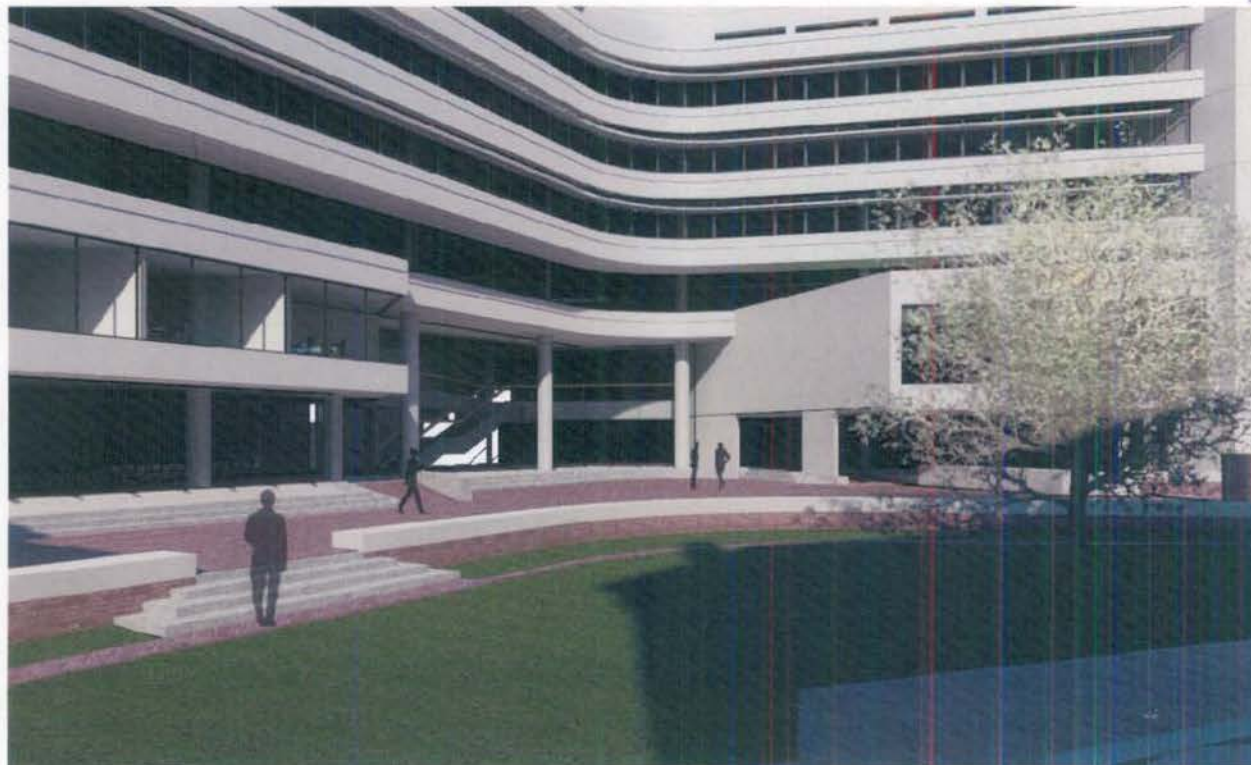


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THE AMERICAN INSTITUTE OF ARCHITECTS

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
CONSOLIDATED REVIEW AND APPROVAL OF A
PLANNED UNIT DEVELOPMENT AND A
ZONING MAP AMENDMENT

October 3, 2008

ZONING COMMISSION
District of Columbia

CASE NO. 08-27

EXHIBIT NO. 3

DEVELOPMENT TEAM

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PREFACE

This statement and the attached documents support the applications of the American Institute of Architects and the American Architectural Foundation to the Zoning Commission for the consolidated review and approval of a Planned Unit Development and a related amendment to the Zoning Map of the District of Columbia.

