

**1900 PENNSYLVANIA AVE., NW
(INTERNATIONAL MONETARY FUND HEADQUARTERS 2)
CONSOLIDATED PLANNED UNIT DEVELOPMENT AND AMENDMENT TO THE
ZONING MAP TO REZONE THE PROPERTY FROM C-3-C TO C-4
Square 119, Lot 26**

Report to the Zoning Commission of the District of Columbia

April 4, 2002

Abstract

The Zoning Commission has taken a proposed action to approve a consolidated Planned Unit Development (PUD) and related zoning map amendment at 1900 Pennsylvania Avenue, NW, in Square 119, Lot 26. The site would be rezoned from C-3-C (Commercial Medium-High Density) to C-4 (Central Business District). The former PEPCO building that currently occupies the square would be demolished in order to construct the new International Monetary Fund Headquarters 2 (IMF-HQ2). The proposed 12-story, 130-foot-high building would have 649,350 square feet of office, meeting, and retail space, and an FAR of 10.0. The new IMF-HQ2 would include streetscape improvements that satisfy IMF's need for perimeter security.

Federal Interests

The identified federal interests include Pennsylvania Avenue, a Special Street in the Preservation and Historic Features Element of the Federal Elements of the Comprehensive Plan for the National Capital, as well as four nearby National Park Service reservations on Pennsylvania Avenue (including Edward Murrow Park and James Monroe Park) identified as Special Places in the Comprehensive Plan. In addition, because the International Monetary Fund is an international organization the project should conform to the Foreign Missions and International Organizations Element of the Comprehensive Plan.

Authority

Section 8 of the Planning Act of 1952, as amended (40 U.S.C. 71g), and D.C. Code, sec. 5-417.

Commission Action

The Commission concludes that the proposed consolidated Planned Unit Development and related rezoning, subject to the guidelines, conditions, and standards established by the Zoning Commission, would not adversely affect the identified federal interests nor be inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital.

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BACKGROUND AND STAFF EVALUATION

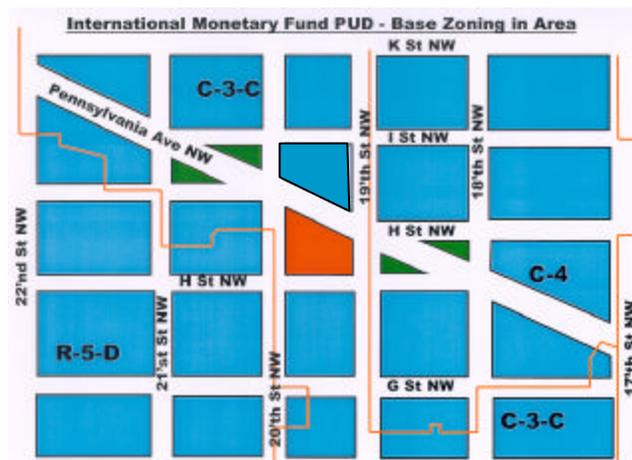
DESCRIPTION OF THE PROPOSAL

The District of Columbia Zoning Commission has referred the proposed consolidated PUD and related zoning map amendment to the Commission for federal interest review and comment. The objective of the PUD process is to permit flexibility of development in return for the provision of superior public benefits, provided that the PUD process is not used to circumvent the intent and purposes of the Zoning Regulations or result in an action inconsistent with the Comprehensive Plan. NCPC’s role is to review and comment on the proposed project, considering whether it has an adverse affect on the federal interest.

The Site

The project site includes the entirety of Square 119, Lot 26, bounded by Pennsylvania Avenue to the north, 19th Street to the east, 20th Street to the west, and H Street to the south. The site encompasses 64,935 square feet of total land area. Land uses in the vicinity include the Mexican Embassy across Pennsylvania Avenue; the existing International Monetary Fund Headquarters (HQ1) across H Street to the south; the World Bank headquarters to the southeast; and George Washington University to the west.

The site is currently zoned C-3-C (Commercial Medium-High Density) and surrounding zoning consists primarily of a mixture of C-3-C, C-4 (Central Business District) and R-5-D zoning. Some portions of the surrounding C-3-C zone to the north have an additional overlay, the New Downtown Receiving Zone, which permits increased levels of height and density consistent with the matter-of-right C-4 zone. The property immediately to the east is zoned C-4, while the area to the north and south of the project site is zoned C-3-C, including the existing IMF-HQ2. West of the site there is a split-zoned square consisting of C-3-C and R-5-D (Residential High-Density)—the uses consist mainly of George Washington University (R-5-D), as well as the commercial/office uses known as Red Lion Row (C-3-C). The attached zoning map depicts the existing zoning in the vicinity of the project site.



