GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

★ ★ ★

Office of the Director

Memorandum

TO: District of Columbia Zoning Commission

FROM: Andrew Altman, Director
Office of Planning

DATE. February 5, 2004

ZONING COMMISSION
District of Columbia
Case 04-01
Exhibit 13

RECEIVED
D C OFFICE OF ZONING
2004 FEB 27 PM 3 43

SUBJECT: **Preliminary 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**.

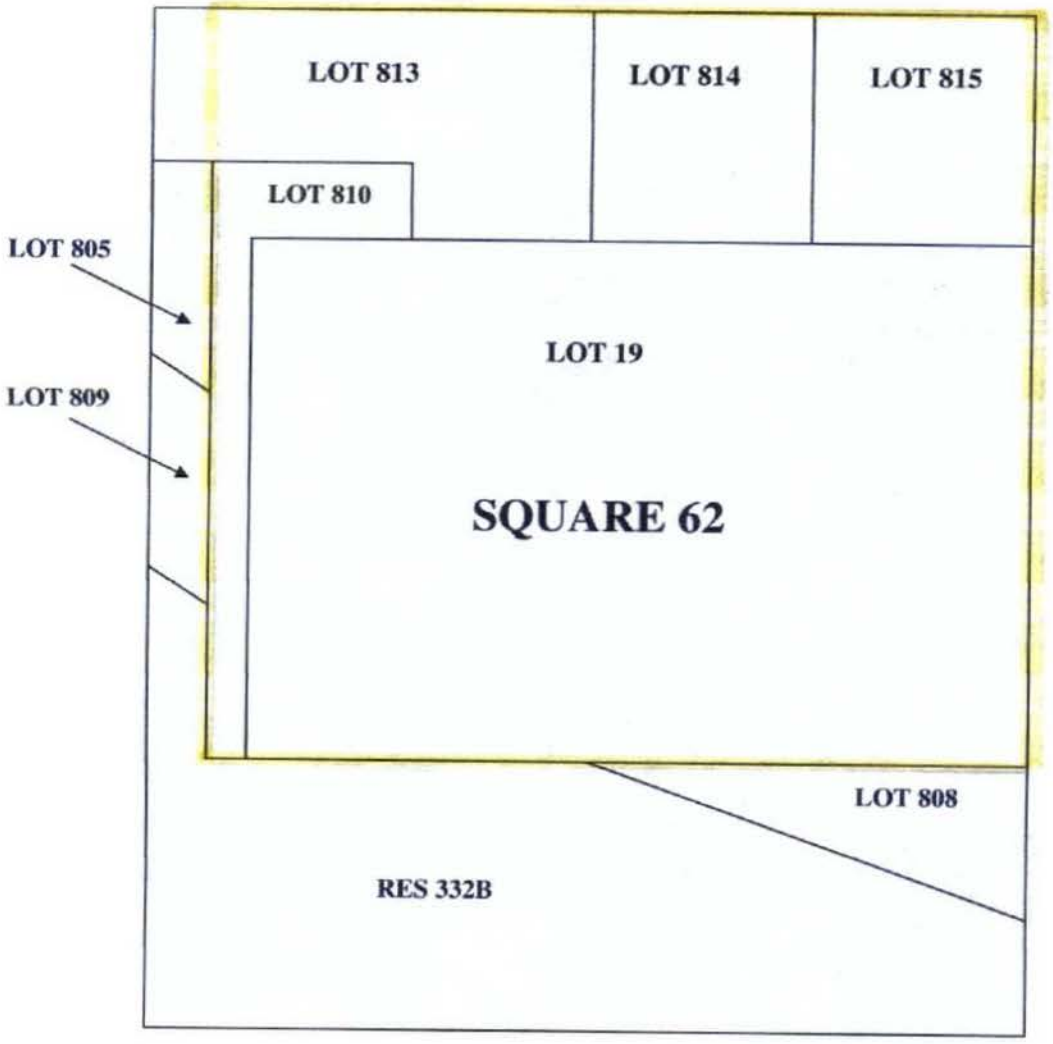
APPLICATION
Pursuant to 11 DCMR § 3011 1, the applicant, American Pharmacists Association, is requesting approval of a consolidated PUD and Map Amendment from unzoned to SP-2 for Lots 810, part of 813, 814, and 815 located in Square 62,

RECOMMENDATION
The Office of Planning recommends that the proposed consolidated PUD and related Map Amendment be setdown for public hearing.

