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Executive Director
Patricia E. Gallagher, AICP

IN REPLY REFER TO:
NCPC File No. Z.C. 01-36C

SEP 6 2002

Zoning Commission for the
District of Columbia
2nd Floor, Suite 210 South
441 4th Street, NW
Washington, D.C. 20001

Members of the Commission:

In response to your request, the National Capital Planning Commission, at its meeting on September 5, 2002, approved the enclosed report to the Zoning Commission for the District of Columbia on the Consolidated Planned Unit Development and related amendments to the Zoning Map of the District of Columbia for the Unified Communications Center on Saint Elizabeths East Campus, east side of Martin Luther King Jr., Avenue, SE.

Sincerely,

Patricia E. Gallagher, AICP
Executive Director

Enclosure

ZONING COMMISSION
District of Columbia
Case 01-36C
Exhibit 54

ZONING COMMISSION
District of Columbia
CASE NO.01-36C
EXHIBIT NO.54

NCPC File No. ZC 01-36C

NCPC
NATIONAL CAPITAL PLANNING COMMISSION

Consolidated Planned Unit Development and Amendment to the Zoning Map of the District of Columbia for the Unified Communications Center

East side of Martin Luther King, Jr. Avenue, SE on the St. Elizabeths Hospital East Campus

(Square S5868 Lot 1)

Report to the Zoning Commission of the District of Columbia
September 5, 2002

Abstract

The Zoning Commission has taken a proposed action to approve a consolidated Planned Unit Development (PUD) and related zoning map amendment on the northern portion of the St. Elizabeths Hospital East Campus for a Unified Communications Center. This project is proceeding under the auspices of the District of Columbia Office of the Chief Technology Officer. The site is currently not zoned and the proposed PUD action will zone the site to a C-2-B (commercial) designation.

Federal Interests

The identified federal interests relevant to this project include the historic St. Elizabeths Campus, a designated National Historic Landmark, and Suitland Parkway, a federal parkway under the jurisdiction of the National Park Service and a designated Special Street under the Comprehensive Plan for the National Capital. Of additional federal interest is the Unified Communications Center's visual impact on the South Capitol Street gateway.

Authority

Approval of comments pursuant to Section 8 of the National Capital Planning Act of 1952, as amended (40 U.S.C. 71g).

Commission Action

The Commission:

- **Expresses concern** with the amount of parking on the site, as well as the absence of an overall transportation management plan for the UCC operation. A similar federal facility at the St. Elizabeths campus would be reviewed against a higher standard of one parking stall for every three employees (1:3), under the Federal Elements of the Comprehensive Plan. The current UCC project is being developed with an approximate ratio of one space for every employee (1:1) and

the Commission strongly encourages the Zoning Commission and the Office of Planning to work with the District of Columbia Office of Chief Technology Officer to reduce this amount of parking and implement alternative transportation services to the UCC employees.

- **Notes** the absence of an overall framework plan for the entire St. Elizabeths Campus, and recommends that the Zoning Commission and the District of Columbia Office of Planning in conjunction with the General Services Administration move forward with a framework plan, taking into account the impacts the UCC may have on the future development of the entire campus as well as the precedent the high parking ratio for the UCC may set for other projects on the campus. New Zoning Commission actions beyond the current project should not be pursued until the St. Elizabeths framework plan has been completed.

- **Expects** that the Section 106 process will be completed in accordance with the "Proposed Historic Mitigation Program" portion of the Memorandum of Agreement (MOA) signed by the District of Columbia, District of Columbia Historic Preservation Office, and the Department of Health and Human Services. The Commission will not review this project as required under Section 5 of the National Capital Planning Act until this MOA provision is satisfied.

- The Commission **concludes** that the proposed consolidated Planned Unit Development and related rezoning, subject to the guidelines, conditions, and standards established by the Zoning Commission, **would not adversely affect the identified federal interests of Suitland Parkway or the South Capitol Street gateway to the National Capital**. The Commission reiterates the Zoning Commission's requirements for additional screening along Suitland Parkway to effectively screen this facility from the parkway viewshed.

* * *

BACKGROUND AND STAFF EVALUATION

The District of Columbia Zoning Commission referred the proposed consolidated PUD and related zoning map amendment to the Commission for federal interest review and comment. The PUD process seeks development flexibility in order to provide superior public benefit, but the process should not be used to circumvent the intent and purposes of the Zoning Regulations or result in an action that is inconsistent with the Comprehensive Plan. NCPC reviewed the proposed project for potential adverse affects on the federal interests and will forward its comments to the D.C. Zoning Commission.