The Proposal

- The existing PEPCO building would be demolished.
- A new 130-foot-high, 649,350-square-foot office building with an FAR of 10.0 would be constructed for the International Monetary Fund Headquarters 2.
- The majority of the building would be occupied by office uses and meeting spaces; however, there would be two retail spaces at the northeastern and northwestern corners of the building along Pennsylvania Avenue containing approximately 6,750 square feet combined.
- The building would have a minimum of 400 parking spaces in three levels of below grade parking, as well as three loading berths—all accessed off of 20th Street. Up to 100 additional spaces could be accommodated through stacked parking.
- Pedestrian access would be from Pennsylvania Avenue and 19th Street, with an additional staff-only entrance on H Street.
- The building would be constructed primarily of glass and aluminum curtainwall, with horizontal banding of precast concrete and with natural stone at the lower levels. A curbed granite wall along Pennsylvania Avenue would incorporate a water element. The Pennsylvania Avenue elevation would also consist of a number of projections and voids cut into the curtain wall.
- The building would have a central glass atrium to provide natural light to the interior offices and create a central common space for the employees.
- The building would include an underground pedestrian connection to IMF HQ1, located across H Street.
- The streetscape elements include a combination of planters, benches, street trees, Washington Globe light fixtures and bollards. The elements that make up the streetscape would be hardened to protect against possible vehicular explosive threat.

Zoning

The proposed action would change the zoning classification on the site from C-3-C (Commercial Medium-High Density) to C-4 (Central Business District) in conjunction with a consolidated Planned Unit Development. The proposed development would be consistent with C-4 matter-of-right requirements for parking, lot occupancy and FAR. Although the proposed project does not require any flexibility in height or density, the PUD process gives a greater opportunity for interested parties to discuss the project in conjunction with the requested rezoning. Below is a zoning comparison table:

	C-3-C (Existing)	C-4 (Permitted/Required)	C-4/PUD (Permitted)	C-4 with PUD (Proposed)
FAR	6.5	10.0	11.0	10.0
Height	90'	130'	130'	130'
Parking	230 min.	360 min.	360 min.	400
Lot Occupancy	100%	100%	100%	95-97.8%

DISTRICT OF COLUMBIA OFFICE OF PLANNING REPORT

In its report to the Zoning Commission dated December 26, 2001, the District of Columbia Office of Planning (DCOP) recommended approval of the proposed application with certain conditions relating to:

- Use of the retail spaces along Pennsylvania Avenue;
- Inclusion of public art on the Pennsylvania Avenue façade;
- Amenity and benefits package;
- Time restrictions for loading; and,
- The streetscape improvements.

The conditions recommended by DCOP have been either integrated into the submission materials or addressed by the Zoning Commission in the guidelines, conditions, and standards (see attached).

PUBLIC PARTICIPATION

The Zoning Commission held two public meetings to hear testimony on the proposed project on January 7th and January 24th, 2002. Both the ANC-2A and the West End Citizens Association (WECA) have expressed opposition to the proposed IMF-HQ2 project. Their concerns include the proposal's design, traffic impacts on 20th Street, the extent of the amenities package and the IMF's encroachment into residential areas in the surrounding Foggy Bottom neighborhood. They have also expressed concern regarding security issues related to the IMF's annual meeting and the resultant protests that the event usually generates.

FEDERAL INTEREST EVALUATION

Staff finds that the proposed consolidated PUD and related rezoning would not adversely affect the character of the adjacent Special Street (Pennsylvania Avenue) or nearby Special Places; or the four NPS reservations to the east and west of the project site along Pennsylvania Avenue. In addition, the proposed IMF-HQ2 is consistent with the location policies contained in the Foreign Missions and International Organizations Element of the Comprehensive Plan.

The proposed rezoning of the site, while permitting greater density than allowed under the existing zoning, is consistent with the C-4 zoning classification to the east. Furthermore, the proposed new building is similar in height, mass, and FAR to many of the surrounding buildings, in particular the adjacent IMF HQ1 and the World Bank, as well as other buildings in the C-3-C/New Downtown Receiving Zone. The location chosen by the IMF for their new headquarters is consistent with the objectives of the Foreign Missions and International Organizations Element of the Comprehensive Plan that encourages new, expanded, or relocated facilities for international organizations to be located in areas of compatible uses and within reasonable proximity to federal offices and other Foreign Missions and International Organizations. It also states that the new facilities should be in proximity to public transportation and located in the

Central Employment Area. In the opinion of staff, the proposed IMF-HQ2 meets the objectives outlined in the Comprehensive Plan.

