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March 23, 2004

STEVEN E. SHER
DIRECTOR OF ZONING
AND LAND USE SERVICES
202-663-7278
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VIA HAND DELIVERY

D.C. Zoning Commission
Suite 210
441 4th Street, N.W.
Washington D.C. 20001

RECEIVED
D C OFFICE OF ZONING
2004 MAR 23 AM 10:37

Re: Zoning Commission Case No. 04-01
American Pharmacists Association (the "Applicant")
Consolidated Review of a Planned Unit Development and Map Amendment at 2215 Constitution Avenue, N W
Pre-Hearing Statement of the Applicant

Dear Members of the Commission·

Enclosed, please find the original and twenty copies of the Pre-Hearing Submission of the Applicant in the above-referenced case. Also enclosed, please find mailing labels for the addresses of owners of property within 200 feet of the subject property and a fee check in the amount of $17,526.60.

As certified in the statement, all of the required information has been submitted and the case is ready for public hearing

Sincerely,

Steven E. Sher
Director of Zoning and Land Use Services

Enclosures

ZONING COMMISSION
District of Columbia
CASE NO. 04-01
EXHIBIT NO. 15

ZONING COMMISSION
District of Columbia
CASE NO.04-01
EXHIBIT NO.15

cc: Karen Thomas, D.C. Office of Planning
Advisory Neighborhood Commission 2A

1799569_v1

Attention: Comptroller
National Academy of Sciences
2101 Constitution Avenue, N.W.
Washington, DC 20418

Joseph Cook
National Park Service
1100 Ohio Drive, S.W.
Washington, DC 20242

Joseph Moravec
Commissioner, Public Building Service
General Services Administration
Room 6340
1800 F Street, N.W.
Washington, DC 20405

Dorothy Miller
Chairperson, ANC 2A
Apartment D206
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Washington, DC 20037

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Executive Officer, Public Buildings Service
National Capital Region
United States General Services Administration
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Orlando Miguel
U.S. Department of State
Office of Real Property Management
2201 C Street, N.W., Room 1264
Washington, DC 20520

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American Pharmacists Association
Improving medication use. Advancing patient care.
APhA
2215 Constitution Avenue, NW
Washington, DC 20037-2985
(202) 628-4410

107063

15-122/540

WACHOVIA WASHINGTON, D.C.

CHECK DATE
3/16/2004

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$17,526.60

04-01

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TO THE ORDER OF
D.C. TREASURER
OFFICE OF TAX AND REVENUE
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WASHINGTON, DC 20002

MP

Linda K Gainey

MP

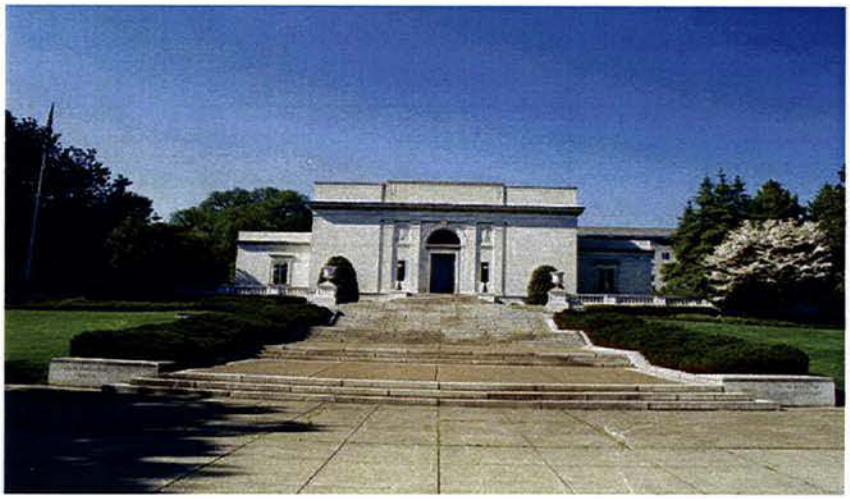
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BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA

AMERICAN PHARMACISTS ASSOCIATION



PRE-HEARING STATEMENT IN SUPPORT OF AN APPLICATION
FOR CONSOLIDATED REVIEW OF A PLANNED UNIT DEVELOPMENT
AND MAP AMENDMENT

