

STAFF RECOMMENDATION

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NCPC File No. 6269



UNIFIED COMMUNICATIONS CENTER

2700 Martin Luther King Jr. Avenue, SE (Saint Elizabeths Hospital Eastern Campus)
Washington, D.C.

Submitted by the District of Columbia Office of the Chief Technology Officer

April 29, 2004

Abstract

The District of Columbia Office of the Chief Technology Officer (DCOCTO) has submitted preliminary and final site and building plans for the construction of a new, 144,000-square-foot facility to house the Unified Communications Center (UCC), which will provide a consolidated communications system for various city agencies. The site is located on the northern part of the East Campus of St. Elizabeths Hospital, formerly federal property, on approximately 11.8 acres.

Commission Action Requested by Applicant

Approval of preliminary and final site and building plans pursuant to Section 5 of the National Capital Planning Act (40 U.S.C. § 8722(b)(1)).

Executive Director's Recommendation

The Commission:

Approves the preliminary and final site and building plans for the Unified Communications Center, except for employee parking, located at 2700 Martin Luther King Jr. Avenue, SE, as shown on NCPC Map File No. 83.10(38.00)-41359.

Requests:

- The applicant reevaluate its proposal and re-submit a project employee parking requirement and final site design to reduce the amount of overall employee parking by adhering to the standard of one parking space for every three employees (1:3).
- The applicant implement alternative transportation services for the UCC employees by minimizing the amount of surface parking and take into account existing and future public transportation opportunities on the St Elizabeths campus, and submit a Transportation Management Plan that will establish programs which will reduce the number of vehicle parking spaces.

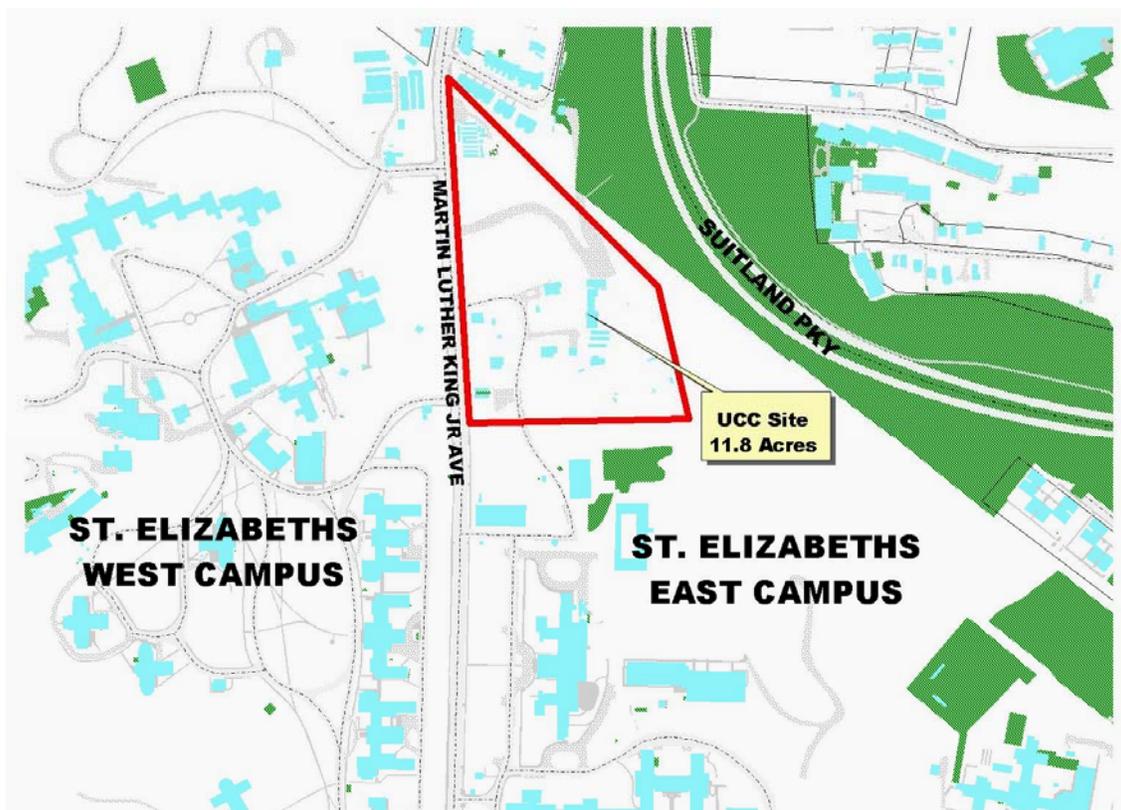
- The District of Columbia Office of Planning, in conjunction with the General Services Administration, complete a St. Elizabeths East and West Campus framework plan, taking into account the impacts the Unified Communications Center may have on that future development, as well as the precedent the unsupported UCC high parking ratio may set for other projects in the vicinity. New Zoning Commission actions at St. Elizabeths campus beyond the current project should not be pursued until the St. Elizabeths framework plan has been completed.

