

2100 K STREET NW



BY PROFESSIONAL ASSOCIATES AND
THE INTERNATIONAL FINANCE CORPORATION

APPLICATION TO THE
DISTRICT OF COLUMBIA ZONING COMMISSION FOR
REVIEW AND APPROVAL OF A CONSOLIDATED PLANNED UNIT DEVELOPMENT

March 5, 2014

DEVELOPMENT TEAM

Applicant

Professional Associates
c/o Blake Real Estate, Inc.
1150 Connecticut Avenue NW, Suite 801
Washington, DC 20036

International Finance Corporation
2121 Pennsylvania Avenue NW
Washington, DC 20433

Architects, Engineers, and Consultants

Shalom Baranes Associates
1010 Wisconsin Avenue NW, Suite 900
Washington, DC 20007

Wiles Mensch Corporation
11860 Sunrise Valley Drive
Reston, VA 20191

Gorove Slade Associates
1140 Connecticut Avenue NW, Suite 600
Washington, DC 20036

Land Use Counsel

Goulston & Storrs, PC
1999 K Street, NW, 5th Floor
Washington, DC 20006

TABLE OF CONTENTS

DEVELOPMENT TEAM	II
TABLE OF CONTENTS	IV
EXHIBITS.....	VI
PREFACE	VIII
 I. INTRODUCTION	 1
A. Summary of Requested Action	1
B. The Applicants	2
C. Project Goals and Objectives and the Benefits of Using the PUD Process	4
D. Development Timetable	4
 II. THE PROPOSED PUD PROJECT.....	 5
A. Site Location	5
B. Project Description	6
C. Development Parameters Under the Zoning Regulations	8
D. Flexibility Under the PUD Guidelines	11
 III. PLANNING ANALYSIS	 13
A. Land Use Impact	13
B. Zoning Impact	13
C. Environmental Impact	13
D. Facilities Impact	14
 IV. PUD EVALUATION STANDARDS	 15
A. Public Benefits and Project Amenities	15
1. <u>Urban Design, Architecture, and Landscaping</u>	<u>15</u>
2. <u>Site Planning, and Efficient and Economical Land Utilization</u>	<u>15</u>
3. <u>Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures</u>	<u>16</u>
4. <u>Environmental Benefits.....</u>	<u>16</u>
5. <u>Uses of Special Value</u>	<u>17</u>
6. <u>Comprehensive Plan</u>	<u>17</u>
B. Public Benefits of the Project.....	17
 V. COMPLIANCE WITH THE COMPREHENSIVE PLAN	 19
A. Land Use Maps.....	19
B. Land Use Element	20
C. Other Citywide Elements	20
 VI. CONCLUSION	 23

EXHIBITS

<u>Description</u>	<u>Exhibit</u>
Compliance with Consolidated PUD Requirements	Included herein
Architectural Drawings and Elevations, including Tabulation of Development Data, Zoning Map, and Photographs of the Subject Property and Surrounding Area	A
Application Forms	B
Surveyor's Plat	C
Property Owners' List	D
Notice of Intent to Surrounding Property Owners and Certificate of Notice	E
Environmental Analysis	F
List of Publicly Available Information	G

PREFACE

This statement and the attached documents support the application of Professional Associates (“Associates”) and the International Finance Corporation (“IFC”) (together, “Applicants”) to the Zoning Commission for consolidated approval of a Planned Unit Development (“PUD”) for the property known as Lots 49, 832, and 840 in Square 74 (“Subject Property”). The Subject Property is the entirety of Square 74, a triangular-shaped block bounded by 21st Street NW, K Street NW, 22nd Street NW, and Pennsylvania Avenue NW in Ward 2. The PUD will result in the construction of a new 11-story office building at the intersection of 21st and K Streets NW (“Project”). Although the Project will be constructed to function as a standalone building, Associates intends to enter into a long-term lease with the IFC to use the Project as expansion space. Accordingly, the Project is designed to seamlessly connect to the existing IFC headquarters building and permit the IFC to accommodate existing demand and future forecasted needs.