BACKGROUND and PROPOSAL
The subject property is located in Square 62 in the northwest quadrant of the District The Square is bound by C Street on the north, 22nd Street on the east, Constitution Avenue on the south and 23rd Street on the west. The subject property 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 existing building at C Street

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 (Attached). The existing structure, the headquarters of the American Pharmacists Association (**APhA**) sits on 52,973 square feet of land on Lot 19 and is zoned SP-2, Special Purpose District An existing three-story rear annex built in 1962 will be demolished and reconstructed as a larger five-story addition consisting of approximately 166,291 square feet of gross floor area The applicant intends to acquire federally owned lots to the north and west of the existing structure including lots 810, 814 and 815 and all but the western 17-foot wide strip of lot 813 for consolidation with the parcel at 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 a lot of single record would meet this criteria Due to the lots' unzoned status, a map amendment is also being requested in conjunction with the PUD.

ZONING COMMISSION
District of Columbia
CASE NO.04-01
EXHIBIT NO.13



AMERICAN PHARMACISTS ASSOCIATION
PROPOSED SUBDIVISION OF SQUARE 62
Consolidation of Lots 19, 810, 814, and 815
and portion of Lot 813 into one lot of record
as highlighted in yellow

Figure 1

ZONING

The applicant is requesting a map amendment to zone the federally owned parcels SP-2, since this logically follows the zoning of Lot 19, which is developed with the existing structure. The development will therefore use the PUD standards of the SP-2 zone to accommodate the proposed private office use 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 development:

Table 1

	SP-2 Standards	PUD/SP-2 Standards	Proposal
Area	15,000 square feet	1 acre (43,560 sq. ft.)	82,085 sq. ft.
Height	90 ft.	90 ft.	63 ft.
FAR	6.0 (3.5 non-residential)	6.5 (4.5 non residential)	2.0
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

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





Area to be Zoned SP-2

PURPOSE AND STANDARDS FOR PLANNED UNIT DEVELOPMENT

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 proposed development will add another element to the historic landmark designed by John Russell Pope. The Office of Planning feels that the Commission should permit the public hearing as a PUD, because of the control, which the PUD process provides to the Commission over design, transportation, storm water management and related issues. This process would allow the Commission to determine the minimum amount of adverse impact on the immediate surroundings. This amount of control would not be possible if the application were heard simply as a map amendment.

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 proposed development supports and recognizes the importance of the architecture of the existing structure and important buildings in the immediate vicinity, including buildings, which comprise the federal Monumental Core and are important to the fabric of historical Washington

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 .."

- 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 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 policies 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.

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

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. 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 Further details will be provided at the public hearing concerning the features of the proposed addition and its relation to the existing and surrounding structures.

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 parking spaces, 59 more than the required spaces Parking is proposed below grade, which would allow 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 a 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 82 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 District Department of Transportation (DDOT) will provide input concerning the applicant's analysis and its 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 the 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 movement 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

To promote environmental stewardship through energy conservation, OP would encourage the applicant to consider pursuing the U S Green Building Council's LEED (Leadership in Energy and Environmental Design) certification and achieve a minimum of LEED Silver designation The Office of Planning will continue to work with the applicant to address the specifics of these amenities and how they will serve and impact the community.

AGENCY REFERRALS AND COMMENTS

If this application is set down for a public hearing, it will be referred to the following District government agencies for review and comment.

1. District Department of Transportation,
2 Department of Health (Storm Water Management).

The project, as submitted also required and obtained concept approvals from

- The Historic Preservation Review Board (May 22, 2003),
- The Commission of Fine Arts (June 19, 2003), and
- The National Capital Planning Commission (July 3, 2003)

COMMUNITY COMMENTS

The application is of interest to ANC-2A and interested parties in close proximity to the site for input and comments on the proposed development Dialogue between the applicant and interested parties will continue if the application is setdown.

RECOMMENDATION

Following review of the application, 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 OP recommends that the application for a consolidated PUD and related map amendment be setdown for public hearing

In addition, the Office of Planning will continue discussions with the applicant prior to the public hearing should structural changes arise, which may differ from this proposal Any significant changes may require resubmission to other agencies.

The Office of Planning recommends that the applicant provide the following information for further review prior to the public hearing.