This Planned Unit Development and Zoning Map Amendment application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10 DCMR (Planning and Development) § 100 et seq. (2006) (the “**Comprehensive Plan**”), as well as many goals and policies of the District of Columbia. Submitted in support of this application are completed application forms, a notice of intent to file a PUD (with property owner list and certification of mailing), architectural drawings, plans, and elevations, and a map depicting the Zoning District for the properties impacted by these applications and the surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a Planned Unit Development and Zoning Map Amendment application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. Summary of Requested Action

The American Institute of Architects and the American Architectural Foundation (collectively, “**Applicant**”) hereby submit applications to the Zoning Commission of the District of Columbia (“**Commission**”) for the consolidated review and one-step approval of a Planned Unit Development (“**PUD**”) and a corresponding amendment to the Zoning Map of the District of Columbia. The project site consists of Square 170, Lots 38 & 39 (the “**Subject Property**”).

The Subject Property is a corner lot bounded by 18th Street, NW to the west, New York Avenue, NW to the south, the Federal Reserve building to the east, and a commercial office building to the north. Advisory Neighborhood Commission (“**ANC**”) 2A also includes the Subject Property within its boundaries. The Subject Property is improved with AIA’s national headquarters building (“**Headquarters Building**”) and the historic Octagon House at the southwest corner. Containing approximately 39,546 square feet of land area, the Subject Property is approximately 0.91 acre in size.

The PUD and Zoning Map Amendment application proposes the renovation and rehabilitation of the Headquarters Building in a manner that respects the integrity of the potentially historic Headquarters Building, while maintaining the existing appropriate relationship to the Octagon House, and while achieving significant Sustainability improvements. The Applicant’s goal is to use this process as a national demonstration project to show how Sustainable Design features can be applied to existing mid-20th Century office buildings. The Applicant will be seeking a LEED Platinum designation for this project and the project will seek to achieve carbon

neutrality by the year 2030. The plans, elevations, and drawings of the proposed PUD project are included in the attached Exhibit A.

The Subject Property is currently located in the SP-2 Zone District. The Subject Property is also located in the High Density Commercial land use category on the District of Columbia Comprehensive Plan Future Land Use Map. The Applicant requests a Zoning Map amendment to the C-3-C Zone District for the Subject Property. The proposed rezoning is consistent with the overarching goals and policies of the Comprehensive Plan of the District of Columbia, as discussed in detail herein.

B. The Applicant

The American Institute of Architects ("AIA") is the leading national professional organization for licensed architects. The AIA is also a leader to all of its architect members and provides guidance to the architecture profession. The organization is the voice of the profession and serves as a resource for all of its members. Acting as an advocate, an education provider, and a program sponsor, the AIA serves the architecture profession in many capacities.

The American Architectural Foundation ("AAF") is a nonprofit organization organized in 1943 to promote the importance of architecture. The AAF works to increase public awareness about how architecture can impact lives and transform places. The AAF seeks to inform individuals and community leaders that cities and buildings can profoundly affect people's quality of life and mental well-being, and architecture is a critical piece of that. Through outreach programs, grants, and educational resources, the AAF seeks to inspire people to become engaged in the built environment around them. The AAF also sponsors competitions and scholarships in accordance with its mission to increase awareness about the importance of architecture.

II. THE PROPOSED PUD PROJECT

A. Description of Surrounding Area and Uses

The Subject Property is located just west of the White House and a few blocks north of the National Mall. Large commercial and federal office buildings and dominate much of the immediate neighborhood. The Federal Reserve building flanks the AIA headquarters just to the east, and the FDIC owns and occupies the building just to the north. Across 18th Street is the large General Services Administration building. Generally, the area surrounding the Subject Property is zoned C-3-C (one block to the north), SP-2, and GOV, with GOV zoning (for the myriad federal government uses) dominating the areas to the south and to the east. The Subject Property and surrounding area are depicted in Exhibit A.

Though large commercial and government buildings dominate the neighborhood, pedestrian activity is remarkably limited. None of the nearby federal government buildings have ground-level retail accessible from the street, and few of the commercial buildings have street-level retail. As a result, there is very little street level vitality or vibrancy in this area, which is likely the result of the SP-2 Zoning which limits the ability for retail uses that are directly accessible from the street.