2215 Constitution Avenue, N.W.

Square 62

Lots 19, 810, Pt. 813, 814, and 815

ZONING COMMISSION
District of Columbia
CASE NO. 04-01
EXHIBIT NO. 15

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HOLLAND & KNIGHT LLP
2099 Pennsylvania Avenue, N.W.. #100
Washington, D.C. 20006
Whayne S. Quin
Mary Carolyn Brown
Counsel for the Applicant
March 23, 2004

PREFACE

American Pharmacists Association ("APhA" or the "Applicant") submits this prehearing statement and the attached documents ("Prehearing Statement") to the Zoning Commission for the District of Columbia in support of its previously submitted application for an addition to the American Pharmacists Association headquarters located at 2215 Constitution Avenue in Northwest Washington. The APhA property is located on Lot 19 in Square 62. In order to accomplish the proposed expansion, APhA is in the process of acquiring the four lots to the north of the existing structure, currently owned by the Federal government. Included within Ward 2 of the city, the site is located in Square 62, which is bounded by 22nd Street on the east, 23rd Street on the west, C Street on the north and Constitution Avenue on the south.

APhA seeks consolidated review and approval of a Planned Unit Development ("PUD") in order to implement this redevelopment plan. The Applicant also requests a Map Amendment in order to establish SP-2 zoning on the four lots owned by the Federal government that are currently unzoned. The subject property consists of approximately 82,085 square feet and contains Lot 19 (located in the SP-2 District), and Lots 810, part of 813, 814 and 815 in Square 62 that are currently unzoned.

The Applicant originally filed a PUD Application and supporting documents, on January 13, 2004 (the "PUD Submission"). The PUD Submission set forth in detail

the proposed development, project design, public benefits and project amenities, and consistency with the Comprehensive Plan and Ward 2 Plan. Since the time of its original submission, APhA has modified its design to increase the density of the addition from 157,775 square feet of gross floor area to approximately 166,750 square feet of gross floor area, or a floor area ratio ("FAR") of 2.14. The height of the building has increased slightly by two and one-half feet, to 65.42 feet, to accommodate the additional space. This Prehearing Statement supplements the PUD Submission and responds to those issues raised by the Zoning Commission and the Office of Planning ("OP").

As set forth below, this Prehearing Statement, along with the original PUD Submission, meets the filing requirements for an application for a PUD and Map Amendment under Chapters 24 and 30 of the District of Columbia Zoning Regulations.

DEVELOPMENT TEAM

Applicant:	American Pharmacists Association 2215 Constitution Avenue, N.W. Washington, D.C. 20037-2985
Owners:	American Pharmacists Association 2215 Constitution Avenue, N.W. Washington, D.C. 20037-2985 United States of America Managed by the General Services Administration Property Disposal Division (WPR) 7th & D Streets, S.W., Room 7709 Washington, D.C. 20407
Development Manager:	The JBG Companies 4445 Willard Avenue, Suite 400 Chevy Chase, MD 20815
Architect:	Hartman-Cox Architects 1074 Thomas Jefferson Street, N.W. Washington, D.C. 20007
Landscape Architect:	James Urban Landscape Architecture 915 Creek Drive Annapolis, MD 21403
Civil Engineers:	Wiles, Mensch Corporation 11860 Sunrise Valley Reston, VA, 703-715-8797
Traffic Consultant:	Wells & Associates, LLC 1420 Spring Hill Road, Suite 600 McLean, VA 22102
Land Use Counsel:	Holland & Knight LLP 2099 Pennsylvania Avenue, N.W., Suite 100 Washington, D.C. 20006

TABLE OF CONTENTS

Page

Preface ii

Development Team iv

Certification of Compliance with § 3013 of Zoning Regulations vi

List of Exhibits viii

I. INTRODUCTION 1

II. MODIFICATIONS TO THE ORIGINAL PUD APPLICATION 2

III. ISSUES RAISED BY THE OFFICE OF PLANNING AND THE ZONING COMMISSION 3

A. Detailed Landscape Plan 3

B Architectural Features of the Proposed Addition and Its Relation to Existing and Surrounding Structures 3

