenced application was held on April 2, 2002. Following this hearing on May 20, 2002, the Washington Home was provided an opportunity to present additional information in support of its application at a public meeting of ANC 3F. At this meeting neighbors were given the opportunity to respond to the information presented by the Home. At a June 17, 2002, duly noticed public meeting, with a quorum present, ANC 3F voted unanimously, 7-0-0, to recommend that the BZA reject the referenced application. See enclosed resolution.

ANC 3F is primarily concerned with The Washington Home's request to build a 173 space parking lot in this R-1-B zone. If granted, this request would result in a 130 percent increase in the currently authorized amount of parking and would produce a paved parking lot of about 1.5 acres. This would represent a 40 percent increase in the size of the existing parking lot and would add nearly half an acre of paved parking to an existing one acre parking lot in a residential zone. A parking lot of this size and scale is typical of suburban commercial locations and is inappropriate for an R-1-B residential zone in the District of Columbia. We are very concerned that this application lacks documentation justifying the amount of parking that is proposed to be accommodated on this oversized parking lot. We are also concerned that building a 1.5 acre parking lot in this residential zone would create a number of problems for our neighbors including:

(1) a 173 space parking lot would likely act as an incentive that would encourage more drivers into an area which already experiences high volumes of commuter cut-thru traffic as well as high levels of local traffic generated by surrounding institutional and commercial uses;

BZA Case No. 16836 Exhibit No. 46

Board of Zoning Adjustment
District of Columbia
CASE NO.16836
EXHIBIT NO.46

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(2) the visual impact of a parking lot of this size would create a dramatic and unalterable change in the residential character of the neighborhood in part because of the removal of 50 trees and the endangerment of several more mature trees, and in part because these trees would be replaced with a very large expanse of asphalt; and

(3) a significant increase in the amount of impervious surface on the site would complicate storm water management;

Failure to Document the Need For Additional Parking

Much of the applicant's case rests on the assertion that it is necessary to provide parking for nurses and other health care service workers employed by the Home because of a general shortage and the high degree of competition for these employees. Yet the applicant's own data show that sufficient parking is available to accommodate nurses and health care service workers on the morning shift which begins at 7:00 a.m. During this shift 93 nurses, representing about two thirds of the Home's 146 nurses, are on duty. The applicant's parking data also show that it is not until 8:30 a.m. when the administrative staff begin to arrive that the usage begins a climb toward a peak of about 130 spaces. These data strongly suggest that the administrative employees whose arrival begins at around 8:30 a.m. are creating a good deal of the demand that is pushing parking lot usage past authorized levels. It is this employee population we would ask the applicant to target for incentives that would encourage them to move from single occupancy vehicles to other means of transportation. In fact, the D.C. Comprehensive Plan at Section 1403.5 directs that use of public transit by institutions should be promoted and employee reliance on single occupant vehicles discouraged as a condition for discretionary approval when possible. We believe the Home can do much more than has been done to reduce the amount of parking demand at its Upton Street location.

In arriving at a figure of 173 parking spaces the applicant's parking analysis makes several broad and unsubstantiated assumptions that raise serious questions about actual parking needs. For example, the parking analysis begins with the assumption that a peak usage of about 130 vehicles is the correct base from which to begin estimating total parking needs. No rationale and no justification are provided for this starting point. In fact, the data show that peak usage is the rare exception which occurs at only brief intervals during the day. No data is provided to show the composition of peak usage in terms of origin and purpose of vehicles parked. Nor is any data provided to show that the demand is coming from the Home itself and is not being generated by vehicles which are not associated with the Home's activities. Such information could be very useful in understanding the sources of parking demand and in managing this demand in ways that could reduce overall usage including peak usage. ANC 3F and Citizens Concerned about the Home's Expansion have made numerous requests for information that might support the assumptions and conclusions in the parking analysis. For the most part, this information has not been provided by the applicant.