B. Existing Buildings on the Subject Property

The historic Octagon House, located at the intersection of 18th Street and New York Avenue, NW, is owned and operated by the AAF. The Octagon House is the oldest museum in the country dedicated to architecture and design and is a valuable resource for the AAF to advance its mission. The Octagon House was built between 1799 and 1801 and has been designated as an historic landmark.

In 1970, the Board of Zoning Adjustment (“BZA”) approved the construction of the AIA Headquarters Building in BZA Application No. 10463. BZA approval was necessary because of

the SP zoning of the site. The BZA approved a seven story office building with three floors for AIA's staff, conference rooms, a library, and exhibition areas for architectural exhibits and four floors to be used as commercial office space for other tenants. In 1970, the SP zone allowed a Floor Area Ratio ("FAR") of 5.5 (the existing building has a FAR of approximately 4.54, which exceeds the SP-2 Zone District FAR maximum of 3.5 for non-residential uses). The BZA granted approval of roof structures that were not setback from all exterior walls of the building at a 1:1 ratio and determined that the rear yard for the building would be deemed to be New York Avenue and that the rear yard dimension can be measured to the mid-point of New York Avenue, as permitted for through lots. In that case, the National Park Service noted that "the new headquarters building has been designed to maintain adequate open space behind the Octagon House to preserve its dignity and beauty". The Order in BZA Appeal No. 10463 is attached as Exhibit B. The Headquarters Building has been described as a buffer that shields the Octagon House from the modern development that surrounds the Subject Property.

Located between the Octagon House and the Headquarters Building is a plaza that includes both hardscape and softscape elements. This plaza provides a wonderful opportunity for members of the general public or the people that work in the Headquarters Building to enjoy the outdoors in a shaded, relatively secluded setting. The proposed PUD project does not propose any new construction in this plaza. The site plan included in Exhibit A depicts the Octagon House, the plaza, and the Headquarters Building.

C. Project Description

The proposed project will keep the AIA's national headquarters in the District of Columbia, while serving as a model of Sustainable Design and construction and while preserving the architectural integrity of a potentially historic structure. This is a significant project for the District and for the whole Sustainable Design movement. Upon completion of this project, the

AIA will occupy floors two through five for office use and floors six and seven will be rented for other commercial office tenants, just as the building has been used since it opened in 1973.

The goal of the project is to modernize the Headquarters Building so it will serve as a demonstration project for Sustainable renovations of existing commercial buildings. The project is on track to achieve LEED platinum certification and will attain carbon neutrality by the year 2030. Every aspect of the renovation will include green design, including water use, the heating/cooling strategy, the lighting scheme, and the stormwater management program.

At the completion of construction, the renovated building will reduce the building's energy consumption by 60%. This aggressive reduction will require the use of passive strategies such as natural ventilation and daylighting. Both strategies will be accomplished through the addition of four shafts into the center of the building. These natural ventilation shafts along with new operable perimeter windows will assist with the movement of air through the perimeter and into the shafts by natural buoyancy and the stack effect. The air will then exit the building at the top of the shafts above the penthouse. Rotating light deflectors will be installed at the top of each shaft to bounce light down to the interior of each office floor. The daylight penetration from the shafts and at the perimeter windows will significantly reduce the building's reliance on artificial light sources during operating hours.

The energy reduction will also require the manipulation of the building envelope to make it more efficient. The new building envelope will include operable, heat reflective glass and solar shades for glare control. The façade modifications will be consistent with the original diagram of the façade to allow the building to remain respectful of its original relationship to the historic context.

The renovated building will include green roof on low levels, permitting visibility from within the building and exterior plaza while reducing the building's stormwater runoff. The main

roof of the building will house both solar thermal equipment and a photovoltaic array to reduce the building's reliance on carbon-producing energy sources. Rainwater will be collected from the roof and stored in a cistern. The harvested rainwater will be used to flush toilets and for landscape irrigation, reducing the building's use of potable water.