1. Treatment of Proposed Addition to Accentuate the Individuality of the John Russell Pope Building 4

2. Building Height and Cornice Lines 5

3. Roof Line 6

4. Vistas and Setbacks 6

5. Materials and Fenestration 7

C. Tree Preservation Efforts 8

D. U.S. Green Building Council's LEED Certification 9

E. Relationship of Proposed Addition to Rear Façade of Pope Building 11

F. Explanation of Alternatives Studied and Discarded in Favor of Current Proposal 12

IV. CONCLUSIONS 12

CERTIFICATION OF COMPLIANCE WITH SECTION 3013 OF THE ZONING REGULATIONS

The Applicant hereby certifies that this application, twenty copies of which were filed with the Zoning Commission on January 13, 2004, complies with the provisions of Section 3013 of the Zoning Regulations as set forth below, that the application is complete

Subsection	Description	Page
3013 1(a)	Information Requested by Commission	Prehearing Statement
3013 1(b)	List of Witnesses	Exhibit D
3013 1(c)	Summary of Testimony of Applicant's Witnesses and Reports for Record: Roger Browning, American Pharmacists Association Graham Davidson, Hartman-Cox Architects James Urban, Urban Landscape Architecture Marty Wells, Wells & Associates, Traffic Engineer Steven E. Sher, Holland & Knight LLP, Land Planner	Exhibit E
3013 1(d)	Additional Information	Submitted herewith or with PUD Application
3013 1(e)	Reduced Plans	Exhibit A
3013 1(f)	List of Maps, Plans or other Documents Readily Available Which Will Be Offered Into Evidence	Exhibit F
3013 1(g)	Estimated Time Required for Presentation of Applicant's Case	Exhibit D
3013.6(a)	List of Names and Addresses of All Property Owners Within 200 Feet of the Subject Property	Exhibit G
3013 6(b)	List of Names and Addresses of Each Person having a Lease with the Owner for All or Part of Any Building Located on the Property Involved in the Application	N/A

The undersigned HEREBY CERTIFIES that all of the requirements of Section 3013 of the Zoning Regulations have been complied with In accordance with Section 3013.8, this application will not be modified less than twenty days prior to the public hearing

Respectfully Submitted,

HOLLAND & KNIGHT LLP

By _____
Whayne S. Quin
Carolyn Brown

LIST OF EXHIBITS

Description	Exhibit
Architectural Plans and Drawings	A
Photographs of Rear Elevation of Pope Building	B
Photographs of Massing Study Models	C
List of Witnesses and Estimated Time Required for Presentation of Applicant's Case	D
Outlines of Witness Testimony	E
List of Maps, Plans or Other Documents Readily Available That Will Be Offered into Evidence	F
List of Names and Addresses of All Owners of Property Within 200 Feet of the Subject Property	G

I.
INTRODUCTION

This prehearing statement and attached documents (the "Prehearing Statement") support the application of the American Pharmacists Association (the "Applicant" or "APhA ") to the Zoning Commission for the District of Columbia for preliminary and consolidated review and approval of a Planned Unit Development ("PUD") and associated Map Amendment The application is also filed on behalf of the United States of America (managed by the General Services Administration), the owner of Lots 810, 813, 814, and 815, which has consented to the submission of this application The Applicant proposes to build an addition to its existing headquarters The properties that are the subject of the application are Lots 19, 810, Pt 813, 814, and 815 in Square 62.

The Applicant originally filed with the Zoning Commission a PUD application and supporting documents on January 13, 2004 (the "PUD Application") The PUD Application set forth in detail the proposed development, project design, public benefits and project amenities, and consistency with the Comprehensive and Ward 2 Plan This Prehearing Statement supplements the PUD Application and responds to those issues raised by the Zoning Commission when it set the case for hearing, and issues raised by the Office of Planning ("OP") in its report recommending that a hearing be scheduled

II.
MODIFICATIONS TO THE ORIGINAL PUD APPLICATION

Since the time of its original submission, APhA has modified its design to increase the density of the addition from 157,775 square feet of gross floor area to approximately 166,750 square feet of gross floor area, or a floor area ratio ("FAR") of 2.14 The height of the building has increased slightly by two and one-half feet, to 65 42 feet, to accommodate the additional space

