

August 26, 2019

VIA IZIS

Fred Hill, Chairman  
D.C. Board of Zoning Adjustment  
441 4<sup>th</sup> Street, NW, Suite 200S  
Washington, DC 20001

**Re: Addition to National Geographic Society Headquarters at 1600 M St.  
NW – Application for Modification of Consequence – Order No. 13540**

Dear Chairman Hill and Members of the Board:

On behalf of the National Geographic Society (“**Applicant**” or “**NGS**”), we hereby seek approval, pursuant to Subtitle Y § 703, for a Modification of Consequence. The scope of this modification request is the proposed expansion of the existing building with the addition of a front entry pavilion at 1600 M Street NW (Sq. 183, Lots 883 & 884) (“**Property**”).

Attached as **Exhibit A** is a copy of Order No. 13540 (“**Order**”) that previously approved special exception and variance relief for an addition to the buildings at the Property. A check for the filing fee in the amount of \$1081.60 (26% of the filing fee) is also included.

**I. Background**

The Property is a rectangular parcel located on M Street NW between 16<sup>th</sup> and 17<sup>th</sup> Streets NW. It is bounded to the north by M Street, to the south by a public alley, to the east by 16<sup>th</sup> Street, and to the west by 17<sup>th</sup> Street. Most of the Property is zoned D-6, but approximately 1/3 of the Property on its east side is zoned D-2.

The Property is NGS’s headquarters and is improved with multiple structures all used by NGS for offices, a museum/exhibit space, and events/presentations/lectures. On the east side of the Property along 16<sup>th</sup> Street is Hubbard Hall, a two-story structure at the corner of 16<sup>th</sup> and M Streets constructed circa 1904, that was the original headquarters building of NGS, and a four-story structure constructed circa 1913 with a later addition constructed circa 1932 (collectively, the “**16<sup>th</sup> Street Building**”) and that NGS continues to occupy. On the

west side of the Property along 17<sup>th</sup> Street is a 10-story building constructed circa 1963 (the “**17<sup>th</sup> Street Building**”) that NGS also uses for various purposes. Between the 16<sup>th</sup> and 17<sup>th</sup> Street Buildings is a seven-story building constructed circa 1984 that NGS currently uses for its administrative offices (the “**M Street Building**”). To the north of the M Street building is a large plaza, and below-grade parking is located under the plaza, the M Street Building, and the 17<sup>th</sup> Street Building. The M Street Building is connected to the 16<sup>th</sup> Street Building, and there is a slight separation between the M Street Building and the 17<sup>th</sup> Street Building, but the buildings are connected underground. The 16<sup>th</sup> Street and M Street Buildings are located within the 16<sup>th</sup> Street Historic District.

In Order No. 13540, final on November 26, 1981, the Board of Zoning Adjustment (“**BZA**” or “**Board**”) approved two special exceptions and a variance to allow the construction of the M Street Building as an addition to the 16<sup>th</sup> Street Building and expand nonprofit office use in the 16<sup>th</sup> Street and M Street Buildings. Specifically, the Board approved a special exception for an addition to an office structure in the SP-2 (now D-2) zone, a special exception to extend the C-4 (now D-6) permitted use into the SP-2 zone by 35 feet, and a variance from the open court requirements. The addition of the M Street Building allowed NGS to further expand its operations on and improve the appearance and functionality of the same property that it had occupied for decades.

NGS now plans a relatively small addition of an entry pavilion to the M Street Building to create a new and more centralized public “front” for its headquarters. The new entry pavilion will be located on the north side of the Property between the 17<sup>th</sup> Street Building and the M Street Building and will add a connection to the 17<sup>th</sup> Street building so that all three of the buildings on the Property are connected above grade. The purpose of the project is to unify the existing NGS property with a new pavilion, plaza, renovated ground level, and cohesive streetscape. The pavilion and plaza will be the main entry and events space for the site and will further establish a strong identity for NGS at its headquarters location. The pavilion will replace the current main entrance on the west side of the 17<sup>th</sup> Street Building, which is a confusing entryway and often highly congested. A new open space in the plaza will be created that can accommodate outdoor presentations, lectures, exhibits, and other outdoor events for student and teacher groups, gatherings of explorers, members, and other visitors all in support of NGS’s mission. The plaza will serve as an urban amenity and welcoming place to encourage further exploration of the museum and its many programs in the buildings.