Another recommendation within the Foreign Missions and International Organizations Element of the Comprehensive Plan is to locate new facilities on Special Streets or Special Places, in Historic Districts or in Historic Landmarks. The proposed new facility is located on a Special Street (Pennsylvania Avenue) and adjacent to four identified Special Places. Staff believes that the new building will enhance the Special Street and nearby Special Places with its contemporary design and quality materials, as well as with its proposed streetscape improvements. While functionally fulfilling the IMF's need for perimeter security, the proposed streetscape improvements would also help to activate a block that is currently stark and unfriendly.

Many of the concerns raised by the ANC and the West End Civic Association are not related to the project's impact on the federal interest, but the issue of security is relevant. This issue relates to the Security Task Force's ongoing preparation of the Urban Design and Security Plan. The applicant has met with staff on a number of occasions to discuss the proposed streetscape enhancements. Because the building is private, the owner will not be required to comply with the Urban Design and Security Plan; however, the District's Public Space Division must approve any streetscape elements. The applicant has indicated that the proposed streetscape has been developed using the Security Task Force's recommendation of incorporating perimeter security as unobtrusively as possible, and employing varying streetscape elements to enrich the streetscape as well as provide pedestrian amenities.

When the Zoning Commission took a proposed action on the consolidated PUD and rezoning on March 11, 2002 they requested clarification of four conditions. Below is an explanation of the amendments recommended by the Zoning Commission and the revised conditions provided by the applicant:

- Condition 4 was amended to ensure that if the District's Public Space Division did not approve the streetscape, the IMF would file a modification with the Zoning Commission. The revised condition reads as follows:

(4) Planters, benches and bollards shall be placed along Pennsylvania Avenue, 19th Street, 20th Street, and H Street as set forth in the plans, subject to review and approval by the Department of Public Works, Public Space Division. In the event that the Department of Public Works, Public Space Division, does not approve the streetscape plan substantially as proposed, the IMF shall file with the Zoning Commission a modification to the PUD approval for a revised streetscape design.

- Condition 6 and 7 were amended to ensure that the proposed retail spaces were occupied within 24 months of the certificate of occupancy. The revised condition reads as follows:

(6) HQ2 shall include a two-level retail space at the corner of Pennsylvania Avenue and 20th Street to be used for a restaurant or market. The space shall be accessible to the general public from the street and shall include a minimum of 6,750 square feet. The IMF shall either lease the space to a tenant or begin operations of the space itself within

twenty-four months from the issuance of the certificate of occupancy for the office space in the building.

(7) The design of HQ2 shall also include a space at the corner of Pennsylvania Avenue and 19th Street devoted to community-oriented retail, exhibit or cultural space. The space shall be accessible to the general public from the street and shall include a minimum of 2,675 square feet. The IMF shall either lease the space to a tenant or begin operations of the space itself within twenty-four months from the issuance of the certificate of occupancy for the office space in the building.

- Condition 8 (d, e) was amended to establish the physical area in which off-site benefits could be applied, in this case within one-quarter mile of the PUD site or within the boundaries of the ANC. The revised condition reads as follows:

(8) The IMF shall contribute a total sum of \$1,000,000.00 for off-site community amenities in accordance with the following:

- d. The IMF shall contribute \$100,000.00 to the D.C. Central Kitchen within ninety days from the issuance of the building permit for HQ2. This contribution shall be devoted to programs which benefit the area within one-quarter mile of the Site or within the boundaries of the ANC 2A.*
- e. The remaining portion of the \$1,000,000.00 shall be earmarked for (i) replacement of diseased trees or installation of new trees in the geographic area bordered by E Street to the south, 22nd Street to the west, Pennsylvania Avenue to the north, and 18th Street to the east; and (ii) other neighborhood beautification projects endorsed by the Department of Public Works, with the advice of the ANC 2A and the WECA. Representatives of the IMF shall first work with the Department of Public Works to identify the tree needs of this geographic area and shall determine the appropriate level of funding for trees based on these needs. If funds remain from the original \$1,000,000.00, special beautification projects shall then be identified. These special beautification projects shall be located within one-quarter mile of the Site or within the boundaries of the ANC 2A. The IMF shall provide the Department of Public Works and the ANC 2A all appropriate paperwork to justify these expenditures. All trees shall be installed, and any special projects endorsed by the Department of Public Works shall be completed, prior to issuance of a certificate of occupancy for HQ2.*

None of the modified conditions described above creates an adverse affect on the identified federal interests.

