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ADMITTED IN NEW YORK
AND NEW JERSEY ONLY

August 29, 2003

RECEIVED
D.C. OFFICE OF ZONING
2003 AUG 29 PM 1:31

BY HAND DELIVERY

Mr. Alberto Bastida
Secretary to the Zoning Commission
Office of Zoning
441 Fourth Street, N.W., Suite 210-South
Washington, D.C. 20001

Re: St. Coletta of Greater Washington, Inc.; Supplemental Filing for Zoning Commission Case 03-21

Dear Mr. Bastida:

On the behalf of St. Coletta of Greater Washington, enclosed please find one (1) original and twenty (20) copies of the supplemental filing of the Applicant for Zoning Commission Case Number 03-21 for the property located in Square E-1112, Lot 800. Also included are two full size sets of plans.

Should you have any questions, please do not hesitate to contact us.

Thank you very much.

Sincerely yours,

Jacques B. DePuy

Stephanie A. Baldwin

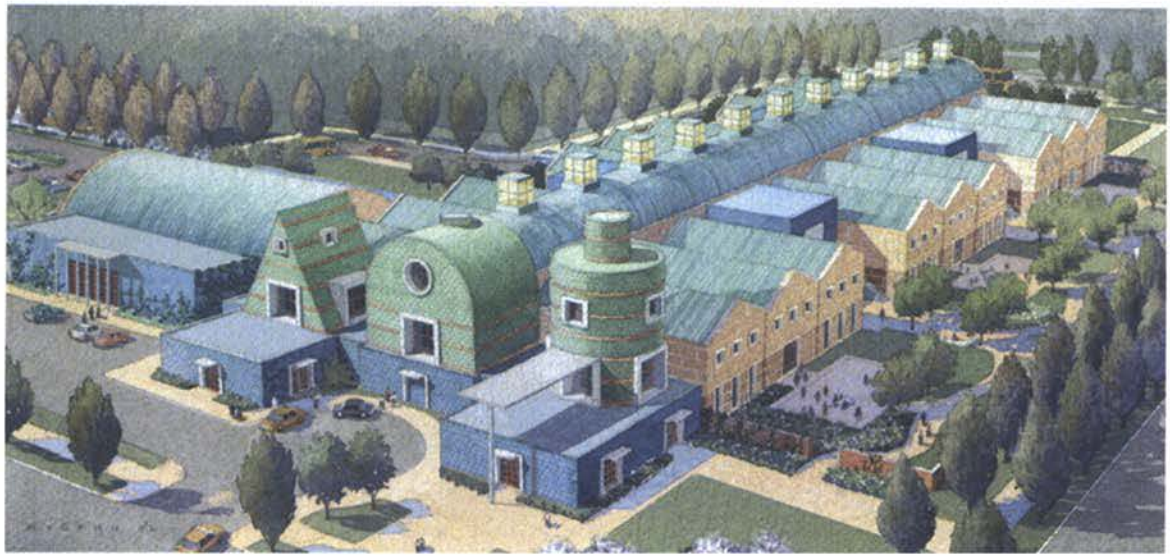
213456
Enclosures

ZONING COMMISSION
District of Columbia
Case 03-21
Exhibit 12

ZONING COMMISSION
District of Columbia
CASE NO.03-21
EXHIBIT NO.12

cc Ms. Sharon Raimo (w/encl.)
Ms. Kathy Padian (w/encl.)
Mr. Michael Catlett (w/encl.)
Mr. John Diebboll (w/encl.)
Mr. O.R. George (w/encl.)
Ms. Susan Goltsman (w/encl.)
Mr. Jude McKenna (w/encl.)
Office of Planning (Attn: Ms. Maxine Brown-Roberts) (w/encl.)
ANC 6-B (Attn: Mr. Ken Jarboe) (w/encl.)

ST. COLETTA OF GREATER WASHINGTON



PRE-HEARING SUBMISSION

DISTRICT OF COLUMBIA
ZONING COMMISSION CASE NO. 03-21

RECEIVED
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2003 AUG 29 PM 1:32

St. Coletta of Greater Washington, Inc.
207 South Peyton Street
Alexandria, VA 22314

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ST. COLETTA OF GREATER WASHINGTON

PLANNED UNIT DEVELOPMENT AND RELATED MAP AMENDMENT

PROJECT TEAM

PROPERTY OWNER	District of Columbia under the terms of a Transfer of Jurisdiction dated October 25, 2002 from the United States through the General Services Administration
LESSEE/USER	St. Coletta of Greater Washington, Inc.
ARCHITECT & PLANNER	Michael Graves & Associates
CIVIL ENGINEER	A. Morton Thomas and Associates
LANDSCAPE ARCHITECT	Moore Iacofano Goltsman, Inc.
SURVEYOR	A. Morton Thomas and Associates
TRANSPORTATION CONSULTANT	O.R. George & Associates, Inc.
PROJECT MANAGEMENT	Advanced Project Management, Inc.
LAND USE COUNSEL	Greenstein DeLorme & Luchs, P.C.

PREFACE

On July 3, 2003, St. Coletta of Greater Washington, Inc. (the "Applicant") filed for approval with the Zoning Commission, Zoning Applications for a Consolidated Planned Unit Development and an Amendment to the Zoning Map for property which is bounded by 19th Street, S.E. on the west, Independence Avenue, S.E. on the north and the balance of Reservation 13 to the south and west (Lot 800 in Square E-1112), in southeast Washington, D.C. (Ward 6).

The Application was submitted to the Zoning Commission of the District of Columbia in conformity with Chapter 24 of the Zoning Regulations of the District of Columbia. This pre-hearing statement is submitted by the Applicant in support of its original Application.

Previously submitted in support of this Application were (a) a completed application form; (b) a notice of intent to file for approval of the PUD and the zoning map amendment; (c) architectural plans and drawings; (d) a portion of the District of Columbia Zoning Map showing the subject site; (e) a description of the project's compliance with the PUD evaluation standards; and (f) a description of the project's consistency with various elements of the Comprehensive Plan and the Master Plan for Reservation 13. The Applicant hereby incorporates into this pre-hearing statement, by reference, the previously filed application, statement, and exhibits as hereby modified. This pre-hearing statement and the attached documents meet the supplemental filing requirements of Chapters 1 and 30 of the District of Columbia Zoning Regulations.