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PROJECT SUMMARY

Site Description

The new communications center is located at the northern extent of the East Campus of St. Elizabeths Hospital on approximately 11.8 acres that front Martin Luther King, Jr. Avenue, SE. The parcel is legally identified as Lot 1, Square S5868. The site is surrounded by Suitland Parkway on the east and the St. Elizabeths East and West Campuses on its south and west boundaries as depicted in the map below.



PROJECT SITE LOCATION

There are two separate structures that make up the overall complex—a three-story call center building and a smaller, two-story, childcare center located to the north of the call center. The two

structures will be faced with brick masonry, but the call center façade will also include cast stone and glass. The call center (also known as the communications center) will stand no higher than 57 feet.

Background

Historically, the St. Elizabeths Campus was owned by the federal government and operated by the Department of Health and Human Services. The East campus was transferred to the District of Columbia government on October 1, 1987. When the property was under federal authority, it was not zoned for use since federal properties are exempt from zoning under the District of Columbia Municipal Regulations. When transferred to the District government, however, the property was zoned to a C-2-B property category by the District of Columbia Zoning Commission. Also, at the time of the zoning approval on September 9, 2002, the project was permitted as a Planned Unit Development (PUD) (commercial with the Planned Unit Development overlay). This zoning promotes mixed use, medium intensity development with an overall maximum Floor-to-Area Ratio (FAR) of 3.5. Although the project attributes conform to the C-2-B matter of right regulations, the PUD approval allows flexibility in the overall design.

On September 5, 2002, the National Capital Planning Commission approved a report to the Zoning Commission of the District of Columbia noting the following:

- The Commission expressed concern with the amount of parking on the site, as well as the absence of an overall transportation management plan for the UCC operation. A similar federal facility, if developed at the St. Elizabeths campus, would be reviewed against a standard of one parking space for every three employees (1:3) under the Federal Elements of the Comprehensive Plan. The proposed UCC project is being developed with an approximate ratio of one space for every employee (1:1) and the Commission strongly encouraged the Zoning Commission and the Office of Planning to work with the District of Columbia Office of Chief Technology Officer to reduce this amount of parking and implement alternative transportation services for the UCC employees.
- The Commission noted the absence of an overall framework plan for the entire St. Elizabeths Campus and recommended that the Zoning Commission and the District of Columbia Office of Planning, in conjunction with the General Services Administration, move forward with a framework plan taking into account the impacts the UCC may have on the future development of the entire campus. The Commission also noted the precedent that the UCC high parking ratio may set for other projects within the campus vicinity.
- The Commission also expected the Section 106 process would be completed in accordance with the “Proposed Historic Mitigation Program” portion of the Memorandum of Agreement (MOA) signed by the District of Columbia, District of Columbia Historic Preservation Office, and the Department of Health and Human Services. The Commission emphasized that it would not review the project as required under Section 5 of the National Capital Planning Act until this MOA provision is satisfied.