1 A detailed landscaping plan;
2. A detailed stormwater management and sediment control plan.

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

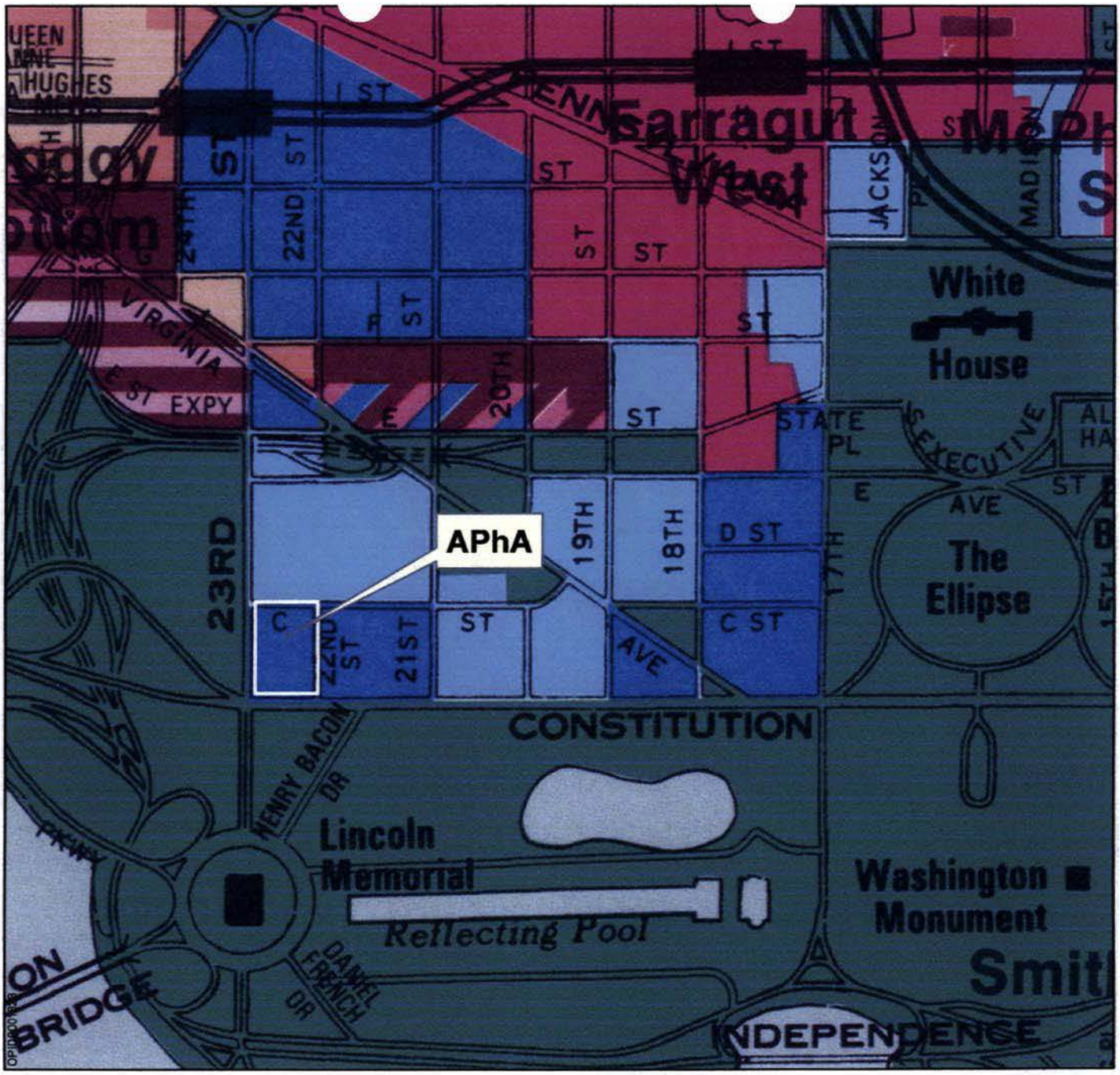
The additional information indicates that the proposed project is comparable to the neighboring historic institutional buildings. The proposed 30% site coverage is only slightly above the average 27%, and slightly below the average 32% including paved areas as coverage. The project size has been reduced 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.



Comprehensive Plan Map
American Pharmacists Association
ZC # 04-01

N

Feet

0 500 1,000

★ ★ ★ Government of the District of Columbia
Anthony A. Williams, Mayor

Office of Planning ~ February 20, 2004

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

Generalized Land Use Key

- Residential Low Density
- Residential Moderate Density
- Residential Medium Density
- Residential High Density
- Water
- Commercial Low Density
- Commercial Moderate Density
- Commercial Medium Density
- Commercial Med.-high Density
- Commercial High Density
- Federal
- Institutional
- Local Public
- Parks, Recreation and Open Space
- Production and Technical Employment



Attachment 1