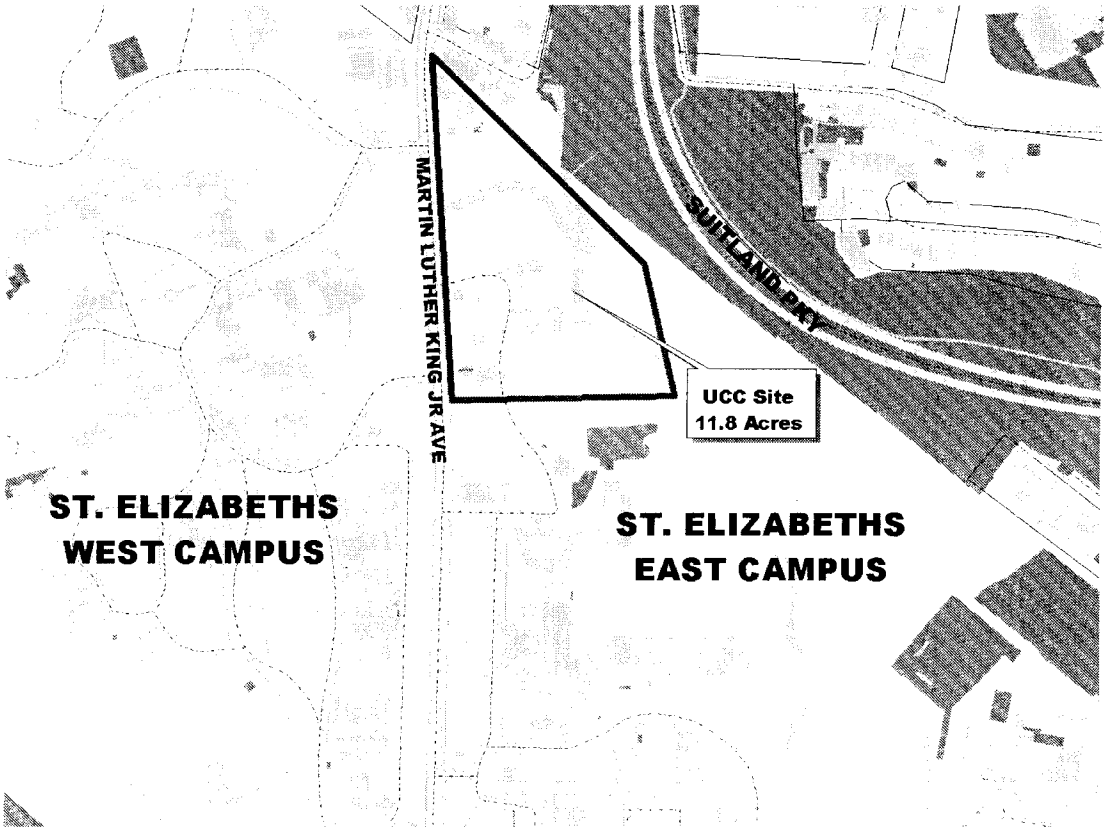
The Commission must review the Unified Communications Center and the current referral from the Zoning Commission under Section 5 of the National Capital Planning Act. However, NCPC staff has determined that the Section 5 review cannot be performed at this time because the "Proposed Historic Mitigation Program" portion of the Memorandum of Agreement (MOA), which mandates a Section 106 process, has not been satisfied. NCPC will move forward with a Section 5 review once that portion of the MOA has been completed.

DESCRIPTION OF THE PROPOSAL

The project is an undertaking of the District of Columbia Office of Chief Technology Officer (DCOCTO) and it entails the development of a 144,000-square-foot Unified Communications Center (UCC) which will serve as a consolidated communications system for several District operations. The center will handle the following functions:

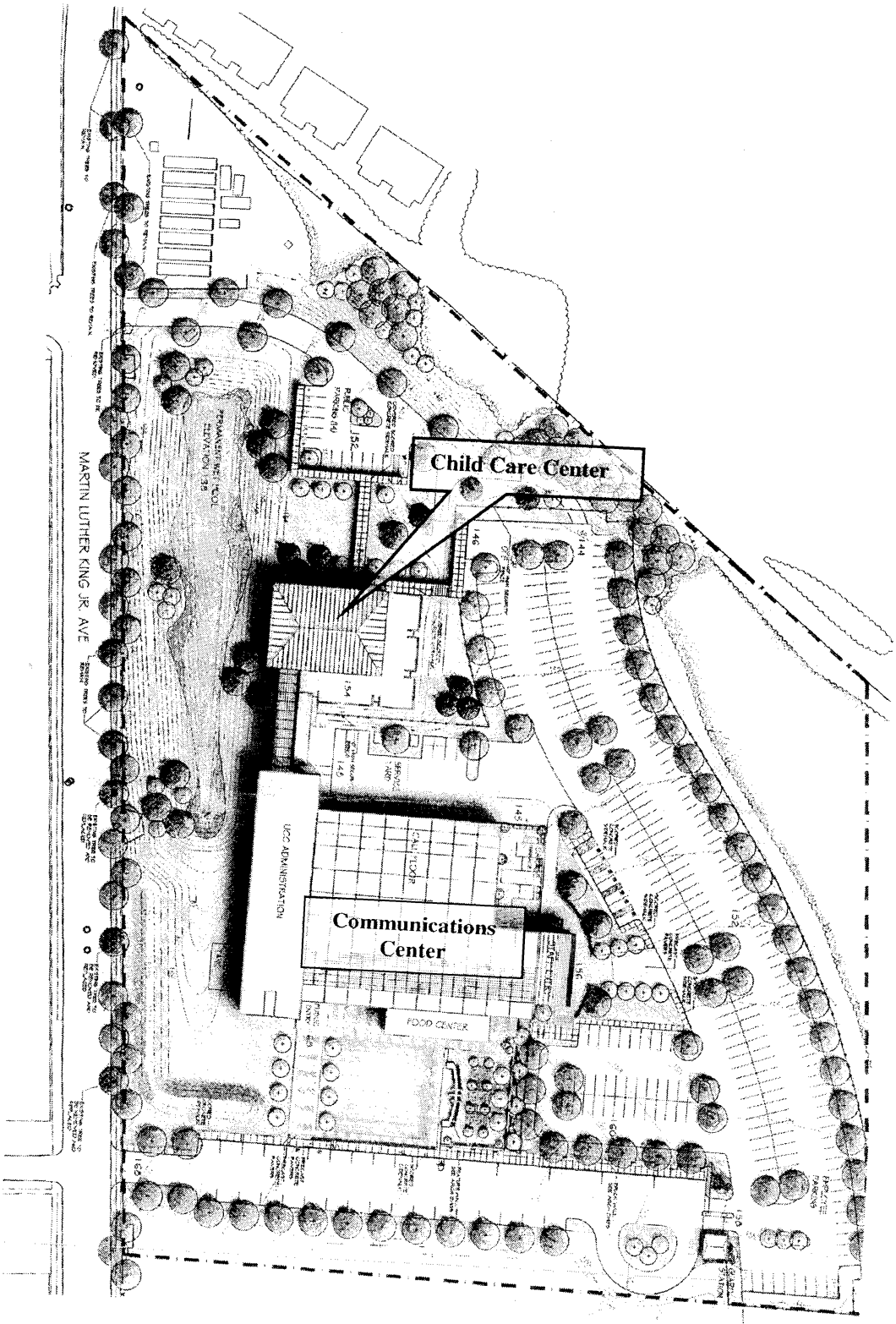
- Police and Fire 911 and 311 (public safety/non-emergency) Call Takers
- The Mayor's Call Center (727-1000)
- "Answers Please" Call Takers
- Traffic Management
- St. Elizabeths Call Center
- Mayor's Emergency Command Center
- Administrative functions for the above operations
- Administrative functions for the Emergency Management Agency

The site is located on the northern part of the East Campus of St. Elizabeths Hospital on approximately 11.8 acres that front on Martin Luther King, Jr. Avenue. The parcel is legally identified as Lot 1, Square S5868. The site is surrounded by Suitland Parkway and the St. Elizabeths East and West Campuses, which include 336 total acres of land. The following map depicts the site's general location.



The UCC will house a call-taking dispatch area that includes 139 communications consoles, a dining area, a childcare center, conference rooms, a media press room, administrative offices, and staff training spaces. The UCC will have 72 hours of emergency self-sustaining capability.