This PUD application is consistent with the District of Columbia Comprehensive Plan, D.C. Law 16-300, 10A DCMR (Planning and Development) § 100 et seq. (2006) (the “Comprehensive Plan”), as well as numerous goals and policies of the District of Columbia. This Project will benefit the District through exemplary architecture and sustainable design. The Project will also benefit the surrounding neighborhoods through streetscape improvements and other new benefits and amenities to be provided in association with the increase in density resulting from the PUD process.

Submitted in support of this application are completed application forms, a copy of the notice of intent to file a PUD that was mailed to surrounding property owners and parties (with the certification of mailing and list of property owners), architectural drawings, plans, and

elevations of the proposed project, and a map depicting the Zone Districts for the property and surrounding area. As set forth below, this statement and the attached documents meet the filing requirements for a PUD application under Chapter 24 of the District of Columbia Zoning Regulations.

I. INTRODUCTION

A. *Summary of Requested Action*

This document supports the application of Professional Associates (“Associates”) and the International Finance Corporation (“IFC”) (together, “Applicants”) to the Zoning Commission for the District of Columbia (“Commission”) for consolidated approval of a Planned Unit Development (“PUD”) for the property known as Lots 49, 832, and 840 (“Subject Property”). IFC owns Lot 49, which is currently improved with the IFC’s international headquarters (“IFC Headquarters”) and a portion of a private alley. Lots 832 and 840 (“Development Site”) are owned by Associates and are currently improved with a 9-story commercial office building and the remaining portion of a private alley. The Subject Property is located in the Foggy Bottom/West End neighborhood of Ward 2, within the jurisdiction of Advisory Neighborhood Commission (“ANC”) 2A.

The Subject Property consists of approximately 83,201 square feet, or approximately 1.9 acres, of land area; of this area, the Development Site comprises approximately 11,111 square feet of land area. Associates intends to construct a new 11-story commercial office building on the Development Site (the “Project”).¹ Although the Project will be constructed to function as a standalone building, Associates intends to enter into a long-term lease with the IFC to use the Project as expansion space for its headquarters. Accordingly, the Project is designed to seamlessly connect to the IFC Headquarters building and permit the IFC to meet its growing needs. The Project will also include approximately 4,000 square feet of retail space near the intersection of 21st and K Streets.

¹ Above the ground floor, the Project will extend over the portion of the private alley that is on the IFC Headquarters Parcel, approximately 20 feet to the west and approximately 10 feet to the south of the Development Parcel.

The Project will have a building height of approximately 130 feet. The total gross floor area included in the Project is approximately 153,756 square feet. Together, the Project and the IFC Headquarters will have a total gross floor area of approximately 872,180 square feet for a total floor area ratio (“FAR”) of approximately 10.48. The Project will occupy approximately 100% of the Development Site. The Project will include approximately 48 below-grade parking spaces as well as a loading and service area in the interior of the block, both accessed from the private alley.

The Subject Property is located in the High Density Commercial Land Use category on the Future Land Use Map. It is located in the C-3-C Zone District and in the New Downtown Receiving Zone. Pursuant to Section 1709.21 of the Zoning Regulations, the Applicants have purchased Transferable Development Rights to increase the permitted matter-of-right FAR for the Subject Property to 10.0 FAR. Under Section 1709.24, the maximum permitted FAR for a PUD in a receiving zone is 10.5 FAR. Pursuant to this section, the Applicants will use the PUD process to increase the permitted FAR of the Subject Property from 10.0 to 10.48, or a 0.48 FAR increase (40,009.40 square feet). No other flexibility from the Zoning Regulations is required to accommodate the Project.

B. The Applicants

Professional Associates is a related entity of Blake Real Estate, Inc. Blake Real Estate (“Blake”) has been an integral member of the Washington, DC real estate community for over sixty years. Blake’s portfolio has included not only office building development but also multifamily, hotels, shopping centers, and warehouses. The company’s expert staff of real estate professionals provides clients with full-service, results-oriented operations.