CERTIFCATE OF COMPLIANCE WITH SECTION 3013 OF THE ZONING REGULATIONS

Greenstein DeLorme & Luchs, P.C., land use counsel to the Applicant, hereby certifies that this pre-hearing statement, twenty (20) copies of which were filed with the Zoning Commission of August 29, 2003, complies with the supplemental filing requirements of Section 3013 of the Zoning Regulations and that the application will not be modified less than twenty (20) days prior to the public hearing.

Subsection		Page
3013.1(a)	Information requested by Commission	[N/A]
3013.1(b)	List of Witnesses	Page vi
3013.1(c)	Summary of Testimony of Applicant's Witnesses and Reports for the Record:	
	St. Coletta of Greater Washington, Inc.	Exhibit D
	Michael Graves & Associates	Exhibit D
	Moore Iacofano Goltsman, Inc.	Exhibit D
	A. Morton Thomas and Associates	Exhibit D
	O.R. George & Associates, Inc.	Exhibit D
3013.1(d)	Additional Information	Pre-hearing Statement
3013.1(e)	Reduced Plans	Exhibit A
3013.1(f)	List of Publicly Available Maps, Plans, and Other Documents	Exhibit C
3013.1(g)	Estimated Time Required for Presentation of Applicant's Case	1.5 hours
3013.2	Two Sets of Full-Size Plans	Submitted herewith
3013.4	Memorandum of Understanding for Amenities	None
3013.6(a)	List of Names and Addresses of All Property Owners within 200 Feet of the Subject Property	Exhibit E

Respectfully Submitted,

GREENSTEIN DELORME & LUCHS, P.C.

By: _____
Jacques B. DePuy

By: _____
Lyle M. Blanchard

By: _____
Stephanie A. Baldwin

LIST OF WITNESSES AND ESTIMATE OF TIME REQUIRED TO PRESENT CASE

1. Ms. Sharon Raimo, Executive Director, or other representative of St. Coletta of Greater Washington, Inc.

2. Michael Graves, FAIA, John Diebboll, AIA, or other representative of Michael Graves & Associates

3. Susan Goltsman, FASLA, or other representative of Moore Iacofano Goltsman, Inc.

4. Jude McKenna or other representative of A. Morton Thomas and Associates

5. Osborne R. George, P.E., or other representative of O.R. George & Associates, Inc.

Estimated Time Required to Present Case: 1.5 hours

LIST OF EXHIBITS

Description	Exhibit
Project Plans	Exhibit A
Traffic Report	Exhibit B
Publicly Available Maps	Exhibit C
Outlines of Testimony	Exhibit D
Property Owners within 200 Feet	Exhibit E
Zoning Tabulation	Exhibit F

PRE-HEARING STATEMENT IN SUPPORT OF APPLICATIONS FOR A CONSOLIDATED PLANNED UNIT DEVELOPMENT AND ZONING MAP AMENDMENT

A. PROJECT SUMMARY

This pre-hearing statement and the attached documents are submitted in support of, and set forth the rationale to justify the approval of, the applications of St. Coletta of Greater Washington, Inc. ("the Applicant" or "St. Coletta") to the Zoning Commission of the District of Columbia. These applications seek approval of a consolidated Planned Unit Development ("PUD") and a zoning map amendment for a site ("the PUD site") containing 227,276 square feet located at 19th Street, S.E. and Independence Avenue, S.E. in Reservation 13, also known as Lot 800 in Square E-1112, in Southeast Washington, D.C. (Ward 6). The site is located southwest of the D.C. Armory and R.F.K. Memorial Stadium, east of the Capitol East/Capitol Hill neighborhood, and north of Congressional Cemetery. The project site is bounded by 19th Street, S.E. on the west, Independence Avenue, S.E on the north, and the balance of Reservation 13 to the east and south. As of the submission of this pre-hearing statement, the applications have been clarified to exclude from the PUD site, the area south of the planned extension of Burke Street, S.E. through Reservation 13.

As a part of land which is currently a federal reservation, the site is unzoned. The Applicant proposes that the site be zoned SP-1, which is a medium density zone.

The PUD site consists of vacant land in the shape of an inverted "L". Historically, the site was the location of D.C.'s jail which dated from the 1870's. The old jail was demolished after the construction of a new jail in 1976. The Stadium/Armory Metrorail Station lies beneath the property on its western edge along 19th Street, S.E.

Currently, Reservation 13 is a campus setting with large buildings serving the D.C. Department of Corrections and the D.C. Department of Health. The buildings which once served D.C. General Hospital and that stand closest to the PUD site are mostly vacant, nearing the end of their lifecycle and in need of significant repair or replacement.

Across 19th Street, to the west, is the Hill East neighborhood, a residential district consisting mostly of row houses. To the north, across Independence Avenue, S.E., are the Armory and R.F.K. Memorial Stadium.

St. Coletta proposes to construct a school for students with cognitive disabilities on the PUD site. The design, scale and bulk of the building is consistent with the residential scale and character of the neighborhood. The school will support classrooms, kitchens, speech and occupational therapy rooms, group rooms, locker rooms, an infirmary, a hydrotherapy room, administrative offices, and conference rooms. In addition, a gymnasium, community meeting and open space will be provided, all of which will be available to the public after school hours and on the weekends. The new facility will serve children and young adults between the ages of

four and twenty-two. The Lease Agreement provides a "First Opportunity Right" to students who reside in the District of Columbia to occupy one hundred percent of all available school slots.

The exterior design of the school building creates an identity for St. Coletta, while responding to its surrounding context. The building appears along 19th Street, S.E. as a series of prototypical 'houses' which relate directly to the homes across the street. Within the main section of the building is a three-story sky lit atrium hallway running down its center which arranges five classroom 'homes' on either side like an interior street or a "village green." From within the structure, students will be encouraged to see the school as a collection of different buildings that are nevertheless part of the larger community.