In summary, staff finds that the proposed consolidated PUD and zoning map amendment for the International Monetary Fund Headquarters 2 does not adversely affect the federal establishment or identified federal interests, nor is it inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital.

CONFORMANCE WITH THE COMPREHENSIVE PLAN

The Foreign Missions and International Organizations Element of the Comprehensive Plan specifies suitable locations for international organizations in the Nation's Capital. In providing for the locations of these organizations, the element states:

1. To meet the objectives, new, expanded or relocated facilities for International Organizations, except to the extent, to which the Secretary of State makes Section 206 of the Foreign Missions Act applicable, shall be permitted to locate only:
 - a. (1) In the Central Employment Area, except in areas under the jurisdiction of the Architect of the Capitol, and (2) in other medium/high density to high bulk business centers, low to high-density mixed use areas, and limited office and apartment areas.
 - b. In areas served by public transportation to reduce parking requirements; and
 - c. Where adequate parking, public facilities, utilities and services, including streets, street lighting, water, sewer, electricity, telephone, and refuse collection, are available or can be provided.
2. Among locations that meet the criteria, International Organizations should give preference to locations:
 - a. In proximity to those U.S. and other International Organizations with which such organizations regularly conduct business;
 - b. On Special Streets or Places, in Historic Districts or in Historic Landmarks; or
 - c. In areas being assisted or supported with government renewal or revitalization programs.

In determining the consistency of the proposed PUD with the identified policies, it is noted that the PUD site would be located within the Central Employment Area in a high-density commercial area. The District of Columbia's Generalized Land Use Map designates the areas for high-density commercial land use. The site is presently zoned C-3-C (Commercial Medium High-Density) and would be rezoned under the PUD agreement to C-4 (Central Business District). The site is adjacent to the IMF Headquarters and near the World Bank, two international organizations with close business ties. The U.S. Treasury offices are also located nearby. The site is located in close proximity to the Farragut West and Foggy Bottom Metrorail Stations and substantial indoor parking would be provided. Furthermore, a Transportation Management Plan would be established to encourage ridesharing and the use of public transit.

Moreover, the proposed PUD site would be located adjacent to Pennsylvania Avenue, NW, and four federal reservations, including the Edward R. Murrow Park on the east and the James

Monroe Park on the west. The Preservation and Historic Features Element of the Comprehensive Plan designates Pennsylvania Avenue as a Special Street and the four small parks as Special Places. Applicable policies in this element specify:

The existing street space and the buildings fronting on Special Streets and Places should be maintained, protected, and enhanced. Any repair, maintenance, improvement or new building should respect the historic elements, enhance the aesthetic quality, and promote the amenity of this space.

The visual quality of Special Streets and Special Places should be carefully controlled and coordinated by the selection and placement of signs, traffic signals, lighting, bus stops, and other elements of street furniture, as well as pavement patterns, and materials that together should promote a harmonious, orderly, and safe streetscape. Parking areas, driveways or service areas should be carefully controlled, located, and designed to avoid adverse impact.

Pedestrian usage of Special Streets and Places should be encouraged by emphasizing extra width and other special amenities of sidewalks, where feasible. Areas should be provided for various types of leisure time activities as appropriate, ground floor uses in buildings, attractive entrances, and outdoor activities that would enliven the street scene should also be encouraged.

The four small parks are also designated as designed landscape parks in the Parks, Open Space and Natural Features Element. An applicable policy in this element states:

Designed landscape parks (squares, circles, and triangles) associated with the L'Enfant City should be restored, where necessary, protected and enhanced generally as green landscaped areas, providing oases for pedestrians and settings for monuments, memorials, and civic art...

In regard to these policy specifications, the proposal would provide space at ground level for a restaurant or a market and additional space would be provided for community-oriented retail, exhibit or cultural space. Pennsylvania Avenue would be enhanced with new planters and benches and the four NPA reservations would receive replacement benches.

The proposed PUD adequately meets the criteria for the location of international organizations in the Nation's Capital and is consistent with applicable policies contained in the Comprehensive Plan for the National Capital in the Preservation and Historic Features Element, as well as the Parks, Open Space and Natural Features Element of the Plan.