The International Finance Corporation is a member of the World Bank Group that provides investment, advisory, and asset management services intended to encourage private sector development in developing countries. The IFC was established in 1956 to reduce poverty and promote development through investment in private enterprises. The IFC Headquarters was designed by Michael Graves and constructed in the mid-1990s. The headquarters reached a height of 130 feet and a FAR of 9.98 (on Lot 49) through the acquisition of TDRs.²

The IFC has outgrown the existing headquarters building, and the Project will provide much-needed expansion space. The IFC Headquarters was originally designed to house a workforce of 1,800 employees, but it now accommodates roughly 2,800 employees. The Project will provide additional space that ensures the IFC will be able to remain at the Subject Property for the foreseeable future. Under the terms of a lease agreement between the IFC and Associates, IFC will lease space in the Project for a minimum period of forty years. IFC will also retain options to purchase the Project during the lease term. As a result, the Project is very much designed to accommodate the IFC's expansion program: the Project will also align its floors with the existing headquarters building where possible, providing for seamless horizontal expansion. In the event that the IFC no longer needs or desires to occupy the Project after the lease term expires and IFC has not exercised its options to purchase the building, the Project is also designed to serve a separate set of tenants with the standalone lobby entrance as well as separate parking and loading facilities.

² Although a PUD was approved for the IFC Headquarters in Z.C. Order No. 660 (1989), that PUD was never executed or constructed.

C. *Project Goals and Objectives and the Benefits of Using the PUD Process*

Consistent with the goals of the District as outlined in the Land Use Element of the Comprehensive Plan, the Applicants intend to redevelop the Subject Property with commercial uses that will improve the utilization of land at this strategic, transit-oriented location. This PUD will provide Class A office space three blocks from the Foggy Bottom-GWU Metrorail station in an attractive and sustainable building that is compatible with surrounding buildings and uses. The PUD will also provide the IFC, a prominent international organization, with additional office space that is needed for IFC's continued growth.

The PUD process outlined in Chapter 24 of the Zoning Regulations serves as the appropriate means of achieving the above objectives, because the PUD process provides the community and District agencies with the tools needed to ensure that the Project is well-designed and best meets the needs of the community while making sure that the density and uses are appropriate and the architecture is compatible with the surrounding neighborhood.

D. *Development Timetable*

Associates intends to begin construction of the Project in 2016 and will take approximately 24 months. The Project is expected to be completed in 2018.

II. THE PROPOSED PUD PROJECT

A. *Site Location*

As described above, the Subject Property consists of two components: Lot 49, the IFC Headquarters parcel; and Lots 832 and 840, the Development Site.³

The IFC Headquarters Parcel consists of approximately 72,090 square feet of land area and is improved with the 11-story IFC Headquarters and a portion of a private alley.

The Development Site, is located at the intersection of 21st and K Streets NW and consists of approximately 11,111 square feet of land area. The Development Site is improved with a nine-story commercial office building and a portion of a private alley.

The alley was a former public alley that was closed in 1990 in order to effectuate the development of the IFC Headquarters.

The Subject Property is generally surrounded by commercial office buildings. To the north and east of the Subject Property – and in particular the Development Site – are commercial office buildings ranging between 90 and 130 feet in height. To the south of the Subject Property, across Pennsylvania Avenue, is a 90-foot tall commercial office building, a recently-approved PUD for a 130-foot tall commercial office building (Z.C. Order No. 06-11G/06-12G), and the twelve-story H.B. Burns Memorial Building. To the west of the Subject Property is Washington Circle.

The Subject Property is located in the C-3-C Zone District and in the New Downtown receiving zone. The Foggy Bottom-GWU Metrorail Station is approximately three blocks to the southwest of the Subject Property, and the Metrorail station entrance is approximately four

³ To facilitate the Project, the Subject Property will be combined into a single lot of record. As noted in footnote 1, above the ground floor, the Project will extend over the private alley onto the IFC Headquarters parcel approximately 20 feet to the west and approximately 10 feet to the south of the Development Parcel.

blocks from the Development Site. The Washington Metropolitan Area Transit Authority recently replaced all three escalators at the station entrance and installed additional improvements to the entrance, including a canopy to protect the escalators and a separate staircase that provides an additional pedestrian connection between the street and the platform. Surrounding property to the north, east and south is also located in the C-3-C Zone District and is part of the commercial office district along K Street known as the Golden Triangle.

B. Project Description

As shown on the architectural plans, elevations, and drawings attached as Exhibit A in this application, the Applicants seek approval to construct an eleven-story commercial office building with approximately 4,000 square feet of retail space and approximately 48 below-grade parking spaces (“Project”).

