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D.C. OFFICE OF ZONING
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Monday, June 30, 2003

DC Zoning Commission
441 4th St, NW
Room 220 South
Washington, DC 20001

Re: Zoning Commission Proposed Rulemaking, Case No. 02-44 (Retail Arcades)

Honorable Members of the Commission:

This letter provides comments of Lano/Armada Harbourside, LLC (Lano/Armada) on the above captioned matter.

Lano Armada is the developer of the last remaining waterfront site in Georgetown, immediately adjacent to Rock Creek and Washington Harbor. The project, zoned W-2, involves two buildings, one will house the new Swedish Chancery, the other will contain five floors of office and a penthouse floor of residential.

The entire project received US Commission of Fine Arts (CFA) concept approval on June 18th, 2003. Leo A Daly has been engaged to develop working drawings, and construction on the entire site will commence immediately thereafter.

The Project has an unusual number of public benefits. The design of the Swedish Chancery building was the culmination of a design competition, and the winning design is striking and intended to invite the public to share in its use since the first two floors will provide public exhibition space and conference facilities.

The developer is working with GSA and The US National Park Service (NPS) to remove the unsightly GSA Coal and Ash House at the corner of K Street, NW and 30th Street, NW and build a public park over two floors of public underground parking. The developer and the NPS have developed a linear park along Rock Creek and a plan for a Park on the NPS land on the historic "Mole" area immediately in front of the Swedish Chancery on the Potomac. Between the buildings, an elliptical garden and park, reminiscent of Dumbarton Oaks in Georgetown, is planned.

ZONING COMMISSION
District of Columbia
Case 02-44
Exhibit 28

ZONING COMMISSION
District of Columbia
CASE NO.02-44
EXHIBIT NO.28

These extraordinary public benefits would be jeopardized by a broad reading of the proposed rule, if it changes the settled treatment of arcade credits in the W-2 zone. All of the work for this project has assumed the continuing application of current code regarding arcade credits. Since both buildings have cantilevered levels, any adverse unanticipated change will stop the project in its tracks, possibly requiring redesign and resubmission to OGB and CFA.

We urge that the final rule adopted clearly clarify that there is no intention to prohibit or discourage open arcades that are outside of the Central Employment Area.

Thank you for the opportunity to submit these additional comments.

Very truly yours,



Alan R. Novak

cc: A. Russell Kirk