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

Proposal

As previously noted, the two separate structures that comprise the overall development will house different functions and purposes. The main communications center structure houses a call-taking dispatch area that includes 139 communications consoles, a dining area, conference rooms, a media press room, administrative offices, and staff training spaces. The comprehensive incorporation of all these operations allows the UCC to have 72 hours of emergency self-sustaining capability. The childcare center exhibits large rooms for individual activity and learning areas along with necessary restrooms and food preparation area.

The primary entrance to the communications center building is situated at the south end of the structure immediately adjacent to a public accessible parking area and is placed in context with other surface parking. A parking area is also concentrated on the eastern portion of the site along with a smaller parking area located to the north for the childcare center. The eastern lot connects directly to the main staff entrance via a paved walkway. There are 274 parking stalls (238 secured employee spaces, plus 36 non-secured public spaces) that are accessed by the northern and southern ingress/egress driveways intersecting with Martin Luther King Jr. Avenue. The District of Columbia Office of the Chief Technology Officer (DCOCTO) has stated that the overlapping day and late afternoon shifts, which include 252 and 60 employees respectively, require that the specified number of vehicle parking spaces be provided in the final plans.

The final site plans show extensive landscaping in the interior and around the perimeter of the site to effectively screen the facility from Martin Luther King Jr. Avenue and Suitland Parkway. Along the portions of the development adjacent to Martin Luther King Jr. Avenue, as well as the areas visible from Suitland Parkway, the landscape plan depicts numerous evergreen and canopy trees to soften the facility's aesthetic appearance from these roadways. Furthermore, the plan illustrates numerous trees and groundcover in the interior of the site that will improve the visual integrity of the asphalt parking lot and to enhance the architecture of the UCC facility.

As a security measure, the Unified Communications Center is sited with a 100-foot standoff distance from Martin Luther King Jr. Avenue. A limited wet pool/retention pond and a landscaped berm lie within that setback, providing sloped terrain for an unauthorized vehicle to traverse. Additional security measures include a ten-foot-high security fence enclosing the whole of the Communications Center facility, and a guard station on the eastern portion of the site for screening vehicles that enter the employee parking area.

