

**RANDALL JUNIOR HIGH SCHOOL REDEVELOPMENT**

**STATEMENT OF  
THE TRUSTEES OF THE CORCORAN GALLERY OF ART  
AND MR RANDALL CAPITAL LLC  
IN SUPPORT OF AN APPLICATION TO THE  
DISTRICT OF COLUMBIA ZONING COMMISSION  
FOR A  
CONSOLIDATED PLANNED UNIT DEVELOPMENT  
AND  
RELATED MAP AMENDMENT**

**April 11, 2007**

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**ZONING COMMISSION  
District of Columbia**

**CASE NO. 07-13 ZONING COMMISSION  
District of Columbia  
EXHIBIT NO. 5 CASE NO. 07-13  
EXHIBIT NO.5**

## **PREFACE**

This statement is submitted by the Trustees of the Corcoran Gallery of Art and MR Randall Capital LLC in support of an application for consolidated approval of a planned unit development and a related map amendment before the District of Columbia Zoning Commission. The subject property is located at 65 I Street, S.W. (also known as 820 Half Street, S.W.) and includes Lot 801 in Square 643-S. The site is currently improved with a group of buildings that previously housed the Randall Junior High School. The Applicant seeks to rezone the property from R-4 to C-3-A to allow the development of a nine-story mixed-use arts and residential building that will incorporate the main Randall School building and its east and west wings. The new building will be constructed to an FAR of 4.32 and a maximum height of 90 feet.

## **DEVELOPMENT TEAM**

**Owner:**

Trustees of the Corcoran Gallery of Art  
500 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20006

**Developer:**

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1155 Connecticut Avenue, N.W.  
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Washington, D.C. 20036

**Design Architects:**

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**Land Use Counsel:**

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**Traffic Consultant:**

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McLean, Virginia 22102

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## I. INTRODUCTION

This statement and the attached documents support the application of the Trustees of the Corcoran Gallery of Art (the "Corcoran") and MR Randall Capital LLC (collectively, the "Applicant") to the Zoning Commission of the District of Columbia (the "Commission") for the consolidated review and approval of a Planned Unit Development ("PUD") and related Zoning Map amendment. The Applicant seeks approval of the proposed PUD and a rezoning of the property at 65 I Street, S.W., (Square 643-S, Lot 801) from R-4 to C-3-A to allow the development of a new mixed-use development, which will include a residential condominium building and facilities for the Corcoran College of Art and Design.

### **A. Project Summary**

The proposed project contemplates the construction of a mixed-use development that will include 400-500 residential condominium units, new facilities for the Corcoran College of Art and Design, and three levels of underground parking. No less than twenty percent of the residential units in the development will be reserved for households earning less than eighty percent of area median income ("AMI"). The original 1906 Randall School building and its two flanking wings dating from 1927 will be retained, rehabilitated and incorporated into the new development. Other additions of lesser historic value will be removed to allow construction of the new development. The proposed project will be constructed to a density of 4.32 FAR and a maximum height of 90 feet. The Corcoran use of the facility will comprise approximately 0.66 FAR of the total project. The PUD is designed by Shalom Baranes Associates, an architectural firm with extensive expertise in the renovation and adaptive reuse of historically significant properties.

## **B. The Applicants**

The Corcoran Gallery of Art, a District of Columbia nonprofit corporation, was founded in 1869 as the first museum of art in the District of Columbia. The Gallery has an extensive collection of historical and modern American art, as well as contemporary art, photography, European painting, sculpture, and decorative arts. The Corcoran College of Art and Design was founded in 1890 and enrolls approximately 500 undergraduate and graduate students. Additionally, the college offers non-degree art classes to more than 3,000 children and adults each year.

MR Randall Capital LLC, a Delaware limited liability company, is a subsidiary of Monument Realty. Monument Realty was formed in the District of Columbia in 1998 and has since become one of the nation's most successful development firms. Monument Realty has extensive experience developing residential, commercial, and mixed-use projects in the District of Columbia and the outlying metropolitan area.

## **II.** **PROJECT DESCRIPTION**

### **A. Site Location and Description.**

The PUD site is located at 65 I Street, S.W. (also known as 840 Half Street, S.W.) and consists of Lot 801 in Square 643-S, the city block bounded by I Street on the south, former 1st Street on the west, partially-closed H Street on the north, and South Capitol Street on the east, in southwest Washington, D.C. The site contains approximately 115,724 square feet of land area. The property is presently improved with the former Randall Junior High School, which consists of its original 1906 building and numerous subsequent additions. In recognition of the historical significance of the school, the Applicant filed an application with the D.C. Historic Preservation Review Board ("HPRB") to designate the building and its site as an individual landmark. The

HPRB is granted landmark status to the building at its March 22, 2007, meeting. The most significant, earliest and intact portions of the Randall School buildings will be retained, rehabilitated and incorporated into the new development. The later additions of lesser historical value will be removed.

The subject property is located within Ward 6 and is designated for "Medium Density Residential" use on the Future Land Use Map of the Comprehensive Plan. The land in the vicinity of the subject property has a variety of designations, including high density commercial land uses to the south and east of the site, mixed-use medium and high density residential, medium density commercial and medium density residential. The site is currently zoned R-4 and is surrounded by similarly zoned land on three sides. The property located to the south and southeast of the subject site is zoned C-3-A and C-3-C. The western edge of the subject property includes a portion of 1st Street, S.W. that was closed in connection with the urban renewal plans of the 1950s. The proposed development does not contemplate any new construction within this area and will thus maintain the integrity of the historic L'Enfant street plan. To the north and east of the site are the Randall Recreation Center and ballfields.

