



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Michael Jurkovic, AICP, Development Review Specialist

J.S. Jennifer Steingasser, Deputy Director, Development Review and Historic Preservation

DATE: December 9, 2024

SUBJECT: ZC Case 91-07A: Modification Without Hearing for International Monetary Fund Headquarters Phase III PUD 91-7M/79-13

I. RECOMMENDATION

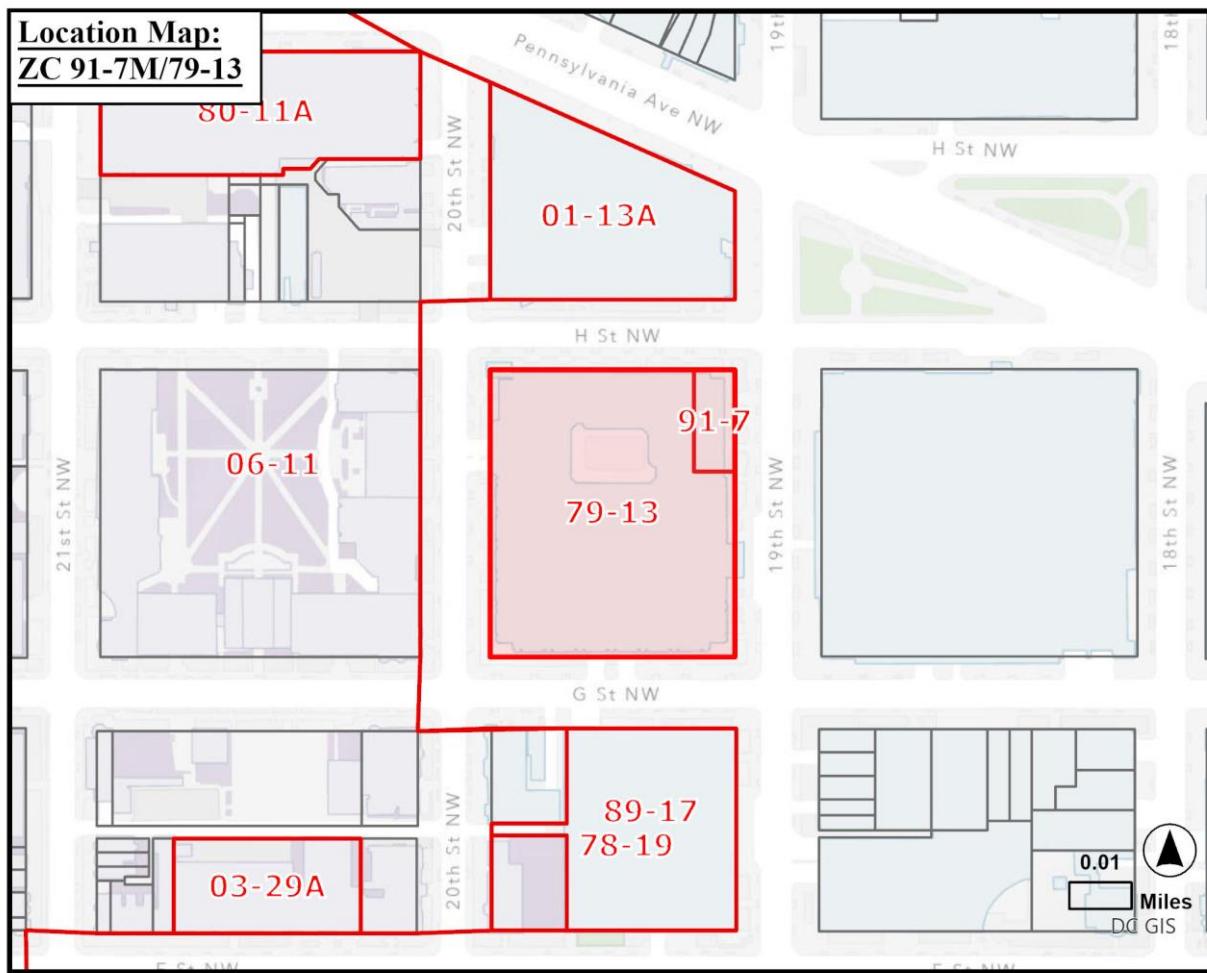
The Office of Planning (OP) recommends **approval** of the following request:

- Modification to the original Order 310 removing Decision No. 13; and
- Change in position on the Visitors' Center Amenity as discussed in ZC 91-7M/79-13.

II. APPLICATION SUMMARY

Applicant:	Venable LLP. for International Monetary Fund (IMF)
Address:	700 19 th Street NW
Ward / ANC:	Ward 2, ANC 2A
Legal Description:	Square 120; Lot 51
Project Summary:	Commercial Office Building at Square 120 with maximum height of 130 feet and total FAR of 9.07
Previous Approvals:	1. ZC 68-69 & 68-70: Phase I 2. ZC 91-7: Phase II 3. ZC 91-7M & 79-13: Phase III
Requested Modification:	Modification of Order 310-A to remove Decision No. 13 of the Original Order 310 reading the library/reading room and a change of position regarding the continued function of the Visitors' Center and current security protocols.

III. APPROX. PUD BOUNDARIES



IV. PROPOSED MODIFICATION

Subtitle Z § 703 provides for Zoning Commission consideration of a modification without hearing to an approved Planned Unit Development (PUD) as follows:

703 CONSENT CALENDAR – TECHNICAL CORRECTIONS TO ADOPTED RULES AND MODIFICATIONS WITHOUT HEARINGS TO CONTESTED CASE ORDERS AND PLANS

...