From its current location in Alexandria, Virginia, St. Coletta has served families of youths with mental retardation, autism or multiple disabilities in the metropolitan Washington D.C. area for more than 40 years. In the last 10 years, St. Coletta's services have grown to provide educational, therapeutic and vocational training in addition to a day support programs to 180 students and adults. In the spring of 2000, St. Coletta reached its maximum capacity at its current location. With sixty-seven percent (67%) of St. Coletta's current school enrollment and fifty percent (50%) of the clients in the adult day support program coming from the District of Columbia, and a significant number of District residents on the St. Coletta waiting list, the choice to expand its programs into the District was logical. Thus, a cornerstone of the planning for this new facility has been the consideration of the needs of children and young adults in the District of Columbia.

Currently, more than two thousand schoolchildren with special education needs are bused to private schools around the D.C. metropolitan area, with some enduring a trip more than an hour ride from their home. Other children are in residential placements, some as far away as Wyoming. District of Columbia Public Schools recognizes the urgent need to provide District schoolchildren with special education, but undertaking the remodeling, renovating and building of public facilities to accommodate these students will take years. As such, the District has encouraged preferred private schools to relocate and expand in the District. At St. Coletta's new facility in the District, many disabled residents of the District of Columbia will receive every opportunity to increase their independence.

Mayor Anthony Williams has acknowledged that the construction of St. Coletta's new facility would serve a population of the District which is currently under served. As stated above, sixty-seven (67%) of St. Coletta's current enrollment at the Alexandria, Virginia facility are from the District. The District is also interested in establishing a special education teacher and paraprofessional training program with St. Coletta. Through an intended public/private partnership with D.C. Public Schools, St. Coletta plans to train D.C. Public School teachers, therapists and paraprofessionals in assisted technology, alternative student assessment, behavior management and Individualized Educational Plan development. Moreover, the redevelopment plan of Reservation 13 is considered by Mayor Williams to be crucial to the city's goals of integrating the Reservation's land resources into the city and the Hill East neighborhood with a blend of desired public uses, homes and commercial activity in order to build a vibrant riverfront neighborhood.

B. ST. COLETTA

The St. Coletta school was founded in 1959 in Arlington, Virginia. St. Coletta of Greater Washington, Inc. is a nonprofit entity organized in 1974. It is to be the developer and user of the PUD site. It is the parent corporation to the St. Coletta School and the St. Coletta Day Support Program. St. Coletta students come from the entire metropolitan Washington, D.C. area. The majority of students are from the District, with smaller percentages from Prince George's, Calvert, Charles and Montgomery Counties in Maryland and Alexandria, Arlington, and Fairfax and Loudon Counties in Virginia. Students range in age from four through twenty-two.

C. PROJECT SITE

The property which is the subject of this application is located at the northwest corner of Reservation 13 in Ward 6. The property is sited on the south side of Independence Avenue, S.E., at the intersection with 19th Street, S.E. The site extends south within Reservation 13 approximately 450 feet and east approximately 620 feet from the intersection of Independence Avenue and 19th Street, S.E. (See Exhibit "A").

All of Reservation 13, which is federally owned land, is unzoned. The section of the Reservation on which the site lies is also currently unimproved. The Stadium/Armory Metrorail Station lies beneath the property on its western edge along 19th Street, S.E.

Under the terms of the Lease Agreement between the District of Columbia and St. Coletta, St. Coletta has leased two parcels of land comprising 5.217 acres. One lot is designated for the construction of the school. This lot contains 3.8 acres. However, due to an easement for the benefit of Washington Metropolitan Area Transit Authority ("WMATA"), the area of the lot is effectively reduced to 3.24 acres. The other parcel comprises 1.417 acres of land. This second parcel will revert to the District when 20th Street, S.E. is extended through the site, as required by the Reservation 13 Master Plan. Currently, a parking lot exists on that parcel, and until the extension of 20th Street, the parking lot will be used by St. Coletta.

It should be noted that several site and landscaping plans included with the original PUD application that depicted an area south of the Burke Street extension have been deleted from the Pre-Hearing Statement and exhibits. This area is not subject to the Lease Agreement and is therefore not a part of this PUD proposal.

D. PUD SITE VICINITY

The Hill East neighborhood to the west of Reservation 13 consists mostly of rowhouses with front-yard setbacks and alleyways in the rear, organized in the gridded street plan of the historic L'Enfant plan. To the north of the proposed school site are the D.C. Armory and R.F.K. Memorial Stadium, both imposing structures surrounded by large parking lots. Also in the

vicinity of the site are a D.C. Water and Sewer Authority pump station and swirl concentrator and the historic Congressional Cemetery.

Currently, Public Reservation 13 consists of large opens spaces, the former D.C. General Hospital and D.C. Correctional Facility buildings. Reservation 13 was set aside as public land as early as 1791 in the original L'Enfant Plan. Since that time, the area has appeared on maps and plans as isolated from the adjacent neighborhood and as a barrier to the Anacostia River waterfront. The streets surrounding Reservation 13 terminate at the site's edges, abruptly halting the orthogonal street plan of the surrounding area.

The Master Plan for Reservation 13 envisions the Reservation as an attractive edge to the Hill East neighborhood that will link it to the waterfront by way of new public roads and provide both District-wide and neighborhood needs. Health and science uses are planned to be the predominant use, blended with recreation, education, civic uses, and housing. There are plans for a village square, a neighborhood park, and tree-lined streets connecting through the site to a new waterfront park on the Anacostia River.

E. COMMUNITY PARTICIPATION

Reaching capacity at its present location in Alexandria, Virginia in the Spring of 2000, and recognizing the desperate need for services in the District of Columbia for students with cognitive disabilities, St. Coletta's began investigating possible locations in the District with the hope of building an additional facility in D.C. Meetings with District leaders, including representatives of District of Columbia Public School, led to the joint recognition of the need for an appropriate site. With District plans to redevelop Reservation 13, St. Coletta's became a part of the planning process of the 67 acre site.

The creation of a Draft Master Plan for Reservation 13 was the result of a community effort. The planning process was a collaborative effort that included input from over 15 governmental agencies and over 300 people from the community. The process included three public meetings, an intensive 3-day planning workshop and a weekend review session. St. Coletta actively participated in this broad-based planning effort. Specifically, the school presented its plans for development to the community and participated in a series of "stakeholders" meetings held at the Office of Planning in which community members also participated.