The parking analysis "assumes" that one third of the 52 non-residential vehicles parked in the vicinity of The Washington Home, a total of 17 vehicles, are part of the Homes parking demand. No documentation is provided to show that these cars could be identified in any way that could lead to this conclusion or that drivers of these vehicles were observed leaving their vehicles and going to the Home. Yet 17 parking spaces are allocated based on this unsubstantiated assumption. Further, the parking analysis uses a "circulation" factor of ten percent to add 16 more spaces to the parking requirement without explaining the basis for this the ten percent factor and without explaining how these 16 spaces would be used for both parking and circulation. The parking analysis also assumes that four parking spaces will be added for the four
new beds that are requested as part of the application. This one for one ratio is far out of line with the existing ratio of approximately one parking space for each 2.7 beds.

We believe the Home's parking needs are substantially less than 173 spaces since the parking analysis is based on a number of faulty assumptions. For this reason, we strongly recommend that in the absence of proper documentation, there be no increase in the number of authorized spaces. Put simply, the Board should not, in the absence of adequate data, grant a special exception for a non-conforming use that would authorize an oversized surface parking lot to be built in a residential zone.

We believe the Home can do much more to reduce parking demand at its facility. For example, it can promote the use of public transportation and carpooling as alternatives to driving. Currently, The Washington Home provides no financial incentives to employees to use mass transit. Yet the Home's location makes it ripe for such a program. It is within walking distance of two Red Line Metro stations, Van Ness and Tenley Town; five major bus lines on Wisconsin Avenue are within one block of The Washington Home; two cross town bus routes (H3 during the morning and evening rush hours and N8 from 6 a.m. to 1 a.m.) stop within one and two blocks of the Home. The cross town routes run east to west and provide connections to three major bus lines on Connecticut Avenue as well as the Van Ness Metro station. In sum, The Washington Home is located in a mass transportation hub and should take advantage of this location to reduce parking demand at its Upton Street facility.

The Home's CEO informed ANC 3F that an employee survey had been conducted which led to a conclusion that transit subsidies would primarily benefit current Metro users. But no details were
offered on the survey nor was there any indication that consideration had been given to aggressively marketing Metro among the drivers of automobiles. In order to be effective, a mass transit program requires a combination of tangible incentives and active education and promotion. Nothing from the applicant suggests that the Metro subsidy option has been seriously
weighed as a method for diminishing employee dependence on private vehicles for daily commuting.

Mass transit is just one of several alternatives to bringing automobiles to the Upton Street facility. Others include shuttle bus service to the metro such as that provided by FNMA; car pools including car pools with neighboring commercial and institutional activities such as FNMA, Broadcast House, and the USPS Friendship Station; and use of satellite parking including possible use of the National Presbyterian Church at Van Ness Street and Nebraska Avenue. We believe these opportunities should be exhausted before consideration is given to enlarging the existing parking facility.

Neighbors are very concerned that a 173 space parking facility will act as an incentive for bringing more vehicles into an area that is already overburdened with non-local traffic. "Build it and they will come" is the fear. This section of North Cleveland Park experiences significant amounts of cut-thru traffic. During the morning rush hour numerous automobiles traveling south on Nebraska Avenue turn left onto 38th Street, make a right turn onto Upton, and then turn left on Wisconsin Avenue in order to continue south on Wisconsin to FNMA and Georgetown. They do this to avoid driving through Tenley Circle to enter onto southbound Wisconsin Avenue from Nebraska. During the evening rush hour Upton Street between Reno Road and Wisconsin Avenue is heavily used as a cut-thru by commuters heading north on Reno seeking to avoid waiting for the left turn signal at Van Ness Street. Van Ness is a designated cross-town street and is designed to handle higher volumes of traffic. Upton Street is a residential side street and is not intended to carry these large volumes.

The traffic situation on Upton Street, 37th Street and 38th Street is exacerbated by commercial development in the 4000 and 4200 blocks of Wisconsin Avenue that has increased the amount of traffic on these local streets. The proximity of several large institutions including The Washington Home, Sidwell Friends School, the US Postal Service Friendship Station, and the Hearst School adds significantly to the traffic load on local streets. These conditions make it all the more important that The Washington Home examine alternatives to creating a shopping center size parking lot that will act as a parking magnet in this residential zone.