Located on a historic campus, the UCC's design approach appears to promote the technology of its functions. There are two separate structures that will comprise the overall development: a three-story call center and a smaller, two-story childcare center that is located to the north of the call center. The two structures will be constructed using brick masonry, but the call center will additionally utilize cast stone and glass materials. A brick colonnade will provide secure pedestrian movement between the two buildings. The three-story call center will stand no higher than 57 feet. The following site plan illustrates the design concept:



Parking facilities are mainly concentrated on the eastern portion of the site, with smaller parking areas located to the north and the south of the UCC complex. There are 282 parking stalls (240 secured employee + 42 non-secured public) that are accessible by the northern and southern ingress/egress points off of Martin Luther King Jr. Avenue. DCOCTO has stated that the overlapping of the day and late afternoon shifts, which include 252 and 60 employees respectively, necessitated this number of stalls. The

eastern lot connects directly to the main staff entrance via a paved walkway, while the southern and northern lots provide access to the public and childcare facilities respectively.

DCOCTO has also submitted a detailed landscaping plan and planting schedule for the UCC project. The plan shows that extensive landscaping needs to be completed in the interior and around the perimeter of the site to effectively screen the facility from Martin Luther King Jr. Avenue and Suitland Parkway. Along the portions of the development adjacent to Martin Luther King Jr. Avenue, as well as the areas visible from Suitland Parkway, the landscape plan depicts numerous evergreen and canopy trees to soften the aesthetic appearance of the facility from these roadways. Furthermore, the plan illustrates numerous trees and groundcover in the interior of the site that will improve the visual integrity of the asphalt parking lot and to enhance the architecture of the UCC facility.

In addition to this landscaping effort, the DCOCTO has consulted with the National Park Service (NPS) on a reforestation area to the northeast of the subject property. This reforestation will occur in an area featuring an existing swale and gravel channel that will be disturbed by the UCC construction. Furthermore, the Zoning Commission has required additional landscaping within the Suitland Parkway right-of-way, further screening the UCC from that roadway. These additional plantings in public space will be implemented in coordination with the NPS.

As a security measure, the Unified Communications Center is sited with a 100-foot standoff distance from Martin Luther King Jr. Avenue. A wet pool/retention pond and a landscaped berm lie within that setback, providing difficult terrain for a vehicle to traverse. Additional security measures include: a ten-foot-high security fence, enclosing the Communications Center facility but not the Child Development Center; and, on the eastern portion of the site, a guard station for screening vehicles that enter the employee parking area.

The UCC will have an approximate total staff of 349 employees working in three different shifts. The following table illustrates the total number and function of employees for each shift:

Shift	Administrative/Training Staff	Support/Day Care Staff	Dispatch/Call Taking Staff	Total
First/Day	88	32	132	252
Second	7	12	41	60
Third	5	5	27	37
TOTAL				**349**

Summary:

- The first/day shift will generate 252 employees. Administrative officers and Child Development Center employees will be on duty during this shift.
- The second shift will include 60 employees.
- The third shift will be staffed with 37 employees.

On Site Telecommunication Facilities

Due to the function of the Unified Communication Center, there will be telecommunications facilities throughout the site. According to the Telecommunications Plan submitted by DCOCTO, there are a total of 69 antenna structures, 40 of which are live telecommunications facilities. The balance of the structures include "dummy" antennas that will appear to be live antennas, but will in fact be inoperable and acting

as "place holders" to provide architectural continuity should additional live, operable antennas become needed on the UCC facility. The location and description of these facilities can be described as follows:

- Four antennas will be located on the northeastern portion of the site, at the edge of the paved parking lot: two ground plane and two whip antennas, mounted on separate 30-foot-high poles.

- Four antennas will be mounted to the Child Development Center at the northern part of the facility. These will consist of two ground plane and two whip antennas, four feet above the parapet of the Child Development Center.

- 29 separate antennas will be located on the main Communications Center facility, with the bulk of them concentrated on the western portion of the structure. The antennas in this location include two satellite dishes, 12 feet in diameter, as well as a host of various whip antennas, all measuring no more than 5 inches in diameter and rising to 11 feet above the roof parapet.

- In addition to the 29 above-mentioned antennas, the project includes 22 "dummy" antennas, which are fiberglass poles measuring 3 inches in diameter. These dummy antennas will be located among the antennas on the UCC structure itself.

