GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

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Office of the Director

Memorandum

TO: District of Columbia Zoning Commission

FROM: Andrew Altman, Director
Office of Planning

ZONING COMMISSION
District of Columbia
CASE NO. 04-01
EXHIBIT NO. 21

DATE: May 24, 2004

SUBJECT: **Final Report** - Zoning Commission Application **#04-01**
American Pharmacists Association (APhA) (Square 62, Lots 19, 810, Pt 813, 814 and 815) - **Consolidated PUD and Related Map Amendment**.

APPLICATION
Pursuant to 11 DCMR § 3011 1, the applicant, American Pharmacists Association **(APhA)**, is requesting approval of a consolidated PUD and Map Amendment from unzoned to SP-2 for Lots 810, part of 813, 814 and 815 located in Square 62.

RECOMMENDATION
The Office of Planning recommends approval of the consolidated PUD and Map Amendment to zone the above parcels SP-2

BACKGROUND and PROPOSAL
OP's setdown report of February 5, 2004 provided details of the applicant's proposal and its relation to the existing structures on the developed portions of the site, including the landmark Russell Pope Building and the 1962 annex to the rear The existing structure is the national headquarters of the association and forms an integral element of the city's Monumental Core It is anchored to the east by the National Academy of Sciences and to the west by the future site of the Institute of Peace The Department of State sits to the north of the association's headquarters building at C Street The proposed development will add another building to the landmark site designed by John Russell Pope

The preeminent architecture and history of the existing structure is well documented and supported in the application's review by the Historic Preservation Review Board (Attachment 1)

An existing three-story rear annex built in 1962 will be demolished and reconstructed as a larger five-story addition consisting of approximately 166,750 square feet of gross floor area. The applicant intends to acquire federally owned lots to the north and west of the existing structure for consolidation with the developed parcel (Lot 19), as part of its site development Zoning Regulations require that each building be located on its own lot of record, therefore the proposed consolidation of the above mentioned lots into

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a lot of single record would meet this criteria. Since the lot is not zoned, a map amendment is also being requested in conjunction with the PUD

After submission of the original application to the Zoning Commission, the applicant made minor modifications to the original PUD application, including an increase in gross floor area from 157, 775 square feet to approximately 166,750 square feet This represents an increase in FAR from 2 0 to 2 14. The height of the building was also increased by two and one-half feet, from 63 feet to 65 42 feet to accommodate the additional space. These changes have been submitted to, and approved by, the Commission of Fine Arts (CFA) and the Historic Preservation Review Board (Attachment 2) The current changes are lower than proposals previously submitted and approved by CFA

ZONING

The federally owned parcels are proposed to be zoned SP-2, since this logically follows the zoning of the developed lot (Lot 19) The development will therefore use the PUD standards of the SP-2 zone to accommodate the additional private offices proposed on the site.

The following table is a comparison of the development standards of the base SP-2 zone, the PUD/SP-2, and the proposed.

	SP-2 Standards	PUD/SP-2 Standards	Proposal
Area	15,000 square feet	15,000 square feet (43,560 sq ft)	82,085 sq ft
Height	90 ft.	90 ft.	65 42 ft.
FAR	6 0 (3.5 non-residential)	6 5 (4 5 non residential)	2.14
Lot Occupancy	N/A	N/A	52%
Rear Yard	2 ½ "/foot of vertical distance from the mean finished grade at the middle of the rear of the structure to the highest point of the main roof or parapet wall, but not less than 12 ft.	4"/foot of vertical distance from the mean at the middle of the rear of the structure to the highest point of the main roof or parapet wall, but not less than 12 ft.	18 ft.
Side Yard	None Required. If provided, it must be at least 2 ins. wide per foot of height, but not less than 8 ft. wide	None Required. If provided, it must be at least 2 ins. wide per foot of height, but not less than 8 ft wide	N/A
Loading	Setback required – 18 5 ft Height of Enclosure – 18 5 ft	Setback required – 18.5 ft Height of Enclosure – 18.5 ft	Setback required – 8 ft (portion) Height of Enclosure – 9 ft and 12 ft. (portion)
Parking	In excess of 2,000 ft^2 1 for each additional 1,800ft^2 of gross floor area.	91 (As in SP-2)	150

Table 1

The applicant is not requesting any flexibility from the PUD requirements of the SP-2 Zone District

PLANNING AND POLICY ISSUES

Consistency with the Comprehensive Plan

The Generalized Land Use Map categorizes Square 62 as institutional with land and facilities occupied by colleges, universities, hospitals, religious institutions and similar facilities as the predominant uses. Section 2403.4 of the Zoning Regulations requires that the application is "not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site." The SP-2 Zone designation for this site is classified as medium to high density matter-of-right development, including offices for trade associations and professionals permitted as a special exception requiring BZA approval. There are a few instances where institutional uses are part of a mixed-use designation and these locations are judged individually. The density and office use proposed in this development is not inconsistent with the recommendation of the Generalized Land Use Plan.

The PUD also complies with other sections of the Comprehensive Plan including the following Major Theme of the Plan.

- Section 108 – Preserving the Historic Character of the District

The District contains many "collections of buildings, which contribute to the beauty and fabric, as well as affording a picture of its history." The existing building is a designated historic landmark. The proposed development supports and recognizes the importance of the architecture of the existing structure and buildings in the immediate vicinity, which contribute to the fabric of the District's Monumental Core.

The application is also consistent with Chapter 2, the Economic Development Element, including the objectives of Sections 203and 204 to foster the District's promotion and stimulate private sector growth.

- Section 203 1(a), which is to "promote the District as the location of choice for a variety of appropriate industries, including.. headquarters of businesses and national membership organizations. ."

