

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Jennifer Steingasser, Deputy Director *JS*  
Development Review & Historic Preservation

**DATE:** January 18, 2011

**SUBJECT:** Supplemental Report - ZC #08-34: I-395 Air Rights (Return to L'Enfant)  
Consolidated PUD, First-Stage PUD, and Related Map Amendment

The Office of Planning (OP), through the submission of this report, responds to the Applicant's January 10, 2011 filing. OP continues to support development above the Center Leg Freeway. The Applicant's proposal offers an exciting opportunity to connect streets, to create unique high density mixed-use development, and to integrate innovative environmental features. In the latest submission, the Applicant has addressed a number of questions raised by the Zoning Commission. Nevertheless, consistent with points raised in earlier reports, OP notes the following issues with the latest submission:

Consolidated PUD for the North Block

1. *Retail strategy, ceiling heights, and arcade design* – The Applicant has submitted a retail strategy for the site which suggests that the proposal exhibits characteristics that could create a successful retail environment, primarily internalized to focus on the proposed arcade areas. OP remains concerned regarding certain features of the retail design:
  - While noting the difficulties associated with successful retail arcades, the study concludes that a retail arcade is an appropriate solution for this site. However, the study does not detail what measures the Applicant will undertake to maximize the chances that the retail space will be successful for the development and surrounding community. The study notes a number of possible retail uses, but does not discuss the locations of these uses, or how they would be appropriately phased-in as the project is developed over time.
  - OP acknowledges the difficulties associated with street fronting retail at this time, but strongly encourages the Applicant to reexamine the paucity of retail fronting Massachusetts Avenue in this changing and emerging neighborhood. The designated flexible retail/office spaces, which are designed with the lowest ceiling heights (11.4') on the North Block, give the impression that the spaces are being steered toward office uses. Increasing the ceiling heights to a more attractive height for retail, such as the approximately 13'-14' found elsewhere in the North Block, could ensure greater flexibility of use in the future. Additionally, as shown in the Applicant's Post-Hearing Submission Tab 5, the dedicated retail spaces flanking the North Plaza entrance would have little street presence. OP recommends that these designated retail spaces be expanded to some extent to provide a more robust and visible appearance along Massachusetts Avenue.
  - OP continues to have concerns regarding the strategy of organizing retail in an interior arcade design. While the retail strategy report references the Washington Harbor as a comparable case of through-block retail, OP encourages the Applicant to provide

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additional examples of analogous arcade designs that have proven successful (as was requested by the Zoning Commission).

2. *Eco-chimneys* – Although the Applicant submitted eco-chimney sketches and renderings, OP still cannot evaluate this project feature. The eco-chimney shape appears to vary between pages 4 and 5 of the Post Hearing Submission 11x17 Packet (“Eco-Chimney Design”) and related perspective views. But more pointedly, OP cannot determine how the chimney would function from a pedestrian viewpoint in the prominent West Plaza location. For example, would the eco-chimney impede circulation or appear as a barrier to arcade access? OP supports the inclusion of the innovative environmental feature and potential sculptural attraction but would encourage further clarification of its impact on the pedestrian experience.
3. *Plaza designs* – OP remains concerned that the plazas and entries to the arcades do not sufficiently create enlivened space which would attract pedestrians to the retail. For example, the East Plaza, as portrayed on page 8 of the Post-Hearing Submission 11x17 Packet, presents a sizable austere area with monolithic paving and hulking trellises. It appears that decorative paving may be intended for the East Plaza (see Post-Hearing Submission Tab 5), but there is inconsistency in the submission. Additionally, at the covered nexus of the Pedestrian Way and G Street Garden, the Applicant’s submission describes how “a seasonally-rotating sculpture or decorative visual attraction will draw the pedestrian toward the G Street Garden.” However, no focused rendering of this challenging space is provided. The plazas have the potential to create signature entrances to the arcades, to attract pedestrians to the retail, and to provide an opportunity for complementary managed outdoor space. OP therefore recommends that the Applicant further refine the plaza designs. Enhanced landscaping, paving, and lighting features, among other possibilities, should be incorporated to increase the plazas’ appeal.
4. *Public Space* – OP reiterates that building projections, such as the canopies, must comply with building code, public space, and Downtown Streetscape Regulations, including location and treatment of Pepco vaults and sidewalk paving materials. The Applicant has informed OP that the location of Pepco vaults has not yet been determined. OP recommends that the Applicant commit to the vaults not being placed in public space.

#### First-Stage PUD

1. *E Street sidewalk width* – The Applicant has committed to providing a 10’ sidewalk along the north side of E Street, which is an increase of approximately 3’ from the Applicant’s earlier site plan. The sidewalk would border a proposed 130’ tall building in the South Block. While OP believes the Applicant’s latest sidewalk increase is an improvement, OP recommends that the Applicant provide, at least at the street level, a minimum 14’ sidewalk width (10’ for circulation and 4’ for street furniture such as tree boxes and light poles).
2. *South block massing* – The recent submission includes a number of very similar options for possible massing of the largest South Block building. The options reduce the total square footage on the South Block by approximately 30,000 square feet or .35 floor area ratio (FAR) for a new total of 9.5 FAR. Minor differences distinguish the various alternatives, which also are presented in a highly conceptual form. OP is supportive of the revised FAR intended for the South Block and would defer additional comments until consideration of a Second-Stage PUD application. If the Zoning Commission remains concerned about the massing of the building an alternative would be to approve an FAR of 9.0 with the condition that the Applicant may request an additional .5 FAR at the second stage subject to a determination by the Commission that the FAR does not result in an inappropriate mass.
3. *Flexibility detail* – The Applicant provided minor changes intended to narrow the proposed “General Flexibility for PUD.” OP is generally supportive of the modified language, but would

request that the Applicant further clarify the “general design parameters proposed for the project” referenced in provision number 5 (page 11 of the Post-Hearing Submission).

4. *Heights & meaningful connections* – OP is supportive of the building heights as proposed, contingent on the Applicant successfully demonstrating a meaningful connection to 3<sup>rd</sup> Street as would be considered as part of the Second-Stage PUD application.
5. *Adas Israel Synagogue* – OP has discussed the proffer for the relocation of the Adas Israel Synagogue. The Applicant has agreed to clarify that the relocation will be at the Applicant’s expense. OP recommends that this proffer be clarified in the proposed action and order.
6. *Environmental Benefits and Amenities* – The Applicant has clarified that the co-generation plant cannot be proffered at this time due to the on-going NEPA process. OP recommends that a detailed statement be provided by the Applicant to clarify exactly which environmental benefits are to be proffered and built in the consolidated PUD, the First-Stage, and those that are dependent on conclusion of the NEPA process.