Zoning Background and Analysis

Historically, the St. Elizabeths Campus has been under the ownership of the federal government and operated by the Department of Health and Human Services. The East campus was transferred to the District of Columbia government on October 1, 1987. Because the property was originally under federal authority, there is no zoning designation assigned to it, as federal properties are exempt from zoning regulations under §106.4 of the District of Columbia Municipal Regulations. However, §106.5(b) establishes that District-owned properties are subject to zoning requirements, particularly in the case of redevelopment projects such as this.

Under the current proposal, the UCC site will be zoned to a C-2-B/PUD (commercial with the Planned Unit Development overlay) designation. This zoning promotes mixed use, medium intensity development with an overall maximum Floor-to-Area Ratio (FAR) of 3.5. Although this project falls within the requirements of the C-2-B matter of right regulations, the PUD does allow flexibility in overall design through Zoning Commission review and approval. The following table presents the zoning summary:

	C-2-B	**C-2-B/PUD**	**Proposed**
Minimum Area	n/a	15,000 sf	513,755 sf
Maximum FAR (Non-Residential Uses)	1.5	2.0	0.28
FAR (Residential Uses)	2.0	2.5	0.00
Total FAR	3.5	4.5	.28
Height	65 feet	90 feet	65 feet
Principle Permitted Uses	office, retail, service and food business, residential, entertainment, assembly hall, universities, daycare, telephone exchange, antennas, hospitals		Office w/accessory food court and daycare

Staff understands that the District of Columbia Office of Planning is developing a framework plan for the entire St. Elizabeths East Campus in conjunction with the General Services Administration. This framework plan will act as a master plan, guiding future development and zoning decisions on the site. The recommendations of this Plan have not been formulated at this time. However, the UCC zoning action is moving forward without considering how this particular zoning action will affect other viable land uses on the site, or how the UCC will interact with the future vision of the East Campus.

Parking/Transportation Issues

As mentioned above, the UCC is providing 240 employee parking spaces to serve an employee population of 349. Staff finds that the UCC project provides an excessive amount of parking given its total number of employees and its accessibility to transit. The Anacostia and Congress Heights Metro Green Line stations are within proximity of the development and nine Metro bus routes (the A2, A4, A5, A6, A7, A8, A42, A46, and A48 routes) serve the St. Elizabeths campus directly. The proposed abundance of parking leads to unnecessary site disturbance and added impervious surface in the development of the project. In addition, providing excessive parking encourages employees to commute to work in single occupant vehicles, contributing regional traffic congestion and degraded air quality.

As a standard of analysis, the guidelines developed by NCPC for the planning of federal installations can be used to demonstrate the optimum parking for the UCC project. The UCC is located within the District of Columbia but outside of the Central Employment Area. The current federal parking ratio for that area is 1:3, or 1 parking space for every 3 employees. Visitor spaces and spaces for the disabled are allowed in addition to that number. In reviewing this project using federal guidelines, it is necessary to consider the largest shift of employees and the overlap between shifts. In this instance, there will be a total of 252 employees on the larger first shift that overlaps with the second shift of 60. The optimum number of spaces based on the federal ratio is 94. That figure is determined as follows:

- 252 employees on the first shift
- 30 employees on the second shift (1/2 of the 60 total second shift to allow for overlap)
- 282 total employees at any one time

- 282 employees divided by 3 equals 94 parking spaces (ratio of 1:3).

Under the District of Columbia Zoning Code, the minimum amount of parking required for this development is 77 spaces. The proposed 282 (240 secured employee + 42 non-secured public) is a 266 percent increase over the minimum standard established by the zoning regulations. The PUD submission materials provide no justification for this amount of parking and no transportation management plan to encourage UCC employees and visitors to utilize alternate forms of transit in their commute to the Center.

Historic Preservation Issues

St. Elizabeths Hospital was listed in the National Register of Historic Places in 1979 and was designated a National Historic Landmark in 1990. The National Trust for Historic Places has recently placed the complex on its list of America's 11 Most Endangered Historic Places.

Founded in 1852, St. Elizabeths Hospital was the nation's first large-scale, government-run mental institution. It was designed to care for the nation's military personnel and District of Columbia residents. Dorothea Dix, the famous nineteenth-century advocate for the mentally ill, developed her treatment methodology and philosophy at this facility. The hospital was also used for convalescing soldiers during and after the Civil War.