Since the original filing of the PUD application, the Applicant has further evaluated the layout of its space in the building and the projected future needs for its space in the building as well as tenant needs. Recognizing that there will be no long term ability for any further expansion of the building, the Applicant determined that including an additional floor in the building now would be prudent to address those needs The additional density has been obtained through a reduction in ceiling heights and an increase in depth of excavation, causing the total height of the building to be only marginally increased. The impact of the most significant view of the building, from the sidewalk on Constitution Avenue, will remain unchanged from the original PUD submission, as the height of the Pope building, the mature evergreen trees and shrubs to remain, and the angle of sight from the sidewalk to the south will continue to block the view of the addition

III.
ISSUES AND QUESTIONS RAISED BY THE OFFICE OF PLANNING AND THE ZONING COMMISSION

A. Detailed Landscape Plan.

A detailed landscape plan is submitted with this Prehearing Statement as Page L1.01 of the revised Plans.

B. Architectural Features of the Proposed Addition and Its Relation to Existing and Surrounding Structures.

The existing APhA headquarters building, designed by the preeminent American architect John Russell Pope, is listed in the National Register of Historic Places and in the D.C. Inventory of Historic sites (the "Pope Building"). Because of the property's landmark status, the design of the proposed addition has been closely scrutinized by the several government agencies charged with review and approval authority over the project, including the Commission of Fine Arts ("CFA"), the D C Historic Preservation Review Board ("HPRB"), and the National Capital Planning Commission ("NCPC") Like the Zoning Commission, these agencies were particularly concerned with the relationship of the proposed addition to the historic building structure as well as the surrounding environment.

The primary designing principle for Hartman-Cox Architects, the project architects, was to ensure that the Pope Building continued to read as a separate and distinct structure even with an addition. John Russell Pope designed the original building to accommodate future expansion, evident through his choice of Vermont

marble for the front and sides of the building and buff-colored utility brick for the building's rear. The unarticulated brick rear façade of the building can be seen in the photographs attached as Exhibit B Records dating from the 1930's from the Commission of Fine Arts and APhA also document Pope's intention for a rear addition across the full rear façade The existing addition, which was eventually constructed in 1962 following a design by Pope's successor firm, Eggers and Higgins, only attaches to the building for part of the rear, leaving an unfinished look to this façade

1. **Treatment of Proposed Addition to Accentuate the Individuality of the John Russell Pope Building.**

The free-standing character of the Pope Building has been preserved through ample setbacks and height limits. The highest mass of the building sits back sixty feet from the original building to alleviate any crowding of the original structure As the addition moves closer to the Pope Building, the height of the addition steps down to place a lower roof line directly behind the Pope Building

The proposed design also allows for the removal of all current surface parking areas, which currently flank the Pope Building on the east side and the existing addition on the west side. The surface parking will be replaced by landscaping, which will create further distinction of the historic Pope Building

2. Building Height and Cornice Lines.

Constitution Avenue, serving since the early 20th century as the northern ceremonial edge of the Mall, is bordered on the north side from 19th Street to 22nd Street by a row of buildings approximately 50 feet in height. The facades along Constitution Avenue are regular and form a line of light colored buildings behind a screen of vegetation The buildings of the Interior Department, the Federal Reserve, and the National Academy of Sciences each occupy a substantial portion of the land on which they sit. The proposed addition to the APhA building is consistent with the plan, height, and massing of these other buildings and will continue the horizontal building facades that form the edge of the Mall along Constitution Avenue.

The facades of the Federal Reserve and the National Academy of Sciences characterize the south side of C Street, with a major cornice line at approximately 40 feet with one or two stories above. The facades of these buildings, like the Constitution Avenue side, are light colored, symmetrical, and regular. (On the north side of C Street, the Federal Reserve addition and the State Department, at approximately 105 feet, tower over the buildings of the opposite side) The proposed addition to the APhA building will continue the height, massing and cornice lines of the south side of the street A major horizontal line reinforces the 40 foot cornice height, with the top floors relating to the upper floors of the Federal Reserve and the National Academy of Sciences buildings.

