



MEMORANDUM

TO: Zoning Commission

FROM: Jennifer Steingasser, Deputy Director Development Review & Historical Preservation

DATE: June 29, 2012

SUBJECT: Preliminary Report on Zoning Commission Case No. 12-XX, a Proposed Zoning Map Amendment to Establish Initial Zoning on Square 0323

I. RECOMMENDATION

The Office of Planning (OP) **recommends** that the Zoning Commission set down this application for a public hearing to establish initial zoning of Downtown Development (DD)/ Central Business (C-4) District on Lot 800, Square 0323, and Parcels 1, 2 and 3 being part of Squares 349 and 350 for federal property that is the site of the Old Post Office Building at 1100 Pennsylvania Avenue NW.

The proposed DD/C-4 zone district is not inconsistent with the District of Columbia Comprehensive Plan Future Land Use and Generalized Policy maps.

II. SITE AND AREA DESCRIPTION

Address:	1100 Pennsylvania Street
Legal Description:	Lot 800, Square 0323, and Parcels 1, 2 and 3 being part of Squares 349 and 350
Ward:	2
Lot Characteristics:	The site is relatively flat, approximately 118,800 square feet (2.71 acres) in area and has frontage along Pennsylvania Avenue to the north, C Street to the south and 12 th Street NW to the west (refer to Exhibit 1).
Existing Development:	The Old Post Office Building (also known as the Nancy Hawks Center) which was constructed from 1892 to 1899 to house the US Post Office Department Headquarters and the District post office, occupies the entire square. According to DC land records the building has approximate floor area of 389,000 square feet. The most striking features of this Romanesque Revival building is the clock tower on the northern façade that reaches a height of 315 feet, (third tallest structure in DC, behind the Washington Monument at 555 feet and the Basilica of the National Shrine of the Immaculate Conception at 329 feet) and the nine-story interior light court topped by an enormous skylight. Since the 1980's the building has been renovated for variety of uses (refer to Exhibit 2).
Zoning:	The square is federal property that is currently not zoned.

Historic District:	Federal Triangle Historic District and Pennsylvania Avenue National Historic Site; the original building was listed in the National Register of Historic Places in 1973.
Adjacent Properties:	High-density mixed use commercial development to the north across Pennsylvania Avenue, and federal office buildings to the south, east and west.
Surrounding Neighborhood Character:	High density government and mixed use commercial.

III. APPLICATION IN BRIEF

The General Services Administration (GSA) is currently in negotiations on a long-term lease of the building and site for major private business redevelopment. Because the use of the property will no longer be used for a Federal public building or use, and will shift to a private business, the property requires zoning. The anticipated redevelopment would include office, retail and hotel components.

IV. ZONING

The single lot on Square 0323 is developed a single building with 389,000 square feet of floor area, equal to a floor area ratio (FAR) of 6.3, a building height of 135 feet and a bell tower that reaches an approximate height of 315 feet.¹ Other squares south of Pennsylvania Avenue and developed with high-density office buildings, some with ground floor and lower level retail and service lease space, are not subject to District zoning. Properties north Pennsylvania Avenue that are developed with high-density mixed office, retail and residence uses are in DD/C-4 and DD/C-5 districts (refer to Exhibit 2).

The Central Business (C-4) District was designed for the downtown core that comprises the retail and office centers for both the District and surrounding jurisdictions. It was intended to encompass sufficient area to support the variety of commercial, retail, and business uses needed to serve the metropolitan area, but compact enough to retain its identity. It was anticipated that this zone district would also contain high-density residential and mixed use developments. Office, retail and hotel uses are allowed in this district as a matter of right under § 752.2 (a). The maximum allowable FAR and height in this district is 8.5 FAR and 130 feet² as a matter of right, and 10.5 FAR and 130 feet under a planned unit development (PUD).

The Pennsylvania Avenue Development (C-5 (PAD)) District is located directly across Pennsylvania Avenue for the site. The C-5 was specifically established for the area on the north side of Pennsylvania Avenue, N.W. and between 10th Street and 15th Street, N.W., consistent with the goals and mandates of, and in accordance with the development plan promulgated under the Pennsylvania Avenue Development Corporation (PADC) Act of 1972. However the PADC boundaries as mandated by the Congress do not extend south of Pennsylvania Avenue, therefor C-5 is not being proposed for this site.