The Association's headquarters has operated at this location since 1934. The District has long accommodated national organizations and associations and in this instance, the proposed expansion at this location can be accommodated, thus promoting the District as a location of choice for the association's growth.

- Section 204 2(c), which is to "enhance the environmental quality of areas of significant development through guidelines related to access and egress, setbacks, landscaping, lighting, facades and structural relationship to adjacent buildings. "
- Section 805, which outlines "Specific Policies for Protection and Enhancement of Historic Properties".

Section 700.4 declares that a major policy of the Urban Design Element is to carefully control future development to protect and enhance the national and international image qualities. Further, as an addition of strong architectural character, the annex proposal supports the following established policy objectives as outlined in Section 710.2 (d) through (g) to:

- Encourage new development within areas of strong architectural character to contribute to the physical identity and character of those areas;
- Encourage building massing and scale of new development to be sensitive to established patterns

- Protect and enhance the green landscape and park-like setting of trees, grass areas and plants: and
- Enhance and maintain design emphasis on the special nature of each area through distinctive landscaping ..in accord with the architectural character of the area.

Section 805.16 requires that new construction on historic landmarks be compatible with the historical architectural character and cultural heritage of the landmark.

These objectives are integral components in the applicant's design of the site, evidenced by the due diligence applied by the applicant's recognition of the details necessary to respect Russell Pope's original structure, in conjunction with surrounding structures and their significance along Constitution Avenue

According to submissions by other review agencies, the proposed annex seeks to complement the valuable features of the existing structure and those in the immediate vicinity to which it will be visually related, with respect to the subject proposal's design, height, mass, configuration, building materials, texture, and color All amendments have been subsequently reviewed and approved by the Commission of Fine Arts, the Historic Preservation Board and the National Capital Planning Commission. All approvals have been included as part of the applicant's submission

Site Planning and Design
As referenced above, the historic significance of this site and its relevance to the Monumental Core of the District is understood and well documented in submissions to relevant agencies OP recognizes that significant attention to detail (scale, massing and materials) was required to respect the integrity of John Russell Pope's classical Beaux-Arts structure and the proposed addition's relation to it and other structures in the immediate vicinity, as well as to Constitution Avenue. The applicant has submitted detailed transcripts of CFA's review on June 19, 2003, which documents the Commission's comments and approval. According to the applicant, various submissions sought to reduce the appearance of the building from Constitution Avenue and separate the mass from the existing historic structure.

The report of the National Capital Planning Commission (NCPC) dated July 3, 2003 (submitted by the applicant, Attachment 3), outlined that the lot coverage for the site with the proposed addition will be 30 percent This falls within range of the 38 percent coverage of the Federal Reserve and the 20 and 22 percent coverage for the National Academy of Sciences and the Department of the Interior's site respectively, along Constitution Avenue. While the proposed development alters the relationship of the landmark structure to its setting on the Avenue, the transformation remains consistent with larger buildings and wider buildings fronting Constitution Avenue and C Street

Traffic and Parking
The existing building is currently served by 35 surface parking spaces, with ingress and egress from 22nd and 23rd Streets. The proposed development will provide 150 structured underground parking spaces, 33 more than the required spaces for the SP-2 zone district requirements. Proposed below grade parking allows conversion of some of the existing surface parking to be replaced with landscaping. The subject property's location approximately five (5) blocks from metro and two blocks from an entry ramp to I-66 provides adequate access for employees and visitors.

The applicant has provided an amended traffic impact study with analysis provided for the existing structure and proposed addition on the assumption that the development would be completed and occupied by 2005. Briefly, the study concluded that the proposed expansion would generate an average of 84 net additional peak hour vehicles-trips and the study area would continue to operate with an imperceptible delay (less than one second of delay per vehicle) during both morning and afternoon peak hours at street intersections.

The applicant has held scoping meetings with the District's Department of Transportation (DDOT) and OP understands that DDOT will provide input concerning the applicant's analysis and the potential impact due to additional traffic.

Public Benefits and Amenities

Sections 2403.5 through 2403 13 discuss the definition and evaluation of public benefits and amenities The applicant has proposed the following as amenities:

1. Design, Architecture, Landscaping and Open Space and Historic Preservation

The applicant submits that the proposed addition is sensitive to the original Pope design and the addition allows for the "continued use and viability of the landmark building..." Due to its extensive review and recommendations from HPRB, NCPC and CFA, the results are believed compatible with the existing structure and surrounding buildings, creating consistency with building lines along C and 23rd Streets The existing landscape is also considered a part of the historical fabric of the site and efforts will be made to preserve this landscape and expand with new plantings along a dedicated 17-foot wide strip, originally a part of lot 813.

2. Transportation

Proposed off-street parking will be located below grade and exceeds the zoning regulations requirements. The benefit accrues to additional landscaping on site Additional access to the site will be made available at 23rd Street, which would relieve vehicular congestion in the immediate area.

3. Environmental Benefits

According to the applicant, the site would benefit from remediation in conjunction with construction, since soil testing revealed contamination with volatile organic compounds (VOCs) due to a dry cleaning establishment in the 1940s.

Additional benefit will also be derived from extensive efforts, which will be made to preserve the significant mature trees during construction. The applicant provided a detailed landscape plan as previously requested by OP, which proposes planting a significant number of American elms. The health of the trees were also rated and trees along 22nd and 23rd Streets would be marked for tree preservation if they are in good condition and will not conflict with construction activities In the latter instance, damage to those trees would be mitigated using protection measures as identified in the industry's standard, ***Technical Guide to Preservation of Trees During Land Development***, published by the International Society of Arboriculture, 1989.