On the ground level of the building, retail uses and multi-purpose spaces will increase the pedestrian activity and dynamism in the immediate vicinity of the Subject Property. The retail uses will draw pedestrians from 18th Street and New York Avenue into the plaza or building where they can enjoy a coffee, a meal, or shop for books. Thus, the myriad workers in the area will have additional opportunities to visit the AIA and the plaza, and the result will be a lively and appealing outdoor plaza and a neighborhood retail destination. At this time, the PUD project does not anticipate any addition to the Octagon House.

D. Development Data

The total gross floor area in the existing building is approximately 134,187 square feet for a total FAR of approximately 4.54. The Headquarters Building is a non-conforming building as to FAR and roof structures. The measured building height of the Headquarters Building will not change, it will remain 86 feet, 8 inches tall. The proposed new ventilation shafts will extend 20 feet, 7 and $\frac{3}{4}$ inches above the roof level. With one exception, the ventilation shafts will be setback from all exterior walls of the roof at a ratio of at least 1:1.

The pertinent zoning data for the project, including the comparisons chart, is included in Exhibit A. The proposed project has a FAR and height that is significantly less than what is permitted under the C-3-C District matter-of-right and PUD Guidelines (maximum FAR of 6.5 and a maximum building height of 130 feet).

E. Flexibility under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require the approval of the BZA.

The proposed renovations require additions to the non-conforming roof structures, which are not permitted pursuant to 11 DCMR §2001.3. In addition, the Applicant requests flexibility to construct ventilation shafts on the roof that exceed 18 feet, 6 inches in height. As noted above these ventilation shafts must be higher than the surrounding roof structures in order to achieve the significant Sustainability goals for this project. Most of these ventilation shafts will be set back from all exterior walls of the building at a ratio of 1:1. However, the Applicant requests flexibility for one of the ventilation shafts (the westernmost shaft) to be set back less than a ratio of 1:1 from the western façade, adjacent to 18th Street. The Zoning Commission has the authority to grant this requested flexibility pursuant to Section 2405.7 of the Zoning Regulations.

III. PLANNING ANALYSIS

Through the PUD process, the Applicant will renovate a potentially historic structure and will take that structure to the highest levels of Sustainable Design. The proposed project supports numerous policies of the Comprehensive Plan.

A. Land Use Impact

The proposed project will have negligible – if any – negative impacts on the land use of the area adjacent to the Subject Property. The Subject Property is surrounded by office buildings and an office building use already exists on the site. The project will not increase the measured height

of the existing Headquarters Building, nor will it have any appreciable increase in FAR. Further, the project's addition of ground floor retail uses will enhance the aesthetic of the Subject Property and will have positive impacts on the surrounding neighborhood by providing an "urban oasis" that otherwise does not exist.

B. Zoning Impact

The proposed Zoning Map Amendment application can be granted without adversely affecting nearby and adjacent Zone Districts. As noted above, a C-3-C Zone District is located one block north of the Subject Property, on the north side of E Street, NW. The creation of a single Zone District (C-3-C) for the Subject Property gives the Applicant flexibility in achieving the proposed Sustainable Design¹ features and increases the opportunities for providing street-accessible retail uses. While the project may not require all of the height and density permitted in the C-3-C Zone District, including the Subject Property in this Zone District is more consistent with the Comprehensive Plan Future Land Use Map inclusion of the Subject Property in the High Density Commercial Land Use Category.

C. Environmental Impact

The Applicant is thoroughly committed to creating an environmentally sensitive building; indeed, the main goal of the project is to create a building to serve as a model of Sustainable Design. The building will attain LEED platinum certification, and the building's Sustainable Design elements will encompass every aspect of the building's form and function. The construction materials will be from recycled and low-impact sources wherever possible; the energy and water systems will minimize use and maximize conservation; stormwater runoff will

¹ Since the building is currently deemed to be a non-conforming building as to FAR, the addition of a single square foot of gross floor area would require the Applicant to seek variance relief from the BZA.

be effectively controlled; and a strategy will be developed to achieve carbon neutrality by the year 2030. As more specifically detailed in Exhibit F, no adverse environmental impact will result from the construction of this project.

