



Stanton Park Neighborhood Association

P O Box 75085, National Capitol Station, Washington, D C 20013-5085

January 2, 2006

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DC OFFICE OF ZONING

RECEIVED

Stephen Mordfin
Development Review Specialist
Office of Planning, Government of the District of Columbia
801 North Capitol Street NE, Suite 4000
Washington, DC 20002

Re Case No. 05-34 – Petition by ANC 6C for
Map Amendment to Square 895, Lot 76

Dear Mr Mordfin

Stanton Park Neighborhood Association (SPNA) is a civic association that works for improvement of the Stanton Park neighborhood by representing the interests of the north Capitol Hill community in the area bounded by East Capitol Street, 10th Street NE, H Street NE, and 2nd Street NE. SPNA supports ANC 6C's Map Amendment Application. The current R-5D zoning of the MedLINK property is inconsistent with the surrounding neighborhood and should be brought into compliance with the Comprehensive Plan by being rezoned as Moderate Density Residential (R-4, R-5A or R-5B).

The ANC Application results from five years of community efforts to promote development of this property in a manner more compatible with the surrounding neighborhood. The present classification of this property is a zoning anomaly (created 30 years ago to accommodate a community-oriented hospital that has not existed for the last 15 years) in the midst of an R-4 neighborhood in the Capitol Hill Historic District. Two overriding concerns that are specific to this square have driven the need for rezoning to achieve compatibility with the Comprehensive Plan.

- 1 St James, the primary contributing historic structure on this square, and the historically contributing 1928 hospital building are the reference points for the height limitation and other design parameters for any new or replacement structures on this property. The 1975 tower structure, constructed under the existing R-5D zoning which allows a maximum height of 90 feet, is not

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historically contributing, and should not serve as a point of reference for any development on this square. Therefore, SPNA supports a zoning classification that would allow structures that do not exceed a height of 60 feet (*e g*, R-5A PUD or R-5B PUD, as shown on the attached table of Zoning Options)

- 2 The 14 years of ongoing parking violations on the part of MedLINK's Hospital and Intensive Care Nursing facility have imposed an inordinate burden on the surrounding community. Unfortunately, Department of Consumer and Regulatory Affairs has indicated it does not know how to enforce the parking requirements and the State Hospital Planning and Development Agency (SHPDA) has declined to condition the facility's Certificate of Need (CoN) on requiring such compliance. Further, SHPDA's recent approval of the transfer of MedLINK's CoN to a new entity (Specialty Hospitals of America) with a 10 year lease of the tower structure and an option to renew for an additional 5 years means that parking by more than 300 employees of the hospital/nursing facilities is likely to continue to be a concern for at least the next 10 years. For this reason and also because the developers have indicated that market forces require a high ratio of off-street parking, SPNA supports a zoning classification that would provide a parking ratio of one parking space per residential unit for any new or replacement development on this property (*e g*, R-5A or R-5A PUD as shown on the attached table)

To achieve consistency with the Comprehensive Plan and to address these two longstanding concerns requires a zoning reclassification that will limit building height to 60 feet and require one parking space for each residential unit.

In response to the Zoning Commission's concern that rezoning the property will result in "inconsistencies", SPNA answers that the inconsistency would be the existing tower building (building C) at a height of 78 feet (which has been an inconsistency and a design and zoning anomaly for 30 years). In fact, the new structures proposed under the Holladay development and the new structures proposed under the Shalom Baranes development would be within the 60-foot height limitation. On the other hand, absent rezoning, the owner might attempt to redevelop the property at a height of 90 feet, which would completely overshadow St. James and the 1928 structure and create a massing and density incompatible with the surrounding R-4 neighborhood. Further, any zoning classification that allows less than one parking place per residential unit (and one parking place per hospital bed) imposes an unreasonable burden on the surrounding community.

In response to concerns that rezoning is a strategy to derail the on-going Historic Preservation Review Board (HPRB) design review of the current Shalom Baranes development proposal, SPNA notes that both the height and the parking ratio of the current design proposal would be consistent with the zoning classifications suggested herein by SPNA. Further, this design proposal is merely the current iteration of five years of design proposals, and as indicated by SPNA's December 8, 2005 letter to HPRB (copy enclosed), the current design is far from final.

While there are additional reasons that support rezoning of this property, that rezoning need not result in any significant or new “inconsistencies” or in any way affect proceedings before HPRB. Further, the longstanding zoning concerns described in this letter and the presentations of the ANC and other community organizations demonstrate conclusively that the ANC’s Application should be set for a hearing on the merits

Sincerely,

A handwritten signature in black ink, appearing to read "Monte Edwards", written over a horizontal line.