OP encouraged the applicant to consider pursuing the U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) certification to achieve a minimum of LEED Silver designation. However, while the applicant has not explicitly stated that a rating would be pursued, the LEED checklist was submitted with items applicable to the proposed addition, including consideration of.

- Indoor Environmental Quality – Utilizing Minimum IAQ Performance Standards
- Materials and Resources – Use of local and recycled materials

- Energy and Atmosphere – Ventilation system will be designed to exceed the current industry's standard (ASHARE 62). Low-emitting materials will be used.

PURPOSE AND STANDARDS FOR PLANNED UNIT DEVELOPMENT (PUD)

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Chapter 24. A PUD is "designed to encourage high quality developments that provide public benefits." The PUD is intended to facilitate a site-specific project and the assurance of a quality development. The PUD process provides the Commission control over design, transportation, storm water management and related issues and determination on the minimum adverse impact on the immediate surroundings This would not be possible if the application was simply a map amendment

PUD ANALYSIS

In general, OP feels that the PUD is consistent with Zoning Regulations, and is not inconsistent with the Comprehensive Plan objectives The PUD proposes a use that is appropriate for the proposed zoning and complimentary to the zone map and the intent of the zoning regulations.

The specific requirements and evaluation standards for the proposed PUD were reviewed as follows:

PUD Evaluation Standards (§2403)

2403 3 The impact of the project on the surrounding area and on the operation of city services and facilities shall not be found to be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project

The proposed project will provide increased parking for staff and visitors to the offices, thereby reducing the demand for on-street parking in the immediate vicinity No additional services or infrastructure is required for the site's development. OP believes the project presents no adverse impact on the surrounding community , a position also supported by the ANC 2A.

2403.4 The Commission shall find that the proposed PUD is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site

As indicated previously in the report, OP believes this project is not inconsistent with the Comprehensive Plan and furthers the public policies established by the Plan's Economic Development Element, outlined in Section 203. In addition the applicant has demonstrated in their report to the Commission dated June 3, 2004, that the proposed design is consistent with the Historic Element as outlined in the requirements of Section 805, which outlines "Specific Policies for Protection and Enhancement of Historic Properties".

2403.5 In the context of the Comprehensive Plan, the Commission shall also evaluate the specific public benefits and project amenities of the proposed development, which features may in some instances overlap

According to the applicant, the public benefits and amenities package includes the following major items:

1. Superior design and architecture

2. Preservation and enhancement of open space.
3 Historic Preservation
4. Transportation features
5. Environmental Mitigation measures

The proposed development features on-site environmental improvements, including the removal of contaminated soil from the lot, thereby reducing the emissions of volatile organic compounds from the site. The applicant has indicated that while LEED rating on the addition will not be pursued, they intend to apply LEED standards as it relates to minimum energy performance and CFC reduction in its HVAC equipment selection The proposal also plans to attain superior indoor environmental air quality standards by exceeding the current industry standard for ventilation required by the LEED program Interior installations will include low emitting materials in choices in adhesives, paints and carpeting throughout the building

This project also includes on-site stormwater management facilities comprised of new drainage systems and a large sand filter. The stormwater management features and engineering will be reviewed by the Department of Health's Stormwater and Sediment Control Division during the building permit review.

2403 6 Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title

Sale of the property to APhA permits a logical expansion of the landmark structure currently used by APhA as its headquarters. The Zoning Commission and District agencies would not have had the benefit of a review of the development proposal if the project were developed as unzoned federally owned property. Therefore, it is beneficial to the public that this development is given public review and oversight through the Zoning Commission's process.

Given the historic significance of the site, including the landscaping and building's structure, OP believes that the applicant has demonstrated significant effort in crafting a superior design that respects and complement's the site's existing structure, as evidenced in supporting comments and approvals from the Commission of Fine Arts, the Historic Preservation Review Board and the National Capital Planning Commission.

2403 9 Public benefits and project amenities of the proposed PUD may be exhibited and documented in any of the following or additional categories

(a) Urban design, architecture, landscaping, or creation or preservation of open spaces,

The density of the project is in keeping with the character of the surrounding neighborhood. The proposed structure will not be unduly burdensome on the existing infrastructure, much of which will not be visible from Constitution Avenue. According to reports from CFA and HPRB, as well as those conducted by the applicant, the proposed height of the structure would be minimally visible from Constitution Avenue.

OP is satisfied that the applicant has provided a detailed landscaping plan for the project area. The plan reflects a common theme, which blends the older and newer plantings. Extensive measures were documented to show tree preservation measures, before, during and post construction

(b) Site planning, and efficient and economical land utilization,

Based on the reviews and the applicant's submission to OP, OP believes that the main objectives to site planning and design included.

- Integrating the proposed addition into the site's historic fabric by providing appropriate connections to the surrounding structures to the east and west of the site, as well as to Constitution Avenue,
- Providing an environmentally sensitive site design, and
- Developing an architecture that complements the surrounding context.

OP supports the applicant's effort at respecting the existing structure's mass by gradually increasing the height of the addition away from the Pope building The resulting lot occupancy of the site will be comparable to neighboring structures while maintaining a visual separation when viewed from Constitution Avenue.

(c) Effective and safe vehicular and pedestrian access, transportation management measures, connections to public transit service, and other measures to mitigate adverse traffic impacts,

While access from C Street remains questionable due to security concerns of the State Department, the proposal improves on pedestrian access with a secondary entrance from 23rd Street. The site is well served by public transit, including Metrobus routes and Metro rail located within easy walking distance (5 blocks) to the north. Based on the applicant's submitted traffic study, the Level of Service (LOS) on both 22nd and 23rd driveway/street intersections would not be significantly changed by the addition, as projected traffic flows at both AM and PM peak periods, showed no significant changes in volume.

The location is well served by Metro bus and rail systems.

