

# COMMISSION ACTION

NCPC File No. 6361



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**AMERICAN PHARMACISTS ASSOCIATION  
CONCEPT DESIGN FOR NEW ADDITION  
2215 Constitution Avenue, NW**

Submission by the American Pharmacists Association

July 10, 2003

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*Commission Action Requested by Applicant*

Approval of concept design pursuant to the Deed for the Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958.

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*Commission Action*

The Commission approves the concept design for an addition to the American Pharmacists Association building pursuant to the Deed for Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, as shown on NCPC Map File No. 1.34(08.21) 41199, provided that in the further development of the concept design:

- The applicant study the relocation of the parking garage entrance to the addition rather than under the extended terrace adjacent to the Pope building, so that the views of the Pope building and the appearance of its grounds remain as unaltered and as undisrupted by vehicles as possible; so that the basic symmetry of the original terrace around the Pope building be retained; and so that the services for the office building be contained in the office building itself to minimize the adverse effect on the Pope building.
- A monumental, primary entrance be provided to the building from C Street and that the C Street façade be altered at the first story accordingly, as befits a long façade facing a street and a prominent government headquarters building.
- ? The preliminary and final site and building plans include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23<sup>rd</sup> Street.

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Deborah B. Young  
Secretary to the National Capital Planning Commission

# STAFF RECOMMENDATION

NCPC File No. 6361



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**AMERICAN PHARMACISTS ASSOCIATION  
CONCEPT DESIGN FOR NEW ADDITION  
2215 Constitution Avenue, NW**

Submission by the American Pharmacists Association

July 3, 2003

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***Abstract***

The American Pharmacists Association (APhA) has submitted a concept design for an addition to its building at 2215 Constitution Avenue, NW. Designed by the notable American architect John Russell Pope, the one-story monumental headquarters building, listed in the National Register of Historic Places, was completed in 1934. It is a significant element in the row of exemplary monumental, Beaux Arts-style buildings along the north side of Constitution Avenue facing Constitution Gardens. The Pope building was designed with primarily ceremonial interior spaces; in 1962, a two-story office addition of a similar size was constructed behind the original building. APhA proposes demolishing the 1962 office addition and replacing it with a five-story office building of approximately 166,291 square feet that will be connected to the original Pope building.

In order to accomplish the new construction, APhA must purchase lots at the north side of Square 62 (at C Street, NW) owned by the federal government and managed by the General Services Administration (GSA). NCPC reviewed the notice of availability of excess real property in June 1999, stating that it had no objection to the site for private development provided the development be compatible with the area, that a 17-foot-strip of land along 23<sup>rd</sup> Street be retained in federal ownership to protect the viewshed from 23<sup>rd</sup> Street, and that the proposed development be reviewed by NCPC and CFA in accordance with the 1958 deed restriction.

***Authority***

Approval of concept design pursuant to the Deed for the Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, which requires approval by NCPC of all structures erected in the square.

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### *Executive Director's Recommendation*

The Commission:

**Approves** the concept design for an addition to the American Pharmacists Association building pursuant to the Deed for Exchange of Lands in Square 62 in the District of Columbia dated December 30, 1958, as shown on NCPC Map File No. 1.34(08.21) 41199, **provided** that in the further development of the concept design:

- The parking garage entrance be located in the addition rather than under the extended terrace adjacent to the Pope building, so that the views of the Pope building and the appearance of its grounds remain as unaltered and as undisrupted by vehicles as possible; so that the basic symmetry of the original terrace around the Pope building be retained; and so that the services for the office building be contained in the office building itself to minimize the adverse effect on the Pope building.
- A monumental, primary entrance be provided to the building from C Street and that the C Street façade be altered at the first story accordingly, as befits a long façade facing a street and a prominent government headquarters building.
- The preliminary and final site and building plans include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23<sup>rd</sup> Street.

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## **BACKGROUND AND STAFF EVALUATION**

### *DESCRIPTION OF PROPOSAL*

The original 1934 structure is a severe, one-story monumental building that has solid white marble walls without fenestration other than a monumental door and two windows on the front façades of the side wings. The central portion of the building is surmounted by a high classical attic parapet, while small wings extend to the sides and rear under a flat roof. The diminutive building on its relatively large lot was deemed appropriate by virtue of both its design and the resultant open setting for its important location near the recently completed Lincoln Memorial. The building, which was allowed to be constructed slightly forward of the established building line for Constitution Avenue because of its small size, features a monumental entrance path and staircase that extends the full width of the central portion of the building. A symmetrical terrace extends across the front of the building. The 1962 addition is connected to the rear of the Pope building by a hyphen and does not extend beyond the width of the original building.

