

October 30, 2024

t 202.344.4369
f 202.344.8300
ZGWilliams@Venable.com

VIA IZIS

Anthony Hood, Chairperson
District of Columbia Zoning Commission
441 4th Street NW, Suite 200-S
Washington, DC 20001

Re: Application for Planned Unit Development (“PUD”) Modification Without a
Hearing to Z.C. Order 310, as amended by Z.C. Order 310-A (700 19th Street NW
(Sq. 120, Lot 0051))

Dear Chairperson Hood:

Please accept this letter as a Statement in Support of the Application of the International Monetary Fund (the “Applicant” or the “IMF”), the owner of the property located at 700 19th Street NW (Sq. 120, Lot 0051) (the “Property”), for a Planned Unit Development (“PUD”) Modification Without a Hearing to Z.C. Order 310, as amended by Z.C. Order 310-A. (*See* Exs. 1 and 2). This Application is made pursuant to Subtitle Z, Section 703 of the D.C. Zoning Regulations. The purpose of this Application is to modify a condition in Z.C. Order 310 related to a library/reading room and to modify statements in the record and in Z.C. Order 310-A related to a Visitors’ Center and auditorium in Case No. 91-7M/79-13.

I. Background

The Zoning Commission approved a Planned Unit Development (“PUD”) in 1969 for Phase I of what is now known as the HQ1 building of the IMF headquarters in Z.C. Case Nos. 68-69 and 68-70. The Board of Zoning Adjustment later approved further processing Appeal Nos. 10040 and 10297.

The Zoning Commission approved Z.C. Order 310 (Case No. 91-7) in 1980 for Phase II of the HQ1 building. Z.C. Order 310 permitted an addition to the then existing IMF HQ1 building. In 1992, the Zoning Commission approved Phase III of the HQ1 building as part of Z.C. Order 310-A in Case No. 91-7M/79-13. Z.C. Order 310-A permitted an additional, and final expansion of HQ1.

As part of Z.C. Order 310 and Z.C. Order 310-A, the Zoning Commission approved certain conditions related to each project. The proposed project, as described in Z.C. Order 310, included

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a “library/reading room.” Finding of Fact No. 14 in Z.C. Order 310 stated that the library “would provide foreign newspapers and manuscripts, a community outreach program, lectures, and exhibits explaining the function of the IMF.” The Zoning Commission addressed the library/reading room in Condition No. 13 of Z.C. Order 310 as follows:

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.

During the Zoning Commission’s review of Z.C. Case No. 91-7M/79-13, the IMF submitted a letter addressing a proposed new Visitors’ Center to be built as part of Phase III. (*See* Ex. 3). In the letter, the IMF proposed a proffer related to the Visitors’ Center as follows:

1. IMF commits to furnishing the ANC and Foggy Bottom Association, as part of its mailing list, notices of events and the calendar for all programs at the Center.
2. IMF commits to making the auditorium available to the ANC and Foggy Bottom Association for their meetings on a prescheduled basis.
3. In view of the desire to increase the local orientation of programs and events, the Director of the Visitors’ center or his designee, will meet with the Advisory Neighborhood Commission on a quarterly basis to discuss program planning. With meaningful input from the community, a dialogue should develop to produce programs, exhibits and events that the community can and will enjoy.

In Z.C. Order 310-A, in Finding of Fact No. 45, the Zoning Commission found that one of the public benefits associated with the Phase III proposal was the Visitors’ Center (which was to triple in size and included an auditorium). The Zoning Commission, however, did not address the Visitors’ Center or the auditorium in any of the guidelines, conditions, or standards set forth in the “Decision” section of Z.C. Order 310-A. Nor did the Zoning Commission adopt the proposed IMF proffer related to the Visitors’ Center.

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II. Proposed Modifications to Z.C. Order 310 and 310-A

Due to current security protocols at IMF HQ1, as explained more fully below, the IMF now seeks to modify and/or clarify the requirements of Z.C. Order 310 and 310-A, as related to the library/reading room and the Visitors' Center and auditorium. Pursuant to 11 DCMR, Subtitle Z, Section 703.6, the IMF seeks a modification without a hearing given that the proposed modifications involve minor changes to a condition and the modifications may be understood without witness testimony. No physical changes to the existing IMF buildings are proposed as part of this application.