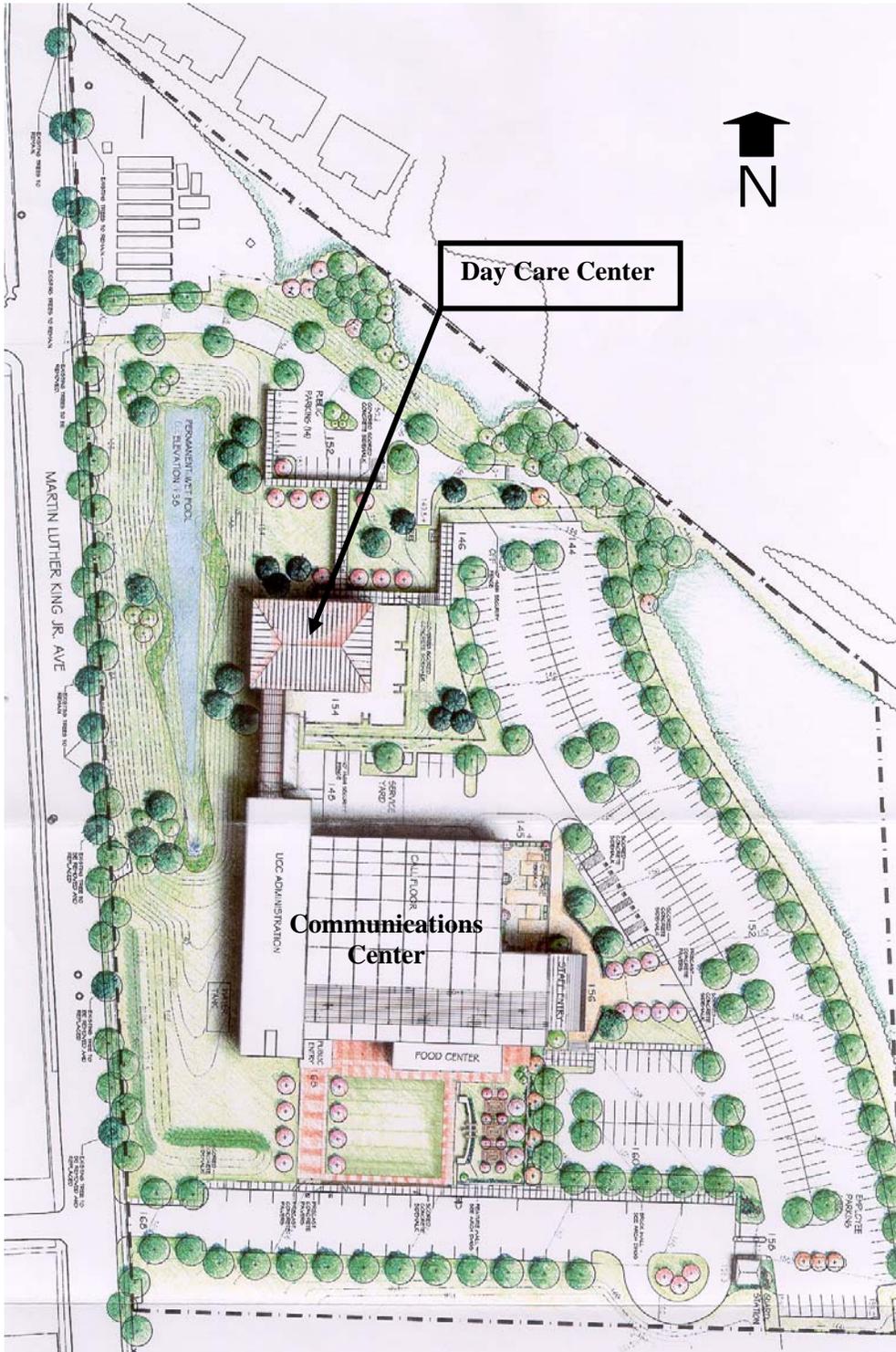
Due to the function of the Unified Communications Center, there will be telecommunications antenna located throughout the site. According to the submitted final project plans, there are a total of 69 antenna structures, 40 of which are active telecommunications functions. The balance of the structures include "dummy" antennas that will appear to be functioning antennas, but will

in fact be inoperable and acting as “place holders” to provide architectural continuity should additional operable antennas become needed at the UCC facility.

The location and description of these facilities can be described as follows:

- Four antennas will be located on the northeastern portion of the site, at the edge of the paved parking lot: two ground plane and two whip antennas, mounted on separate 30-foot-high poles.
- Four antennas will be mounted on the Child Development Center at the northern part of the facility. These will consist of two ground plane and two whip antennas, extending four feet above the parapet of the Child Development Center.
- Twenty-nine separate antennas will be located on the main Communications Center facility, with the bulk of them concentrated on the western portion of the structure. The antennas in this location include two satellite dishes, each 12 feet in diameter, as well as a host of various whip antennas measuring no more than 5 inches in diameter, and rising to 11 feet above the roof parapet.
- In addition to the 29 above-mentioned antennas, the project includes 22 “dummy” antennas which are fiberglass poles measuring 3 inches in diameter. These dummy antennas will be located among the antennas on the UCC structure itself.

The UCC will have an approximate total staff of 349 employees working in three different shifts. Also, within the adjacent childcare center there will be a staff of approximately 32 full and part-time workers that will provide necessary service to the communications staff.



UNIFIED COMMUNICATIONS CENTER SITE PLAN

PROJECT ANALYSIS

Executive Summary

Staff review finds limited issues with the final project design since many of the previous concerns expressed by the Commission's 2002 review of the project have been addressed by the final site and building plans. Issues about further screening of the complex from the Suitland Parkway and provisions for additional landscaping and trees within the main employee parking area are resolved by the revised final project site planting and landscape plans.

