

April 22, 2016

**VIA IZIS AND HAND DELIVERY**

Anthony Hood, Chairperson  
D.C. Zoning Commission  
Office of Zoning  
441 4th Street, N.W., Suite 210  
Washington, DC 20001

Re: Z.C. Case No. 14-04A  
Request for Minor Modification - Penthouse

Dear Chairman Hood and Members of the Commission:

Pursuant to Sections 411.24 and 3030 of the Zoning Regulations, the Applicant requests a minor modification to add penthouse habitable space to the PUD that was approved by the Zoning Commission in Z.C. Case No. 14-04. The original PUD approved the construction of an addition to the existing International Finance Corporation headquarters at 2100 K Street NW ("Project"). A copy of the original order of approval is attached as Exhibit A. Plans illustrating the proposed modification are attached as Exhibit B.

Briefly, the Applicant proposes a minor adjustment to the penthouse footprint to convert and enlarge the approved rooftop elevator lobby into a habitable room consisting of approximately 1,570 square feet of floor area, inclusive of the bathroom. The habitable space will have a height of 15 feet, consistent with the Commission's original approval. The remainder of the penthouse will have a height of 18'6", also consistent with the Commission's original approval. The penthouse materials and design will otherwise remain the same, and the penthouse will comply with all setback requirements.

Pursuant to Section 411.25(a), the plans attached as Exhibit B include a fully dimensioned copy of the approved and proposed roof plan, as well as sections, elevations, and perspectives illustrating the proposed change.

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Pursuant to Section 411.25(b), the proposed roof structure complies with all of the penthouse regulations as follows:

- Use (§ 411.4): the penthouse contains mechanical space and habitable indoor space that will be used by the building's office tenants.
- Single Structure (§ 411.6): the penthouse is located within one enclosure that harmonizes with the main structure in design.
- Enclosure (§ 411.7): all mechanical equipment except for the cooling tower is fully enclosed.
- Heights (§§ 411.9, 770.6, and 2405.1): the habitable space is one uniform height and the mechanical space is a second, uniform height. The penthouse height does not exceed 20 feet.
- Verticality (§ 411.10): the enclosing walls rise vertically to a roof.
- FAR (§ 411.13): the habitable space is 1,570 SF, or 0.02 FAR, which is well within the 0.4 FAR maximum for habitable space.
- Parking and Loading (§ 411.15): consistent with the original approval, the proposed Project exceeds the parking requirements, so the additional required parking space associated with the penthouse can be accommodated within the proposed amount of parking spaces. The penthouse space does not trigger an additional loading requirement.
- Housing Linkage (§ 411.17): the Applicant will provide the required contribution associated with the habitable penthouse space.
- Setbacks (§ 411.18): the penthouse is set back from the north and east edges of the roof a distance that it at least equal to its height. The west and south edges of the roof of the Project adjoin the existing IFC building. No setback is required from those edges because (a) the entire structure is one building for zoning purposes and (b) even if the structures were separate buildings, they have the same permitted height.

Pursuant to Section 411.25(c), the Applicant has notified ANC 2A of the request.

The modifications described above do not affect the overall height, mass, bulk, or design that was approved by the Commission. Rather, they are minor changes required to accommodate the recent changes to the Zoning Regulations and Height Act regarding roof structures.

We look forward to the Commission's consideration of this modification at an upcoming public meeting.

Very truly yours,

  
David Avitabile

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## CERTIFICATE OF SERVICE

On April 22, 2016, I caused a copy of the foregoing letter and enclosure to be delivered by electronic, hand or by U.S. Mail to the following:

Joel Lawson  
D.C. Office of Planning  
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David Avitabile