A final point on the lack of justification for additional parking involves current operation and use of the existing parking lot. The Home operates an uncontrolled parking lot with very lax, if any, enforcement measures to ensure that parked vehicles have business at the Home. In fact, even the Home admits that it is likely that non-Home vehicles are parking in this lot in the absence of enforcement to ensure that only permitted vehicles are present. Furthermore, observational data collected by the Home's residential neighbors suggests that the existing lot is striped for more than the authorized level of 75 vehicles. The Washington Home itself in its submission admits that the parking lot often accommodates more than 75 vehicles. Given these numbers, consideration should be given to maximizing use of the existing parking lot to accommodate the Home's parking demand, within the requirements of the Zoning Code, before any thought is given to paving an additional half acre of green space to create more parking spaces. Use of supervised parking or valet parking could also increase the capacity of the existing lot without increasing its size.

Impact on Trees and Landscaping

We are concerned that construction of a 173 car parking lot would result in the removal of 50 trees in and around the current parking lot. Based on our understanding of the information submitted to date, it appears that these trees would not be replaced. In addition, several large mature trees, including a 41.5 inch diameter tulip poplar, a 28 inch sycamore, and two white pines with diameters of 21inches and 23.5 inches respectively, would be damaged perhaps irrevocably by construction activities in their critical root zones. These trees are part of two significant stands of trees along Upton and 37th Streets. Their exceptionally tall canopy is a superb community resource, visible for blocks around. They add immeasurably to the quality of life in the neighborhood and undoubtedly provide solace to residents of the Home who can see them from their rooms and the terrace. The stands of trees would be greatly diminished in their grandeur and presence by the loss of these trees to an asphalt parking lot.

Furthermore, the proposed nearly one and a half acre parking lot unlike the present lot would contain virtually no interior landscaping to temper the heat island effect of such a large amount of
asphalt or to break up the vista of row upon row of parked cars. The importance of interior landscaping, recognized in the requirements of Section 2303 of the Zoning Code, is shown by the design of the current lot which includes an island with trees and shrubs. This island makes the parking lot hospitable to those using it, not only visually but sensorially as well. From the streets and from the Home's terrace the island hides the view of cars parked on the other side of it, making the lot seem smaller than it really is and extending one's sense of green space across the expanse of the lot. Such mitigation is absent from the proposed parking lot which is a rectangular asphalt box empty of any vegetation or interest save a few sentinel trees confined to the small triangles at the far ends of the parking rows.

For good reason, 11 DCMR Section 2303.1(a)(f) requires that "[l]andscaping with trees and shrubs shall cover a minimum of five percent (5%) of the total area of the parking lot". The proposed parking lot does not meet this standard. Although the Home proposes to screen the perimeter of the parking lot with shrubs and has said that this will constitute its required landscaping, Section 2303.2 makes clear that perimeter screening is an additional requirement. We strongly recommend that any landscaping plan that may be approved in connection with this application provides adequate perimeter screening between the parking lot and homes on 37th Street and Upton Street. At present such screening exists and it must be maintained.

In the case of neighbors on 38th Street just to the north of The Washington Home improved landscaping is needed. Currently, there is insufficient landscaping separating 38th Street residents from The Washington Home's institutional facade. This application does nothing to change that. The Ward 3 Comprehensive Plan requires that

> the compatibility of. . . [institutional] uses must be maintained [and]. . . expansion carefully controlled. The residential neighborhood objectives [of this plan] are to conserve the

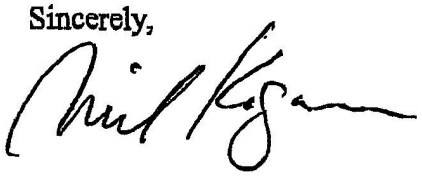
Storm Water Management

ANC 3F continues to be concerned that the size of the proposed parking lot will create serious storm water management problems. Creating a nearly one and a half acre parking lot would significantly increase the amount of impervious surface. This in turn will increase storm water flow and impose storm water management requirements under a regulatory program administered by the Environmental Health Administration of the D.C. Department of Health (DOH). Moreover, the applicant's claim that the proposal will exceed the DOH requirements is not supported by any definitive regulatory document or by any documentation from DOH. We believe that the applicant's proposal is designed to maximize the use of land for surface parking while minimally meeting storm water management standards.