**B. Development Covenant for the Property**

The property is being developed pursuant to a covenant between the District of Columbia and the Trustees of the Corcoran Gallery of Art. In the Fall of 2006, the District sold the former Randall Junior High School property to the Corcoran in order that it may be redeveloped for use as a museum and school of fine arts, and a new residential development. Under the terms of the agreement, the Corcoran must provide a minimum of 80,000 square feet of space to arts education and arts-related uses, and a minimum of 340,000 square feet of space for residential uses. Twenty percent of the residential units must be set aside for households earning no more

than 80 percent of the AMI. To fulfill its obligations under the covenant, the Corcoran has selected MR Randall Capital LLC as its development partner. The affordable housing component under the covenant is two and a half times the requirement set forth in the Zoning Commission's recently adopted Inclusionary Zoning ("IZ") regulations. The Applicant has also elected not to avail itself of the full bonus density permitted under section 2604 of the IZ provisions, which permits a density of 4.8 FAR.

**C. Existing Topography.**

The grade of the subject property is relatively level, but rises approximately one and a half feet in elevation from west to east.

**D. Project Design.**

Overview

The proposed PUD will integrate the historically significant portions of the existing Randall Junior High School complex into a new development consisting of residential, educational, and arts-related uses. Upon completion, the building will contain approximately 499,843 square feet of gross floor area, which equates to an overall density of approximately 4.32 FAR. Approximately 76,043 square feet of gross floor area will be devoted to exhibition, studio, and classroom space for the Corcoran College of Art and Design.<sup>1</sup> The College will occupy the renovated Randall Junior High School buildings, as well as additional space on the first three floors of the western wing in the proposed new construction. The residential portion of the development, containing approximately 423,800 square feet of gross floor area, will be located in the remaining portions of the new building. The residential space will be divided into approximately 400-500 condominium units. The development will also include a three-level

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<sup>1</sup> The Corcoran School of Art and Design will occupy a total of approximately 100,000 square feet of space, a portion of which is below grade and does not count toward FAR.

underground parking garage, which will contain spaces for approximately 390 to 470 vehicles. The new construction in the development will rise to a maximum height of 90 feet, which is the maximum permitted height allowed under the PUD standards for the C-3-A District.

2. Project Massing

The massing of the new construction is E-shaped in configuration, with the two end-legs connecting to the historic wings of Randall School. The shorter, center-leg will project into an interior courtyard that separates the new construction from the existing building. The massing concept, which evolved through a series of meetings with District agencies and reflects recent comments of HPRB, places a majority of the project's density away from the historic building toward the rear of the site. Small, two-story additions are located to either side of the 1927 wings. The sensitive massing of the new construction allows the historic Randall School to continue to appear as a separate building along I Street, S.W., and maintain the character of the existing streetscape.

3. Exterior Façade Materials

Designed in institutional interpretation of the Georgian Revival style, the historic building is faced with red brick and limestone trim. In order to distinguish the historic building from the new construction, the proposed PUD will be clad primarily in metal and a contrasting brick color which complements the former school. Different shades of brick will be blended to render the Project's distinctive massing elements. Painted aluminum window systems will be incorporated throughout. Cast stone or concrete copings, window openings, and horizontal trim will articulate certain floor levels, and other architectural elements will add rich detailing to the facades.

4. Courtyard Design and Landscaping

The PUD will provide a series of landscaped courtyards along former 1st Street and at the interior of the site. A ceramics courtyard and exhibition garden at the western perimeter will enliven the I Street corridor. An interior courtyard for sculpture and other art displays will animate the interior of the site while also offering passive recreation space for residents of the complex.

5. Site Circulation

Parking and loading access is at the rear of the site along H Street, S.W., with a private driveway located in a portion of the former 1st Street right-of-way. The residential portion of the building will have two points of access. One entrance will be located at the northwest corner of the site, leading to the principle lobby with front-desk service and the main elevators. A secondary entrance will be located at the southeast corner of the building on I Street and connect by corridors to a second set of elevators and the main lobby. Pedestrian access around the site will be accommodated through pathways and public sidewalks. Patrons of the Randall Recreation Center will continue to have vehicular access along H Street.

**E. Matter-of-Right Development Under Existing Zoning.**

The subject property is located in the R-4 District, which "is designed to include those areas now developed primarily with row dwellings, but within which there have been a substantial number of conversions of the dwellings into dwellings for two (2) or more families." 11 DCMR § 330.1. Buildings in the R-4 District may be constructed to a maximum height of 40 feet as a matter of right and may contain no more than three stories. 11 DCMR § 400.1. The Zoning Regulations require a minimum lot area of 1,800 square feet for row dwellings and flats, 3,000 square feet for semi-detached one-family dwellings, and 4,000 square feet for all other

structures. 11 DCMR § 401.3. The minimum lot width in the R-4 District for row dwellings, semi-detached dwellings, and detached dwellings are 18 feet, 30 feet, and 40 feet, respectively. 11 DCMR § 401.3. There is no maximum floor-area ratio ("FAR") prescribed for the R-4 District, 11 DCMR § 402.4, and the maximum lot occupancy is sixty percent. 11 DCMR § 403.2. The height, number of stories and lot occupancy limitations within the R-4 District result in an effective density ceiling of 1.8 FAR.

Under the PUD guidelines for the R-4 District, buildings may be constructed to a height of 60 feet and a maximum density of 1.0 FAR. 11 DCMR §§ 2405.1, 2405.2. The Commission may increase these ceilings by as much as five percent if "the increase is essential to the successful functioning of the project and consistent with the purpose and evaluation standards of ... [Chapter 24 of the Zoning Regulations]." 11 DCMR § 2405.3.

**F. Matter-of-Right Development Under Proposed C-3-A Zoning.**

The Applicant seeks to have the subject property rezoned from R-4 to C-3-A. The C-3-A District allows "medium density development, with a density bonus for residential development within a general pattern of mixed-use development." 11 DCMR § 740.4. Buildings in the C-3-A District may be constructed to a maximum height of 65 feet as a matter of right with no limit on the number of stories. 11 DCMR § 770.1. Development in the C-3-A District may have a maximum density of 4.0 FAR, but no more than 2.5 FAR may be devoted to non-residential uses. 11 DCMR § 771.2. The maximum lot occupancy in the C-3-A District is seventy-five percent. 11 DCMR § 772.1.<sup>2</sup>

Under the PUD guidelines, the maximum allowable height for a building in the C-3-A District is 90 feet. Development within the C-3-A District may have a maximum density of 4.5

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<sup>2</sup> Under the IZ provisions of the newly adopted Chapter 26, C-3-A development would be permitted to achieve a density of 4.8 FAR with 80% lot occupancy. See 11 DCMR § 2604.2.