(d) Historic preservation of private or public structures, places, or parks,

Both the existing structure and the landscaping contribute to the historic fabric of the site and OP is satisfied that Historic Preservation's review recommended approval of the proposal. Recent amendments including a setback of an additional five feet back from the original building has met the Board's approval, since it increases the space around the landmark (HPRB Report, April 22, 2004). The Board found that the conceptual plans with most recent amendments were consistent with the purposes of the preservation law

(e) Employment and training opportunities;

Since the project is a private development, with no public funding assigned, the District's First Source Employment Agreement is not contemplated.

(f) Housing and affordable housing,

This project is essentially an office development and does not provide housing.

(g) Social services/facilities,

Similarly, no social services are associated with this development.

(h) Environmental benefits, such as storm water runoff controls and preservation of open space or trees,

The proposed development creates additional pervious space, new landscaping, environmental improvements and improved site access. The applicant has retained a respected landscape architect to design tree protection measures for all phases of activity on site to preserve the mature "landmark" trees on site The submitted landscape plan proposes to preserve a number of mature trees, and install additional trees.

This project also includes stormwater management facilities on-site. This includes the construction of new drainage systems and a large sand filter. This application has been referred to the Department of Health and no comments have been received. The tree preservation and stormwater management engineering will be reviewed by the Department of Health's Stormwater and Sediment Control Division during the building permit review

(i) Uses of special value to the neighborhood or the District of Columbia as a whole,

The value to the District is in the retention of a long-standing national and local organization representing independent pharmacists that contributes to the District's economy The association's expansion will provide additional space for the association's expanding needs.

(j) Other public benefits and project amenities and other ways in which the proposed PUD substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan

The District's Monumental Core is likely to benefit from the development of the annex in numerous ways. In addition to those previously mentioned, the project substantially advances the major themes and elements of the Comprehensive Plan including.

Economic Development

- Ward 2 as a place to do business (§1301 1(a))
- Encourage office employment growth... in other . parts of the Central Employment Area (§1302.1 (c))
- Encourage development of office buildings in appropriate locations in Ward 2 (§1311.1 (d))

OP believes the location is appropriate as an expansion site for the association. Since available land is scarce, this allows the association to remain at its current location without leaving the District. Thus, it encourages growth and business retention of a national organization in the District.

Historic Preservation Element

- New construction on historic landmarks...should be compatible with the historical architectural character ..In design, height, proportion, mass, building materials and texture, color...(§805.16)

The project proposes to use materials of similar quality and standards reflected in the existing and surrounding structures. The existing structure is composed primarily of Vermont marble on three sides of the building and the proposed structure will be composed of limestone.

2403 10 A project may qualify for approval by being particularly strong in only one or a few of the categories in §2403 9, but must be acceptable in all proffered categories and superior in many.

OP believes that the public benefits are appropriate since no relief is requested through the PUD process.

2403 11 To assist the Commission in applying the evaluation standards of this section, the applicant shall prepare and submit to the record of the case an annotated table that shows

(a) The extent to which the proposed development would comply with the standards and requirements that would apply to a matter-of-right development under the zone district classification of the site at the time the application is filed,

(b) The specific relief that the applicant requests from the matter-of-right standards and requirements, and

(c) If the applicant requests a map amendment, the extent of compliance with, and the requested relief from, the matter-of-right standards and requirements of development under conventional zoning

This table is shown as Table 1.

2403 12 The annotated table required by §2403 11 shall also show how the public benefits offered are superior in quality and quantity to typical development of the type proposed and the duration of the operational or grant programs

Although no flexibility is requested and therefore no amenity package offered, the project exhibits public benefits through the extensive public review and design process The detailed review of the proposed addition has resulted in a building of superior design that fully respects the landmark status of the original building and its unique location at the western end of the National Mall.

AGENCY REFERRALS AND COMMENTS

The application was referred to the District Department of Transportation and Department of Health (Storm Water Management). OP has not received comments from these agencies to date.

The Historic Preservation Review Board
The Historic Preservation Board received submissions from the applicant on 10/25/01 and the designs were approved in concept (May 22, 2003 and April 2004), subject to further review by the Board, and CFA as the project progresses .

The Commission of Fine Arts
The Commission of Fine Arts approved the design concept on June 19, 2003. The report is included in the applicant's submission

The National Capital Planning Commission
Staff evaluation of the concept design recommended approval of the submission on July 3, 2003, on condition of submission of a landscape plan and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23rd Street. This report is also included in the applicant's submission.

COMMUNITY COMMENTS
ANC 2A recommended approval of the concept at their regularly held meeting on May 19, 2004.

RECOMMENDATION

The Office of Planning believes that the proposed PUD is not inconsistent with elements of the Comprehensive Plan and is consistent with the requirements of the Zoning Regulations.

The existing 1934 structure is a single-story marble building with a 1962 annex connected at the rear. The proposed addition is a five-story 166, 291 square foot limestone building OP believes that the prominence of the existing structure has been maintained by the addition and the proposed SP-2 zone designation of the parcel is consistent with the surrounding properties

OP supports the applicant's design and submission on its merits and recommends that the application for a consolidated PUD and related map amendment be approved.

(1)

HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION

Landmark/District	**American Pharmaceutical Association**	(x) Agenda
Address	**2215 Constitution Avenue, NW**	( ) Consent Calendar
Meeting Date:	**February 27, 2003**	(x) Demolition
H P A Number	**03-**	(x) New Construction
Date Received	**10/25/01**	(x) Conceptual Design
Staff Reviewer:	**David Maloney**	(x) Subdivision

The American Pharmaceutical Association (soon to be the American Pharmacists' Association) and Hartman-Cox Architects have applied for conceptual review of a new office annex at the APhA headquarters on Constitution Avenue. The project would involve demolition of the existing office annex, consolidation of land ownership to include U.S. government property on C Street at the rear of the headquarters buildings, and construction of a larger annex to include both expanded quarters for the association and leased space.

