

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF PLANNING



DO. OF PLANNING

2007-07-22

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Jennifer Steingasser, Deputy Director *JK*

**DATE:** October 29, 2007

**SUBJECT:** **Supplemental Report for ZC # 07-13**  
Randall Junior High School Redevelopment  
Consolidated PUD and Related Zoning Map Amendment

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**I. SUMMARY RECOMMENDATION**

The Office of Planning recommends approval of the application subject to:

- Redesign of the north mechanical penthouse wall so that it does not constitute a parapet
- Description of the location of affordable units within the building

**II. APPLICATION-IN-BRIEF**

**Location:** 65 I Street, SW  
Square 643-S, Lot 801  
Ward 6, ANC 6D

**Applicant:** Corcoran Gallery of Art and MR Randall Capital LLC (Monument Realty)

**Current Zoning:** R-4

**Property Size:** 115,724 square feet (2.66 acres)

**Proposed Development:** Redevelop the Randall Junior High School site, keeping the most historic parts of the old school; Provide about 100,000 sf for the Corcoran College of Art and Design as well as 400-500 residential units; Related map amendment to C-3-C.

**Relief and Zoning:** Pursuant to 11 DCMR Chapter 24, the applicant is seeking:

1. PUD-related map amendment from R-4 to C-3-C
2. Special Exception relief from rear yard (§774)
3. Variance to rooftop structure setback (§770.6)

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4. Special Exception for number and height of rooftop structures (§411)
5. Variance relief from court requirements (§776)
6. Variance from number of loading spaces (§2201)

### **III. BACKGROUND**

The applicant originally proposed a consolidated PUD and a related map amendment to C-3-A. In response to community concerns, the applicant asked to amend the application to request C-3-C in the alternative. The original public hearing was scheduled for September 27, but was rescheduled for November 8 to allow for additional design work. This report will supplement the original Office of Planning public hearing report and analyze the modified request.

#### **Community Concerns and Revised Design**

The community expressed concern about the structure being built in the former H Street right-of-way (ROW). While the ROW was closed at the time of urban renewal and is now part of the subject lot, the community wanted to maintain the visual integrity of the old ROW as well as preserve direct access to the Randall Recreation Center to the east of the site. In response, the applicant revised the design to remove the mass of the building from the old ROW. That floor area was recaptured by inserting a new, additional level in the building. The stated proposed height increased from 90 to 100 feet, but the total floor area of 499,843 square feet (4.32 FAR) remains the same as in the original proposal. The increased height surpasses the height limit of a PUD within the C-3-A zone; Therefore the applicant requested that the Zoning Commission consider the C-3-C zone in the alternative. A PUD within the C-3-C zone may request heights of up to 130 feet.

#### **Loading and Parking Access**

As a result of the reconfiguration of the building, access to the loading and parking has been improved. Removal of the H Street "bump out" allows loading and parking functions to be deconcentrated. The new arrangement, with parking and residential loading separated from the school loading, removes the cluster of back-of-house functions that previously existed near the northwest corner of the building. This design also improves pedestrian movement on H Street, which is an important access way for the recreation center. A continuous sidewalk is now included in the design, with interruptions only for the aforementioned service uses.

The community expressed concerns about tractor-trailers maneuvering through the nearby streets. In addition to relocating the loading, the applicant has agreed that no trucks greater than 40 feet in length will be permitted to serve the property. OP has no objection to relief from loading dock size requirements.

#### **Architecture**

During the setdown meeting and at the September 27 meeting, the Zoning Commission expressed concerns about the architectural design of the new addition to the building, especially

its visual relationship to the historic Randall School. As of this writing the applicant has made no changes to the design, but has indicated to OP that they will seek further input from the Commission before making architectural changes.

## **IV. OFFICE OF PLANNING ANALYSIS**

### **Comprehensive Plan**

As noted in OP's public hearing report, this project would further several of the Comprehensive Plan's Guiding Principles, and it would not be inconsistent with a number of its specific Elements

The Generalized Policy Map designates this area as a Neighborhood Conservation Area. These areas are primarily residential in character and have very little vacant or underutilized land. But where redevelopment opportunities exist, new projects should consist of infill housing, public facilities and institutional uses (Comprehensive Plan, §223.1). The redevelopment of the Randall School is an example of locating infill housing and a college on an unused site. The project will enhance the surrounding residential and institutional context and is not inconsistent with the Generalized Policy Map.

The Future Land Use Map recommends the subject site for Medium Density Residential. In Medium Density Residential areas mid-rise (4-7 story) apartment buildings are the predominant use. Pockets of low and moderate density housing may exist within these areas. The designation also may apply to taller residential buildings surrounded by large areas of permanent open space. The Comprehensive Plan goes on to say that the Future Land Use Map is to be interpreted broadly and that zoning should be guided by both the map and the text of the Plan (§224.24(a) and (d)).