Monte Edwards, Co-Chair
SPNA Land Use Committee

Enclosures

Cc Zoning Commission Chair Carol J Mitten
 “ “ Vice-Chair Anthony Hood
 “ “ Commissioner Gregory N Jeffries
 “ “ Commissioner Kevin Hildebrand
 “ “ Commissioner John Parsons
 “ “ Secretary Sharon Schellin

ANC 6C Commissioner Mike Sherman

Zoning Options for Square 895
708 Massachusetts Ave., NE

	R-4	R-5A	R-5A PUD	R-5B	R-5B PUD	R-5D	EXISTING
Max. Building Height	40 feet 3 stories	40 feet 3 stories	60 feet	50 feet	60 feet	90 feet	A 55 feet, 4 stories B 55 feet, 4 stories C 78 feet, 6 stories D 14~ feet, 1 story E 14~ feet, 1 story
Maximum FAR	None	0.9	1.0	1.8	3.0	3.5	2.42
Max. Lot Occupancy	60%	40%	40%?	60%	60%	75%	Approximately 70%
Parking Requirement per Unit	1:3	1:1	1:1	1:2	1:2	1:3	1 per bed
Minimum Depth of Rear Yard	20 feet	20 feet	20 feet?	Min 15', approx 4" per foot of height	Min 15'?	Min 15', approx. 4" per foot of height	
Minimum Width of Open Court	18'; 4" per foot of height of court	18', 4" per foot of height of court	18'?	18', 4" per foot of height of court	18'?	14', 3" per foot of height of court	
Including 5% Minor Deviations Increase in PUD FAR	N/A	N/A	1.05	N/A	3.15	N/A	
Including 5% Minor Deviations Increase in PUD Height	N/A	N/A	.63	N/A	.63	N/A	
Including 20% Exclusionary Zoning FAR (pending)		1.08	1.2	2.16	3.6	4.2	



Stanton Park Neighborhood Association

P.O. Box 75085, National Capitol Station, Washington, D.C. 20013-5085

December 8, 2005

**Mr. Tersh Boasberg, Chair
Historic Preservation Review Board
Attn: Mr. David Maloney
D.C. Office of Planning
801 N. Capitol St., NE
Washington, DC 20002**

**Re: HPA #05-196
700 Constitution Ave., NE**

Dear Mr. Boasberg:

The Land Use Committee of the Stanton Park Neighborhood Association (SPNA) has reviewed the revised plans for referenced project circulated by the applicant on November 17, 2005. In addition, representatives of SPNA participated in the charette held on November 10 and attended the community meeting held on November 30. Although SPNA finds the current proposal improved over earlier versions, particularly with respect to the elimination of the vehicular drop-off on the south side of the project, the Committee continues to withhold its support for the project at this time for the following reasons.

First, SPNA continues to oppose the two-phase development. The Committee only recently learned that the applicant has requested HPRB approval of a subdivision to facilitate the phasing of the project. Subdivision would require the first phase of the project to accommodate the noncontributing structures on the remainder of the parcel. We do not believe that the piecemeal approach implicit in the requested subdivision achieves an appropriate resolution of the aesthetic issues and functional issues inherent in this project.

Second, the newly-announced subdivision proposal is just one example of defects in the process by which the applicant has presented the project to the neighboring community for evaluation up to this point. Moreover, at the November 30 community meeting, the applicant's representatives suggested that the proposal might change significantly again in the days remaining before the HPRB hearing scheduled for December 15, based on DDOT's recommendations following its review of the long-awaited and still unreleased traffic study commissioned by the applicant. Because any significant change to the proposal should undergo community review, SPNA asks HPRB to defer consideration of any new features pending such review. Furthermore, SPNA requests that HPRB preclude any future reintroduction of a vehicular drop-off on the south side of the proposed project by explicitly finding that such a vehicular drop-off would be inconsistent with the character of the Capitol Hill Historic District.

Finally, SPNA remains unsatisfied with the design of the new construction in the project's first phase. Although members are not in complete agreement, some would prefer that the new construction reflect the traditional architectural styles of the Capitol Hill Historic District instead of a modern design that attempts (and largely fails) to appear compatible with those traditional styles. SPNA does note that, while such modern design may be possible, it is not manifested in the current proposal. The Architect has not designed a satisfactory treatment of the proposed parking entrance on 7th Street, and in its present form is a 16 foot by 14 foot tunnel extending under the "hyphen". Most egregious is the "inverted L" canopy or trellis currently proposed for the roof at the corner of building at 7th Street and Massachusetts Avenue.

Sincerely,

A handwritten signature in black ink, appearing to read "Drury Tallant", with a long, sweeping horizontal stroke extending to the right.

Drury Tallant

Co-Chair, SPNA Land Use Committee