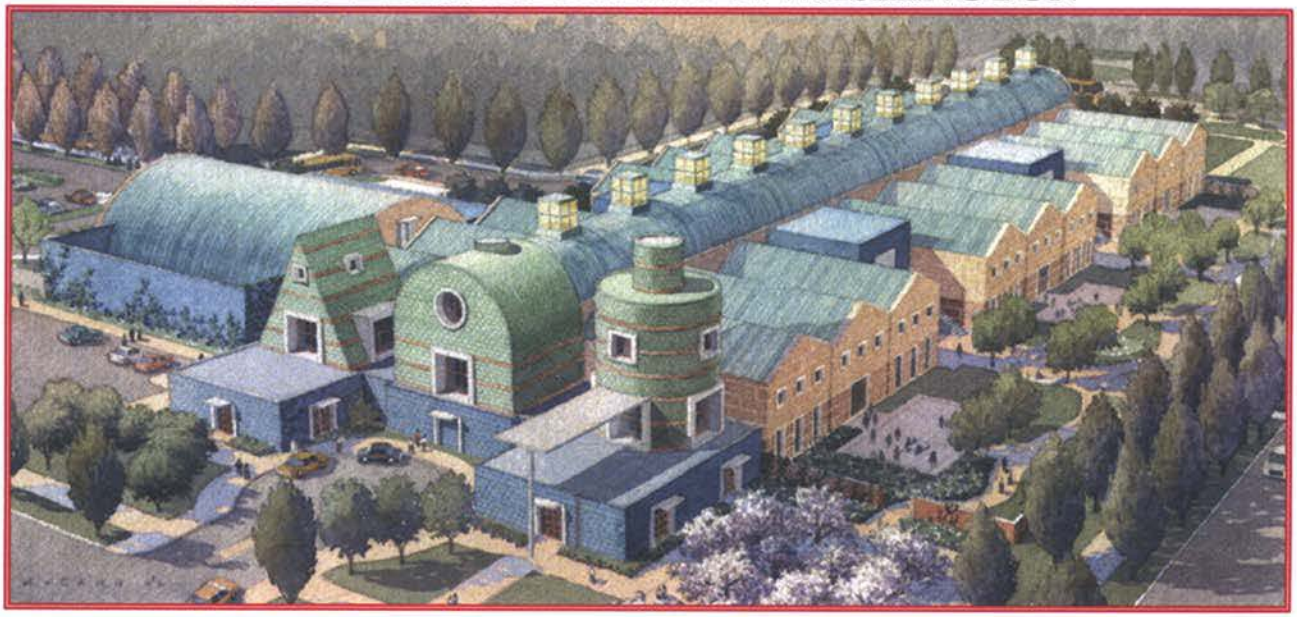
ST. COLETTA OF GREATER WASHINGTON



APPLICATION TO THE

DISTRICT OF COLUMBIA ZONING COMMISSION

FOR A

CONSOLIDATED PLANNED UNIT DEVELOPMENT AND RELATED MAP AMENDMENT FOR A TRACT OF LAND CONSISTING OF 227,276 SQUARE FEET OF LAND LOCATED AT 19TH STREET, S.E. AND INDEPENDENCE AVENUE, S.E. IN RESERVATION 13

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

ZONING COMMISSION
District of Columbia
Case 03-21
Exhibit 5

ZONING COMMISSION
District of Columbia
CASE NO.03-21
EXHIBIT NO.5

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ST. COLETTA OF GREATER WASHINGTON
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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.
DEVELOPMENT ADVISOR	Harps & Scallan, Inc.
LAND USE COUNSEL	Greenstein DeLorme & Luchs, P.C.

COMPLIANCE WITH CONSOLIDATED PUD REQUIREMENTS

The proposed project complies with the requirements of Chapter 24 of the Zoning Regulations as follows:

1. Area Requirement

The project site comprises 227,276 square feet of land and thus satisfies the minimum area requirement of fifteen thousand square feet (15,000 ft.^{2}) of land for a PUD development in an SP-1 zone under the Zoning Regulations (11 DCMR § 2401.1).

2. Notice

The certificate of notice executed by counsel herein states that a Notice of Intent to File a Zoning Applications for an Amendment to the Zoning Map, and for a Consolidated Planned Unit Development was mailed to Advisory Neighborhood Commission 6B and to the owners of all property within 200 feet of the perimeter of the project site on May 6, 2003, as required under the Zoning Regulations (11 DCMR §§ 2406.5 - 2406.10).