The massing, scale, and façade design of the Project is appropriate given the corner location and relationship to the existing IFC Headquarters. Although the Project is designed to internally integrate with the IFC Headquarters, the exterior massing and design takes a different approach. Rather than mimicking the existing building’s facades and continuing the single architectural expression across the remainder of the city block, the Project is designed as a complementary but purposeful contrast to the existing building. As a result, the Project will provide visual variety along 21st Street and K Street both at, and above, street level. The proposed retail space will further activate the public realm at a pedestrian level.

The massing of the Project is very much influenced by the site. The Project marks the corner of 21st and K Streets with a tower embellishment. The triangular geometry of this embellishment is derived in part from the geometry of the overall site and echoes the diagonal

angle of Pennsylvania Avenue. Furthermore, the width of the new facades and the tower follow the pattern of the bay widths found on the existing headquarters building.

The Project will be designed with a contemporary glass façade that is punctuated with terracotta screens, which will provide a counterpoint to the three-dimensional precast detailing of the existing IFC Headquarters. The terracotta color will match the primary masonry color on the existing building, which will allow the Project to further complement the existing building.

The proposed retail space includes both space at ground level and space on a mezzanine level. The Applicants will make all reasonable efforts to lease the proposed retail space to retail tenants. In the event that the mezzanine portion of the retail space is not leased within two years after the issuance of a Certificate of Occupancy for the Project, the Applicant requests flexibility to convert the mezzanine level to any other use permitted in the C-3-C Zone District.

The Project will contain approximately 48 vehicular parking spaces as well as secured, covered parking for at least 12 bicycles within the underground garage. Parking will be accessed from an existing curb cut on 21st Street, which will be narrowed and adjusted further to the north to meet DDOT's current standards. The garage will also be able to be internally connected to the existing IFC garage. The Project also includes a separate area for loading and service vehicles. Loading will be accessed from the private alley, which runs one-way from 21st Street to K Street. Streetscape improvements will be constructed along both street frontages to match the existing streetscape and security perimeter around the IFC Headquarters.

The proposed improvements will incorporate a series of sustainable features that represent an improvement from existing conditions and seek to reduce the impact of the redevelopment. The Project will be designed to meet the equivalent of a Gold rating under the LEED-CS 2009 rating system. The Subject Property is currently covered with impervious

building and paving area. The Project will be designed to capture 1.2” of rainfall through, among other features, a green roof, which will provide a porous vegetated landscape to capture and filter rainfall, and an underground cistern. These features will reduce runoff from the Subject Property, improve the water quality of stormwater that does leave the site, and allow for reuse of water for irrigation and other building system purposes. Although the Project is exempt from the new Green Area Ratio requirements, the Applicants will nevertheless meet the requirement for 0.20 GAR on the Development Site through a green roof. To the extent that the Project cannot accommodate the green roof required to meet 0.20 GAR, additional green roof area will be constructed on the IFC Headquarters sufficient to meet this goal.

C. Development Parameters Under the Zoning Regulations

The Zoning Regulations permit a maximum FAR of 6.5, height of 90 feet, and lot occupancy of 100% in the base C-3-C Zone District. However, as a property in the New Downtown Receiving Zone that is permitted to be constructed to a height of 130 feet under the Height Act, the Zoning Regulations permit a maximum FAR of 10.0 and height of 130 feet. Pursuant to Section 1709.21 of the Zoning Regulations, the Applicants have purchased Transferable Development Rights to increase the permitted matter-of-right FAR for the Subject Property to 10.0 FAR.

Under Section 1709.24 of the Zoning Regulations, the maximum permitted FAR for a PUD in a receiving zone is 10.5 FAR. Together, the Project and the IFC Headquarters will be located on a single lot of record with a total gross floor area of approximately 872,180 square feet of gross floor area, for a total Floor Area Ratio (“FAR”) of approximately 10.48. Therefore,

the PUD will increase the permitted FAR of the Subject Property by 0.48 FAR (or approximately 40,009 square feet).