American Institute of Pharmacy (1932-34)
The American Pharmaceutical Association—the organization representing American pharmacists—was created in 1852 to establish a code of professional conduct and ethics for the profession. For many years the association had no settled home, until it decided to construct an American Institute of Pharmacy in the nation's capital, to serve both as a permanent home for the association and as a memorial to founder William Procter, Jr In 1932, Congress authorized the closing of a portion of Water Street between 22nd and 23rd Streets to create a suitable monumental site for the building on a rise to the north of the Lincoln Memorial By 1934, the imposing Neoclassical headquarters designed by noted architect John Russell Pope was completed, and since that time, in keeping with the vision of the McMillan Plan, it has anchored the row of monumental institutions lining the north side of Constitution Avenue opposite the westward extension of the Mall.

The American Institute of Pharmacy is a one-story structure clad in white Vermont marble. The original building is small—measuring only about 76' by 120' and originally housing only a rotunda, library, museum, lecture room, and minimal office space on the main floor—yet every bit as powerful as the larger institutional buildings that form the monumental thoroughfare. Pope apparently recycled the design from a previous unrealized commission, but nonetheless, in great measure due to the elegance of design and masterful siting at the crest of a cascade of steps, it remains among his most successful buildings in Washington.

From the start, the APhA contemplated adding more space for laboratories or other needs, and by the late 1950s, it had engaged Pope's successors Eggers & Higgins to complete an office annex to the rear of the original structure. The addition, finished in 1962, is about the same size as the original building, but is three stories high, clad in limestone with decorative aluminum spandrel panels It is set back about 25 feet from the Pope building, and connected to it by a one-story glazed passageway

Demolition and Subdivision

The expansion proposal is predicated on demolition of the Eggers & Higgins addition and consolidation of a larger site This raises the issue of the potential significance of the addition relative to the landmark as a whole. Although anticipated at an early stage and clearly designed in a similar Neoclassical manner to be compatible with the original Pope building, the addition does not approach the original building in architectural consequence The National Register nomination for the property does not discuss its architectural features or possible historic significance. The addition is described as "compatible" and "subordinated in design to the original building," but is not specified as either a contributing or non-contributing feature of the designated landmark Its interiors are utilitarian with no distinctive architectural features. There is no evidence that it follows any specific expansion plan prepared by Pope (and indeed, the exposed common brick rear wall of Pope's building suggests that a different kind of expansion might have been contemplated).

To construct the larger addition, APhA must also assemble an additional lot to its north, currently owned by the U.S General Services Administration, so that it will control the entire square. The GSA lot is currently landscaped, and appears to the casual observer to be a portion of APhA's landscaped setting The disposition of this land is subject to Section 106 review, and consultation pursuant to this review is now in progress to ensure that possible adverse effects on historic properties are avoided or suitably mitigated. This review also addresses National Capital Planning Commission approval of the plans, which is required by specific legislation

Proposed Addition

The proposed addition would be considerably larger than the existing annex, filling most of the rear of the site and rising five stories in height behind the Pope landmark. The new annex would nearly fill the entire width of the square, but with a setback from the 23rd Street right-of-way consistent with the existing building lines that establish a broad street vista of the Lincoln Memorial Like the Eggers & Higgins addition and most of the surroundings, the new annex derives its architectural inspiration from the classical tradition Sightline studies show that much of the structure would be concealed from the primary vantage point at the Constitution Avenue sidewalk (and it is a few floors lower than the State Department headquarters to the north of C Street), but there is no question that it would also be perceived as markedly larger than the existing addition, especially to motorists or pedestrians experiencing the building in the round. The addition would be more similar in scale and overall proportions to the larger monumental buildings on Constitution Avenue, such as the National Academy of Sciences (immediately to the east) and Federal Reserve

Given the need for expanded office facilities (and the desirability of a building large enough to support the provision of top-quality exterior finishes that are essential in this context), it should nonetheless be possible with a suitable design to construct a compatible addition to the Pope building while occupying a larger portion of the site and expanding beyond the envelope of the current office annex. The other monumental buildings on Constitution Avenue, also landmarks in their own right, help to establish a larger scale within which an expanded APhA annex can be comfortably situated Pope's own Constitution Hall addition to the original D A R. Memorial Continental Hall is one example of such a large rear expansion

During the ongoing process of Section 106 consultation (among GSA, the applicant, the NCPC, Advisory Council on Historic Preservation, and State Historic Preservation Office), certain

refinements of the conceptual plan presented to the Commission of Fine Arts have been pursued. In particular, the emphasis has been on two major objectives—creating a roofline that reinforces an institutional rather than commercial character, and separating the addition a sufficient distance from the Pope building so that it does not crowd the landmark building and is identifiably a separate structure

The addition of a hipped roof concealing the mechanical penthouse successfully addresses the first objective This roof helps relate the annex to the context of its larger institutional neighbors.