The Downtown Development (DD) Overlay District is applied to subareas identified in the DC Comprehensive Plan including as the Downtown Shopping District (Retail Core), the Pennsylvania Quarter and historic preservation areas which may overlap. The purpose of the DD Overlay District is to help accomplish Comprehensive Plan land use and development policies related to the

¹ Heights taken from the 1972 National Register nomination form

² In the C-4 District, a building or other structure may be erected to a height not exceeding one hundred thirty feet (130 ft.); provided, that the building or other structure shall face or abut a street not less than one hundred ten feet (110 ft.) wide between building lines (Sec 770.4 DCMR 11)

downtown. The most important include creation of a balanced mixture of uses by means of incentives and requirements for critically important land uses identified in the Plan including retail, hotel, residential, entertainment, arts, and cultural uses; guidance and regulation of office uses; the protection of historic buildings and places while permitting sensitive and compatible new development subject to the historic preservation review process of the Historic Landmark and Historic District Protection Act of 1978; and design guidance so new construction will generally be consistent with the urban design, street orientation and design, and historic preservation policies of the Comprehensive Plan.

	C-4	DD/C-4	DD/C-4 PUD	PROPOSAL
Height	130 feet ²	130 feet	130 feet	--
Floor Area Ratio	8.5 ³	8.5	11.0	--
Lot Occupancy	100 %	100 %	100 %	--
Office, Retail, Service and Hotel Uses	Allowed	Allowed	Allowed	Mixed Office, Retail, Service and Hotel Uses

As outlined in the above comparison table, existing development would conform to the allowable lot occupancy and FAR in the C-4 district but would exceed by 5 feet the allowable height.⁴

Based on the above information, the appropriate zone district to accommodate the existing and anticipated uses desired mixed office, retail, service and hotel development is a C-4 district with the Downtown Development Overlay District.

V. COMPREHENSIVE PLAN

The Comprehensive Plan Future Land Use Map designates the subject properties south of Pennsylvania Avenue as Federal, which includes land and facilities owned, occupied and used by the federal government (excluding parks and open space). The "Federal" category generally denotes ownership rather than use. Uses generally found under this designation include military bases, federal government buildings, the International Chancery Center and similar federal government activities (refer to Exhibit 3).

Land with this designation is generally not subject to zoning. However, when Federal interests on any given site are terminated or become public/private partnerships the Plan anticipates that zoning for subject property will be established in a manner that is consistent with its policies.

Squares immediately north of Pennsylvania Avenue are designated High Density Commercial which is used to define the Central Employment Area and other major office employment centers on the downtown perimeter. It is characterized by office and mixed office/retail buildings greater than eight stories in height, although many lower scale buildings (including historic buildings) are scattered about. The corresponding zone districts include C-4.

The Comprehensive Plan Policy Map shows the subject property and most of the downtown in the Central Employment Area which continues to be the business and retail heart of the District. It hosts the widest variety of commercial uses, including but not limited to major government and corporate offices; retail, cultural, and entertainment uses; and *hotels*, restaurants, and other hospitality uses (refer to Exhibit 4).

It should be noted that lack of identification of federally owned lands as either a Neighborhood Conservation Area, Neighborhood Enhancement Area, or Land Use Change Area on the

³ Total allowable floor area ratio for residence, public school and/or allowable permitted use.

⁴ The building National Historic Landmark and predates the zoning regulations; as a preexisting legally established structure the height would be considered legally non-conforming.

Generalized Policy Map does not mean they are exempt from the policies of the Comprehensive Plan should they transfer to private use or that the Comprehensive Plan assumes that they will always remain static.

The Plan also provides the following additional guidance:

- **Policy LU-J.J.3: Central Employment Area (CEA):** The CEA shall include existing "core" federal facilities such as the US Capitol Building, the White House, and the Supreme Court, and most of the legislative, judicial, and executive administrative headquarters of the United States Government. Additionally, the CEA shall include the greatest concentration of the city's private office development, and *higher density mixed land uses, including commercial/retail, hotel, residential, and entertainment uses*. Given federally-imposed height limits, the scarcity of vacant land in the core of the city, and the importance of protecting historic resources, the CEA may include additional land necessary to support economic growth and federal expansion. The CEA may be used to guide the District's economic development initiatives, and may be incorporated in its planning and building standards (for example, parking requirements) to reinforce urban character.... [304.8].
- **Policy LU-1.1.4: Appropriate Uses in the CEA:** Ensure that land within the Central Employment Area is used in a manner which reflects the area's national importance, its historic and cultural significance, and its role as the center of the metropolitan region. *Federal siting guidelines and District zoning regulations should promote the use of this area with high-value land uses that enhance its image as the seat of the national government and the center of the District of Columbia, and that make the most efficient possible use of its transportation facilities* [304.9].
- **Policy LU-J.1.6: Central Employment Area Historic Resources:** Preserve the scale and character of the Central Employment Area's historic resources, including the streets, vistas, and public spaces of the L'Enfant and McMillan Plans as well as individual historic structures and sites. Future development must be sensitive to the area's historic character and should enhance important reminders of the city's past [304.12].
- **Policy LU-1.2.2: Mix of Uses on Large Sites** Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. *Zoning on such sites should be compatible with adjacent uses* [305.7].
- **Policy LU-1.2.7: Protecting Existing Assets on Large Sites:** Identify and protect existing assets such as *historic buildings, historic site plan elements, important vistas, and major landscape elements* as large sites are redeveloped [305.12].
- **Policy LU-1.2.3: Federal Sites:** *Work closely with the federal government on re-use planning for those federal lands where a change of use may take place in the future.* Even where such properties will remain in federal use, the impacts of new activities on trips generated, and to reduce household expenses on transportation by providing options for "car-free" (or one car) living [306.3].
- **Policy LU-3.5 Federal Facilities:** ... The "Federal Workplace" Element of that Plan includes policies to reinforce the preeminence of the monumental core through future siting decisions, *give preference to urban and transit-served sites when siting new workplaces, and emphasize the modernization of existing structures before building new structures.* The Federal Elements include guidelines on the types of federal functions that are appropriate within the Capitol Complex, the Central Employment Area, federal installations, and other areas within the District of Columbia, as well as elsewhere in the region [318.4].

- **Policy LU-3.5.3 Recognition of Local Planning and Zoning Regulations:** Encourage the federal government to abide by local planning and zoning regulations to the maximum extent feasible [318.8].

Additional guidance is provided in the Central Washington Area Element:

- **Action CW-1.1.D: Focused Planning for "Catalytic" Sites:** Develop detailed plans for "catalytic" sites with the potential to significantly shape the future of Central Washington. These sites include but are not limited to ... the old Post Office on Pennsylvania Avenue NW, Old Naval Observatory Hill, and the area around the Kennedy Center [1608.26].

Washington's "traditional" Downtown includes Chinatown, the arts district around Gallery Place ... and concentrations of government office buildings at Federal Triangle and Judiciary Square. *While these areas are distinct from one another, they all offer a blend of historic and contemporary development*, a mix of uses, and largely pedestrian-friendly environments. Private office buildings, many built to the 12- to 14-story limit allowed by the Height Act, extend across much of the area. Traditional Downtown also contains many exceptional historic buildings and public spaces, including many National Register landmarks [1600.5].

- **Policy CW-1.2.2: Preservation of Central Washington's Historic Resources:** Protect and enhance Central Washington's historic resources by continuing the current practices of:
 - a. Preserving the area's historic buildings and districts;
 - b. Requiring that renovation and new construction is sensitive to the character of historic buildings and districts;
 - c. Applying design incentives and requirements to encourage preservation, adaptive reuse, and appropriate relationships between historic development and new construction;
 - d. Encouraging the adaptive reuse of historic and architecturally significant buildings; and
 - e. Preserving the original L'Enfant Plan pattern of streets and alleys, especially alleys that provide for off-street loading, deliveries, and garage access.