D. Facilities Impact

The proposed project will not have an adverse impact on the public facilities that it will rely on for service.

IV. EVALUATION STANDARDS

Section 2403 of the Zoning Regulations provides the standards for evaluating a PUD application. In deciding a PUD application, the Commission is required to “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” (See Section 2403.8). In order to approve a PUD application, the Commission must find that the impact of the project on the surrounding area is either favorable, capable of being mitigated, or acceptable given the quality of the public benefits in the project. (See Section 2403.3.)

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high quality development that provides public benefits and project amenities by allowing applicants greater flexibility in planning and design than may be possible under matter-of-right zoning.

A. Urban Design, Architecture, and Creation of Open Space

Section 2403.9(a) lists urban design and architecture as categories of public benefits and project amenities for a PUD. As shown in the detailed plans, elevations, and renderings included

in Exhibit A, the proposed project exhibits all of the characteristics of exemplary urban design and architecture. By combining Sustainable Design with the appropriate treatment of a potentially historic structure, this project embraces truly exemplary design. The public plaza between the Octagon House and the Headquarters Building will be a signature component of the project and will create a neighborhood destination and gathering spot that is otherwise unavailable in the immediate vicinity. In addition, the proposed retail uses, which will be accessible from 18th Street and New York Avenue, will create an easily-accessible and lively shopping experience for neighborhood workers and pedestrians that heretofore does not exist in the area.

The massing, height, and articulation of the renovated Headquarters Building have been carefully designed in order to create a project that meets the sustainability goals of the AIA, yet is also conscious of the surrounding buildings and uses. Although the exterior of the building will remain largely unchanged, the renovated building respects the design and scale of the surrounding buildings. Thus, the proposed height and density of the building in the PUD project will not have significant adverse impacts on neighborhood because they remain largely unchanged.

B. Site Planning, and Efficient and Economical Land Uses

Pursuant to Section 2403.9(b) of the Zoning Regulations, “site planning, and efficient and economical land utilization” are public benefits and project amenities to be evaluated by the Zoning Commission. The retention of the plaza and the appropriate buffering of the Octagon House is an example of appropriate site planning and efficient and economical land use as a project amenity. Given the Subject Property’s location in the downtown core, it is appropriate to have high density commercial uses as proposed in this PUD project. The creation of a large public plaza (accessible from both 18th Street and New York Avenue) with retail and possibly dining

options creates a respite for neighborhood denizens seeking a retreat in an area otherwise very dense with large office buildings and very lacking in similar outdoor spaces.

C. Environmental Benefits

According to Section 2403.9(h), “Environmental benefits, such as (1) storm water runoff controls in excess of those required by Stormwater Management Regulations. (2) Use of natural design techniques that store, infiltrate, evaporate, treat, and detain runoff in close proximity to where the runoff is generated, and (3) Preservation of open space or trees” are deemed to be public benefits and project amenities. As a sustainable project seeking LEED platinum certification, the renovated Headquarters Building will include an extensive stormwater management program that encompasses the use of green roof and a cistern for stormwater collection and reuse on site. In addition, the numerous design elements that will help the building achieve LEED platinum certification, as described above, are important to this project’s success. The green building materials, use of natural ventilation to reduce the building’s reliance on its cooling system, the low energy lighting scheme, the limited-use water system, the carbon neutrality by 2030, and the many other environmentally-friendly elements of the building’s design are public benefits and project amenities.

D. Historic Preservation

Pursuant to Section 2403.9(d), “historic preservation of private or public structures, places or parks” is public benefits and project amenities to be evaluated by the Zoning Commission. Though the Headquarters Building is neither a designated landmark nor part of a historic district, it does represent a period of architectural significance (Mid 20th Century Modernism) that is held in high regard in the District of Columbia and has drawn the attention of the District’s historic preservation community. Indeed, as the national headquarters for the AIA, the Headquarters

Building holds a particular prominence among architects, and it is a noteworthy building held in high esteem among preservationists in the District.