3. Filing Requirements

A. First Stage (Sec. 2406.11)

Requirement	Page or Figure Number
Completed Zoning Map Amendment and PUD Application forms	Exhibit "B"
Map showing location of project and area zoning	Exhibit "C"
Statement of Explanation and Justification	Pages 1 - 17
Project's goals and objectives	Page 4 - 10
General site and development plan	Exhibit "E"
Tabulation of development data	Exhibit "L"
Circulation plan	Exhibit "H"
Landscaping plan	Exhibit "J"
Existing topography	Exhibit "I"

	Estimated quantities of water and sewer demand	Page 5 - 6

B. Second Stage (Sec. 2406.12)

Requirement	Page or Figure Number
Completed PUD Application form	Exhibit "B"
Detailed Statement of Uses	Page 4 - 5
Detailed Site Plan	Exhibit "I"
Detailed Landscaping Plan	Exhibit "J"
Grading Plan and Erosion Plan	Exhibit "I"
Typical Floor Plans, Sections, and Elevations	Exhibit "M"
Detailed Circulation Plan	Exhibit "H"

CERTIFICATE OF NOTICE

May 6, 2003

The undersigned hereby certify that on May 6, 2003, at least ten (10) calendar days prior to the filing of this application for a Planned Unit Development, a Notice of Intent to File Zoning Applications for an Amendment to the Zoning Map and for a Consolidated Planned Unit Development (Exhibit "A") for a consolidated planned unit development and map amendment for a tract of land consisting of 7.02 acres located at 19th Street, S.E. and Independence Avenue, S.E. in Reservation 13, also known as Lot 800 in Square E-1112, was mailed to Advisory Neighborhood Commission 6B and to all property owners within 200 feet of the perimeter of the property mentioned above, as required by Section 2406.7 of the Zoning Regulations.

GREENSTEIN DELORME & LUCHS, P.C.

By: _____
Jacques B. DePuy

By: _____
Lyle M. Blanchard

By: _____
Stephanie A. Baldwin

STATEMENT OF EXPLANATION AND JUSTIFICATION IN SUPPORT OF APPLICATIONS FOR A CONSOLIDATED PLANNED UNIT DEVELOPMENT AND ZONING MAP AMENDMENT

A. PROJECT SUMMARY

This 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 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. It is anticipated that approximately eighty-five percent (85%) of the students and one hundred percent (100%) of the adult clients at the new facility will be D.C. residents.

The exterior design of the school building creates a new 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 open space 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 simply 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 recognize the urgent need to provide District schoolchildren with special education, but undertaking the remodeling, renovating and building of facilities to accommodate these students will take years. As such, the District has encouraged private schools to relocate and expand in the District. At St. Coletta's new facility in the District, many residents of the District of Columbia will receive every opportunity to increase their educational and independence achievement levels.

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 enrollment at the Alexandria, Virginia facility are from the District. In addition, St. Coletta's has committed to training D.C. Public School teachers, therapists and paraprofessionals in assisted technology, alternative student assessment, behavior management and Individualized Educational Plan development. The District is also interested in establishing a special education teacher and paraprofessional training program with St. Coletta's. Moreover, Mayor Williams also considers the redevelopment of Reservation 13 to be crucial to the city's goals of integrating the land into the neighborhood with a blend of 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, Loudon and Montgomery Counties in Maryland and Alexandria, Arlington, and Fairfax County 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. Photographs of the PUD Site are set forth in Exhibit "N". 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 "D").

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 is to lease two parcels of land comprising 5.217 acres. One lot is designated for the construction of the school. The school lot contains 3.8 acres, but 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. Until that time, the parcel will be used for a parking lot.

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, is a DC 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 a new public road 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 the District of Columbia Public School leaders 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 appeared before Advisory Neighborhood Commission 6-B on four (4) different occasions, most recently on June 3, 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 and staff, resulting in a student to teacher ratio of 1 to 2. 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 open space in the center of the main building (Exhibit "M"). The school day begins at 8:00 a.m. and ends at 3:00 p.m., Monday through Friday, while hours of operation of the school will be from 7:00 am to 5:00 pm, 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 village green, a catering kitchen, the gymnasium (with a full size basketball court) and the garden/plaza at the corner of 19th Street and Independence Avenue 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 design of the school building, as conceived by Michael Graves & Associates, includes three tile-clad multi-story pavilions along Independence Avenue, S.E., which help establish the school's identity. They contain the primary public spaces, including the main entrance and a multi-purpose room to be shared with the community. Perpendicular to the pavilions along Independence Avenue is a central three-story sky lit hall which organizes the classrooms along a single axis, like an interior street or a 'village green.' The classrooms are designed as a series of prototypical 'houses' along this axis. Each house corresponds to a different age group and contains several expandable classrooms, various offices, tutoring rooms, bathrooms, and elevators. The exterior design of the school building along 19th Street, S.E. is in scale and character with the residential neighborhood to the west of the PUD site, appearing as a series of prototypical "houses".