In Southwest, buildings more than seven stories are commonly located next to rowhouses, with some green space, but often large parking lots in between. In this unique circumstance, preservation of the school requires the concentration of the bulk of the new development on the northern end of the site, but permanent open space, in the form of the Randall Recreation Center, is located east and northeast of the property. In the revised design, the former H Street ROW will also be maintained as permanent open space. While it will be paved and function as a street, it will not be built on as in the previous scenario. Also, the proposal maintains the tall character of older southwest buildings, and the new development will be several hundred feet from the nearest rowhouse. Furthermore, the proposal must be seen in the context of South Capitol Street. South Capitol is seen as a major urban boulevard and in the future, near the subject site, it will likely have buildings on it reaching 100 feet tall or more. The revised proposal is not inconsistent with the Future Land Use Map.

### **Height**

The applicant states that the proposed height of the building is 100 feet. In fact, the zoning height of the building is taller because of the design of the mechanical penthouse. As noted in

OP's public hearing report, the mechanical penthouse is designed such that its northern wall is superjacent to the principal northern wall of the building. This constitutes a parapet wall and is therefore included in the calculation of building height. The penthouse is about 16 feet tall, so the actual building height is 116 feet. While this height is allowed in the C-3-C PUD zone, the Height Act limits the building to 110 feet, as Eye Street has a width of 90 feet. The mechanical penthouse should be redesigned so that it is not directly above the northern wall of the building.

### **Zoning Relief for Rooftop Structures**

Section 770.6 requires that mechanical penthouses be set back from exterior walls by a distance at least equal to their height. As described above, the mechanical penthouse has no setback from the northern wall. The applicant states that moving the mass of the rooftop structures away from the historic school, combined with the large ventilation equipment needed for the art production areas results in the zero-setback design. The Office of Planning feels that these are unique and valid reasons for the unusual configuration. OP has no objection to granting some relief for rooftop structure setback, but as discussed above the penthouse cannot be directly above the northern wall.

For a complete analysis of all requested zoning relief, please refer to OP's report dated September 17. OP does not object to the other areas of relief requested by the applicant.

### **Location of Affordable Units**

As of this writing, the Office of Planning has not received information from the applicant regarding the distribution of affordable units throughout the building. OP would like to ensure that affordable units are not concentrated on any floor or in any wing of the building. The applicant should provide this information before the Zoning Commission takes proposed action.

### **Environmental Features**

As noted in the public hearing report, the building, as currently designed, will not achieve LEED certification. OP has asked the applicant to consider additional green features for the building including grey-water reuse and parking for car-share vehicles. OP appreciates efforts to include some green roof and reflective roof on the building, including the central courtyard. That space would act as a green roof for the below-grade parking garage.

### **Amenity Package**

The proffered amenity items, detailed in OP's earlier report, are commensurate with the amount of relief sought. The Office of Planning finds that the presence of the Corcoran College, the provision of 20% affordable housing, the restoration of the Randall School and not building in the old First and H Streets rights-of-way are the most important amenity items. In addition to the items listed by the applicant, another important feature of the development is the inclusion of a green roof and a reflective roof. Altogether, the applicant estimates that they will achieve 21 LEED points, not enough for certification. Items such as greywater reuse could increase the

score, and take advantage of the significant exposed roof area of the project. The provision of flex car vehicles could also increase the score and be a valuable feature for future residents.

In addition to the aforementioned amenities, the applicant has come to agreement with the community about a wide range of other benefits. These include teacher and youth art education, scholarship support for ANC 6D residents, art-related activities for the neighborhood, community meeting space and a public easement over the former H Street ROW.

## **V. COMMUNITY COMMENTS**

At their regular monthly meeting on October 15, 2007, ANC 6D voted to support the application. As of this writing, OP has not received a written report from the ANC.

## **VI. RECOMMENDATION**

The project is not inconsistent with the Comprehensive Plan. The Plan calls for medium density residential uses in this area and the proposed 4.32 FAR is consistent with that designation. Furthermore, the project would further the Guiding Principle which states that the District should support the arts and cultural community. OP considers the proffered amenity package commensurate with the relief requested. OP does not object to the requested zoning relief, but the mechanical penthouse must be redesigned so that its wall does not constitute a parapet. As a parapet it counts toward building height and the building would therefore exceed the 110 foot limit of the Height Act.

The Office of Planning, therefore, recommends approval of the application subject to the provision of additional information about or resolution of the issues listed below:

- Redesign of the north mechanical penthouse wall so that it does not constitute a parapet
- Description of the location of affordable units within the building

JS/mrj