The Applicant and its representatives have met with the District's State Historic Preservation Officer ("SHPO") to review the proposed PUD project and its treatment of the Headquarters Building. The SHPO did not have any concerns that the proposed renovation of the Headquarters Building will adversely impact the ability to designate the Headquarters Building as an historic landmark in the future. The Applicant has determined that it will seek an historic landmark designation of the Headquarters Building in the future. The Applicant and its representatives have also met with the staff of the Commission of Fine Arts ("CFA")² regarding this project and has received similarly positive feedback.

E. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include "other ways in which the proposed planned unit development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan." As described in greater detail in Section V, the PUD is consistent with and furthers many elements and goals of the Comprehensive Plan.

F. Public Benefits of the Project

The annotated table required by Section 2403.11 of the Zoning Regulations is found in Exhibit A. Sections 2403.12 and 2403.13 require the Applicant to show how the public benefits offered are superior in quality and quantity to typical development of the type proposed. This PUD project will include many, if not all, of the attributes of PUD projects that have been recently approved by the Zoning Commission, including:

² CFA has design review authority over this project under the Shipstead-Luce Act.

- exemplary/superior architecture;
- ground floor retail establishments;
- environmental benefits;
- historic preservation; and
- high quality public open spaces.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous policies and action items enumerated in the Comprehensive Plan. The Comprehensive Plan includes the Subject Property in the area known as Central Washington. The Comprehensive Plan's Central Washington Elements includes the following pertinent provisions:

Retain Central Washington as the premier office location in the Greater Washington region.

A range of office space should be planned to meet the needs of high-end, mid-range, and low-end office space users. (Policy CW-1.1.2 Central Washington Office Space)

Promote active street life throughout Central Washington through the design of buildings, streets, and public spaces. This should include:

- d. Providing streetscape improvements that make Downtown streets more comfortable and attractive;
- e. Encouraging active ground floor uses, and discouraging wide building entrances, large internal lobbies, and street-facing garage entrances and loading areas;
- f. Creating and managing well designed public spaces that provide space for spontaneous performances, programmed entertainment, and social interaction. (Policy CW-1.1.2 Creating Active Street Life and Public Spaces)

The proposed PUD project is consistent with these policies. As discussed throughout this statement, the project will offer a newly renovated office building with an “urban oasis” in the form of ground-floor retail and a public plaza. The project will draw pedestrians from 18th Street and New York Avenue and will enliven a block of the City that is otherwise very quiet.

The Comprehensive Plan's Land Use Element includes the following policy that is supported by this project:

Carefully manage the use of sidewalks and other public spaces within commercial districts to avoid pedestrian obstructions and to provide an attractive and accessible environment for shoppers. Where feasible, the development of outdoor sidewalk cafes, flower stands, and similar uses which “animate” the street should be encouraged. Conversely, the enclosure of outdoor sidewalk space with permanent structures should generally be discouraged. (Policy LU-2.4.10: Use of Public Space within Commercial Centers)

The project’s provision of ground-floor retail and an open plaza is consistent with this Policy.

The Comprehensive Plan’s Environmental Protection Element includes the following policies that this project supports:

Include provisions for energy efficiency and for the use of alternative energy sources in the District’s planning, zoning, and building standards. The planning and design of new development should contribute to energy efficiency goals. (Policy E-2.2.5: Energy Efficient Building and Site Planning)

Continue efforts that enable major employers in the city, including the government, institutions, schools, and the private sector to implement energy conservation measures. (Policy E-2.2.6: Energy Efficiency at Major Employment Centers)

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. (Policy E-3.1.1: Maximizing Permeable Surfaces)

Promote green engineering practices for water and wastewater systems. These practices include design techniques, operational methods, and technology to reduce environmental damage and the toxicity of waste generated. (Policy E-3.1.3: Green Engineering)

Take measures to ensure that future development mitigates impacts on the natural environment and results in environmental improvements wherever feasible. Construction practices which result in unstable soil and hillside conditions or which degrade natural resources without mitigation shall be prohibited. (Policy E-3.4.1: Mitigating Development Impacts)

As a project that will attain LEED platinum certification and will be carbon neutral by 2030, this project is entirely consistent with Policies E-2.2.5 and E-2.2.6. The stormwater and runoff containment measures that the project’s design will include are equally consistent with Policies E-3.1.1 and E-3.1.3. Pursuant to Policy E-3.4.1, the project will use recycled and environmentally-friendly building materials.