In sum, the applicant's request for an expansion of the parking lot falls short in several important areas. Documentation that supports a parking lot expansion has not been provided. In addition, the applicant has failed to implement a program for reducing the amount of parking demand at its facility. Equally important, there has been no meaningful attempt to optimize utilization of the existing parking lot by putting in place more effective controls. Fifty existing mature trees will likely be removed and not replaced and numerous other trees will be threatened. An increase in the amount of impervious surface by nearly half an acre raises serious concerns about storm water management. Matters are made worse by the fact that a parking lot of this size does not fit in a residential zone.

Given the shortcomings in the application and the significant negative impacts it would bring, it is strongly recommended that the Board reject the applicant's request for a special exception.

Sincerely,



Phil Kogan, Commissioner
ANC 3F01

Enclosure

cc: George Keys, Jordan Keys and Jessamy
Jon Graham, Citizens Concerned about the Home's Expansion
Karen Thomas, Office of Planning
Ken Laden, DDOT

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Res 02-26

ANC3F RESOLUTION REGARDING THE WASHINGTON HOME'S APPLICATION TO THE BOARD OF ZONING ADJUSTMENT FOR A SPECIAL EXCEPTION (CASE NO. 16836)

Advisory Neighborhood Commission 3F
North Cleveland Park and Forest Hills
P.O. Box 39290, Washington, D.C. 20016-9290

WHEREAS: The Washington Home and Hospice of Washington (TWH) located at 3720 Upton Street NW has applied to the Board of Zoning Adjustment (BZA) for a special exception for "construction of a 4-bed addition to hospice facility and the enlargement of existing parking lot from 75 to 173 parking spaces"; and

WHEREAS: The Washington Home is a non-conforming structure in an R-1-B neighborhood; and

WHEREAS: Section 219.5 of the Zoning Code, Health Care Facilities, provides that a health care facility located in an R-1 district shall not have an adverse impact on the neighborhood because of traffic, noise, or operations; and

WHEREAS: ANC 3F at a March 18, 2002 duly noticed public meeting identified several concerns about impacts of the current application including concern about the size of the proposed parking lot; concern about storm water management; and concern about the number, location, and types of trees affected and had a presentation about the project by the Home at the May 20 ANC meeting; and

WHEREAS: The Washington Home has not justified the need for an additional 98 parking spaces and a 173 car parking lot in an R-1-B zone; and

WHEREAS: In 1997 when The Washington Home applied to the BZA for permission to reconfigure the existing structure and add 12 beds, its application asserted that parking at the Home was "adequate" to meet the needs; and

WHEREAS: Construction of a 173 car parking lot would result in the removal of 50 trees and endangerment of several large mature trees along Upton and 37th Streets because of construction activity in their critical root zone; would increase the amount of impervious surface to nearly one and a half acres which will increase storm water flow into municipal sewers and create potential overflow problems; and would dramatically and unalterably change the residential character of the neighborhood; and

WHEREAS: The proposed nearly one and a half acre parking lot, unlike the present lot, contains virtually no interior landscaping to temper the heat island effect of so much asphalt or to break up the vista of row upon row of parked cars both from surrounding streets and from the Home itself; and

WHEREAS: Opportunities exist for The Washington Home to maximize the use of the existing parking lot through improved management and greater efficiency; and

WHEREAS: The D.C. Comprehensive Plan at Section 1403.5 states that use of public transit by institutions should be promoted and employee reliance on single occupant vehicles discouraged as a condition for discretionary approval when possible; and

WHEREAS: Opportunities exist to increase the use of public transportation and minimize dependency on automobiles by visitors and staff of The Washington Home.

THEREFORE, BE IT RESOLVED THAT: ANC 3F recommends that the BZA not approve Application 16836.

Adopted June 17, 2002, at a duly noticed public meeting with a quorum present by a vote of 7-0-0.

/s/ ***Cathy Wiss***

Cathy Wiss, Chair

/s/ ***David J. Bardin***

David J. Bardin, Secretary

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Name: Rick Nero - BZA
Fax: 727 6072
From: Phil Kogan
Phone: 202 690 5689
Date: June 20, 2002
Subject:

Comments: Attached is the ANC 3F report and resolution on Application 16836, The Washington Home.