FAR, with no more than 3.0 FAR devoted to non-residential uses. 11 DCMR §§ 2405.1, 2405.2.

Again, the Commission may increase these maximum limits by up to five percent if the project cannot successfully function without the additional height or density. 11 DCMR § 2405.3.

The proposed project falls within the PUD guidelines for the C-3-A District. The overall density of the PUD will be 4.32 FAR, with approximately 0.66 FAR devoted to non-residential uses and the remaining 3.66 FAR devoted to residential uses. The building will not exceed 90 feet in height.

**G. Tabulation of Development Data.**

See chart on following page.

## TABULATION OF DEVELOPMENT DATA

	C-3-A Matter of Right	C-3-A PUD Guidelines	Project
Minimum lot area	N/A	15,000	115,724
TOTAL FAR	4.0 total 2.5 non-residential	4.5 total 3.0 non-residential	4.32 total 0.66 non-residential
Gross floor area	462,896 sf (maximum); 289,310 sf (maximum nonresidential)	520,758 sf (maximum); 347,172 sf (maximum nonresidential)	499,843 sf of GFA total; 423,800 sf residential; 76,043 sf nonresidential
Height	65 ft.	90 ft.	90 ft.
Lot Occupancy	75% residential 100% nonresidential	same as matter-of-right	70%
Rear Yard	2.5 ft per foot of vertical ht of building at mean finished grade at rear; not less than 12 ft.	same as matter-of-right	None provided – <i>Relief requested</i>
Side Yard	not required; if provided, then 2 in for each ft of building ht, not less than 6 ft	same as matter-of-right	41 feet (west side)
Courts	Non-residential Width = 3 in/ft of ht; at least 12 ft. Area = 2 x land area, at least 250 sf (closed) Residential Width = 4 in/ft of ht; at least 15 ft. Area = 2 x land area; at least 350 sf (closed)	same as matter-of-right	<i>Relief requested</i>
Parking			
	1 for every 2 residential units (250 required); 2 for every 3 teachers (27 required for 40 teachers); plus, the greater of either 1 for every 10 classroom seats, OR 1 for each 12 stadium seats, OR 1 for every 10 auditorium seats (33 req for 330 classroom seats)	same as matter-of-right	330-410 residential 60 nonresidential
Loading	Residential: 1 berth @ 55 ft deep 1 platform @ 200 sf 1 service/delivery @ 20 ft deep School: (Other use less than 100,000 sf) 1 berth @ 30 ft deep 1 platform@100 sf 1 service @ 20 ft deep	same as matter-of-right	1 berth @ 12 x 55 1 berth @12 x 30 2 service/delivery @ 10x20 1 platform @ 100 sf 1 platform @ 200 sf

The estimated quantity of potable water, sanitary sewage and storm water run-off is attached hereto as Exhibit E.

#### **H. Flexibility Under the PUD Guidelines.**

The PUD process was created to allow greater flexibility in planning and design than may be possible under conventional matter-of-right development. Given the constraints of the site, including the retention of the historic portions of the Randall School, the Applicant will seek flexibility from the area requirements for rear yard, loading facilities, penthouse setback and multiple penthouses of varying height, and several non-compliant courts.

### **III.**

#### **THE PUD PROCESS IS THE APPROPRIATE MECHANISM FOR THIS PROJECT**

#### **A. Benefits of the PUD Process.**

The PUD process is the appropriate mechanism for guiding the development of this site. It allows the project to be developed within the purview of the Zoning Commission, while at the same time providing opportunities for input from various agencies and parties. Through the PUD process, the Office of Planning and other District agencies will have the opportunity for greater participation in the fulfillment of the District's planning objectives for this area. Similarly, the adjacent property owners and area residents will have the opportunity to express their views about the proposed development. Accordingly, the use of the PUD process gives the community and District agencies an opportunity to work with the Applicant to ensure a well-planned development. Finally, the proposed project will provide exceptional project amenities and public benefits to the community and the District of Columbia that would not be provided if the property were developed as a matter of right.

**B. Area Requirements Under Section 2402.1(c)**

The area of the Site is approximately 115,724 square feet in land area, which exceeds the minimum area requirement of 15,000 square feet for a PUD in the C-3-A District. 11 DCMR §2401.1(c).

**C. Height and FAR Requirements Under Sections 2405.1 and 2405.2**

The project has been evaluated under the PUD guidelines for the C-3-A District. As noted above, a PUD in the C-3-A District permits development of approximately 520,758 square feet of gross floor area on the Site, or 4.5 FAR. The development could include up to 3.0 FAR – or 347,172 square feet – of commercial uses, including both office and retail uses. Instead, the project will have a maximum density of approximately 4.32 FAR and will include approximately 76,043 square feet of gross floor area, the equivalent of 0.67 FAR, devoted to the Corcoran College of Art and Design. The PUD will be 90 feet in height, and thus complies with the 90-foot limitation for a PUD in the C-3-A District.

**D. Impacts of the Proposed Project on the Surrounding Area Under Section 2403.3.**

Section 2403.3 of the Zoning Regulations provides that the "impact of the project on the surrounding area and the and the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project." 11 DCMR § 2403.3.

The impacts of the proposed PUD will not be unacceptable on the surrounding area or upon the operation of city services and facilities. In fact, the project will have a positive impact on the immediate area. The project constitutes appropriate residential in-fill development in an area characterized by medium and high-density residential, as well as commercial and institutional uses. The design complements these surrounding uses.