As shown on the attached plans in **Exhibit B** the proposed pavilion will be 41 feet in height, though it will contain mostly one floor with high ceilings. It also will have an outdoor roof terrace and penthouse. The pavilion will fit between the M Street and 17<sup>th</sup> Street Buildings and will create an internal connection between them to provide a more seamless unity of NGS’s buildings. The pavilion will

contain a large lobby for all of the buildings on the site and publicly-accessible spaces as well as a media wall and exhibit space. It also will contain a sizeable second floor balcony that will serve as both a programmatic space and a connecting passage between the 17<sup>th</sup> Street Building and M Street Building.

With the addition of the pavilion, all of the buildings on the Property will be one for zoning purposes. The pavilion will be contained within the D-6 zoned portion of the Property, and all structures within D-6 portion of the Property will comply with (and be well below the maximum permitted for) all development standards for the zone. No new relief from the developments standards or use requirements is being requested with this application. The only reason that BZA approval is required for the proposed pavilion is because the gross floor area of the addition is more than a 2% increase over the existing, which means that the Zoning Administrator cannot approve it.<sup>1</sup> Nevertheless, the proposed addition is still quite small and will increase the existing floor area by only 4%.

The designs of the proposed pavilion, renovated plaza, and enhanced streetscape that comprise this project were granted concept approval by the Historic Preservation Review Board on August 1, 2019.<sup>2</sup>

## II. The Board Should Review the Proposed Addition as a Modification of Consequence

The proposed modification of approved plans falls squarely within the scope of a Modification of Consequence as set forth in the Zoning Regulations. Subtitle Y § 703.4 provides in relevant part that “[The] term ‘modification of consequence’ shall mean ... **a redesign or relocation of architectural elements and open spaces from the final design approved by the Board.**” (Emphasis added.) Further supporting that conclusion, the proposed modification will not create a new area of relief, will not extend the areas of relief previously granted, is a redesign of architectural elements approved by the Board, and is comparatively small in size.

When a modification request is “straightforward” and presents no factual issues that require a public hearing to resolve, a Modification of Consequence is the appropriate type.<sup>3</sup> Here, the request is very straightforward and presents no material new factual issues for the Board to evaluate. The proposed addition will result in a building that is still well within the matter-of-right development standards for the zone and is quite small compared to the existing buildings already on the Property. Accordingly, this request is appropriately evaluated as a Modification of Consequence.

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<sup>1</sup> Subtitle A § 304.10(f).

<sup>2</sup> HPA No. 19-460.

<sup>3</sup> See Zoning Commission Order No. 06-46D, p.5.

**III. The Board Should Approve the Modification to Allow the Addition of the Pavilion**

The Board should approve the requested Modification of Consequence because the proposed addition will result in a building that is still conforming to the development standards for the D-6 zone, is harmonious with its context, and will aesthetically enhance NGS's presence on M Street. The proposed project will add only approximately 23,550 square feet, which is comparatively very small for the 587,607 gross square feet that already exist on this large site. The proposed pavilion will not create materially different impacts than the Board already considered when it approved the M Street Building, and, in fact, it will enhance the Property and the Buildings in many ways. Light, air, and privacy available to neighboring properties will be unaffected since the proposed addition will still leave ample open space in the plaza and will be separated from other properties by its existing buildings and the plaza. However, this pavilion addition will allow NGS to significantly enhance its buildings and outdoor spaces, and provide a greatly improved experience for its employees, guests and all its visitors.

For the reasons given above, the Applicant respectfully requests that the Board determine that proposed modification to the plans approved in the Order is a Modification of Consequence and accordingly approve the same.

Respectfully submitted,

/s/  
Cary R. Kadlecek

Attachments

Certificate of Service

I HERBY CERTIFY that on August 26, 2019, I delivered a copy of the foregoing letter and attachments via email or courier to the recipients listed below.

/s/  
Cary R. Kadlecek

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