With respect to the library/reading room, the IMF seeks to remove Condition No. 13 of Z.C. Order 310 for several reasons. First, current security protocols at the IMF buildings no longer allows building access to the general public. Second, the IMF no longer operates a library/reading room given that the majority of written documents published by the IMF or within the IMF's possession are now digital. For these reasons, the requirements of Condition No. 13 of Z.C. Order 310 are now obsolete and no longer appropriate for the safe and secure operation of the IMF buildings. Therefore, the IMF seeks to remove Condition No. 13 of Z.C. Order 310.

As for the Visitors' Center and auditorium, while no condition in any Zoning Commission order addresses or regulates their use, the IMF seeks to clarify the record given prior statements that were made during the Zoning Commission's review of Z.C. Case No. 91-7M/79-13. First, given current security protocols discussed below, the IMF is no longer able to offer the Visitors' Center and/or auditorium as a venue for public meetings of ANC 2B or the Foggy Bottom Association. Second, and given these same security protocols, the Visitors' Center and auditorium are no longer suitable for programs, exhibits, and events for the general public. The Visitors' Center and auditorium have not been used for this purpose in many years. Current security requirements dictate that the IMF buildings must be maintained as a secure environment and access by the general public and visitors is carefully monitored and controlled. Therefore, the IMF seeks to remove any implied condition or commitment that would require the IMF to maintain public access to the Visitors' Center and/or auditorium.

III. Changes in the Security Landscape and Current IMF Security Measures

The security landscape in the United States has transformed dramatically since the September 11 attacks, fueled by the emergence of both international terrorism and domestic violent extremism. Security protocols at the IMF's headquarters (HQ) have evolved in tandem with these changes. In the wake of September 11 and subsequent major security incidents, the IMF took decisive action by increasing and arming its guard force, employing a specialized K9 team for enhanced screening, and contracting a HAZMAT team to bolster its incident response capabilities.

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Additionally, the IMF has enhanced its access control measures and invested in physical barriers, such as concrete blocks and bollards, to further secure its facilities.

As a result of the heightened security landscape, the requirements for visitors to access IMF HQ have become more stringent. Currently, any visitor must be sponsored by an IMF personnel with escort privileges. Upon arrival, visitors are required to present a valid government-issued photo ID and undergo rigorous screening, including magnetometer and X-ray evaluations. The K9 unit is also deployed for additional screening when necessary. Once inside the IMF's HQ premises, visitors must remain escorted by their hosts at all times. Looking ahead, the IMF plans to implement a more enhanced visitor management system and may require online registration, information submission and clearance prior to arrival. In addition, a more robust framework is now in place for publicly attended events that involves additional resources to complete a security risk assessment and event security plan. This process takes at least 30 days to complete.

Allowing public access to the IMF's headquarters would necessitate a reduction in the institution's security standards and result in an elevated risk to the IMF. As detailed above, no visitor is currently permitted unless sponsored by a staff member or attending an authorized event following a thorough risk assessment. Moreover, once inside, guests must be continuously escorted to prevent access to restricted areas. Consequently, these measures preclude unaccompanied walk-ins, including those wishing to visit the library or other facilities. There are also increasing concerns regarding intentions by individuals and groups to disrupt operations and events while inside IMF buildings.

Given these security considerations, the IMF must restrict public access to its premises unless individuals have a legitimate IMF-related business case, are sponsored by a staff member, or are attending an IMF hosted and approved event for which standard security measures will be in place, some of which will present additional costs.

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IV. Conclusion

For all of the reasons discussed in this letter, the Applicant respectfully requests that the Zoning Commission approve this application for a modification without a hearing to modify Z.C. Order 310 and Z.C. Order 310-A as related to the library/reading room and the Visitors' Center/auditorium in HQ1.

Sincerely,



Zachary G. Williams
Agent for the Applicant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the application materials for a Planned Unit Development (“PUD”) Modification Without a Hearing to Z.C. Order 310, as amended by Z.C. Order 310-A (700 19th Street NW (Sq. 120, Lot 0051)) was sent to the below addresses by e-mail on October 30, 2024.



Zachary G. Williams
Agent for the Applicant

Jennifer Steingasser
Office of Planning
1100 4th Street, SW Suite E650
Washington, DC 20024
Stephen.Cochran@dc.gov
Jennifer.Steingasser@dc.gov

Trupti “Trip” Patel
ANC 2A Chairperson
2A03@anc.dc.gov

Dasia Bandy
ANC 2A07 Commissioner
2A07@anc.dc.gov

John George
President
Foggy Bottom Association
JohnG@FoggyBottomAssociation.org

Western Presbyterian Church
info@westernpresbyterian.org

Citizens for a Responsive ANC-2A
Barbara Kahlow
barbara.kahlow@verizon.net