The project will likewise have no unacceptable impact on traffic. As will be demonstrated by the Traffic Impact Study prepared by Wells and Associates, intersections will continue to operate at acceptable levels after completion of the project. Moreover, the Randall School property is well-served by public transportation, including Metrorail and Metrobus. The site is located within walking distance of the Waterfront/SEU and Navy Yard Metrorail stations, which are both served by the Green line. Metrorail passengers may transfer to the Orange, Blue, and Yellow lines at the L'Enfant Plaza station, which is located just one stop away from the Waterfront/SEU station. A transfer point to the Red line is located at the Gallery Place/Chinatown station, which is only three stops away. The subject property is served by eight separate Metrobus lines on M Street and is also within walking distance of stops on five additional bus service lines. The Corcoran also plans to provide shuttle bus service between the Randall School facilities and its main campus on 17<sup>th</sup> Street, N.W. Residents, employees, and students at the proposed development will therefore have a full range of convenient transportation options.

#### IV.

#### THE PROPOSED PROJECT MEETS THE STANDARDS OF THE PUD REGULATIONS

##### **A. PUD Requirements Under the D.C. Zoning Regulations.**

The proposed development has been evaluated relative to the PUD standards of Chapter 24 of the Zoning Regulations and the PUD guidelines of the C-3-A District. The subject property contains approximately 115,723 square feet of land area, which exceeds the minimum area requirements of 15,000 square feet for a PUD in the C-3-A District. In accordance with the PUD guidelines, the project will not exceed 90 feet in height and will have an overall FAR of 4.32.

**B. Public Benefits and Project Amenities.**

The PUD guidelines define public benefits as "superior features of a proposed planned unit development that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely occur under the matter of right provisions." 11 DCMR § 2403.6. A project amenity is further defined as "one type of public benefit, specifically a functional or aesthetic feature of the proposed development, that adds to the attractiveness, convenience or comfort of the project for occupants and immediate neighbors." 11 DCMR § 2403.7. In evaluating the merits of a PUD application, the Zoning Commission shall "judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case." 11 DCMR § 2403.8.

The minor flexibility requested in the instant PUD application will achieve the goals of the PUD process by providing an exceptional arts component to the Southwest quadrant through the expansion of the highly-acclaimed Corcoran School of Art and Design. The project will also bring a high-quality residential to the site and will have significant public benefits for the neighborhood and the District as a whole. The project's sensitive treatment of the historically significant buildings in the Randall Junior High School complex and the provision of affordable housing are precisely the type of public benefits that the PUD process was designed to encourage. The proposed PUD will provide the following superior public benefits and amenities for the District.

**1. Uses of Special Value to the Neighborhood or the District of Columbia as a Whole.**

The most significant feature of the proposed PUD is the introduction of the Corcoran College of Art and Design to southwest Washington. Almost 100,000 square feet of space

(77,336 square feet of gross floor area) in the proposed development will be occupied by classroom, exhibition, and studio space for the college. This space will allow the school to significantly expand its undergraduate and graduate degree programs, as well as its non-degree art programs for children and adults. The Arts Education Degree Program offer courses and experiential learning opportunities that are explicitly and specifically tailored to the District educational policies. This Master of Arts Teaching program integrates graduate students into the D.C. Public Schools ("DCPS") to expand the arts curriculum of the public school system not otherwise possible while providing valuable teaching experience for Corcoran's M.A. candidates.

Other highly successful art programs initiated by the Corcoran include the following:

- *"After School for All" Program*

A team of program faculty, experienced Corcoran instructors, and advanced degree students planned and implemented summer elementary and middle school art programs under the auspices of "After School for All" (Bancroft, Barnard, Kenilworth, Merrit/Benning, Thurgood Marshall, and Johnson), following grade-appropriate standards of DCPS Visual Art curricula to enhance school-year programs. The same team prepared a ten-week flexible middle school program, adaptable to various school settings and suitable to be implemented by skilled artists-in-residence, as a bridge between independent contract instructors and the DCPS art standards.

- *Elementary School Partnership*

The Corcoran art education faculty and students of J.F. Cook Elementary School established an educational partnership, which can serve as a model for other schools. Under this educational outreach program, the Corcoran teaches two 10-week semesters per year of "integrated art," a discipline based on art education in the following areas: studio, art history, criticism and aesthetics. In 2006-2007, the program was expanded from one grade to four grades, and seven grades are anticipated for 2007-2008. This project is an essential part of the degree program for all Corcoran Art Education students. Corcoran art educators also offered a one-week summer camp for rising 5th graders on the main campus of the Corcoran College, using college-level facilities, multimedia resources, and incorporating three field trips, city walking tours, and individual instruction.

- Professional Development for Art Teachers

The Corcoran provides workshops during regularly scheduled DCPS Office of Curriculum training weeks. Two workshops in Fall 2007 led directly to successful proposals for art awards granted by the *Washington Post* in its annual competition. Additionally, D.C. art teachers received free course tuition, with credit, to hundreds of studio art courses and all pertinent education courses.

- Continuing Education

Continuing Education classes at the Corcoran College of Art and Design make art accessible to anyone with a desire to learn, regardless of age, skill level or experience. As a service to the Greater Washington, D.C. community, the College offers a year-round schedule of credit and non-credit classes during the day, evening and weekend, designed for adults, teens and children. Students can choose from a wide range of courses in studio art, design, photography and art history. The Continuing Education program also offers fourteen specialized Credit Certificates in areas such as Art Illustration and Graphic Design.

- Gallery Education

The Corcoran Gallery of Art's Education Department provides two primary functions. Externally, the Education Department serves as the bridge between the Corcoran's collections and exhibitions and the Washington community at large, our regular patrons and outside visitors, and the diverse education communities participating in our preschool through graduate programs. Within the institution, the Education Department connects formal and informal systems of learning, serving as the audience expert and advocate and identifying areas of creative, collaborative programming for the students.