St. Coletta's new D.C. school will also includes garden and park areas on the west side of the structure, a sky lit open space running down the center of the main building and a gymnasium located on the east side of the main structure, along Independence Avenue. Also along Independence Avenue, to the east of the gymnasium, will be a parking lot. 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 parking lot. The design of the structure 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 its 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 lot 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 DC 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 project 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 Exhibits "E" and "J". 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. A more complete list of Graves Associates' architectural projects is set forth in Exhibit "F". MGA has endeavored to create an architectural character of the new St. Coletta school which reflects the program of use and the specific nature of the site and its surrounding context, while also 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 domestic 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, the interior finishes, fixtures, colors and patterns, carpeting, furniture and even 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. More information on these projects, as well as information regarding other MIG projects is included in Exhibit "G". The landscape plan prepared by MIG integrates the school program's outdoor program needs with the existing neighborhood context and the expressed intention of the Master Plan. The curriculum of the school requires outdoor program areas. These areas are adjacent to the school, and are enclosed for the safety of the children. An articulated wall along 19th Street, S.E. will shield these outdoor classroom areas from 19th Street, S.E. The full length of the articulated wall will feature ornamental landscaping and benches on the street side of the wall, to offer an attractive edge to the community. The south end of the PUD site will be landscaped open space and include the exit driveway. The loading area, which will be able to accommodate several 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 wider planting strip and sidewalk which are increased 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 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 less than twenty-six percent (26 %) 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 "H" for detailed circulation diagram and parking configuration prepared by A. Morton Thomas and Associates and parking and traffic analysis attached as Exhibit "K" 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 from school districts and communities throughout the metropolitan region due to the lack of programs 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 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 75 to 100 students and adults who need the school's services. With the need for St. Coletta's service increasing rapidly, governmental reimbursements are shrinking.

St. Coletta intends to respond to the need for educational and therapeutic programs for children and adults with cognitive disabilities by expanding its programs to a second 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. Such a program would help families and caregivers reinforce skills and therapeutic interventions that occur at St. Coletta during the day. It is the school's experience that the absence of such programming often contributes to a person's placement outside of their family or group home into more restrictive and expensive residential settings.

This public/private partnership between D.C. Public Schools and St. Coletta will offer many opportunities for cooperative ventures that stand to benefit D.C. Public

School personnel and programs. St. Coletta's commitment to offering quality health and dental care to persons with cognitive disabilities from the wider community will be a benefit to the city as a whole. 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. In addition, the school will open its gymnasium and community spaces in the evenings and on weekends for neighborhood use. .

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 consequence 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 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 lot will be planted with trees to provide 50% shade coverage in the summer.

See Exhibit "I" for the grading and erosion plan, and Exhibit "J" for 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. Currently, there is no funding available for these individuals. 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 much needed community space to the surrounding neighborhood. Meeting rooms, the gymnasium and the garden/plaza will be available to the local community after school hours and on the 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 area's Master Plan, while also meeting the goals of the re-development by diversifying the use of the Reservation and offering District-wide and neighborhood needs for special education, meeting space, recreational facilities and 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 two-story frontage 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 below the PUD guidelines for the SP-1 zone district. In fact, height, density, lot occupancy and other zoning characteristics of the St. Coletta school building fall well within the R-4 matter-of-right and PUD guidelines. (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. 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 the published EPA historical data, the area does not have a history of elevated radon and no radon sampling was completed.
- There is no painted debris on the site.
- There are no pending or threatened environmental proceedings or litigation known by site management.

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 much needed resource much closer to home for many of these students. Furthermore, the proposed project will contribute much needed public facilities for the neighborhood, including community meeting space, a gymnasium and landscaped areas, which will all be available to the community 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 forty percent (40%) of the staff. Furthermore, most students will arrive at the school by bus, lessening the amount of road-way traffic generated by St. Coletta students and staff. Upon completion of construction of the new school building, according to the O.R. George 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 Draft 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 Draft Master Plan.

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

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 Draft 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 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. 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. That 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. (See Exhibit "L".)

With the close proximity of an entrance to the Stadium/Armory Metrorail Station to the school, 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 forty percent (40%) 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 forty percent (40%) 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 140 to 105.

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 in order 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 and community space for activities after school hours and on weekends. 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 improve 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 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 community.

d. Providing for Diversity and Overall Social Responsibilities. The development of a school for special education would 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 Comprehensive Plan contains 11 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 a portion of the existing vacant 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 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

school in southeast D.C. will also allow parents to become more active in their children's school lives. Additionally, the PUD Project 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 meets the needs of the District community at large. 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.

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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