Additionally, the UCC submission has demonstrated completion by DCOCTO of its responsibilities for construction of the UCC under Section 106 of the National Historic Preservation Act through the finalization of a Memorandum of Agreement in August 2003. The MOA signatories are DCOCTO, the D.C. Department of Mental Health (DMH), the DC State Historic Preservation Officer (DC SHPO), and the Advisory Council on Historic Preservation. DMH administers the East Campus of St. Elizabeths, but a portion of the campus was subdivided for use by the UCC.

However, it is noted by staff that the Commission's prior concerns about the amount of employee parking have not been addressed by the final plans and the vehicle parking provided. Although the final plans have reduced, by approximately eight employee spaces, the amount of allocated project parking; the final total is still in conflict with the Commission's Comprehensive Plan guidance. The Commission's earlier review of this proposal commented on to the parking issue to the Zoning Commission indicating a need for the applicant to comply with the Comprehensive Plan parking goal for employee parking. That requirement is one parking space for every three employees (1:3). The applicant has submitted no information whatsoever on the issue—including no justification for not adhering to the Comprehensive Plan objective.

In reviewing this project using the Comprehensive Plan's parking goal, it is necessary to consider the largest shift of employees and the overlap between shifts. In the proposal as submitted, there will be a total of 252 employees on the larger first shift that overlaps with the second shift of 60. The optimum number of employee spaces based on the federal ratio is 94. That figure is determined as follows:

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

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

Under the District of Columbia Zoning Code, the minimum amount of parking required for this development would be 77 spaces. The proposed 274 employee spaces is a total that is over the minimum standard established by the zoning regulations. Additionally, no attempt was made to identify any form of transportation management plan to encourage UCC employees or visitors to utilize alternate forms of transit in their commute to the Center.

Consequently, Staff **recommends approval** of the preliminary and final site and building plans except for the employee parking. Staff further suggests that Commission approval should note

the District of Columbia applicant address the Commission's concern to reduce the amount of employee parking, re-submit the project parking design, and that it implement alternative transportation services for the UCC employees by establishing a Transportation Management Plan.

Urban Design and Security Plan

On November 1, 2001, the National Capital Planning Commission adopted a report of the Interagency Security Task Force entitled *Designing for Security in the Nation's Capital*. The report recommended specific urban design strategies to improve mobility and aesthetic conditions through a coordinated prepared plan. The Plan approved by the Commission in October 2002 focuses exclusively on perimeter building security designed to protect employees, visitors, and federal functions and property from threats generated by unauthorized vehicles approaching or entering sensitive building areas.

The District facility location does not impact the NCPC National Capital Urban Design and Security Plan but essentially incorporates many objectives and goals of the Plan through the use of some features discussed in the October 2002 Plan such as building standoff distance, landscaping, retaining walls, and a controlled employee vehicle access point.

Development Program

Applicant: The District of Columbia Office of the Chief Technology Officer

Architect: TRW and DMJMH+N of Arlington, Virginia

Cost: Unspecified

Schedule: Construction of the facility is underway and is scheduled for completion in 2006.

PROJECT CONFORMANCE

Comprehensive Plan for the National Capital

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

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

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

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

The proposed facility would be minimally visible from the Parkway and with the specified appropriate landscaping now coordinated by DCOCTO and the National Park Service, would not detract the unique qualities of this Special Street. The final project plans provide for the additional screening of the UCC complex from the Parkway.

The proposed final project site and building plans are not inconsistent with applicable policies in the Comprehensive Plan.

Federal Capital Improvements Program

The proposed project is not a federal project and consequently is not identified in the Federal Capital Improvements Program Fiscal Years 2004–2009, adopted by the Commission on September 4, 2003.