The total gross floor area included in the Project is approximately 153,756 square feet, and the Project will occupy 100% of the Development Site. The Project will have a maximum height of 130 feet, as measured from the IFC Headquarters' existing measuring point at the midpoint of the Subject Property's Pennsylvania Avenue frontage. The project will contain approximately 48 parking spaces as well as loading and service spaces.

The following tabulation of development data highlights the Project's compliance with the Zoning Regulations.

Table 1: Compliance With the Zoning Regulations

	<u>Underlying C-3-C Zoning</u>	<u>New Downtown Receiving Zone</u>		<u>Existing Building</u>	<u>Project Design</u>	<u>Total PUD</u>
		<i>Matter of Right</i>	<i>PUD</i>			
Height	90 feet	130 feet	130 feet	130 feet	130 feet	130 feet
FAR	6.5	10.0	10.5	8.63 FAR	1.85 FAR	10.48 FAR
Lot Occupancy	100%	100%	100%	100%	100%	100%
Rear Yard	2.5 in/ft of height, not less than 12 feet Measured to center line of street			Complies		
Courts	Width: 3 in/ft of height, not less than 12 ft; Area: 250 s.f.			None provided		
Roof Structure	1:1 setback; 18'6" height limit; single enclosure of uniform height per elevator core			Complies		
Parking	Office: In excess of 2,000 s.f., 1 per 1,800 s.f. Retail: In excess of 3,000 s.f., 1 per 750 s.f.			Required: 299 spaces ⁴ Provided: 331 spaces	48 spaces ⁵	379 spaces
Loading	Office greater than 200,000 s.f.: 3 berths @ 30 ft. deep 3 platforms at @ 100 s.f. each 1 service/delivery space @ 20 ft. deep			3 berths 3 platforms 1 space	1 berth 1 platform 1 space ⁶	4 berths 4 platforms 2 spaces
GAR	0.20			n/a	0.20 ⁷	--

⁴ According to the Zoning Computation Sheet for the IFC Headquarters, the existing building was required to provide 399 parking spaces, less 100 spaces (25%) because of proximity to a Metrorail station entrance.

⁵ No additional parking spaces are required under Section 2100.7 (parking spaces are not required for an addition unless the addition increases the intensity of use of the building by more than 25%). Here, the addition will increase the gross floor area of the existing building by 21%. Even if the addition triggered a parking requirement, the combined parking in the building (379 spaces) would exceed the amount of required parking (299+67=366 spaces).

⁶ No additional loading is required under Section 2201. The existing IFC Headquarters already exceeds 200,000 square feet of gross floor area, and the Zoning Regulations do not require any additional loading above that threshold.

⁷ GAR is not required because the Project is an addition to an existing building that will not exceed 100% of the assessed value of the existing IFC Headquarters.

D. Flexibility Under the PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than is possible under conventional zoning procedures. The PUD regulations specifically allow the Zoning Commission to approve any zoning relief that would otherwise require approval of the BZA. As an addition to the existing IFC Headquarters, the expanded building will continue to comply with the Zoning Regulations and no relief is required.

The PUD regulations also authorize the Zoning Commission to approve flexibility in the final design of the PUD. Here, the Applicants request customary flexibility to modify interior components; vary final selection of exterior materials within the color ranges and materials types as proposed; vary final streetscape design and materials; make minor refinements to exterior details and dimensions; vary the layout, dimensions, and configuration of the parking garage; vary the retail entrances; vary building and tenant signage; vary the location and arrangement of green roof; vary the roof terrace door locations; and reduce the final height of the roof structure.

III. PLANNING ANALYSIS

A. *Land Use Impact*

As detailed in Section V, the proposed PUD project is fully consistent with the goals and policies of the Comprehensive Plan for the District of Columbia, which designate the Subject Property for High Density Commercial land use. Specifically, the Project will expand the IFC's existing corporate headquarters in a signature office building and transit-oriented location, and it will help maintain the District as an international center for learning, knowledge sharing, and trade through the retention of the IFC. The height and density of the Project are appropriate given the proximity to transit, the height and mass of surrounding buildings along K Street, and the avoidance of adverse impacts on nearby residential areas. The PUD will have a positive land use impact that is consistent with the Comprehensive Plan and other planning goals of the District of Columbia.

