



Zoning Commission of the
District of Columbia
441 4th Street, NW
Suite 210
Washington, DC 20001

Re. Case No. 14-13. Text Amendment - Rooftop Penthouse Regulations for All Non-Low
Density Residential Development

Dear Chairman Hood,

I am writing in regards to the proposed rooftop penthouse regulations currently under consideration in Zoning Commission Case No 13-14 (ZC 13-14), specifically to encourage the Commission to take immediate favorable action on a specific portion of the revised regulations that were published in the DC Register on March 20, 2015, and recently deliberated at a hearing held on April 30, 2015. The portion of the regulations I am requesting action on includes those provisions pertaining to high-density zone districts. Based on the testimony provided at the recent hearing, taking prompt action to approve the new rooftop penthouse regulations for high-density areas would allow several ongoing developments to take advantage of the additional density provided by the new regulations without having to expend substantial resources to either retrofit a constructed, or partially constructed building, or modify development plans that have already gone through the entitlement process and/or been fully permitted.

As you may be aware, Carr Properties owns the former Washington Post site, located at 15th and L Streets, NW. We have just finished Schematic Design for what we believe will be a very exciting new office and retail project, which we hope will be a landmark achievement in modern urban design. Our architect is SHoP, a well-known architecture firm that is currently designing some of the finest projects in the world. Upon completion of the project the majority of the office space will be leased to Fannie Mae, keeping this important organization located within the District of Columbia

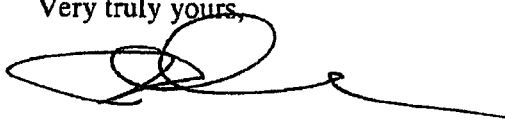
As currently designed, the project consists of approximately 875,000 square feet (sq ft) of office and retail space, situated on a site having a land area of over 90,000 sq ft. We will likely build below the maximum permitted FAR to create a large (approximately 15,000 sq ft) publically accessible central courtyard that will be accessed from 15th and L Streets along with another 10,000 sq ft of open, pedestrian walkways. We are striving to make this courtyard a wonderful place - the highlight of our project - and a very special gathering place for the surrounding neighborhood. Currently, we are working with several retail consultants in an effort to establish an exciting mix of uses that will surround and activate our publically-accessible central courtyard.

We have also endeavored to design a very attractive penthouse and roof level, which could contain approximately 20,000 sq ft of occupiable space. Unlike the unattractive penthouse enclosures of the past, this space will be designed and detailed to the same high level of aesthetic quality as the rest of our project. We are prepared to make the requisite contribution to the Housing Production Trust Fund (HPTF) for this additional occupiable density, as currently proposed in the draft rooftop penthouse regulations. Based on the current average land assessment of approximately \$116.00 per FAR square foot, the amount of our contribution to the HPTF would be approximately \$1,165,000.

To carry out the plan as it is described above, we have an urgent need for the Zoning Commission to take action on ZC 13-14, or at a minimum on the provisions that govern the Downtown commercial zone districts, which have an allowed height of 90 feet or greater. Fannie Mae's requested 2018 project delivery date necessitates an accelerated design and construction schedule. We are currently spending millions of dollars per month on design documents, and have great interest in knowing that they are based on the regulations that will be in effect at the time we file for initial building permits in October 2015.

We understand the concerns raised by those in opposition to the proposed regulations, however, as noted during the recent hearing, these concerns are almost exclusively related to the potential impacts of the proposed regulations on lower density areas, and not higher-density commercial areas. Taking immediate action on the rooftop penthouse provisions relating to high-density areas will provide the development community the assurance it seeks to confidently advance projects that are currently underway, while saving the provisions related to lower density areas for further deliberation by the Zoning Commission and affected neighborhoods.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert O. Carr', with a long horizontal flourish extending to the right.

Robert O. Carr
Vice- Chairman, Development
Carr Properties