A clear separation between the buildings has also been introduced, as shown in the 22nd and 23rd Street elevations submitted in February for Board review The proportions and rhythm of these side facades are critical to establishing a compatible relationship between the original building and annex. As shown, the mass of the annex is skillfully broken down into smaller interrelated components—a slightly projecting central pavilion flanked by taller end pavilions, with a recessed attic behind—that relate to the interlocking masses of the Pope design. The width of the separation is shown at 15 feet in the center, or 10 feet measured at the street elevations While there is no magic numerical dimension for this separation, the allowance of sufficient void to create an amplitude and grandeur of progression from the older structure to the new is critical. It also affects the design proportions of the annex (a narrower gap makes the proportions slightly more horizontal, a wider gap more vertical). To achieve compatibility, the finished architectural composition should appear classically proportioned, generous and unforced in the manner characteristic of this boulevard of institutions

Landscaping

As noted in the National Register nomination, the siting and landscaping of the building are an integral part of the landmark property. The historic landscape (at least some of which is indicated on Pope's original plans) is now mature and includes heavy planting to the sides of the building, with massed evergreens providing a foil to the central marble pavilion It becomes even more important with a large new annex that this landscape design be preserved and reinforced The new annex includes underground vehicular parking and interior loading, and thus allows the beneficial removal of the existing surface parking and loading from the property. This is an opportunity to strengthen landscape features, using them in the same way that Pope did, to enframe and soften the architectural mass.

Recommendations

The staff recommends that the Board approve the conceptual plans for demolition of the Eggers & Higgins Annex, subdivision of the property, and construction of the proposed annex, as consistent with the purposes of the Historic Landmark and Historic District Protection Act, with the following contingencies:

1) Further Board review of developed designs and materials,
2) Sufficient study of the width of the setback between the Pope building and annex, to ensure a compatible design relationship,
3) Preparation of a landscaping plan to conserve and reinforce the historic landscape;
4) Photographic documentation of the Eggers & Higgins addition prior to demolition;
5) Identification of potential opportunities to reuse salvageable architectural materials (such as the aluminum spandrel panels) from the Eggers & Higgins building, and
6) Successful completion of Section 106 and other applicable project reviews

HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION

Landmark/District	**American Institute of Pharmacy**	(x) Agenda
Address	**2215 Constitution Avenue, NW**	( ) Consent Calendar
Meeting Date:	**May 22, 2003**	(x) Demolition
H.P.A Number:	**03-236; 03-286**	(x) New Construction
Date Received	**10/25/01**	(x) Conceptual Design
Staff Reviewer:	**David Maloney**	(x) Subdivision

The American Pharmacists Association and Hartman-Cox Architects return to the Board for further conceptual review of a new office annex at the APhA headquarters on Constitution Avenue.

At the meeting on February 27, the Board recommended that the APhA give specific consideration to Board comments on size and compatibility. The Board also requested any additional avaible information on the existing annex in order to make a determination on whether it should be considered a contributing structure.

Existing Annex
The staff has given further consideration to a possible finding of historic significance for the annex, and has reviewed additional documentation submitted by Traceries on behalf of the applicant, after a full search of available records (selected documents are attached, including information on Eggers & Higgins and correspondence with the Commission of Fine Arts). Based on this material, the design of the annex can be firmly attributed to Richard Eggers, the son of Otto Eggers. The building received a routine review by the Commission of Fine Arts, focusing on the Commission's preference for a marble rather than limestone façade.[1] The design for a "semi-detached" rear addition apparently followed an earlier idea to add wings onto the original building. The record also reflects that the project proceeded after the architect decided to "go along with our structure as designed" since "nothing can be done" about the appropriation of a 17-foot strip along 23rd Street for a proposed overpass approach road.

Based on further consideration of the annex in light of these additional materials, the staff recommends that the Board determine that the addition is "compatible" as described in the National Register nomination for the American Institute of Pharmacy, but not a contributing feature of the designated landmark.

This recommendation is based on the lack of a claim of significance in the National Register documentation, the absence of information showing that the project was considered notable when built or thereafter, the date of construction (1959-62), the absence of true architectural distinction in a design possibly compromised by external constraints, and the tenuous connection between

[1] In one hand-written letter, for example, Commission member Emily Muir writes to Commission Secretary Linton Wilson "Re the Pharmaceutical annex—I don't see how limestone can look more like marble than marble. I would have to be shown! The building as it stands is a credit to Washington. Its annex should be a matter of pride & not sink into the common pit of all economic expediency."

architect Richard Eggers and John Russell Pope.

Revised Architectural Plans
The architects have further refined the massing and composition of the proposed addition in response to the Board's comments. Additional information has also been submitted comparing the site coverage to other buildings along Constitution Avenue.

The additional information indicates that the proposed project is comparable to the neighboring historic institutional buildings The proposed 30% site coverage is only slightly above the average 27%, and slightly below the average 32% including paved areas as coverage. The project size has been reduced nearly 10% below that approved by the Commission of Fine Arts The floor area ratio is 1 99, compared to the allowable 3 5, the initial proposal to CFA at 2 24, and the design approved by CFA at 2.20.

In the revised design, the main block of the addition has been moved an additional five feet back from the original building. This further increases the space around the landmark, and eliminates the need for the unresolved south-facing returns at the ends of the one-story transition element between the landmark and the addition These changes markedly enhance the design compatibility with the historic landmark. The architects have also investigated other possible minor setbacks, but have elected to retain the simple geometric forms characteristic of the historic context.

The conceptual plans will of course be subject to further review by the Board, staff, and CFA as the project progresses.

Recommendation
The staff recommends that the Board take the following actions:

1) determine that the existing annex does not contribute to the landmark;
2) find the conceptual plans as presented consistent with the purposes of the preservation law; and
3) recommend approval of the subdivision as consistent with the purposes of the preservation law.

HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION

Landmark/District:	**American Institute of Pharmacy**	( ) Agenda
Address:	**2215 Constitution Avenue, NW**	(x) Consent Calendar
Meeting Date	**April 22, 2004**	( ) Demolition
H P A Number	**03-236; 03-286**	(x) New Construction
Date Received:	**10/25/01**	(x) Conceptual Design
Staff Reviewer:	**David Maloney**	( ) Subdivision

The American Pharmacists Association and Hartman-Cox Architects return to the Board for revised conceptual review of the proposed expansion of the APhA headquarters on Constitution Avenue. In May 2003, the Board found the conceptual plans consistent with the purposes of the preservation law

Proposed Revision
The proposed revision results from a series of changes in the internal arrangement of the building. Soon after the Board reviewed the plans in May 2003, APhA began to favor an arrangement that allowed the floors of the new addition to align with the floors of the original structure.[1] Because of the change in grade across the site, this meant that the main floor dropped well below the C Street grade level. APhA then determined after further consultation with the State Department about security arrangements on C Street that a main entrance on C Street would be appropriate. This led to raising the second floor level in order to provide sufficient head height for a major entrance and to create a higher base for the C Street elevation. The resulting change adds a mezzanine level and increases the overall height of the building by 30 inches

The roof was also adjusted to achieve an equivalent slope on all sides. Further refinement of the roof design is contemplated.

Evaluation
The proposed change involves some benefits and some disadvantages. The east and west elevations appear to benefit from a taller mid-section relative to the base and attic, and the higher base on C Street is appropriate. On the other hand, there are more floors in the elevations and the separate components of the design are less unified by a continuous base The overall increase of 30 inches in height is not particularly significant, but careful study of the roof is in order, particularly in perspective as well as in elevation. On balance, the staff finds the changes consistent with the Board's approval, with the understanding that façade designs will continue to be refined.

Recommendation
The staff recommends that the Board accept the concept revisions.

[1] The applicant's submission compares the currently proposed sections and elevations to those from June 2003 (the date of the project submission to NCPC) The May 2003 and June 2003 elevations are the same, but the May 2003 section shows the floors of the new building not aligning with the original building (see attached)

(3)

STAFF RECOMMENDATION

NWitherell

NCPC File No. 6361

NCPC
NATIONAL CAPITAL PLANNING COMMISSION

AMERICAN PHARMACISTS ASSOCIATION
CONCEPT DESIGN FOR NEW ADDITION
2215 Constitution Avenue, NW

Submission by the American Pharmacists Association

July 3, 2003

Abstract

The American Pharmacists Association (APhA) has submitted a concept design for an addition to its building at 2215 Constitution Avenue, NW. Designed by the notable American architect John Russell Pope, the one-story monumental headquarters building, listed in the National Register of Historic Places, was completed in 1934 It is a significant element in the row of exemplary monumental, Beaux Arts-style buildings along the north side of Constitution Avenue facing Constitution Gardens. The Pope building was designed with primarily ceremonial interior spaces, in 1962, a two-story office addition of a similar size was constructed behind the original building APhA proposes demolishing the 1962 office addition and replacing it with a five-story office building of approximately 166,291 square feet that will be connected to the original Pope building.

In order to accomplish the new construction, APhA must purchase lots at the north side of Square 62 (at C Street, NW) owned by the federal government and managed by the General Services Administration (GSA) NCPC reviewed the notice of availability of excess real property in June 1999, stating that it had no objection to the site for private development provided the development be compatible with the area, that a 17-foot-strip of land along 23rd Street be retained in federal ownership to protect the viewshed from 23rd Street, and that the proposed development be reviewed by NCPC and CFA in accordance with the 1958 deed restriction.

Authority

Approval of concept design pursuant to the Deed for the Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, which requires approval by NCPC of all structures erected in the square

Executive Director's Recommendation

The Commission

Approves the concept design for an addition to the American Pharmacists Association building pursuant to the Deed for Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, as shown on NCPC Map File No 1.34(08 21) 41199, **provided** that in the further development of the concept design:

- The parking garage entrance be located in the addition rather than under the extended terrace adjacent to the Pope building, so that the views of the Pope building and the appearance of its grounds remain as unaltered and as undisrupted by vehicles as possible; so that the basic symmetry of the original terrace around the Pope building be retained, and so that the services for the office building be contained in the office building itself to minimize the adverse effect on the Pope building.

- A monumental, primary entrance be provided to the building from C Street and that the C Street façade be altered at the first story accordingly, as befits a long façade facing a street and a prominent government headquarters building

- The preliminary and final site and building plans include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23rd Street

* * *

BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

The original 1934 structure is a severe, one-story monumental building that has solid white marble walls without fenestration other than a monumental door and two windows on the front façades of the side wings. The central portion of the building is surmounted by a high classical attic parapet, while small wings extend to the sides and rear under a flat roof. The diminutive building on its relatively large lot was deemed appropriate by virtue of both its design and the resultant open setting for its important location near the recently completed Lincoln Memorial. The building, which was allowed to be constructed slightly forward of the established building line for Constitution Avenue because of its small size, features a monumental entrance path and staircase that extends the full width of the central portion of the building. A symmetrical terrace extends across the front of the building The 1962 addition is connected to the rear of the Pope building by a hyphen and does not extend beyond the width of the original building.

The proposed office addition or annex is a five-story, limestone building of approximately 166,291 square feet of gross floor area. The dimensions of the addition at the first floor are 220

feet in width and 160 feet in depth Above the first floor, the addition is 140 feet in depth In form, the first story connects to the white-marbled Pope building along the width of the historic building The next three stories form a rectangular footprint and a unified vertical fenestration system. Pronounced cornices occur above the first, third, and fourth stories. The fifth floor, measuring 180 feet in width and 95 feet in depth, is set back under a hipped roof at the rear of the new addition. While the addition is rigorously symmetrical in relation to the Pope building when seen from the south on Constitution Avenue, from the east and west the hipped roof is set back to the north side of the square in order to create a larger physical as well as visual separation from the Pope building. The project does not encroach on the 17-foot strip of land along 23rd Street, NW, protecting the open space of the vista down 23rd Street toward the Lincoln Memorial.