The proposed office addition or annex is a five-story, limestone building of approximately 166,291 square feet of gross floor area. The dimensions of the addition at the first floor are 220

feet in width and 160 feet in depth. Above the first floor, the addition is 140 feet in depth. In form, the first story connects to the white-marbled Pope building along the width of the historic building. The next three stories form a rectangular footprint and a unified vertical fenestration system. Pronounced cornices occur above the first, third, and fourth stories. The fifth floor, measuring 180 feet in width and 95 feet in depth, is set back under a hipped roof at the rear of the new addition. While the addition is rigorously symmetrical in relation to the Pope building when seen from the south on Constitution Avenue, from the east and west the hipped roof is set back to the north side of the square in order to create a larger physical as well as visual separation from the Pope building. The project does not encroach on the 17-foot strip of land along 23<sup>rd</sup> Street, NW, protecting the open space of the vista down 23<sup>rd</sup> Street toward the Lincoln Memorial.

The primary pedestrian entrance to the office addition is on 22<sup>nd</sup> Street, NW, with a secondary entrance from 23<sup>rd</sup> Street, NW. The C Street facade of the proposed addition does not have an entrance.

The service areas for the building are off 22<sup>nd</sup> Street, NW. The underground parking entrance is entered from the middle of the block on 22<sup>nd</sup> Street, under a new terrace extended from the east side of the Pope building. The present symmetry of the Pope building and terrace across the front would be altered by the deeper extension of the terrace on the east side of the Pope building over the proposed parking ramp. The proposed terrace extensions on both sides would replace two small surface parking lots that have been installed subsequently. The parking garage would contain approximately 150-180 spaces. The loading dock (with two interior loading berths) is entered from the northeast corner of the building.

#### *PREVIOUS COMMISSION ACTION*

NCPC reviewed the notice of availability of excess real property at its June 3, 1999 meeting, stating that it had no objection to the use of the site for private development, provided the development was compatible with the area, that a 17-foot-strip of land along 23<sup>rd</sup> Street be retained in federal ownership, and that the proposed development be reviewed by NCPC and CFA in accordance with the 1958 deed. The deed requires APhA to secure approval of NCPC for any structures erected on Square 62.

#### *EVALUATION*

APhA has submitted a concept design for a new addition that is grounded in the architectural vocabulary and materials of the Beaux Arts-style institutional buildings on Constitution Avenue, NW. This notable row of monumental buildings was planned and implemented in the 1920s and 1930s, pursuant to the McMillan Plan, the widening of Constitution Avenue, and the completion of the Lincoln Memorial. The current submission is a design concept that will undergo substantial design development before the Commission reviews the preliminary and final site and building plans.

The concept for the office addition appropriately reflects a neoclassical balance of solid to void (masonry facades to window openings), and employs symmetrical and harmonious classical elements such as intermediate cornices and the hipped roof to minimize the visual appearance of

the size of the addition. The first story connection of the addition to the rear of the Pope building is an appropriate method of attaching the two buildings while also separating their respective masses above the first floor by a distance of 20 feet. The asymmetrical massing of the addition when seen from the east and west was a recent design decision that has led to a greater physical and visual distance between the two buildings, now 60 feet at the fifth story. Placing the bulk of the building at the back of the site is also appropriate for the context of C Street, which includes the massive U.S. Department of State on the north side and later additions to the original Beaux Arts-style institutional buildings on the south side of the street. For example, the Federal Reserve's (Eccles Building's) C Street facade is close to the sidewalk and the adjacent National Academy of Sciences subsequently built an addition that abuts the C Street sidewalk.

The prominence of the Pope building on the ridge above Constitution Avenue when seen from the south has been preserved in this concept design proposal. The uniqueness of the Pope building, with its modest 1962 addition and its relatively expansive lot, has been preserved until this time. The proposed addition will alter the relationship of the Pope building to its setting. It will transform the site as a whole into something more consistent with the larger buildings to its east, some of which have been enlarged in the intervening years. The addition itself is similar to the other buildings in the row that have wider frontage on both Constitution Avenue and C Street.

The site of the APhA at the corner of 23<sup>rd</sup> and Constitution has always been relatively open, with low lot coverage, in comparison with the adjacent buildings. With the proposed addition, the lot coverage for the site will be 30 percent, which falls between the 20 percent coverage for the National Academy of Sciences and 22 percent for the Department of Interior (South) at the lower end of the scale and the 38 percent coverage for the Federal Reserve. The mature landscaping at the front and sides of the Pope building will be largely retained, and the surface parking lots on either side of the current addition will be removed. The applicants propose extending the formal terraces around the sides of the Pope building at the same level as the original terrace across the front of the building, albeit in an asymmetrical arrangement to incorporate the parking garage entrance on the east side. The open area at the rear of the square currently has a minimal, contemporary designed landscape that will be replaced by the addition.