In addition, St. Coletta has presented its specific proposal for a PUD and map amendment to neighbors and community organizations. It has appeared before Advisory Neighborhood Commission 6-B on four (4) different occasions, most recently on June 3, 2003, and will meet again with the ANC on October 14, 2003. St Coletta also presented its PUD proposal to immediate neighbors, including those living on 19th Street, S.E., on May 5, 2003 and June 18, 2003. St. Coletta's lease of the PUD site with the D.C. Government was also the subject of public hearings by the Council of the District of Columbia on May 14, 2003.

The planning process for Reservation 13 has been community based, recognizing broad based citizen concerns and desires for the site. Plans for the Reservation 13 site include the development of a blend of public uses and residential development to accommodate both public services for the city and neighborhood needs.

F. PROJECT DESCRIPTION

The PUD project consists of a new school that will offer special education services to students with cognitive disabilities. It will support 200-250 students and a day support/supportive employment program for up to 25 adults. There will be approximately 205 employees, resulting in an approximate student to teacher ratio of 2 to 1. The total square footage of the building will be approximately 100,612 square feet with approximately 63,928 square feet on the first floor and approximately 36,684 square feet on the second floor. As a multifunctional building, the facility will include classrooms, kitchens, speech and occupational therapy rooms, group rooms, a gymnasium, locker rooms, an infirmary, a hydrotherapy room, administrative offices, conference rooms and a sky lit atrium hallway in the center of the main building (See Exhibit "A"). The school day for students begins at 8:00 a.m. and ends at 3:00 p.m., Monday through Friday, while hours of operation of the school for faculty and staff will be from 7:00 a.m. to 5:00 p.m., Monday through Friday, with occasional school activities held on weekends. St. Coletta's plans to share a portion of the building with the neighborhood, allowing use of the community room, the atrium hallway, a catering kitchen, the gymnasium (with a full size basketball court) after school hours and on the weekends. St. Coletta hopes to be able to use the area south of the school site for temporary play space, including both turf and hardscape areas, which it would also share with the neighborhood. The play space will be located so that parts can be preserved at the time of the Burke Street extension. Anything located within the Burke Street extension will be considered temporary. (This area south of the school building is not included with the PUD because it was not leased to St. Coletta and, moreover, any use of this area would be temporary, pending the extension of Burke Street).

The design of the school building, as conceived by Michael Graves & Associates, includes three tile-clad tri-story pavilions along Independence Avenue, S.E. The scale and design of the pavilions help establish the school's identity along the urban avenue and in relation to the Armory building and R.F.K. Memorial Stadium nearby. They contain the primary public spaces, including the main entrance and a multi-purpose room to be shared with the community. Additionally along Independence Avenue, to the east of the pavilions, is the entry vestibule which leads to the gymnasium and community rooms. At the suggestion of the Office of Planning, elements of the gymnasium were brought forward so that the gymnasium structure and its main components align with the rest of the building, creating a continuous edge along Independence Avenue. Perpendicular to the pavilions along Independence Avenue is a central three-story sky lit atrium hallway which organizes the building along a single axis. Houses and studio spaces line the either side of the atrium. Houses are organized by age group and each contains several expandable classrooms, various offices, bathrooms, kitchens and elevators. The exterior design of the school building along 19th Street, S.E. maintains a human scale that matches the character of the residential neighborhood to the west of the PUD site, appearing as a row of prototypical 'houses.' The south end of the building, near the Metro station and along the

anticipated Burke Street, S.E. extension, has also been revised at the suggestion of the Office of Planning. The southern façade is now designed to mirror the main entry at the corner of 19th Street and Independence Avenue. The windows have also been expanded to mirror those on 19th Street. This modification has created a second inviting entry way.

St. Coletta's new D.C. school will also include park and outdoor classroom areas on both the east and west sides of the structure, the sky lit atrium hallway running down the center of the main building, a kitchen garden, temporary play space to the south of the school and a gymnasium located on the east side of the main structure, along Independence Avenue. A perimeter fence will be located on the west side of the building along 19th Street to provide privacy and security for the outdoor classrooms. The fence is set back from the sidewalk approximately fifteen feet and consists of alternate panels that correspond with the building design. Ornamental landscaping will be planted in between the sidewalk and the fence. At the suggestion of the Office of Planning, the design of the fence includes ornamental metal panels which can be seen though to maintain transparency. On the east side of the building along Independence Avenue, there is an existing parking lot for approximately 100 cars. The use of this parking lot is temporary and will be in use only until 20th Street, S.E. is extended into Reservation 13. In addition to the large parking lot, additional parking spaces will also be placed north of the gymnasium along Independence Avenue. Due to the fact that the grading of the larger parking lot does not allow an accessible entry for disabled visitors, the handicapped parking spaces for the facility will be included in this smaller parking area. Lanes for school bus drop-off and pick-up are planned for the east side of the main building, as well as a lane south of the large parking lot. The design of the structure and bus lanes takes into account and is compatible with plans to extend the existing pattern of local streets (i.e., Burke Street and 20th Street) to and through the Reservation 13 site.

Security at St. Coletta is a high priority since the school serves those who are more vulnerable than students in a traditional school setting. As with the St. Coletta facilities in Alexandria, the new D.C. school will have a security system requiring pass cards to enter the building as well as codes to move about once inside. This will allow the staff to more easily contain students in designated areas and to protect students from unauthorized visitors. St. Coletta has budgeted for around the clock surveillance in the form of personnel as well as technology.

Lighting for the parking lots will be provided in accordance with District of Columbia regulations. In addition, pathways and other outdoor areas will be lit for safety purposes. The fixtures selected will provide downcast lighting so to avoid overspill of lighting onto residential areas.

G. ESTIMATED WATER AND SEWER DEMAND

The average daily demand for both water and sanitary sewer flow to be generated by the proposed St. Coletta school is estimated to be approximately 30,000 gallons per day. There are several existing public water and sewer mains located along both Independence Avenue and 19th Street, S.E. Thus, water and sewer demand should be met without dramatic improvement to the

existing public facilities in the area of the PUD site. Final and formal determination of water and sewer availability will be made by the D.C. Water and Sewer Authority ("DC WASA") and will include tests to determine adequacy. All of the proposed connections for sanitary sewer will be coordinated with the DC WASA. Stormwater will be collected and managed by a stormwater management system.