B. *Zoning Impact*

The PUD is consistent with the existing C-3-C zoning for the Subject Property. The expanded building will continue to comply with the height, lot occupancy, yard, court, parking and loading requirements of the Zoning Regulations. All the PUD will do is increase the maximum permitted FAR to a 10.48 FAR, which is within the 10.5 FAR permitted for a PUD in a receiving zone.

C. *Environmental Impact*

As more specifically detailed in Exhibit E, no adverse environmental impact will result from the construction of the Project. The Project will include features such as a green roof and underground cistern that will allow for the capture of 1.2" of rainfall and represent a significant

improvement over existing 100% impervious conditions. The Project is targeting a Gold rating under the LEED-CS 2009 rating system.

D. Facilities Impact

The proposed Project will not have an adverse impact on the facilities that it will rely on for service. The Foggy Bottom-GWU Metrorail station, which is four blocks from the Development Site, as well as numerous Metrobus lines—and the DC Circulator—all service the site, and it is expected that many of the Project’s occupants and visitors will use public transit. The Project will also provide bicycle facilities to promote the expanded use of cycling as an alternative to driving. The Project also contains 48 below-grade parking spaces to accommodate the parking demand of building users and visitors who may choose to drive to the Project as well as adequate loading facilities to accommodate building service and deliveries. Importantly, the Project will provide less parking than the existing office building, which will reduce traffic impacts associated with the Development Site.

Gorove Slade Associates (“GSA”) has been retained to prepare a transportation impact statement. GSA and DDOT have begun discussions regarding the scope of the study, and GSA expects to complete the study well in advance of the public hearing.

IV. PUD EVALUATION STANDARDS

A. *Public Benefits and Project Amenities*

Section 2403.9 provides categories of public benefits and project amenities for review by the Zoning Commission. The objective of the PUD process is to encourage high-quality development that provides public benefits and project amenities by allowing applications greater flexibility in planning and design than may be possible under matter-of-right zoning.

The proposed Project will achieve the goals of the PUD process by providing exemplary design and planning, vehicular and pedestrian improvements, uses of special value, and environmental benefits.

1. Urban Design, Architecture, and Landscaping

Section 2403.9(a) lists urban design, architecture, and landscaping as categories of public benefits and project amenities for a PUD. As shown on the detailed plans, elevations, and renderings included in Exhibit A, the proposed Project exhibits many characteristics of exemplary urban design, including use of high-quality materials, pedestrian-oriented landscape and hardscape improvements, clear separation of pedestrian and vehicular entrances and circulation patterns, inclusion of features that promote alternatives to driving, and sustainable features.

2. Site Planning, and Efficient and Economical Land Utilization

Pursuant to Section 2403.9(b) of the Zoning Regulations, “site planning and efficient and economical land utilization” are public benefits and project amenities to be evaluated by the Zoning Commission. The site is currently underutilized and fails to fully capitalize on its New Downtown / K Street location. The proposed Project will provide an appropriately-sized

development that complements the height and mass of the IFC Headquarters as well as other buildings along K Street.

3. Effective and Safe Vehicular and Pedestrian Access and Transportation Management Measures

The Zoning Regulations, pursuant to Section 2403.9(c), state that “effective and safe vehicular and pedestrian access” can be considered public benefits and project amenities of a PUD. The proposed Project will provide vehicular access from a reconfigured curb cut on 21st Street and the existing private alley, which will separate vehicular and pedestrian entrances and promote pedestrian safety. The Project’s location along K Street and near the Foggy Bottom-GWU Metrorail station will also promote pedestrian activity both for building users as well as passers-by. The Project will also promote bicycle use through the provision of additional bicycle facilities in the below grade parking garage.

4. Environmental Benefits

Section 2403.9(h) states that environmental benefits are considered to be public benefits and project amenities of a PUD. The proposed Project will include a series of sustainable features that represent an improvement from existing conditions and seek to reduce the impact of the redevelopment. The Subject Property is currently covered with impervious building and paving area. Even though the GAR requirements do not apply to the Project, the PUD will nevertheless achieve a 0.20 GAR for the Development Site through, among other features, approximately 4,900 square feet of green roof, which will provide a porous vegetated landscape to capture and filter rainfall, and an underground cistern. These features will reduce runoff from the Subject Property, improve the water quality of stormwater that does leave the site, and allow for reuse of water for irrigation and other building system purposes. The Project is being

designed to achieve the equivalent of a Gold Rating in the USGBC's LEED-CS 3.0 2009 Rating System.