When the East Campus of St. Elizabeths was transferred from the Department of Health and Human Services (HHS) to the District of Columbia (DC) in 1989, HHS, DC, the District of Columbia Historic Preservation Office (DCSHPO), and the Advisory Council on Historic Preservation (ACHP) signed a Memorandum of Agreement (MOA). The MOA recognized that the transfer of St. Elizabeths would have an effect on the historic hospital and outlined future steps for preserving, rehabilitating and retaining its contributing historic, archaeological and landscape resources.

Within close proximity to the proposed UCC are six structures that contribute to the character of the National Historic Landmark. Two of these, the Dry Barn and the Horse Barn, were specifically identified in the MOA. The other affected historic resources are four mid-19th-century cottages that are associated with the "Shepherd's Farm," the original name and use of the East Campus. The farm provided both therapeutic activity and food for inmates. This portion of the campus, where the UCC is proposed, is a rural cultural landscape, the last remnant of the agricultural landscape that characterized much of the hospital property in the late nineteenth century.

The MOA requires the submission of plans to the DCSHPO and ACHP for review and approval prior to implementation. Pursuant to the 1989 MOA, the DC SHPO determined that the proposed UCC project would have an adverse effect on the historic properties and agricultural setting at St. Elizabeths. Through the Section 106 consultation process, the applicant has proposed mitigation that would include the stabilization of the Horse Barn and Dry Barn as part of the UCC project. Two of the four cottages would be demolished, and the two with the most physical and architectural integrity would be moved closer to the two barns, thereby ensuring that part of the ensemble of agricultural buildings remain. Since these actions would have an adverse effect and were not foreseen when the original MOA was drafted, a separate MOA with mitigation measures for the adverse effect is being developed by the District government, the DC SHPO, and the ACHP. This agreement has not been finalized.

The applicant has proffered a historic preservation amenity package as part of the zoning PUD case. This would constitute the mitigation for the demolition of two of the four cottages and the change to the character of the agricultural setting. The package includes the following:

(1) The financial contribution of $500,000 previously made by the Applicant to the Office of Planning to help fund the forthcoming framework plan for the historic St. Elizabeths Hospital campus; and

(2) An additional financial contribution of $1.2 million to be made to a historic preservation mitigation fund. This fund will be used to stabilize the Dry Barn and Horse Barn and to relocate and renovate the two onsite cottages. The $1.2 million will be allocated and spent in accordance with the design and in order of priority approved by the D.C. State Historic Preservation Officer.

DISTRICT OF COLUMBIA OFFICE OF PLANNING REPORT

In its report to the Zoning Commission dated April 3, 2002, the District of Columbia Office of Planning (DCOP) recommended approval of the consolidated PUD and map amendment to C-2-B. In a follow-up report to the Zoning Commission dated June 28, 2002, DCOP recommended approval of the historic amenity package and revised antenna plan. Also within this report, DCOP reiterated to the DCOCTO its requirement to receive Section 106 approval in accordance with the 1987 Memorandum of Agreement, and stated that the historic amenity package proffered to the Zoning Commission through the PUD process is not a substitute for the 106 approval.

PUBLIC PARTICIPATION

The District of Columbia Zoning Commission held a public hearing on this zoning action on Thursday, April 18th to receive public input regarding this project. The local Advisory Neighborhood Commission

8A (ANC 8A) submitted a letter to the Zoning Commission dated April 9, 2002 opposing the construction of the UCC because of various issues related to the site and the campus as a whole. However, in a letter dated June 6, 2002 the Chair of ANC 8A stated that the concerns of the Ward 8 community have been adequately addressed by DCOCTO and that a Memorandum of Understanding (MOU) between ANC 8A, ANC 8C and DCOCTO has been drafted and will be executed. This MOU establishes DCOCTO's commitment to employing Ward 8 residents through internship and apprenticeship programs, contracting of local and minority owned businesses, and DCOCTO's commitment to containing the potentially hazardous fly ash embedded in the site. Other letters of support were received from:

- Sandra Allen, Councilwoman for Ward 8
- The Anacostia Economic Development Corporation
- Dr. Art Bridges, Principal of Ballou Senior High School
- Covenant House Washington Youth Center

FEDERAL INTEREST EVALUATION

The identified federal interests relevant to this project include the historic St. Elizabeths Campus, a designated National Historic Landmark, and Suitland Parkway, a federal facility under the jurisdiction of the National Park Service and a designated Special Street under the Comprehensive Plan. Of additional federal interest is the Unified Communications Center's visual impact on the South Capitol Street gateway.