The calculations of water and sanitary sewer flow are based on the average number of daily occupants of the building (a maximum of 500), allowing for the use of twice as much water as a regular large school because of the special needs of St. Coletta (50 gallons per day). Added to this total is a twenty percent contingency.

H. PROJECT BENEFITS

The proposed PUD clearly fulfills the desperate need in the District for services for youths and young adults with cognitive disabilities. The benefits and amenities of the St. Coletta school project are discussed below.

1. Urban design, architecture, landscaping, or creation or preservation of open spaces;

The school project will have significant urban design, landscaping, and open space features as discussed in section F above and as shown in Exhibit "A". The project has been designed by Michael Graves & Associates ("MGA"), an eminent architectural firm with a worldwide reputation. Other projects by MGA include the International Finance Corporation headquarters, the Prettyman U.S. Courthouse, and the Washington Monument Restoration. MGA has endeavored to create an architectural character of the new St. Coletta school which reflects the program and the specific nature of the site and its surrounding context, while taking into account the needs and response of the building users. The school's house-like facades along 19th Street allow students and teachers alike to identify with their classrooms in a home-like manner, a compositional strategy that reflects the school's functions through figurative design. The interior design of St. Coletta reinforces the idea of individual houses inside the atrium, or 'village green,' that extends the full length of the building. Every feature of St. Coletta's new building, including the interior finishes, fixtures, colors and patterns, carpeting, furniture and accessories, are considered by MGA and are implemented into MGA's vision for the project.

In addition, the landscape, open space, green areas and recreational spaces have been designed by Moore Iacofano Goltsman, Inc. ("MIG"), a nationally recognized firm with expertise in urban design and environmental design for youths. Other projects by MIG which represent design of children's environments and urban design include the Tule Elk School in San Francisco, California and the Brookfield Zoo Children's Zoo in Brookfield, Illinois. The curriculum of St. Coletta requires outdoor program areas. The landscape and outdoor space plan prepared by MIG integrates the school's outdoor

program needs with the existing neighborhood context and the expressed intention of the Master Plan. The outdoor program areas border along the school's east and west sides, adjacent to each 'house', and are enclosed for the safety of the students. An articulated fence along 19th Street, S.E. will shield these outdoor classroom areas from 19th Street, S.E. The full length of the articulated fence will include decorative metal work and trellises, along with ornamental landscaping on the street side of the fence, to offer an attractive edge to the community. Thus, a pedestrian walking along 19th Street will be able to view the building through the articulated fence. The south end of the PUD site will be landscaped open space, including a play area, turf area and sitting areas which will be gated for safety purposes, but will be accessible to the public during certain hours. The loading area, which will be able to accommodate numerous busses, will be located on the east side of the building, where it will be shielded and out of view from the public right-of-way. When not in use for loading or unloading, this area will serve as a hard surface play area for the students of St. Coletta. Along the Independence Avenue, S.E. frontage, trees and other landscaping will fill the planting strip to provide a grander boulevard feel and increase pedestrian safety along that roadway. A public garden/plaza will be located at the northwest corner of the school building at 19th Street and Independence Avenue, S.E.

2. Site planning, and efficient and economical land utilization;

The site planning responds to the intentions defined by the Master Plan for Reservation 13, particularly with regard to the future extension of Burke Street and the creation of 20th Street perpendicular to Independence Avenue and on axis with the center of the Armory. Bounded by these anticipated right-of-ways to the east and south, as well as by the Stadium/Armory Metrorail Station easement to the west, the building utilizes the remaining available land efficiently and economically. The proposed 2-3 story structure is more than 20 feet below the maximum allowable height of 65 feet and uses approximately twenty-eight percent (28 %) of the maximum allowable lot occupancy. The smaller, more residential-looking components of the building face the houses across 19th Street, S.E., while the larger, more commercial-looking pavilions face Independence Avenue and the Armory.

3. Effective and safe vehicular and pedestrian access; transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts;

As discussed in section I.5 below under "Traffic Impact," the St. Coletta school will not adversely impact the adjacent road network from the perspective of trip generation, parking or access. Designation of sufficient internal access ways for buses will mitigate any potential traffic congestion. With regard to public transit, the Stadium/Armory Metrorail Station will provide superior transit because of its close proximity to the site. See Exhibit "A" for detailed circulation diagram and parking

configuration prepared by A. Morton Thomas and Associates and parking and traffic analysis attached as Exhibit "B" prepared by O.R. George and Associates.

4. Social services/facilities;

St. Coletta is investing approximately twenty-four million dollars to build a state of the art special education facility in the District of Columbia. The new school will be a national prototype of the best practices in special education and will serve 200-250 individuals with moderate to severe mental retardation, autism and secondary disabilities. St. Coletta currently serves nearly 180 individuals in its Alexandria locations. These children and adults are referred to St. Coletta from school districts and communities throughout the metropolitan region due to the lack of programs in their locale for youths and young adults with severe disabilities. St. Coletta's professional staff of social workers and speech/language, occupational and physical therapists provide students with comprehensive and quality care that cannot be offered at an appropriate level in the mainstream settings. Nowhere is the need for such services as great as in the District of Columbia.

People with mental retardation and autism and their families in the greater Washington, D.C. area value the services provided by St. Coletta and, thus, the demand for its services has grown exponentially. Over the past four years, St. Coletta's population has quadrupled, yet it maintains a waiting list of 50 to 80 students and adults who need the school's services.

St. Coletta will be able to respond to the need for educational and therapeutic programs for children and adults with cognitive disabilities by expanding its programs to a facility located in the District of Columbia. In conjunction with the new site, St. Coletta aims to provide services in the home environment by adding comprehensive case management services and a Family Outreach/Community Intervention Model. This Model has been devised because many of the students come to St. Coletta with severe "behavior problems" that have made them unsuccessful in more traditional school settings. While St. Coletta students often make great progress after they spend time in the school's program, that progress is often limited by and not carried over into the home environment. The Model program helps families and caregivers reinforce the skills learned and implement therapeutic interventions that occur at St. Coletta during the day. It is the school's experience that the absence of such programming can often lead to a person's placement outside of their family or group home into more restrictive and expensive residential settings.