5. Uses of Special Value

Section 2403.9(i) lists uses of special value to the neighborhood or the District of Columbia as a whole as public benefits and project amenities of a PUD. The proposed Project will provide approximately 4,000 square feet of retail uses as well as streetscape improvements along the Project frontage, which have been previously recognized by the Commission as uses of special value. The Applicants have commenced discussions regarding potential additional public benefits and project amenities with ANC 2A and has received initial feedback regarding a variety of potential interests. The Applicants will continue to work with ANC 2A and other neighborhood organizations to develop a targeted proposal that will enhance the Foggy Bottom / West End neighborhood.

6. Comprehensive Plan

According to Section 2403.9(j), public benefits and project amenities include "other ways in which the proposed planned development substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan." As described in greater detail in Section V, the PUD is consistent with and furthers many goals and policies of the Comprehensive Plan.

B. *Public Benefits of the Project*

Section 2403.12 requires the Applicant to demonstrate that the public benefits offered are superior to typical developments of the type proposed. This application achieves the requirement of this provision by offering:

- Exemplary/superior architecture and site planning,
- Uses of special value, including street-level retail uses,
- Sustainable development features, and
- Streetscape improvements.

In addition to the above benefits, the Applicants will provide the housing linkage contribution required by Section 2404 of the Zoning Regulations, which will provide additional benefits to the District in the form of support for affordable housing initiatives. For the reasons set forth above, the Project contains numerous public benefits and project amenities that are superior to typical developments.

V. COMPLIANCE WITH THE COMPREHENSIVE PLAN

The proposed PUD is consistent with and fosters numerous goals and policies in the Comprehensive Plan.

The purposes of the District elements of the Comprehensive Plan for the National Capital are to: (1) Define the requirements and aspirations of District residents, and accordingly influence social, economic, and physical development; (2) Guide executive and legislative decisions on matters affecting the District and its citizens; (3) Promote economic growth and jobs for District residents; (4) Guide private and public development in order to achieve District and community goals; (5) Maintain and enhance the natural and architectural assets of the District; and (6) Assist in the conservation, stabilization, and improvement of each neighborhood and community in the District.

D.C. Code § 1-301.62 (2006). The proposed Project significantly advances these purposes by furthering the social and economic development of the District through increased commercial office space and the continued improvement of the IFC.

A. *Land Use Maps*

The Property is located in the High Density Commercial land use category on the Future Land Use map and in the Neighborhood Conservation Area category on the Generalized Policy maps. The Property is also located across the street from the defined boundary of the Central Employment Area (“CEA”). The Framework Element provides guidelines for using the Future Land Use and Generalized Policy Maps. This Element states that the Future Land Use map should be interpreted “broadly” and that zoning for an area should be guided by the Future Land Use Map interpreted in conjunction with the text of the Plan. The Element also clearly provides that density and height gained through the Planned Unit Development process as bonuses that may exceed the typical ranges cited for each land use category. 10 DCMR § 226.1.

The High Density Commercial land use category defines “the central employment district of the city and other major office centers on the downtown perimeter.” The category is

comprised of office buildings greater than 8 stories in height, and the C-3-C Zone District is listed as a corresponding zone district. 10 DCMR § 225.11. Accordingly, the existing C-3-C zoning and proposed use, height and density of the Project is compatible and consistent with the High Density Commercial land use designation of the Subject Property. The Project is also compatible with the scale and architectural character of the surrounding area, which is consistent with the Neighborhood Conservation Area categorization on the Policy Map. 10 DCMR § 223.5.