National Environmental Policy Act

As a District of Columbia agency project, outside of the central area of the District on non-federal property, the National Environmental Policy Act does not apply to the proposed construction.

The District of Columbia has reviewed the action and determined that it qualifies as an exempted action in accordance with the implementing rules of the District of Columbia Environmental Policy Act of 1989. As the action is an activity outside of the Central Area, which has been concurrently defined by the Commission and Council to include the Shaw School and Downtown Urban Renewal Areas, the action is not subject to final federal approval as defined under Commission environmental procedures. Nevertheless, staff reviewed the action for extraordinary circumstances as sanctioned by NEPA but finds no significant issues that would alter the determination of exemption.

- The project, as submitted, would not generate major impacts on cultural resources.
- The proposed exterior improvements will not generate significant adverse impacts on the natural environment.
- No significant noise impacts are anticipated because all construction activities will comply with local noise ordinance restrictions as required by the construction permitting process of the District of Columbia.

National Historic Preservation Act

The DCOCTO recognized its responsibilities for construction of the UCC under Section 106 of the National Historic Preservation Act through the completion of a Memorandum of Agreement

in August 2003. The MOA signatories are DCOCTO, the D.C. Department of Mental Health (DMH), the DC State Historic Preservation Officer (DC SHPO), and the Advisory Council on Historic Preservation. DMH administers the East Campus of St. Elizabeths, but a portion of the campus was subdivided for use by the UCC.

St. Elizabeths Hospital, including both the east and west campuses, was listed in the National Register of Historic Places in 1979 and was further designated a National Historic Landmark in 1990. The terms of an earlier MOA executed in 1989 as a requirement of transfer of portions of the initial campus from the federal government to the District of Columbia government stated that "all plans and specifications for the rehabilitation of, or new construction at or adjacent to, or temporary abandonment of, the [specified] historically significant components . . . will be submitted to the [DC SHPO] for review and approval prior to implementation."

This consultation and review culminated in the 2003 MOA. The proposed UCC was determined to have an adverse effect on the St. Elizabeths Hospital National Historic Landmark District, specifically as a result of the proposed demolition of two nineteenth-century staff residences, the relocation of another two nineteenth-century staff residences, and the removal of mature trees and significant re-grading that would affect the historic, agricultural context of the historic Dry Barn and Horse Barn.

MOA mitigation measures include: the relocation and stabilization of the two staff residences to locations near the Dry Barn and Horse Barn, with specific conditions for the position of the houses and their treatment; the recordation to HABS standards of the staff residences; the retention and protection of mature trees and landscape features to the extent possible and the planting of an additional 22 trees along Martin Luther King, Jr. Avenue, SE; and the stabilization of the Dry Barn and Horse Barn with stipulated treatment and ongoing maintenance measures.

CONSULTATION

National Park Service

The DCOCTO has consulted with the National Park Service (NPS) on a reforestation area (approximately 0.7 acres) to the northeast of the project property. This reforestation will occur in an area featuring an existing swale and gravel channel that will be disturbed by the UCC construction. Furthermore, the Zoning Commission required additional landscaping within the Suitland Parkway right-of-way, further screening the UCC from that roadway. These additional plantings in public space have been implemented in the final project plans in coordination with the NPS.

District of Columbia Office of Planning Report

In its report to the Zoning Commission dated April 3, 2002, the District of Columbia Office of Planning (DCOP) recommended approval of the consolidated PUD and map amendment to C-2-B. In a follow-up report to the Zoning Commission dated June 28, 2002, DCOP recommended approval of the historic amenity package and revised antenna plan. Also within this report, DCOP reiterated to the DCOCTO its requirement to receive Section 106 approval in accordance with the

1989 Memorandum of Agreement, and stated that the historic amenity package proffered to the Zoning Commission through the PUD process is not a substitute for the 106 approval.

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on April 14, 2004 and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC; District of Columbia Office of Planning; the District Department of Transportation; the General Services Administration and the Washington Metropolitan Area Transit Authority.