3. **Roof Line.**

The massing of the proposed addition has been broken into three heights This provides the opportunity to break the roof into smaller sections, following a similar treatment of the roof lines of the neighboring National Academy of Sciences and the Federal Reserve Board buildings A lower roof, aligning with the existing building, occurs directly behind the Pope Building to reinforce the presence of the historic structure and to act as a link to the larger structure behind it The majority of the addition is broken in two separate masses, one a floor higher than the other. The largest, uppermost roof is a sloped, metal roof similar to other roofs along Constitution Avenue. This entire roof treatment lends a more institutional character to the proposed addition, and maintains the monumental qualities of the Constitution Avenue corridor.

4. **Vistas and Setbacks.**

The original design intent for the proposed addition was to create a 17 foot landscaped setback (in addition to the area included in the street width) along 23rd Street that would match the depth of the National Park Service land along the existing APhA property line. Through the course of the design process, the building line was moved in order to hold the western exterior wall in line with the Department of State building This added an additional ten feet to the setback on 23rd Street, for a total of 27 feet of setback. This enlarged setback and continuation of the building line established by the Department of State reinforces and enhances the vista

looking south towards Constitution Avenue and the Lincoln Memorial. The ten foot setback was replicated on 22nd Street to maintain symmetry, opening up this vista as well. It should be noted that APhA maintains all of this green area, including the 17 foot strips either owned by or dedicated to the National Park Service.

The addition design places the narrower dimension of the building along C Street, stepping back from the area at the front of the addition, and thereby opening up the 22nd Street intersection with C Street. Looking north on 22nd Street, this treatment allows for a better view of the main entrance of the Department of State It also provides more landscaped area around the building, particularly at the corners

5. **Materials and Fenestration.**

Constitution Avenue is bounded on the south by the Mall and on the north by a row of light, low, long, and formal buildings, beginning at Virginia Avenue with the Department of the Interior and ending opposite the Lincoln Memorial with the APhA building Of this row of buildings, APhA is the smallest and most compact The Interior Building, Federal Reserve, and National Academy of Sciences are light stone buildings with regular, monumental bays several stories in height. The infill spandral panels are metal The upper floors, above the main cornice, are stone with punched openings

The addition to the APhA building will be consistent with these materials and rhythms The building will be light in color, a little darker and warmer than the historic building, with regular bays 15-20 feet on center. Above a major cornice line,

punched windows reflect the regular rhythm below The regular façade not only continues the line of buildings along Constitution Avenue, it provides an appropriate backdrop for the solid masonry elevation of the existing historic structure. The color of the addition's stone defers to the stark white color of the Pope building's Vermont marble

C. Tree Preservation Efforts.

All street trees and existing site trees with the exception of those within the area of the building construction zone were surveyed by Keith Pitchford, a Certified Arborist Mr Pitchford prepared an inventory and conditions report dated February 5, 2004. Existing trees were found to range from poor to excellent The majority of street trees and the holly/ magnolia groves on the south side of the construction zone were found to be in fair to good condition The trees along C Street were found to be in poor to good condition Their proximity to the construction zone as well as to adjacent sidewalk damage do not make them good candidates for preservation The majority of the street trees on 22nd and 23rd Streets will be preserved to the extent that they are in good condition and are not near construction conflict points. For further details, see the Page L1.01 of the Plans

Trees at the APhA site will be preserved using the most current practices for tree preservation. All trees identified for preservation will be provided with:

- Pre–construction therapy including mulching, growth regulator application, deadwood removal, and disease and insect controls,

- Construction preservation including fencing of root preservation areas, sheeting and shoring where appropriate to reduce the size of the construction zone, mulching, matting, silt intrusion, watering, disease and insect monitoring and control; and
- Post-construction therapy including vertical mulching, dead wood removal, watering, and disease and insect controls

All work will follow the recommendations of *Trees and Development – A Technical Guide to Preservation of Trees During land Development* by Nelda Metheny and James Clark, published by the International Society of Arboriculture, 1989

D. U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) Certification.

The American Pharmacists Association has been a resident of the District of Columbia since 1934 and intends to maintain its building at its present location indefinitely Consequently, decisions regarding design, materials and equipment are made with respect to long term ownership, maintenance, and cost. In general, this is consistent with the standards of the Leadership in Energy and Environmental Design Green Building Rating System™ i e , high performance, sustainable buildings The Applicant does not anticipate pursuing LEED certification.