Parking and loading will occur from 22<sup>nd</sup> Street, NW. This street, now a cul-de-sac since the temporary closure of C Street in front of the Department of State, also provides access for parking for the National Academy of Sciences and for traffic to the Department of State. The applicants propose constructing the parking garage in the middle of the block on 22<sup>nd</sup> Street, with a ramp entering the building under an extended terrace on the southeast corner of the Pope building. One mature street tree would be removed for the construction of the ramp across the sidewalk.

**Staff recommends that the location of the garage entrance not be approved as proposed, for the following reasons:**

- The garage entrance will result in an asymmetrical terrace around the Pope building, which should be avoided. A guiding principal since the beginning of the project has been

the symmetrical response of the new office addition to respect the Pope building's symmetry.

- There will be greater visibility of the garage entrance and ramp and of vehicular stacking and activity in the more prominent and monumental southern portion of the square, as seen from Constitution Avenue or 22<sup>nd</sup> Street.
- The garage ramp crossing the sidewalk will disrupt pedestrian flow mid-block and may create the appearance of cars entering underneath the Pope building, which should be avoided.
- Physical and service impacts such as parking and loading that result from the construction of a significant new office building on the site should be contained within the new office addition or confined to the area of the new addition and should not be placed near the Pope building, its existing terrace, or its lawn. In fact, the applicant's prior protection of the Pope building and the front portion of the square from the impacts that will result from the new office addition has been a significant beneficial, mitigating factor during the review of the design development in the past year.

**The staff also recommends that the proposed C Street elevation be improved with a monumental, primary entrance, as befits a building of this size at this location.** Although the interior plans indicate a circulation system that runs east-west through the addition, staff considers a well-designed entrance from C Street, whether used at the current time or not, to be essential to the design and future utility of the office building addition.

**Staff also requires the preliminary and final submission to include a landscape plan, material samples, and evidence of an agreement with the National Park Service for the protection of the 17-foot strip of land adjacent to 23<sup>rd</sup> Street.**

### *COORDINATION*

#### Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on June 18, 2003, and forwarded the proposal to the Commission with the statement that the project has been coordinated with all agencies participating. The participating agencies were NCPC; the District of Columbia Office of Planning; Fire Department; the Department of Housing and Community Development; the District Department of Transportation; the General Services Administration; and the National Park Service.

### Commission of Fine Arts

The Commission of Fine Arts (CFA) approved the concept design at its June 19, 2002 meeting, with a discussion focused on the changes in the massing and reduction in size since CFA approved a previous concept for the building in April 2002. The CFA chairman recommended that the windows on the east, north, and west facades be smaller than the proposed monumental windows on the south (front) façade of the office addition.

### National Historic Preservation Act

GSA is serving as lead federal agency for the purposes of consultation under Section 106 of the National Historic Preservation Act. The D.C. State Historic Preservation Office has been consulting since Spring 2002 to seek ways to minimize the adverse effects of the office addition on the Pope building and its setting. The D.C. Historic Preservation Review Board (HPRB) reviewed and approved a similar concept submission to that currently before the Commission at its May 2003 meeting. However, in the submission to the HPRB, the garage entrance was at the northeast corner of the site (also from 22<sup>nd</sup> Street). It entered the office addition itself rather than an extended terrace next to the Pope building. Section 106 consultation will continue through the final design phase.

The environmental assessment (EA), which includes the historical information and analysis necessary as a basis for Section 106 consultation, is in draft and will be revised once the National Capital Planning Commission, the HPRB, and the Commission of Fine Arts approve a concept design.

### National Environmental Policy Act

Pursuant to the regulations implementing the National Environmental Policy Act (NEPA), The General Services Administration (GSA) is completing an Environmental Assessment (EA) of this project and its associated action of federal land disposal. The National Capital Planning Commission is serving as a cooperating agency in the NEPA process to achieve full consideration of the pending final Commission action to review the project.

The project site, from the initial consideration of the EA preliminary information, does not appear to present significant environmental issues, but does include consideration of landscape treatment, potential building massing, hazardous material disposition, pedestrian and vehicular circulation, and site design security considerations.

Potential adverse visual effects are one of the primary issues of the EA, and have been responded to in the revised concept development of the present submission. Subsequently, APhA will incorporate an approved revised concept plan into the EA as the preferred alternative to be evaluated. Public distribution of the EA is anticipated in mid-summer 2003.

The revised concept plan material is considered acceptable for concept submission, with the completion of the NEPA process scheduled for fall 2003, prior to submission of preliminary (or preliminary and final) project plans.