The primary pedestrian entrance to the office addition is on 22nd Street, NW, with a secondary entrance from 23rd Street, NW. The C Street facade of the proposed addition does not have an entrance

The service areas for the building are off 22nd Street, NW. The underground parking entrance is entered from the middle of the block on 22nd Street, under a new terrace extended from the east side of the Pope building. The present symmetry of the Pope building and terrace across the front would be altered by the deeper extension of the terrace on the east side of the Pope building over the proposed parking ramp The proposed terrace extensions on both sides would replace two small surface parking lots that have been installed subsequently. The parking garage would contain approximately 150-180 spaces. The loading dock (with two interior loading berths) is entered from the northeast corner of the building.

PREVIOUS COMMISSION ACTION

NCPC reviewed the notice of availability of excess real property at its June 3, 1999 meeting, stating that it had no objection to the use of the site for private development, provided the development was compatible with the area, that a 17-foot-strip of land along 23rd Street be retained in federal ownership, and that the proposed development be reviewed by NCPC and CFA in accordance with the 1958 deed The deed requires APhA to secure approval of NCPC for any structures erected on Square 62

EVALUATION

APhA has submitted a concept design for a new addition that is grounded in the architectural vocabulary and materials of the Beaux Arts-style institutional buildings on Constitution Avenue, NW. This notable row of monumental buildings was planned and implemented in the 1920s and 1930s, pursuant to the McMillan Plan, the widening of Constitution Avenue, and the completion of the Lincoln Memorial. The current submission is a design concept that will undergo substantial design development before the Commission reviews the preliminary and final site and building plans.

The concept for the office addition appropriately reflects a neoclassical balance of solid to void (masonry facades to window openings), and employs symmetrical and harmonious classical elements such as intermediate cornices and the hipped roof to minimize the visual appearance of

the size of the addition The first story connection of the addition to the rear of the Pope building is an appropriate method of attaching the two buildings while also separating their respective masses above the first floor by a distance of 20 feet. The asymmetrical massing of the addition when seen from the east and west was a recent design decision that has led to a greater physical and visual distance between the two buildings, now 60 feet at the fifth story. Placing the bulk of the building at the back of the site is also appropriate for the context of C Street, which includes the massive U S Department of State on the north side and later additions to the original Beaux Arts-style institutional buildings on the south side of the street For example, the Federal Reserve's (Eccles Building's) C Street facade is close to the sidewalk and the adjacent National Academy of Sciences subsequently built an addition that abuts the C Street sidewalk

The prominence of the Pope building on the ridge above Constitution Avenue when seen from the south has been preserved in this concept design proposal The uniqueness of the Pope building, with its modest 1962 addition and its relatively expansive lot, has been preserved until this time. The proposed addition will alter the relationship of the Pope building to its setting. It will transform the site as a whole into something more consistent with the larger buildings to its east, some of which have been enlarged in the intervening years. The addition itself is similar to the other buildings in the row that have wider frontage on both Constitution Avenue and C Street

The site of the APhA at the corner of 23rd and Constitution has always been relatively open, with low lot coverage, in comparison with the adjacent buildings With the proposed addition, the lot coverage for the site will be 30 percent, which falls between the 20 percent coverage for the National Academy of Sciences and 22 percent for the Department of Interior (South) at the lower end of the scale and the 38 percent coverage for the Federal Reserve. The mature landscaping at the front and sides of the Pope building will be largely retained, and the surface parking lots on either side of the current addition will be removed The applicants propose extending the formal terraces around the sides of the Pope building at the same level as the original terrace across the front of the building, albeit in an asymmetrical arrangement to incorporate the parking garage entrance on the east side. The open area at the rear of the square currently has a minimal, contemporary designed landscape that will be replaced by the addition.

Parking and loading will occur from 22nd Street, NW This street, now a cul-de-sac since the temporary closure of C Street in front of the Department of State, also provides access for parking for the National Academy of Sciences and for traffic to the Department of State The applicants propose constructing the parking garage in the middle of the block on 22nd Street, with a ramp entering the building under an extended terrace on the southeast corner of the Pope building One mature street tree would be removed for the construction of the ramp across the sidewalk.

Staff recommends that the location of the garage entrance not be approved as proposed, for the following reasons:

- The garage entrance will result in an asymmetrical terrace around the Pope building, which should be avoided A guiding principal since the beginning of the project has been

the symmetrical response of the new office addition to respect the Pope building's symmetry

- There will be greater visibility of the garage entrance and ramp and of vehicular stacking and activity in the more prominent and monumental southern portion of the square, as seen from Constitution Avenue or 22nd Street

- The garage ramp crossing the sidewalk will disrupt pedestrian flow mid-block and may create the appearance of cars entering underneath the Pope building, which should be avoided

- Physical and service impacts such as parking and loading that result from the construction of a significant new office building on the site should be contained within the new office addition or confined to the area of the new addition and should not be placed near the Pope building, its existing terrace, or its lawn. In fact, the applicant's prior protection of the Pope building and the front portion of the square from the impacts that will result from the new office addition has been a significant beneficial, mitigating factor during the review of the design development in the past year.

The staff also recommends that the proposed C Street elevation be improved with a monumental, primary entrance, as befits a building of this size at this location. Although the interior plans indicate a circulation system that runs east-west through the addition, staff considers a well-designed entrance from C Street, whether used at the current time or not, to be essential to the design and future utility of the office building addition

Staff also requires the preliminary and final submission to include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23rd Street.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on June 18, 2003, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC, the District of Columbia Office of Planning, Fire Department, the Department of Housing and Community Development; the District Department of Transportation, the General Services Administration, and the National Park Service