- Community Programs – Corcoran ArtReach

Each semester, the Community Studios program provides free after-school studio art and creative writing instruction for D.C. students between the ages of 6 and 21. All classes take place in partnership with local community centers:

1. *THEARC* – located in Southeast, brings the programs and services of cultural, health, recreation, and human development organizations to residents east of the Anacostia River in the Ward 8 region of the District of Columbia. As one of nine partners in the 110,000 square-foot community campus, Corcoran ArtReach provides free visual arts programming to youth and families. Students in our program have the opportunity to exhibit their work at our on-site community gallery.
2. *The Patricia M. Sitar Center* – located in Adams-Morgan, is a community arts center that provides a safe, structured and nurturing environment for exploring music, dance, drama, writing and visual arts. It focuses primarily on programs and activities for at-

risk children, youth and their families and reaches out to all community members through shared experiences in the arts.

3. *The Latin American Youth Center (LAYC), Art and Media House* – located in Columbia Heights, the LAYC Art & Media House encourages D.C. youth between the ages of 12 and 18 to discover the power of their art as a means of self-expression and as a tool for exploring community issues. The creative abilities of youth are developed through hands-on training in media and fine arts. Through these programs, participants broaden their understanding of themselves and are provided with opportunities for sharing their perspectives through exhibitions and presentations.

These programs—and the college's continuing education programs, in particular—will further a number of the policies set forth in the Arts and Culture Element of the Comprehensive Plan and will provide a significant benefit of special value to the surrounding neighborhood and the District as a whole.

## 2. **Housing and Affordable Housing.**

The project will result in a significant addition to the District's housing stock. The development will contain 400-500 residential condominium units, amounting to more than 423,800 square feet of residential floor area. Significantly, the Applicant will set aside twenty percent of those units for individuals and families earning less than twenty percent of AMI. In addition to furthering the general housing objectives and policies of the Zoning Regulations and the Comprehensive Plan, the proposed development will help satisfy the growing demand for housing in this rapidly changing neighborhood.

The affordable housing component is two and a half times that required under the recently adopted IZ provisions under Chapter 26 of the Zoning Regulations. The total project density is 0.5 FAR, or 55,000 square feet, less than the twenty percent IZ bonus density permitted for a project in the C-3-A District.

### **3. Historic Preservation.**

The PUD will also allow the renovation and adaptive reuse of the historic portions of the Randall Junior High School. These structures have fallen into a state of disrepair in recent years and are in danger of losing their historic character. The proposed project contemplates the rehabilitation of these historically significant buildings and their careful integration into the planned development on the site. The renovation of these buildings will significantly improve the appearance of the streetscape and enhance the attractiveness of the surrounding neighborhood.

### **4. Revenue for the District.**

The proposed PUD will create a number of employment opportunities for District residents during both the construction and operations phases of the development. As indicated in the economic analysis performed by Basile Baumann Prost & Associates, which is attached hereto as Exhibit F, the construction of the proposed development will create 425 direct on-site jobs with an aggregate payroll of approximately \$18.5 million. These on-site positions will, in turn, generate 375 additional jobs off site. These indirect jobs will have an aggregate payroll of more than \$13.2 million. The purchase of construction materials and related consumer expenditures during the construction phase of the project will amount to more than \$47 million. These economic impacts will result in approximately \$1.5 million in tax and fee revenues for the District during the construction of the project.

When it is completed, the proposed development will provide a total of 128 permanent on-site jobs with an aggregate annual payroll of nearly \$6.5 million. In addition, the project is expected to create 547 indirect jobs with a total annual payroll of approximately \$19 million.

The occupants of the residential condominiums in the development will have an aggregate annual income of more than \$45 million, if 466 residential units are produced. Based on these projections, the District is expected to collect more than \$6.2 million in additional sales, income, and property taxes. The economic impact analysis also predicts that the expanded student body at the Corcoran College of Art and Design will generate additional retail expenditures—and corresponding sales tax revenues—that are not reflected in the calculations presented above. Finally, the proposed development project is likely to have significant economic spillover effects on the surrounding community. The renovation and adaptive reuse of the aging Randall Junior High School complex will significantly enhance the appearance of the streetscape and is likely to stimulate additional private investment on adjacent properties.

During the construction of the proposed PUD, the District is expected to collect approximately \$1.5 million in additional income taxes, sales taxes, and building permit fees. After the project has been completed, the development is projected to generate more than \$6.2 million in additional tax revenue each year. This increase in tax receipts represents a significant public benefit for the District.

##### **5. First Source Employment Opportunities.**

Likewise, in furtherance of Mayor's Order No. 83-265 and D.C. Law 5-93, the Applicant will work with the Department of Employment Services ("DOES") to execute a First Source Employment Agreement in order to achieve the goal of utilizing District residents for at least fifty-one percent of the jobs created by the PUD project. The Applicant will use DOES as its first source for recruitment, referral, and placement of new hires for employees whose jobs are created by the PUD.

## **6. Local Business Opportunities.**

The Applicant will enter into a Memorandum of Understanding with the D.C. Department of Small and Local Business Development in order to achieve, at a minimum, the goal of thirty-five percent participation by small, local, and disadvantaged businesses in the contracted development costs for the design, development, construction, maintenance, and security for the project to be created as a result of the PUD. This memorandum contributes significantly to the District's goal of ensuring adequate opportunities for small and local businesses to participate in development projects throughout the city.

## **V.**

### **COMPLIANCE WITH THE D.C. COMPREHENSIVE PLAN**

#### **A. Purposes of the Comprehensive Plan.**

The D.C. Code provides that the District Elements of the Comprehensive Plan are designed to:

- (a) Define the requirements and aspirations of District residents, and accordingly influence social, economic and physical development;
- (b) Guide executive and legislative decisions on matters affecting the District and its citizens;
- (c) Promote economic growth and jobs for District residents;
- (d) Guide private and public development in order to achieve District and community goals;
- (e) Maintain and enhance the natural and architectural assets of the District; and
- (f) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District.

D.C. Code § 1-301.62 (2001).

The proposed redevelopment project significantly advances these purposes by promoting the District's social, economic, and physical development through the provision of new arts and residential uses, promoting economic growth and jobs for District residents, achieving a number of arts, housing, and historic preservation goals for the community and the District, maintaining

and enhancing the architectural assets of the District, and stabilizing and improving the South Capitol Street/Near Southwest neighborhood.