It should be noted that the Applicant's proposal involves the redevelopment of an urban site that requires no additional infrastructure, such as roads and utility lines,

nor the destruction of virgin landscape In fact, during the excavation for the project, soil that was contaminated by the subject property's former occupant – a dry cleaner – will be removed. The planned APhA addition, therefore, represents significant environmental advantages as proposed.

In addition, the following items from the LEED checklist are applicable to the proposed addition

Sustainable Sites
Erosion and Sediment control
Development Density
Alternative Transportation - Transit
Alternative Transportation- Parking Capacity
Reduced Site Disturbance- Protect or Restore Open Space
Reduced Site Disturbance- Development Footprint
Stormwater Management- Rate and Quantity
Storm water Management- Treatment
Heat Island Effect. Non-Roof

Energy & Atmosphere
Fundamental Building Systems Commissioning
Minimum Energy Performance
CFC Reduction in HVAC & R Equipment
Optimize Energy Performance
Ozone Protection

Materials & Resources
Storage & Collection of Recyclables
Resource Reuse- 5%
Recycled Content - 5% (PC + 1/2 PI)
Regional Materials- 20% Manufactured Regionally

Indoor Environmental Quality
Minimum IAQ Performance
Environmental Tobacco Smoke (ETS) Control
Carbon Dioxide Monitoring
Ventilation Effectiveness

Construction IAQ Management Plan - During Construction
Construction IAQ Management Plan- Before Occupancy
Low-emitting Materials- Adhesives & Sealants
Low-emitting Materials-Paints & Coatings
Low-emitting Materials- Carpet

Innovation & Design Process
Tree Protection
LEED Certified Designer Points

Furthermore, the building HVAC systems will be designed to meet or exceed the energy efficiency standards established by the United States Green Building Council LEED program and applicable codes To provide superior indoor air quality, outside air ventilation systems will be designed to meet or exceed the requirement of the current version of ASHRAE 62 (ASHRAE 62 is the current industry standard for ventilation and required by the LEED program.) Outside air will be filtered to a level of 85% and cooled or heated depending on the season prior to distribution throughout the occupied space, exceeding the LEED program requirements. In general, the design of the HVAC systems will show sensitivity to sustainable design issues.

E. Relationship of Proposed Addition to Rear Façade of Pope Building; Photographs of the Existing Rear Façade.

As discussed above, the John Russell Pope building, constructed in the early 1930s, is finished on three sides, the south, east, and west, with Vermont Marble In sharp contrast, however, the rear (north) façade of the building is finished in a light brown utility brick (see photographs attached as Exhibit B) It is clear that an addition was planned for the rear of the building The proposed addition to the

historic structure will cover the entirety of the north wall, but none of the other three, more finished facades The Applicant believes that this is consistent with Pope's original intentions.

F. Explanation of Alternatives Studied and Discarded in Favor of Current Proposal.

Numerous massing possibilities and fenestration approaches for the addition to the historic John Russell Pope building have been contemplated throughout the design process This has been necessary to meet the goals of the American Pharmacists Association, the urban design demands of this prominent site, and the suggestions of the boards and commissions that have reviewed the design

Included as Exhibit C are photographs of some of the massing study models, all taken from the southwest. The photographs are identified by date In general, the primary goals of the changes as the plans evolved were to.

- Reduce the appearance of the building from Constitution Avenue, and
- Separate the mass of the addition from the existing, historic building

The resulting design is of a substantially higher quality as a result of these reviews and changes

IV.
CONCLUSION

For the reasons stated above, and those set forth in the PUD application and supporting statement, American Pharmacists Association submits that the PUD and

related Map Amendment meet the standards of Chapter 24 of the Zoning Regulations and is consistent with the purposes and intent of the Zoning Regulations and Zoning Map Furthermore, the project is consistent with the land use objectives of the District of Columbia, will revitalize the economic and institutional needs of the community and, therefore, satisfies the requirements for PUD approval Finally, the project provides significant public benefits and amenities and furthers the goals and policies of the District of Columbia Accordingly, American Pharmacists Association requests that the Zoning Commission approve the PUD and Zoning Map amendment applications.

Respectfully submitted:

HOLLAND & KNIGHT LLP

By: _____
Whayne S. Quin

By _____
Mary Carolyn Brown

2099 Pennsylvania Ave., N.W
Suite 100
Washington, D C 20006
(202) 955-3000

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