703.6 *For the purposes of this section, a “modification without hearing” is a modification in which impact may be understood without witness testimony, including, but not limited to a proposed change to a condition in the final order, a change in position on an issue discussed by the Commission that affected its decision, or a redesign or relocation of architectural elements and open spaces from the final design approved by the Commission. Determination that a modification can be approved without witness testimony is within the*

Commission's discretion. A request to add or change a zoning map designation to an approved planned unit development shall not be considered without a hearing.

As detailed in the applicant's filings at Exhibit #2 the following Modification to the original Order 310 for ZC Case 79-13 is requested:

Existing Decision Language to be Removed:

13. *The proposed library/reading room shall be constructed as shown on Drawing Z-18 and Z-19 of Exhibit No. 60. Such library/reading room shall include an "outreach program" as outlined in the record of this case to encourage its use by the neighborhood and the Washington community. Access to the library/reading room by the public shall be allowed during normal working hours of the IMF and at other selected times.*

The filings note that construction of the third phase of development is complete, but since September 11, 2001, the security protocols at the IMF have been steadily increased. Currently, the IMF is no longer open to the public and visitors are only permitted on official IMF business when sponsored by a staff member or during a scheduled IMF event. In addition to the removal of Decision #13, the applicant also wishes to clarify that the previous proffer by the IMF to Address to the Issues of Opposition regarding the Visitors' Center operation and outreach are no longer warranted. (Exhibit #13, pgs. 4-5.)

V. EVALUATION OF THE MODIFICATION WITHOUT HEARING REQUEST

The requested modification focuses on the continuing evolution of the IMF's security needs and how they relate to the original library/reading room amenity from ZC 79-13 and the associated Visitors' Center which was expanded as part of the modification ZC 91-7M. The applicants refer to Findings of Fact No. 14 of Order 310, an instance in which the purpose of the library/reading room was elaborated. Specifically, the Architect at the time of the initial application spoke to the public benefit being the availability of reading/research materials at the amenity space. OP would generally agree with the applicant's notion that since the time the library/reading room was originally proffered that the availability of the IMF's documents has transferred to their eLibrary (<https://www.elibrary.imf.org/>) and it is unlikely that an individual would need or elect to visit a small library in person while the IMF's archives are available virtually. However, the materials themselves are not the sole amenity for which the physical space being available to the public was considered.

Discussed further in Order 310 at Findings of Fact No. 11:

The reading and exhibit room will be approximately 4,650 square feet in area and therefore a significant public facility... One of the most important public amenities will be the reading and exhibit room which will contain information relating to international organizations and economic affairs, reference books, and a wide range of international and financial periodicals. Also, a lecture area will be available for presentations about the IMF and there will be an exhibit area for exhibits on, for example, money and trade. The facility will permit the IMF to make some of its resources available to the public, without compromising the security of the headquarters building... At the suggestion of the Commission, the applicant developed an outreach program to encourage use of the facility through distribution of information to school, college and public libraries and tourist information centers.

As described above the library/reading room was also seen as an "exhibit room" tied to the lecture area. Therefore, it is of OP's opinion that the library/reading room from Phase I can be seen as the precursor to the Visitors' Center which was expanded in the Phase III application.

The OP report for ZC 91-7M/79-13 from September 13, 1991, examined the applicant's amenity proffers offered at the time. Said report indicated that the Commission contemplated in the original Phase I approval that the IMF would eventually occupy the entirety of Square 120 with a development envelope height of 130 feet. When reviewing the PUD's current FAR of 9.07 with what would have been consistent with aggregate FAR plus 5% through a PUD in the R-5-C (4.0 FAR) along with the granted C-3-C (8.0 FAR) zone, the additional PUD-granted FAR would appear to have been justified by the amenity package which was proffered. From an examination of the record, the Amenities and Benefits identified at the time of the most recent approval could be found at Order 310-A, Finding of Fact No. 45:

- Superior architectural design;
- The interactive landscaped area;
- The Visitors' Center (which would triple in size);
- The transportation management program; and
- The overall indirect benefits to the District resulting from the presence of this prominent international organization.

At the time the applicant described the then public programming of the Visitors' Center which included public exhibits on a variety of subjects and regular screenings of a film which provided an overview of the role of the IMF internationally. The expansion of the Visitors' Center was declared by the applicant to result in an enhancement of IMF HQ1's role as a cultural center and active neighbor. However, as detailed by the applicant in their filing the request to remove the public's access to the IMF HQ1 has stemmed from the organization increased security needs to protect their employees.

Therefore, since the applicant attests that the public access to the IMF HQ1 is no longer in the best interest of the security operations and the IMF's archives are reasonably convenient to access via their eLibrary. OP has no objection to the requested modification to remove Decision No. 13 of the original Order 310 and the change in position on the public component of the Visitors' Center amenity.

VI. COMMENTS FROM OTHER DISTRICT AGENCIES

There were no comments from other District agencies at the time OP completed this report.

VII. COMMENTS FROM ANCs

ANC 2A filed a request that the Zoning Commission delay its ruling on the modification without hearing in [Exhibit 5](#).

VIII. COMMENTS FROM THE PUBLIC

As of the date of this report, no community comments have been filed to the record.