**B. The Future Land Use Map and the Generalized Policy Map.**

The Future Land Use Map designates the subject property for medium density residential uses. The proposed rezoning of the property to C-3-A and residential development is consistent with this designation, with a total residential density of 3.66 FAR and a density of only 0.66 FAR devoted to school uses, which is less than previous school uses on the site.

The proposed project is also consistent with the site's designation as a "Neighborhood Conservation Area" on the Generalized Policy Map. The Comprehensive Plan provides that development of Neighborhood Conservation Areas "should be compatible with the existing scale and architectural character of the area." 10 DCMR § 223.5. Compliance with this provision is ensured through design review of the project by the HPRB.

The proposed development will likewise be compatible with the land use designation of this site and those of the surrounding area. With the exception of the Randall Recreational Center and Playground to the east, the property in the vicinity of the subject site is designated in the Future Land Use Map for moderate-, medium-, and high-density residential uses, as well as medium- and high-density commercial uses. The proposed project—a mixed-use arts and residential development—will be consistent with the character of this transitional neighborhood.

**C. Compliance with the Citywide Elements of the Comprehensive Plan.**

The proposed project is consistent with a number of the citywide elements of the Comprehensive Plan, and will substantially advance their stated goals and policies.

## 1. Land Use Element (Chapter 3).

The Comprehensive Plan provides that “[b]ecause the Land Use Element integrates the policies and objectives of all the other District Elements, it should be given greater weight than the other elements as competing policies in different elements are balanced.” 10 DCMR § 300.2.

The underlying goal of the Land Use Element is to:

[e]nsure the efficient use of land resources to meet long-term neighborhood, citywide, and regional needs; to help foster other District goals; to protect the health, safety, and welfare of District residents and businesses; to sustain, restore, or improve the character and stability of neighborhoods in all parts of the city; and to effectively balance the competing demands for land to support the many activities that take place within District boundaries.

10 DCMR § 302.1. The proposed project will advance this important goal by complying with a number of the policies set forth in the Land Use Element of the Comprehensive Plan.

*Policy LU-1.1.5: Urban Mixed Use Neighborhoods: Encourage new central city mixed use neighborhoods combining high-density residential, office, retail, cultural, and open space uses in the ... South Capitol Street corridor / Stadium area. ... Housing, including affordable housing, is particularly encouraged and should be a vital component of the future land use mix. 10 DCMR § 304.10.*

The proposed project contemplates the construction of a mixed-use development that will include nearly 100,000 square feet of arts-related space, including cellar areas, and more than 423,800 square feet of gross floor area devoted to residential use. Twenty percent of the residential units will be set aside for households earning less than 80% of area median income ("AMI"). The presence of the Corcoran College of Art and Design and the adjacent residential development will significantly enhance the vitality of the South Capitol Street corridor/Stadium area.

*Policy LU-2.1.4: Rehabilitation Before Demolition: In redeveloping areas characterized by vacant, abandoned, and underutilized older buildings, generally encourage rehabilitation and adaptive reuse of existing buildings rather than demolition. 10 DCMR § 309.9.*

The Applicant intends to retain and rehabilitate the principal building in the Randall Junior High School complex, as well as its east and west wings. These historic buildings will house the Corcoran College of Art and Design and will represent precisely the type of adaptive reuse encouraged by Policy LU-2.1.4.

*Policy LU-2.1.12: Reuse of Public Buildings: Rehabilitate vacant or outmoded public and semi-public buildings for continued use. Reuse plans should be compatible with their surroundings, and should limit the introduction of new uses that could adversely affect neighboring communities. 10 DCMR § 309.16.*

The District of Columbia sold the Randall Junior High School property to the Corcoran Gallery of Art after determining that the property was no longer needed for any public use. The proposed use of the existing buildings as a center devoted to arts education will be compatible with the property's surroundings and will not adversely affect the Near Southwest community. Similarly, the residential portion of the development will have no adverse effects on the surrounding neighborhood. Indeed, the proposed development will help create the critical mass of residential uses that will be necessary to ensure the economic health of this rapidly changing area.

## **2. Housing Element (Chapter 5).**

The stated goal of the Housing Element of the Comprehensive Plan is to “[d]evelop and maintain a safe, decent, and affordable supply of housing for all current and future residents of the District of Columbia.” 10 DCMR § 501.1. The proposed project will help achieve this goal by advancing the policies discussed below.

*Policy H-1.1.1: Private Sector Support: Encourage the private sector to provide new housing to meet the needs of present and future District residents at locations consistent with District land use policies and objectives. 10 DCMR § 503.2.*

The proposed development will include over 423,800 square feet of gross floor area devoted to residential uses. As noted above, the Applicant intends to reserve twenty percent of

the residential units in the development for households earning less than 80% of AMI. The proposed project will further the District's policy of leveraging private development to create affordable housing within the city.

*Policy H-1.1.4: Mixed Use Development: Promote mixed-use development, including housing, on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors, and around appropriate Metrorail stations. 10 DCMR § 503.5.*

The proposed development will contain both residential and arts-related uses. The subject site is located only one block away from South Capitol Street and is within walking distance of four Metrorail stations on three separate lines. The project will represent precisely the type of mixed-use development that Policy H-1.1.4 is designed to encourage.

*Policy H-1.1.5: Housing Quality: Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood. 10 DCMR § 503.6.*

The Declaration of Covenants executed by the Corcoran Gallery of Art and the District of Columbia specifically requires that the affordable units in any development on the Randall Junior High School property be indistinguishable from the market-rate units in the project. As a result, the project will comply with Policy H-1.1.5 of the Housing Element.

*Policy H-1.2.5: Workforce Housing: In addition to programs targeting persons of very low and extremely low incomes, develop and implement programs that meet the housing needs of teachers, firefighters, police officers, nurses, city workers, and others in the public service professions with wages insufficient to afford market-rate housing in the city. 10 DCMR § 504.12.*

Twenty percent of the residential units in the proposed development will be reserved for families who earn less than 80% of AMI. These units will be priced at a level that is affordable for nurses, teachers, and members of the other occupational categories listed in Policy H-1.2.5.