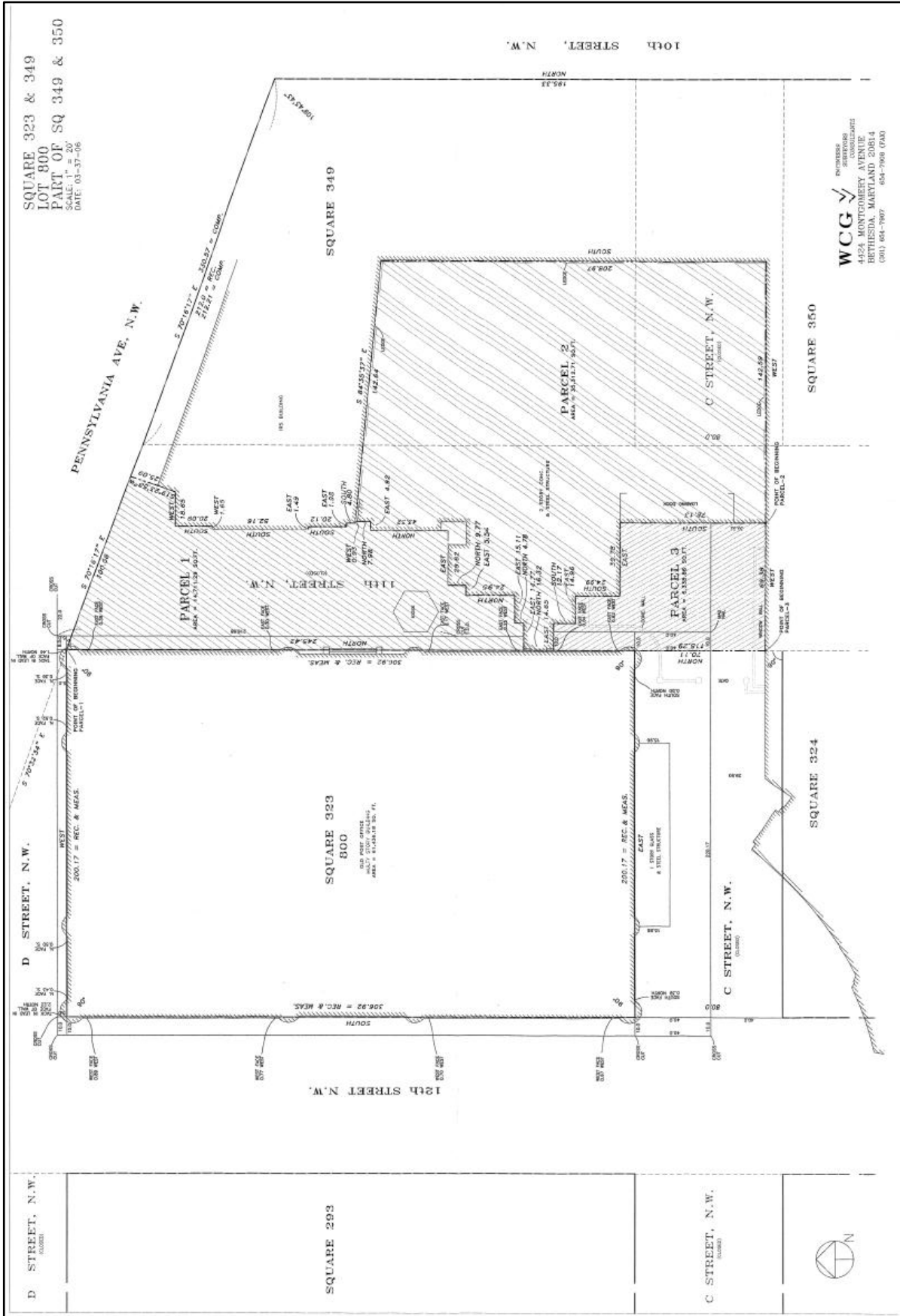
Historic resources should be recognized as essential to Downtown's economic vitality and competitive edge, particularly for retail, tourist, and entertainment activities [1609.2].