As stated in the Historic Preservation section of this report, there are significant historic issues, which constitute a federal interest in this project. Specifically, there are six historic resources within close proximity to the proposed UCC. Two of these resources, the Dry Barn and the Horse Barn, were specifically identified as contributing elements in the MOA. The other impacted historic resources are four cottages dating from the 1880s and associated with "Shepard's Farm," which occupied a large portion of the East Campus and, as a working farm, provided therapeutic activity for inmates and produced farm goods to increase the hospital's self-sufficiency. This portion of the campus near the proposed UCC is the site's last remnant of the later 19th-century agricultural landscape. The applicant has made progress in protecting these historic amenities by proffering the above-described historic preservation package. However, this does not substitute for the Section 106 approval, which is a legal requirement established by the federal transfer of land to the District to protect the historic nature of the St. Elizabeths Campus. It is imperative that the DCOCTO complete this process before construction of the UCC begins. NCPC staff has communicated to DCOCTO, both verbally and in writing, that the National Capital Planning Commission will not perform a Section 5 Review until the Section 106 and the terms of the MOA have been satisfied.

The District of Columbia Office of Planning in conjunction with GSA is in the process of developing a framework plan for the development of the entire St. Elizabeths campus. At this time, DCOP is completing consultant selection process to conduct the framework study. As noted, the District of Columbia is in possession of the eastern campus. It is staff's view that, absent a coherent vision for the future development of the St. Elizabeths campus, the proposed UCC project is being developed in a vacuum. The UCC project will have substantial impacts on future surrounding uses on both sides of the campus. As the western campus is still in the possession of the federal government, it is staff's opinion that the Zoning Commission and the Office of Planning need to work with the General Services Administration in completing the framework plan for the St. Elizabeths campus taking into account the impacts the Unified Communications Center may have on the potential, viable land uses for the future development of the entire campus. As stated earlier, the proposed development exceeds the 1:3 parking ratio and may set a precedent in future developments on the eastern campus. This framework plan needs to specifically address transportation issues on the St. Elizabeth campus and should provide recommendations on how future projects, such as the UCC, can reduce the number of single-occupancy vehicles commuting to the site and in turn promote alternative forms of transit.

In regards to Suitland Parkway, any visual impact from the UCC to this federal roadway should be mitigated to preserve the parkway-type setting. Staff concludes that the additional landscaping required by the District of Columbia Zoning Commission along the Parkway and in its right-of-way, as well as the landscaping proposed along the eastern edge of the UCC site, will soften the views of the Unified Communications Center from the parkway users. DCOCTO has submitted digital renderings of these views with the additional landscaping and these renderings support this assessment.

The final federal interest to be evaluated is the visual impact this development will have on the monumental core and, specifically, the South Capitol Street gateway. Given the site's elevated location south of the Capitol, as well as its proximity to the South Capitol Street corridor, the UCC will be visible within that important ceremonial viewshed. The numerous telecommunications facilities located on and around the site will be partially hidden behind the UCC's parapet and will, therefore, be minimally visible. The short height (4') of the antennas located on the Child Development Center and the slim diameter (no more than 4") of the live and "dummy" antennas on the UCC roof will make the antennas difficult to detect from the gateway's main vista. Additionally, staff concludes that the building's architectural design will not present a visual intrusion in the South Capitol gateway corridor.

CONFORMANCE WITH THE COMPREHENSIVE PLAN

The facility would be located on the St. Elizabeths Campus, which is a historic property but in need of restoration in many respects. An applicable policy in the Preservation and Historic Features Element of the Comprehensive Plan specifies:

> Every effort should be made to provide for the continued, appropriate use of all Historic Properties. If the original use or reasonable intensification of the original use is no longer feasible, appropriate adaptive uses consistent with applicable land use regulation should be encouraged.

Suitland Parkway, which runs parallel to a large portion of the historic campus, is a designated Special Street in the Element. An applicable policy states:

> Special Streets and Places should be maintained and enhanced in a manner that promotes their roles as major features that help establish the images and the symbols of the National Capital in the minds of its residents and visitors...

The proposed facility would be significantly visible from the Parkway, but with appropriate landscaping, would not detract from the unique qualities of this Special Street.

The proposed facility and the proposed zoning change to accommodate it are not inconsistent with applicable policies in the Comprehensive Plan.