St. Coletta will also provide other services to the community, such as the public/private partnership between D.C. Public Schools and St. Coletta, which will offer many opportunities for cooperative ventures that stand to benefit D.C. Public School personnel and programs. Additionally, St. Coletta plans to offer healthcare services a few days every month to persons with cognitive disabilities from the wider community, which will be a benefit to the city as a whole.

Furthermore, St. Coletta's D.C. facility will employ approximately two hundred faculty and staff who will bring their spending power to a formerly neglected section of the city. Lastly, the school will make its gymnasium and public spaces available for use in the evenings and on weekends for neighborhood and community groups.

5. Environmental benefits, such as storm water runoff controls and preservation of open space or trees;

The trees currently existing along 19th Street and Independence Avenue, S.E. will be retained and preserved, pending an evaluation of health by a certified arborist. Over 100 additional trees will be planted on the PUD site as a part of the new landscape plan. The site plan has been designed to maximize open space and minimize impervious surface coverage. Outdoor space to be utilized by the school for curriculum purposes, including outdoor classrooms, recreational space and a garden, all incorporate planned landscape planting. The overall landscape and street tree plans are designed in accordance with the objectives and character of the Reservation 13 Master Plan. Landscape areas along 19th Street, S.E. have been increased from current conditions and designed to reflect the character of the adjacent community.

The landscape and site plan will integrate stormwater management design where possible. This may include bioswales or filtration in the parking lot and on-site drainage of large turf areas. The parking lots will be planted with trees to provide 50% shade coverage in the summer.

See Exhibit "A" for the grading and erosion plan, and plans which show the detailed proposals for landscaping, planting and garden areas.

6. Use of special value to the neighborhood or the District of Columbia as a whole;

The development of the new St. Coletta special education facility in the District of Columbia will fulfill the critical need for services and special education to students with mental retardation, autism and/or multiple disabilities within the District. The District of Columbia has approximately 2,000 students waiting for placement in some type of special education program including 160 mentally retarded and autistic children in a public school building that is beyond repair and scheduled for demolition. St. Coletta has never turned any child away for lack of funds. St. Coletta currently maintains several adult clients without reimbursement for service.

Additionally, the new school will offer needed community activity and meeting space to the surrounding neighborhood. Public meeting rooms and space, the gymnasium and the garden/plaza will be available for use by the local community after school hours and on weekends.

7. Other public benefits and project amenities and other ways in which the proposed PUD substantially advances the major themes and other polices and objectives of any of the elements of the Comprehensive Plan.

The construction of the St. Coletta school will be among the first of the planned developments for Reservation 13. It will establish a foundation for the re-development of the area conforming with the Reservation 13 Master Plan, while also meeting the goal of the utilization of the land within the Reservation so to satisfy a diversity of public needs, and by offering the neighborhood, as well as the entire District, resources for special education, community meeting space, recreational facilities and landscaped open space. It also will promote the more efficient use of the public land, contribute a positive image for the area and enhance the value of the land resource of Reservation 13 to the benefit of surrounding neighborhoods.

I. PLANNING ANALYSIS

1. Land Use Impact

The development of the St. Coletta educational facility proposed under this PUD application is consistent with the existing and planned surrounding land uses and with building heights and densities of the surrounding area. According to the Master Plan for Reservation 13, the height of the buildings closest to 19th Street, S.E. are at a range of two to four stories, matching the townhouse neighborhood to the west. The design of the St. Coletta school structure along 19th Street will be consistent with the residential scale and character of the neighborhood. Specifically, the building will have a two-story frontage along 19th Street, which will be broken up into eleven smaller façades, while the taller parts of the structure, including the gymnasium, are placed along Independence Avenue.

2. Zoning Impact

The proposed SP-1 zoning is appropriate for the site and consistent with the Reservation 13 Master Plan and the D.C. Comprehensive Plan. The height and density of the project falls well within the PUD guidelines for a SP-1 zone district. In fact, height, density, lot occupancy and other zoning characteristics of the St. Coletta school building fall well below the R-4 matter-of-right and PUD maximums. (The R-4 zone is the predominant zone to the west of the site and throughout Capitol Hill). See further discussion of zoning issues in Section "I" below ("Zoning Analysis and Relief Requested").

3. Environmental Impact

The subject property was previously the site of the former D.C. Jail and Alms House as early as 1878. Use of the land as a jail site continued until the buildings were razed with the construction of the new jail in 1976. Since that time, no buildings have been constructed on the site, leaving the area undeveloped and vacant. An environmental analysis undertaken for St. Coletta, by Comprehensive Environmental Assessments dated May 2002, found the following:

- No evidence of foundation walls or other subsurface structures were observed.
- No electrical substations or high-tension power lines were observed on the subject property or adjacent properties.
- No suspected asbestos-containing materials were found.
- No evidence of improper usage of hazardous materials was found on the site or observed on adjacent properties.
- There is no evidence of hazardous waste generation, use, storage or disposal on this property.
- No above ground or underground storage tanks were reported for, found on or previously identified for the site, and there is no visible or documented evidence of soil or groundwater contamination.
- There is no evidence of environmental issues with lead-in-water, sewage disposal, water supply.
- According to the published EPA historical data, the area does not have a history of elevated radon.
- There is no painted debris on the site.
- There are no known pending or threatened environmental proceedings or litigation.

4. Facilities Impact

The proposed St. Coletta educational facility will provide a much needed school for cognitively disabled students in the District of Columbia. Currently over two thousand school children from the District are bussed to private schools in the metropolitan area for their education. The construction by St. Coletta of its new D.C. school will bring a greatly needed resource much closer to home for many of these students. Furthermore, the proposed project will contribute much needed public facilities to the neighborhood, including community meeting space, a gymnasium and landscaped areas, which will all be available for community use during non-school hours. St. Coletta also hopes to be able to use space south of the school site, on a temporary basis, for play and recreation space for the school, which would also be available to the community during non-school hours.