B. Land Use Element

The Land Use Element promotes the continued development of the District's connected business districts – including the Golden Triangle/K Street district – as integral parts of the city's central business district. See Policy 1.1.2. The Land Use Element also calls for concentration of office development within the CEA, and specifically notes that the goals appropriate for the CEA may be applied to additional land necessary to support economic growth given the scarcity of vacant land in the District. See Policy 1.1.3. The Land Use Element also includes a number of policies that promote transit-oriented development near Metrorail stations such as the Foggy Bottom-GWU Metrorail station. See Policy 1.3. The Subject Property provides an opportunity to fulfill these goals through the development of a strategically located infill parcel as a commercial office building that is consistent with the height and mass of nearby properties. As discussed herein, the proposed Project will not impose adverse impacts on nearby property and is therefore not inconsistent with Policy LU-2.3.2.

C. Other Citywide Elements

Implementation of the PUD will continue to permit the IFC to thrive and evolve, which furthers important policies and goals of the Economic Development Element of the Comprehensive Plan. The Economic Development Element specifically cites the offices of

World Bank Group organizations such as the IFC as a “major economic sector in their own right with a cumulative direct economic impact . . . of over a billion dollars, and much more in terms of contracting.” 10 DCMR § 703.3. Accordingly , the Comp Plan specifically calls on the District to draw on the presence of organizations such as the IFC to enhance the District as an international center for learning, knowledge sharing, an trade. Policy ED-1.1.6. .

Here, the Project will not only support the IFC’s contributions to the District’s economic development but will also provide direct contributions through the development of a signature commercial office building that will accommodate high-end tenants and further Policy ED-2.1.3. The new commercial office development will provide additional office space for the District’s core industries and in space that is proximate to Central Washington, in support of Policy ED-1.1.1 and Policy ED-2.1.1. In particular, the proposed PUD is fully consistent with Policy ED-2.1.5, which supports continued office sector growth “through infill and renovation within established commercial districts to more efficiently use available space while providing additional opportunities for new space.” Such use of the Subject Property as high-end office space will fulfill these goals and provide additional opportunities for employment.

The Project will also further other citywide elements of the Comprehensive Plan, including the Housing, Transportation, Environmental Protection, and Urban Design Elements.

- The Project will result in funding for affordable housing efforts, which supports goals and policies related to the production of affordable housing. See H-1.1 – H-1.2.
- Consistent with the policies of the Transportation Element, the Project reinforces transit-oriented development anchored by the Foggy Bottom-GWU Metrorail station, as well as encouragement of transportation demand management and pedestrian- and bicycle-related improvements,. See T-2.2 – T-2.4; T-3.1 – T-3.2. In particular, this Project provides improvements to the pedestrian streetscape and bicycle storage, thus fulfilling “action” items of the Comprehensive Plan. See Action T-2.2.C; Action T-2.3.A.
- The proposed Project incorporates many of the features called for the Environmental Element, including the use of permeable materials and green roofs to reduce runoff. See Policies E-3.1.1 to E-3.1.3.

- The design of the proposed building provides an infill development of a strategic but underutilized site that will satisfy multiple goals of the Urban Design Element, through infill development that relates to the scale of surrounding buildings (UD-2.2.1, UD-2.2.7); new development that complements the form, height, and bulk of historic landmarks (UD-2.2.2); and maintenance of the established façade lines and form along the block (UD-2.2.6).

Finally, the Project is consistent with the Near Northwest Area Element. The expanded space for the IFC is located at 21st and K Streets, well within the established office corridor along K Streets, and it will avoid impacts on surrounding residential areas or other neighboring properties. Policy NNW-1.1.6. Consistent with the approach for other large institutions in the Near Northwest area, the Project will permit the IFC to “build up” on existing property and reduce the need for additional land for expansion. See 10 DCMR 2107.2(j)

VI. CONCLUSION

For the foregoing reasons, the Applicants submit that the enclosed applications meet the standards of Chapter 24 of the Zoning Regulations; are consistent with the purposes and intent of the Zoning Regulations and Map; will enhance the health, welfare, safety, and convenience of the citizens of the District of Columbia; satisfy the requirements for approval of the included applications; provide significant public benefits; and advance important goals and policies of the District of Columbia. Therefore, the consolidated PUD application should be approved and adopted by the Zoning Commission.

Accordingly, the Applicants respectfully request that the Zoning Commission set the PUD application down for a public hearing at the earliest possible date.

Respectfully submitted,

GOULSTON & STORRS, PC

_____/s/____

Phil T. Feola

_____/s/____

David M. Avitabile

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