Thus, this project more than meets the standards set forth in Chapter 26 of the Zoning Regulations.

**3. Economic Development Element (Chapter 7).**

The Comprehensive Plan provides that the goal of the Economic Development Element is to:

[s]trenthen the District's economy by sustaining its core industries, attracting new and diverse industries, accommodating future job growth, fostering the success of small businesses, revitalizing neighborhood commercial centers, improving resident job skills, and helping a greater number of District residents find and keep jobs in the Washington regional economy.

10 DCMR § 701.1. In addition to furthering the general goal of economic development by creating new jobs and tax revenues for the District, the Randall School redevelopment project will also advance the Comprehensive Plan's specific policy for economic development and institutional growth.

*Policy ED-2.4.1: Institutional Growth: Support growth in the higher education and health care sectors. Recognize the potential of these industries to provide employment and income opportunities for District residents, and to enhance the District's array of cultural amenities and health care options. 10 DCMR § 710.3.*

The Corcoran College of Art and Design has a current enrollment of 350 undergraduate and 150 graduate students and intends to double that figure over the next five years. Additionally, the College presently employs approximately 196 faculty and 44 staff and those number would increase to a total of 365 faculty and 80 staff at the Randall School site. The proposed expansion of the College's undergraduate and graduate programs is expected to result in a corresponding increase in employment opportunities for District residents.

**4. Urban Design Element (Chapter 9).**

The goal of the Comprehensive Plan's Urban Design Element is to:

[c]nhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment, and improving the vitality, appearance, and security of streets and public spaces.

10 DCMR § 901.1. In keeping with this objective, the Applicant has gone to great lengths to integrate the new residential portion of the development with the historic fabric of the Randall School complex. Additionally, the project respects the integrity of the L'Enfant street plan and thus complies with the Urban Design Element's policy of reinforcing the L'Enfant and McMillan Plans.

*Policy UD-1.1.2: Reinforcing the L'Enfant and McMillan Plans: Respect and reinforce the L'Enfant and McMillan Plans to maintain the District's unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of the L'Enfant Plan reservations (green spaces), limits on street and alley closings ..., and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas or viewsheds. 10 DCMR § 903.7.*

The western edge of the subject property includes a portion of 1<sup>st</sup> Street, S.W. that was closed in connection with the southwest urban renewal plans of the 1950s. Although this area is no longer used as a public street, the Applicant has agreed to forego development on this portion of the site to maintain the integrity of the original L'Enfant street plan.

##### **5. Historic Preservation Element (Chapter 10).**

The overarching goal of the Historic Preservation Element of the Comprehensive Plan is described as follows:

Preserve and enhance the unique cultural heritage, beauty, and identity of the District of Columbia by respecting the historic physical form of the city and the enduring value of its historic structures and places, recognizing their importance to the citizens of the District and the nation, and sharing mutual responsibilities for their protection and stewardship.

10 DCMR § 1001.1. The sensitive treatment of the historically significant portions of the Randall School complex, and the integration of the new residential building into the historic fabric of the existing structures, will significantly advance the goal described above. In addition, the proposed project will further a number of the specific policies outlined in the Historic Preservation Element of the Comprehensive Plan.

*Policy HP-1.3.1: Designation of Historic Properties: Recognize and protect significant historic properties through official designation as historic landmarks and districts under both District and federal law, maintaining consistency between District and federal listings whenever possible. 10 DCMR § 1005.2.*

On its own initiative, the Applicant filed a landmark application with the HPRB for the Randall Junior High School site to ensure retention and rehabilitation of its most significant original building and its east and west wings. Landmark status was granted on March 22, 2007. Although landmark designation significantly affects the site's development potential, the Applicant believes that these structures are historically significant and should be preserved.

*Policy HP-2.3.1: The Plan of the City of Washington: Preserve the defining features of the L'Enfant and McMillan plans for Washington. Work jointly with federal agencies to maintain the public squares, circles, and major reservations as landscaped open spaces that provide a means to experience the legacy of the city plan. Preserve the historic pattern of streets and associated minor reservations, and protect these historic rights-of-way from incompatible incursions and intrusions. 10 DCMR § 1010.3.*

As noted above, the Applicant does not intend to construct any improvements on the closed portion of 1st Street, S.W. Similarly, the north façade of the building has been designed to maintain the historic street wall lines along portions of former H Street to further preserve the integrity of the historic orthogonal street pattern. The current design of the project will further the objectives of Policy HP-2.3.1 by preserving the historic pattern of streets established by the L'Enfant Plan.

*Policy HP-2.4.1: Rehabilitation of Historic Structures: Promote appropriate preservation of historic buildings through an effective design review process. Apply design guidelines without stifling creativity, and strive for an appropriate balance between restoration and adaptation suitable from the particular historic environment. 10 DCMR § 1011.4.*

The proposed development will be subject to review by both the HPRB, the Mayor's Agent for Historic Preservation and the Zoning Commission. These proceedings will involve precisely the type of extensive design review contemplated by Policy HP-2.4.1. Because the Randall Junior High School building and its wings have been designated as landmarks, moreover, any future attempts to demolish or alter these structures will require further review by the Historic Preservation Review Board.

*Policy HP-2.4.2: Adaptation of Historic Properties for Current Use: Maintain historic properties in their original use to the greatest extent possible. If this is no longer feasible, encourage appropriate adaptive uses consistent with the character of the property. 10 DCMR § 1011.5.*

Although the Randall Junior High School will no longer be used by the D.C. Public Schools, it will still be devoted to an educational use. The Corcoran College of Art and Design has a current enrollment of 500 undergraduate and graduate students and provides non-degree art classes to more than 3,000 children and adults each year. The proposed change in use is fully consistent with the objectives of Policy HP-2.4.2.