5. Traffic Impact

Currently, according to a report prepared by O.R. George and Associates dated April 21, 2003, the area roadway network operates without any significant operational, capacity or safety deficiencies and the proposed development should not alter these conditions. The report also states that proposed provisions for site access and circulation, as well as parking, are sufficient and do not present any operational or safety deficiencies. The proposed development is in close proximity to the Stadium/Armory Metrorail station, which would be used by an average of fifty percent (50%) of the staff. Furthermore, most students will arrive at the school by bus, lessening the amount of roadway traffic generated by St. Coletta students and staff. Upon completion of construction of the new school building, according to the O.R. George and Associates report, the area would continue to operate at an acceptable level during morning peak hours and near capacity during afternoon peak hours. With the appropriate designation of access points for buses, any possibility of congestion would be alleviated.

The Master Plan for Reservation 13 calls for the integration of the site with adjacent land uses, specifically seeking to improve access and circulation on the adjacent roadway network. The development of St. Coletta will not adversely affect these goals of the Master Plan.

A detailed analysis of the project impacts on traffic can be found in the attached Traffic and Transportation Study (See Exhibit "B").

J. ZONING ANALYSIS & RELIEF REQUESTED

The St. Coletta applications seek approval of (i) a consolidated Planned Unit Development pursuant to Chapter 24 of the Zoning Regulations and (ii) a zoning map amendment. The site is currently unzoned. St. Coletta proposes to zone the site as SP-1, a zoning classification that is in harmony with the Master Plan designation for the western portion of Reservation 13 along 19th Street, S.E. In addition, the proposed SP-1 classification would not be inconsistent with the zoning pattern in the surrounding area nor the Comprehensive Plan Land Use Map. Unzoned federal land exists to the north. The residential area to the to the west is zoned R-4.

The SP-1 District is a medium density mixed-use zone district, which permits row houses, apartments, offices, and institutions to a maximum sixty-five (65) feet, a maximum floor area ratio (FAR) of 4.0, and a maximum lot occupancy of not more than eighty percent (80%) of the lot upon which it is located for residential uses. A chief purpose of a SP District is to act as a buffer between adjoining commercial and residential areas. (11 DCMR § 500.2). Although the Armory and R.F.K. Memorial Stadium are technically not zoned commercial, the structures are commercial-like in size and bulk and adjoin the residential district without any buffer. The creation of a SP-1 district in the area would help deflect the drastic disparity between the residential and commercial or institutional areas and uses.

The proposed SP-1 zoning is also consistent with the Master Plan for Reservation 13. The Master Plan calls for the construction of city-wide uses, including health-care, recreational, and educational uses along Independence Avenue to the east of St. Coletta's site, and the development of a neighborhood south of St. Coletta's site, which will include single family homes, apartments, community amenities and neighborhood retail.

St. Coletta's new D.C. school project has been designed to comply with all SP-1 standards. In fact, the new facility is well within both SP-1 and R-4 standards. In all instances, compliance with the prescribed building height for all structures (i.e., seventy-five (75) feet) has been achieved. Similarly, the floor area ratio of the facility and the overall FAR of the proposed development is well within the 3.5 maximum FAR allowed for nonresidential buildings in a SP-1 PUD.

Because of the close proximity of an entrance to the Stadium/Armory Metrorail Station to the school and its proposed Metrorail use, St. Coletta also requests zoning relief from Section 2104.1(a) in order to be eligible for a reduction in the number of required parking spaces required based on the proximity to a Metrorail station. Approximately fifty-five percent (55%) of the staff and employees of St. Coletta in Alexandria use Metrorail as their mode of transportation to work. It is expected that a minimum of fifty percent (50%) of the employees will use Metrorail at the new school in the District of Columbia.

According to 11 DCMR Section 2104, St. Coletta would be eligible for a reduction of up to twenty-five percent (25%) of the required number of parking spaces as a matter of right but for the fact that the PUD site is located within 800 feet of an R-4 district (an R-4 district is located to the west of the site across 19th Street, S.E.). Thus, the Applicant requests zoning relief in the form of a deviation from the requirement of Section 2104.1(a) in order for it to apply the twenty-five percent (25%) reduction in required parking spaces. This would bring the number of parking spaces required from 137 to 103.

K. COMPLIANCE WITH DISTRICT OF COLUMBIA COMPREHENSIVE PLAN

The St. Coletta school project is not inconsistent with the District of Columbia Comprehensive Plan or with adopted policies and programs. In fact, the PUD and proposed map amendment are consistent with and foster numerous goals and policies stated in the Comprehensive Plan, D.C. Law 5-76, 10 DCMR (Planning and Development) Section 100 *et seq.* (1984), particularly those set forth within the Land Use Element. The purposes of the District of Columbia Comprehensive Plan Act 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) (1999 Repl. Vol.)).

The new educational facility proposed by St. Coletta significantly advances these purposes. It does so by guiding private and public development so as to achieve District and community goals through the development of an educational facility for special education and by assisting in conservation, stabilization and improvement of the Hill East neighborhood and re-development of Reservation 13.

1. Compliance with Major Themes

Four major themes that are applicable to this project were adopted as part of the Comprehensive Plan (the "Plan") (10 DCMR §§ 101.1(a), (e), (f) and (j)). The St. Coletta's proposal is consistent with these themes as follows:

a. Stabilizing and Improving the District's Neighborhoods. The proposed development will help to initiate the improvement of Reservation 13 and provide a much needed special education facility, as well as community space for activities after school hours and on weekends, bringing activity and vibrancy to the area. The design of the new school building is compatible with the scale of neighboring residences.

b. Respecting and Improving the Physical Character of the District. The high quality of the proposed school project will be an asset to the Hill East neighborhood and will help to enhance the physical character of the Reservation 13 area. The design of the proposed project is in scale and character with surrounding structures.

c. Preserving and Ensuring Community Input. St. Coletta's became a part of the planning process for Reservation 13 after its discussions with District of Columbia Public Schools led to the joint recognition of the need for an appropriate site for a special education school within the District. The plan for Reservation 13 was formulated in a collaborative effort with over 15 government agencies and over 300 concerned and interested citizens. St. Coletta's D.C. school project has been carefully planned with input and participation from the neighborhood and ANC 6-B.

d. Providing for Diversity and Overall Social Responsibilities. The development of a school for special education will respond to the pressing need for quality services in the area of special education for those with cognitive disabilities in the District of Columbia. In partnership with the District of Columbia, St. Coletta also plans to offer teacher training, parent training and paraprofessional staff development which would be open to employees from the D.C. Public Schools.