The Comprehensive Plan's Economic Development Element includes the following policies that are supported by this project:

Promote the qualities that favor the District as a headquarters or branch setting for multi-national corporations, including its economic, social, political and locational attributes. Focus in particular on companies that contract with the federal government but are currently headquartered elsewhere. Construct incentive packages to encourage large corporations to locate and maintain their offices in the District. (Policy ED-2.1.2: Corporate Headquarters)

Emphasize opportunities for build-to-suit/signature office buildings in order to accommodate high-end tenants and users and corporate headquarters. Consider sites in secondary office centers such as NoMA and the Near Southeast for this type of development. (Policy ED-2.1.3: Signature Office Buildings)

As a demonstration project for Sustainable Design, the renovated Headquarters Building will be a national symbol, and approval of this project will allow AIA to maintain its national headquarters within the District, all of which is supported by Policy ED-2.1.2. In addition, the approval and development of this project will encourage other large national organizations to locate in the District and build similar projects, which is also consistent with that Policy. The Sustainable Design and historic preservation components of this project will be both a local and national emblem of commercial architecture and is, therefore, consistent with Policy ED-2.1.3.

The Comprehensive Plan's Urban Design Element includes the following policies that are supported by this project:

Promote excellence in the design of Downtown buildings and landscapes. Particular attention should be focused on ground floor (street) levels, with greater architectural details used to improve visual image. (Policy UD-2.1.4: Architectural Excellence)

Provide urban squares, public plazas, and similar areas that stimulate vibrant pedestrian street life and provide a focus for community activities. Encourage the "activation" of such spaces through the design of adjacent structures; for example, through the location of shop entrances, window displays, awnings, and outdoor dining areas. (Policy UD-3.1.8: Neighborhood Public Space)

The project will offer a unique combination of Sustainable Design components with particular attention paid to historic preservation of an existing office building. These elements will make the

renovated Headquarters Building the hallmark of green commercial architecture. As such, this project will be the very definition of architectural excellence pursuant to Policy UD-2.1.4. In addition, the plaza will enliven the area with a new public gathering space, which is consistent with Policy UD-3.1.8.

This project supports the following policies from the Comprehensive Plan's Historic Preservation Element:

Anticipate the need to preserve the record of our own time. Significant structures and settings from the modern era after the Second World War are the products and places of the recent past whose preservation will retell the story of our era for future generations. Evaluation of the recent past should not be colored by current fads or trends but should instead be judged by scholarly research and documentation after sufficient time has passed to develop an objective historical context. (Policy HP-1.1.4: The Recent Past)

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. (Policy HP-2.4.2: Adaptation of Historic Properties for Current Use)

The Headquarters Building was completed in 1973 and is part of the modern era of architecture. Accordingly, preserving this structure from the "recent past" is consistent with Policy HP-1.1.4. In addition, the renovation of this historic structure maintains its use as a commercial office building, which supports Policy HP-2.4.2.

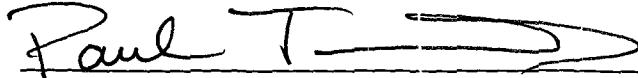
VI. CONCLUSION

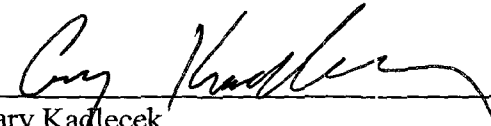
For the foregoing reasons, the Applicant submits that the consolidated PUD and Zoning Map Amendment applications meet the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of a consolidated PUD and Zoning Map amendment; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD application and Zoning Map amendment should be approved and

adopted by the Zoning Commission. Accordingly, the Applicant respectfully requests that the Zoning Commission to set down this project for a public hearing at the earliest possible date.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP


Paul Tummonds


Cary Kadlec