*Policy HP-3.2.1: Preservation and Community Development: Promote historic preservation as a tool for economic and community development. 10 DCMR § 1017.3.*

In its current state, the Randall Junior High School actually detracts from the character of the surrounding neighborhood. The rehabilitation and adaptive reuse of these historic structures will provide an attractive physical environment for the students of the Corcoran College of Art and Design. In addition, the renovation of these deteriorating buildings will improve the overall

appearance of the streetscape and help stimulate additional private investment in the surrounding area.

#### **6. Community Services and Facilities Element (Chapter 11)**

The Community Services and Facilities Element of the Comprehensive Plan is designed to “[p]rovide high-quality, accessible, efficiently managed, and properly funded community facilities to support the efficient delivery of municipal services, protect public health and safety, and enhance the well-being of current and future District residents.” 10 DCMR § 1101.1. In support of that objective, the Community Services and Facilities Element includes a policy addressing the disposition of public properties that have become—like the Randall Junior High School—functionally obsolete.

*Policy CSF-1.1.4: Addressing Facilities That Are Functionally Obsolete: Develop reuse or disposition plans for public buildings or sites that are functionally obsolete, that cannot be rehabilitated cost-effectively, or that are no longer needed. 10 DCMR § 1103.10.*

At the time of its sale to the Corcoran Gallery of Art, the Randall Junior High School had become a serious drain on public resources. The District's decision to sell the property was based on its determination that the existing structures could not be rehabilitated in a cost-effective manner for any public use. The redevelopment of the property by a private third party, on the other hand, will benefit the District in two ways. First, the District is entitled to fifty percent of the proceeds on any subsequent sale of development rights on the property. Second, the transfer of this site to private ownership will result in a significant increase in property tax receipts. In short, the sale of this property will provide a substantial economic benefit for the District.

## 7. Arts and Culture Element (Chapter 14).

The Arts and Culture Element of the Comprehensive Plan reflects the District's longstanding commitment to the development and retention of arts and other cultural uses in the city, particularly in areas where such uses are underrepresented:

Support and encourage arts and cultural venues, programs and learning experiences in the District of Columbia that inspire a vibrant cultural life for all segments of the population. Enhance the city's diverse artistic and cultural traditions through decisions affecting the physical environment.

10 DCMR § 1401.1. The proposed project, which will include approximately 100,000 square feet devoted to arts-related uses, is consistent with this general goal and will further a number of the specific policies enunciated in the Arts and Culture Element.

*Policy AC-1.1.2: Development of New Cultural Facilities: Develop new neighborhood cultural facilities across the District, providing affordable space for grass roots and community arts organizations. Provide technical and financial assistance to organizations to help plan and build such facilities. 10 DCMR § 1403.3.*

The proposed project will include almost 100,000 square feet of exhibition, studio, and classroom space for the students of the Corcoran College of Art and Design. Approval of this PUD application will further Policy AC-1.1.2 by allowing the development of an important new cultural facility in the Near Southwest neighborhood.

*Policy AC-1.1.3: Distribution of Facilities: Promote improved geographic distribution of arts and cultural facilities, including development of arts facilities and venues east of the Anacostia River and in other parts of the city where they are in short supply today. 10 DCMR § 1403.4.*

There is currently a dearth of arts and cultural facilities along the South Capitol Street corridor. The proposed PUD will help correct this imbalance in the geographic distribution of the District's cultural resources.

*Policy AC-4.4.1: Arts Education Programs: Build a stronger constituency for the arts in the District through arts education in K-12 schools including attendance at*

*arts performances and arts exhibitions, and support of adult art programs for persons of all ages and backgrounds. City resources should be used to help promote the strong and diverse arts programs offered by our public schools. 10 DCMR § 1415.3.*

In addition to its undergraduate and graduate programs of study, the Corcoran College of Art and Design offers art classes to more than 3,000 children and adults each year. The proposed development will further the objectives of Policy AC-4.4.1 by allowing the school to significantly expand these programs.

**D. Compliance with the Lower Anacostia Waterfront / Near Southeast Area Element.**

In addition to the citywide elements, the Comprehensive Plan includes ten geographically based "area elements." The subject property is located within the Lower Anacostia / Near Southeast area. As discussed below, the proposed project is consistent with the objectives and policies of the Lower Anacostia / Near Southeast Area Element.

*Policy AW-2.2.1: South Capitol Street Urban Boulevard: Transform South Capitol Street into a great urban boulevard and "walking" street, befitting its role as a gateway to the U.S. Capitol and a major Anacostia River crossing. Development along the street should include a mix of federal, District, and private uses. 10 DCMR § 1512.7.*

The site of the proposed development is located within the South Capitol Street / Buzzard Point policy focus area. The project will provide an appropriate mix of residential and arts-related uses in close proximity to South Capitol Street. The introduction of an arts college and new condominiums in this area will help achieve the District's goal of creating a vibrant urban neighborhood along this important corridor.

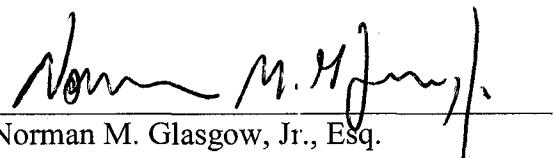
**VI.  
CONCLUSION**

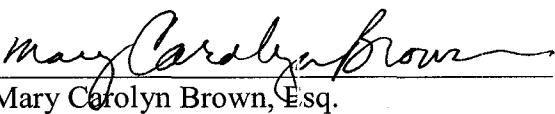
For the foregoing reasons, the Applicant submits that the PUD and related map amendment satisfy the standards of Chapter 24 of the Zoning Regulations and are consistent with

the purposes and intent of the Zoning Regulations and Zoning Map; will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; satisfies the requirements for approval of a consolidated PUD; provides significant public benefits; and advances important goals and policies of the District of Columbia. Accordingly, the Applicant respectfully requests that the Zoning Commission approve this application.

Respectfully submitted,

HOLLAND & KNIGHT LLP

  
\_\_\_\_\_  
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Mary Carolyn Brown, Esq.

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