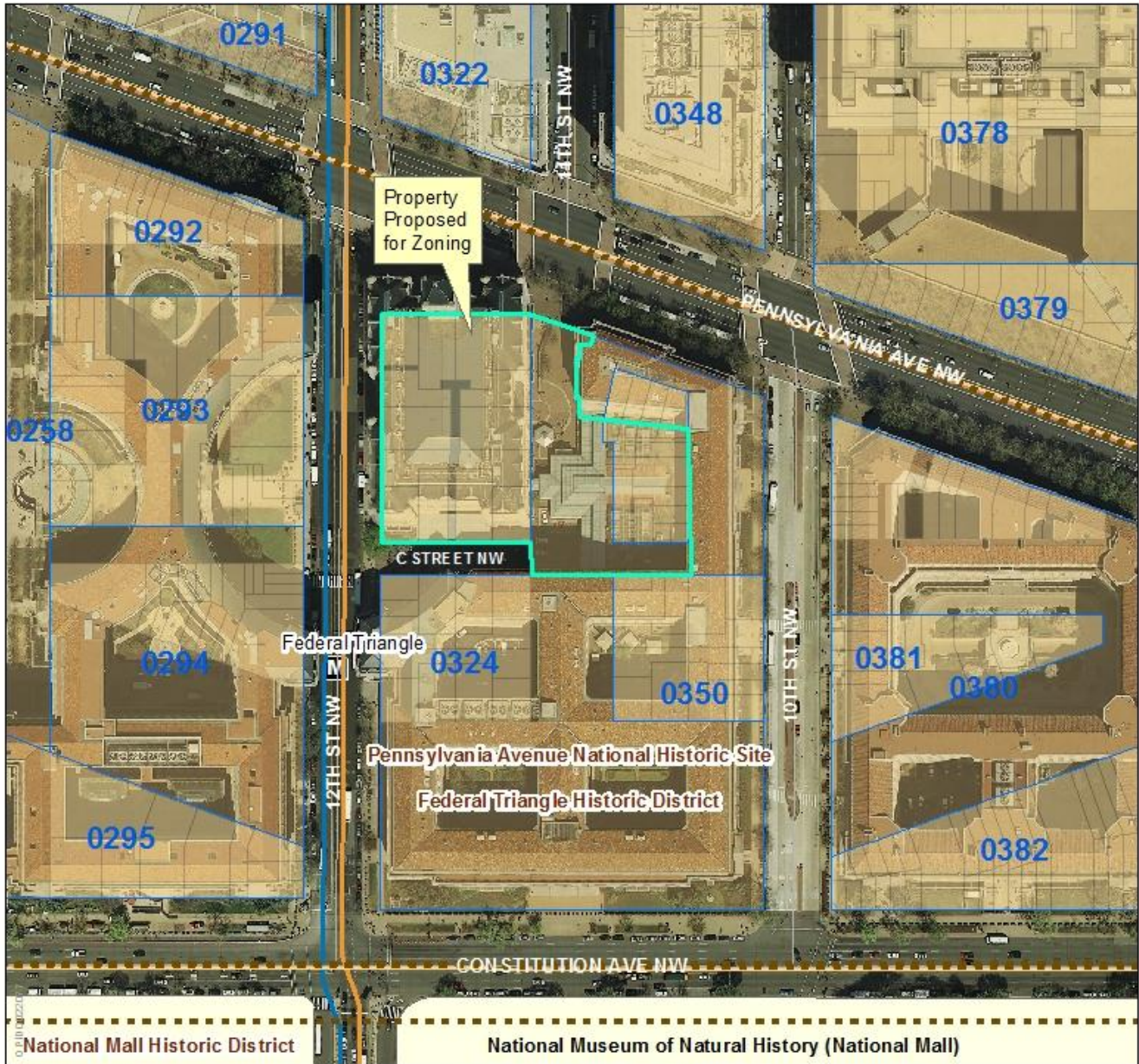
Rezoning the subject property to C-4 with the DD/Downtown Arts Overlay District would support the referenced land use designations, the referenced Plan guidance for future development of historic properties in the Downtown and would be consistent with the Comprehensive Plan objectives for the Central Employment Area and Gallery Place subarea.

Establishing the proposed zoning as prescribed for compatible mixed-use redevelopment of the subject properties would therefore not be inconsistent with the current Comprehensive Plan.

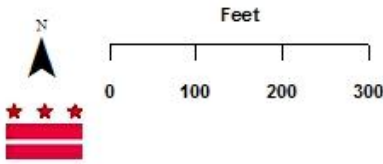
VII. RECOMMENDATION

Accordingly, the Office of Planning supports setting down this zoning petition for a public hearing.





**Zoning Commission Application No. 12-XX
1100 Pennsylvania Avenue NW**



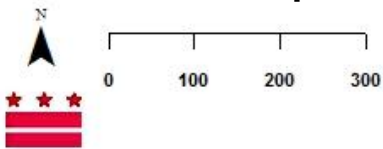
Government of the District of Columbia
Office of Planning ~ June 21, 2012

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-  Metro Bus Routes
-  Property Squares
-  Metro Stations
-  Street Center Lines
-  Water



**Zoning Commission Application No. 12-XX
 Area Future Land Use Designations
 Comprehensive Plan Future Land Use Designations**



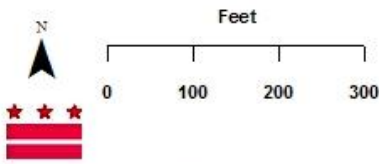
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-  Property Squares
-  Commercial-High Density (CHD)
-  Federal (FED)
-  Parks, Recreation, and Open Space (PROS)
-  Street Centerlines
-  Water



**Zoning Commission Application No. 12-XX
Comprehensive Plan Generalized Policy Designations**



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- Property Squares
- Selection from Comp Plan Policy polygons
- Type**
- Central Employment Area
- Federal Lands
- Central Washington
- Parks
- Neighborhood Conservation Areas
- Street Centerlines
- Water