October 29, 2003

D.C. OFFICE OF ZONING
2003 OCT 30 PM 12:31

Mr. Jeffrey H. Griffis, Chair
Board of Zoning Adjustment
441 4th St., NW, Suite 210
Washington, DC 20001

Re: BZA Case 17043, SPNA Appeal of Certificates of Occupancy for
Capitol Hill Healthcare Group/Medlink Hospital
700 Constitution Avenue, NE, Square 875, Lot 76 (R-5-D)

Dear Mr. Griffis:

I am writing to support Stanton Park Neighborhood Association's appeal of Certificates of Occupancy CO 51289 and CO 51290 issued to the Capitol Hill Healthcare Group on March 26, 2003. My support is based on the following reasons:

1. There is a real problem with parking in the neighborhood, particularly on nights and weekends. I see a lot of people in scrubs and visitors parking on 7th St. at those times. I have made a few informal counts of license plates while walking from new, more distant parking spaces to my residence, and about 50% of the cars on 7th St. had Maryland license plates.

2. Activity at the hospital has increased. I see more ambulances and emergency vehicles double parked at the front door on deliveries at all hours of the day and night (why aren't they using the alley entrance?), and groups of day patients out on walks. In 2001 the property was in negotiations to be sold and activity was on hold. In 2002 Medlink announced that the sale was off and they were going to increase operations, make some landscaping improvements and bring in more programs. This is good for the District as the city needs all the medical facilities it can get, but they need to be administered in a reasonable manner.

3. When I was the ANC commissioner for this area, I asked a Medlink official why people in scrubs would be parking on the street. They said only fulltime staff are allowed to use the underground garage, not visiting nurses or any other part-time personnel. Not only should all personnel affiliated with the hospital have access to the garage, but patient visitors as well.

4. In June of 2001, I participated in an inspection of the garage. I saw no physical reason why it could not hold its full complement of cars. Regardless of the letter of the law, CHHG should be a good neighbor and use any excess capacity.

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5. In 2001 Medlink sold two surface parking lots on Squares 865 and 895 that held 103 spaces. This may have been within their rights, but it took them out of compliance with BZA Order 16407 and its existing C of 0 requiring 276 spaces. When we asked Mr. Michael Johnson, then Zoning Administrator, why he was not enforcing the order, he said that activity had decreased and the hospital would be sold soon. To this day I disagree with that reasoning, and as you can see neither of those factors is currently the case.

6. Section 2101.1 of the Zoning Regulations, Schedule of Requirements for Parking Spaces, requires one parking space per bed for hospitals in residential areas. According to SPNA there are 177 beds and 300 employees, yet the new C of O requires only 60 spaces. The requirement should be based on all beds, not some subset. How many beds do the SHPDA records show?

Personally I am pleased that CHHG/Medlink has decided to continue providing healthcare facilities in the District. There is a severe shortage of residential nursing facilities, particularly for low-income patients, and Medlink provides a valuable service. I also believe they can be a better neighbor in the Capitol Hill community.

I respectfully urge the Board to revoke Certificate of Occupancy permits CO 51289 and 51290 because they were improperly issued and to order a new permit process, if CHHG desires, which provides for community input and requires the Zoning Administrator to verify, using information of record, the factual basis (i.e. number of beds) for the request. Thank you for your time and consideration of this matter.

Sincerely,

Janet Quigley
644 Massachusetts Ave., NE
Washington, DC 20002