2. Compliance with Major Elements

The proposed St. Coletta school project specifically furthers the policies and objectives of the environmental protection, urban design and land use elements.

a. Environmental Protection Element

> "It is the goal of the District to protect the environment, to resist threats to its overall quality, to act, to maintain and enhance its positive features in the interest of residents, workers, and visitors, and to protect residential communities . . ." (10 DCMR § 401.1)

The St. Coletta development will promote energy conservation, improve air quality, and improve the natural environment. The PUD's enhanced landscape components, including street trees and planting, and the creation of park settings and open spaces surrounding the structure, will create important environmental elements for the nearby residential areas.

b. Urban Design Element

> "It is the goal of the District to promote the protection, enhancement, and enjoyment of the natural environs and to promote a built environment that serves as a complement to the natural environment, provides visual orientation, enhances the District's aesthetic qualities, emphasizes neighborhood identities, and is functionally efficient." (10 DCMR § 701.1)
>
> "The areas in need of new and improved character objective is to encourage new development or renovation and restoration of older structures in areas with vacant or underused land or buildings to secure a strong, positive physical identity." (10 DCMR § 712.1)

The proposed school development will begin the revitalization of Reservation 13 and the enhancement of the area through superior design elements and site planning. The development will replace existing unutilized land in Reservation 13. The development will exhibit a strong physical identity and character that is in scale with the residential neighborhood to the west and which balances with the larger structures to the north, creating a more positive and stable image for the area, while also promoting more efficient use of the public land and enhancing the value of the land resource of Reservation 13.

c. Public and Institutional Land Use Element

> "Encourage the appropriate and compatible development of public land near selected metrorail stations and provide for development at appropriate levels of intensity and use to capitalize fully on the

development and public transportation opportunities which the stations provide. ..." (10 DCMR § 1115.1(a))

"Encourage joint public and private development of publicly owned or controlled land to stimulate desired development and to provide an opportunity for the District government to receive monetary and non monetary returns on public investment in the public transit system, land, buildings and infrastructure, ..." (10 DCMR § 1115.1(b))

"Identify unneeded public buildings and lands that could be used to supply additional housing, commercial services, and to accommodate private community service organizations and other physical and social needs., utilizing alternative implementation techniques including negotiated sales, long-term leasing, ..." (10 DCMR §1115.1(i))

The proposed school will be located near the Stadium/Armory metrorail station on land that is currently vacant. As anticipated in the Master Plan for Reservation 13, the construction by St. Coletta will initiate the revitalization and stimulate the development of the underused land resources of Reservation 13 which lie adjacent to the metrorail station.

3. Generalized Land Use Maps

The school project also complies with the generalized land use maps, as amended by D.C. Act 12-275, which designate the site as public land. Subsequent thereto, the Federal Government transferred all of Reservation 13 to the District of Columbia and the Council of the District of Columbia adopted a master plan for Reservation 13. The educational use proposed by St. Coletta's is consistent with that master plan.

4. Ward 6 Plan

The proposed St. Coletta school project is also consistent with the Ward 6 Plan, particularly the following recommended core principles:

"The objective for public facilities is to provide adequate facilities for the efficient distribution of services that promote the health, education and welfare of the citizens of Ward 6." (10 DCMR § 1717.1)

"To continue to provide a comprehensive network of public health, social and economic services to meet the needs of residents in Ward 6." (10 DCMR § 1729.1(c))

St. Coletta's new D.C. school will fulfill these objectives by effectuating the identified need for special education resources for District schoolchildren. The presence of St. Coletta's

school in southeast D.C. will also make it easier for District parents to become more active in their children's school lives because of the facility's proximity to their homes. Additionally, the St. Coletta development will provide much needed community, recreational and open space after school hours and on the weekends.

L. COMPLIANCE WITH MASTER PLAN FOR PUBLIC RESERVATION 13

The proposed project is also consistent with the Council-adopted Master Plan for Reservation 13, particularly the following core principles:

a. "Utilize the site to meet a diversity of public needs including health care, education, employment, government services and administration, recreation and housing."

b. "Maintain a human-scale of building heights that match existing neighborhood buildings and increase in height as the site slopes downward to the Anacostia waterfront."

c. "Demonstrate environmental stewardship through environmentally sensitive design, ample open spaces, ... that serve as public amenities and benefit the neighborhood and the city."

d. "Create attractive 'places' of unique and complementary character including: ...[a] district for city-wide uses and services, such as health care, education, and recreation along Independence Avenue..."

The St. Coletta school project will fulfill these objectives by providing an educational institution which will meet the needs of the District. The building will have a strong sense of character and identity that is sensitive to its surroundings. Moreover, the building will be surrounded by landscaped gardens, tree-lined streets and open spaces, creating clean, healthy and attractive spaces.

M. CONCLUSION

For the reasons stated above, St. Coletta of Greater Washington, Inc., submits that the PUD plan meets the standards of Chapter 24 of the Zoning Regulations and the application for a map amendment meets the criteria of the Zoning Enabling Act set forth in Section 6-641.02 of the D.C. Code and the Zoning Regulations. The school project is consistent with the purposes and intent of the Zoning Regulations and Map, the Comprehensive Plan and the Master Plan for Reservation 13. It will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia, will tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, recreational, educational, and cultural opportunities, and will further economy and efficiency in the supply of public services. The St. Coletta school proposal also satisfies the requirements for approval of a consolidated PUD.

Specifically, it provides significant public benefits, advances important goals and policies of the District of Columbia, and encourages the stability of the future plans for Reservation 13. Therefore, based on the foregoing, the applications for approval of a PUD and zoning map amendment should be approved by the Zoning Commission.

Respectfully submitted,

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