

# Attachment 2 | Summary of Public Comments

## October 6, 2016 National Capital Planning Commission Meeting

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# **GENERAL SUMMARY OF COMMENTS**



## **GENERAL SUMMARY OF COMMENTS**

**Uses** – emphasis on importance of ensuring there is a variety of land uses; emphasis should be on residential, include affordable housing, a grocery store, and children playground; ground floor uses that increase street level activity on all streets; and uses that increase evening and nighttime activities. Cultural uses were also suggested, such as those that interface with consulates as well as an Animation and Video Gaming Museum and Education Center.

**Restoration of Existing Building** - One commenter suggested retaining existing building and improve by opening courtyard for retail and restaurants and improve façade with glazing and green walls.

**9<sup>th</sup>, 10<sup>th</sup> and E Streets** - While the design and activity along Pennsylvania Avenue is of key importance, care must be taken not to overwhelm the adjacent streets; consider activity and design along E Street, 9th Street and 10th Street, NW to ensure they relate to the context of city fabric and consider their impacts on adjacent areas. Ground floor retail should be encouraged on all perimeter streets.

**Pennsylvania Avenue Public Realm** - While several members of the public feel strongly that the existing 75' sidewalk should be retained to maintain the grand scale and breadth of the avenue, a number also felt strongly that the sidewalks should be substantially narrowed to less than 30' to be commensurate with other areas of downtown that are more lively and active. Most of the individuals that commented stated that the sidewalks should be narrowed but maintained at a width that allowed adequate space for a variety of outdoor activities and civic uses, cafes, seating, and make pedestrian experience more pleasant and to encourage people to linger. Some stated importance of preserving tree line. Others commented on the importance of symmetry along the Avenue, including building wall and tree canopy. Suggestions were made to reduce the width of the cartway to minimize the expanse of pavement. Most everyone agreed on the need to enhance and activate pedestrian experience along the avenue by improving uses, public space, and design. For example, add a variety of active retail uses, especially restaurants with sidewalk cafes, special landscaping, retail kiosks and art works.

Opinions about heights ranged from maintaining lower height along the avenue to skyscrapers; generally, building heights should be similar to surrounding buildings; lower if the building sits closer to the street, higher if it sits back with a maximum of height 135'. Market Square residents are concerned that reduced setbacks and taller buildings will block views, light, and create shadows in units.

**Materials** – guidelines should call for masonry materials to be compatible with architectural style, do not permit glass boxes.

**D Street** – Many support opening up the D Street right-of-way for pedestrian activity and services, but concern about vehicular traffic due to awkward intersection at 10th Street, D Street and Pennsylvania Avenue.

**Circulation** - North south circulation north of D Street should be considered to bring more light into northern parcel. The traffic pattern surrounding the parcels, specifically on 9th and 10th, is sub-optimal.

**Development** – Overall development should be extroverted or outward facing to keep activity on perimeter streets, not interior facing to concentrate activity on the interior of the block. Scale of blocks and buildings will be important; should be many parcels, not large mega block buildings and building heights and build-to-lines will be very important in establishing the character of the future building complex.

**Penthouses and Rooftop Uses** – Penthouses should be kept within the 160' height limit and roof tops should include provisions for recreational areas, green roofs, gardens, and restaurants.

**Phasing** – Guidelines should ensure that if development is phased, there is an acceptable phasing plan that includes minimum developable areas and phasing locations.

# **COMMISSION MEETINGS AND AGENCY LETTERS**





June 2, 2016

L. Preston Bryant, Jr., Chair  
National Capital Planning Commission  
401 9<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20004

SUBJECT: P7713 National Capital Planning Commission, Washington, DC – Squares 378 and 379, 935 Pennsylvania Avenue, NW, Washington, DC – Draft Square Guidelines

Dear Chairman Bryant and Members of the Commission:

My name is Rebecca Miller and I am here today to testify on behalf of the DC Preservation League (DCPL), Washington's citywide nonprofit advocate for the preservation and protection of the historic and built environment of our nation's capital.

DCPL is participating in the Section 106 undertaking under the National Preservation Act as a consulting party, and thus far, feel the process is going well. I would however like to address a few points in the Executive Director's report that are of concern to the organization.

As noted in the report, local interests include a strong desire to revitalize the Avenue; redevelopment of Squares 378 and 379 provides a significant opportunity to increase the economic vitality within this vicinity of downtown. The project should create a place that is for the city and its residents, yet accommodating to downtown workers and visitors. The project should also reinforce the importance of Pennsylvania Avenue and the principles of the L'Enfant Plan.

The principles of the L'Enfant Plan are being ignored on Pennsylvania Avenue. As currently written, the staff is recommending a 20-30 foot build-to-line from the property line, which is in direct conflict with the goals of the Comprehensive Plan and the City's goals of having a mixed-use vibrant connection to the downtown commercial area.

Policy HP-2.3.5 of the comp plan states that: Enhancing Washington's Urban Design Legacy Adhere to the design principles of the L'Enfant and McMillan Plans in any improvements or alterations to the city street plan. Where the character of the historic plan has been damaged by intrusions and disruptions, promote restoration of the plan through coordinated redevelopment and improvement of the transportation network and public space.

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Fay Armstrong | Sean C. Cahill | M. Jesse Carlson, Esq. | Melissa Cohen, AIA, LEED AP | John DeFerrari | Edward D. Dunson, AIA  
Hany Hassan, FAIA | Gerard Heiber, LEED AP | Rob McClennan, AIA | Donald Beekman Myer, FAIA  
D. Peter Sefton | Edwin Villegas | Chuck Wagner | Juliet Zucker



Slide 13 shows a historic photograph of Pennsylvania Avenue with D Street open, an important element to restoring the L'Enfant plan, and one the DC Preservation League fully supports. However, a setback of 20-30 feet or more from the building line on Pennsylvania Avenue would greatly diminish development opportunities on the Avenue. The sidewalk from curb to building line is 26.5 feet, adding an additional 20-30 feet would all but deny a successful development on square 379.

In order to not be in conflict with the comprehensive plan's historic preservation elements, and to not be considered an adverse effect, reinforcing the L'Enfant Plan right-of-way, may in fact be the more appropriate option, and most beneficial from a development perspective to the City of Washington and its residents and visitors.

This option, nor the development impacts have not been fully considered, and DCPL urges the commission to instruct the staff to further study allowing construction to the historic right-of-way line and to also include the consulting parties in this discussion.

Thank you for your consideration of the comments of the DC Preservation League.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Miller". The signature is written in a cursive style.

Rebecca Miller  
Executive Director

REVISED DRAFT 6/2/16

**A. Hassinger's Remarks to the Executive Director's Recommendation  
Commission Meeting: June 2, 2016  
NCPC File Number P7713**

Good afternoon Chairman and Commission members. Thank you for the opportunity to provide this testimony on behalf of the General Services Administration.

My name is Aaron Hassinger and I am the GSA Project Executive for the FBI Headquarters Consolidation project. I would like to thank NCPC for your staff's hard work in developing these recommendations and coordinating stakeholder input and public comment.

Successful execution of the FBI Headquarters Consolidation project will allow for a high quality mixed use project to be developed at the J. Edgar Hoover site, and in doing so contribute to a renewed vibrancy and vitality for Pennsylvania Avenue. Pennsylvania Avenue's significance as America's Main Street is not lost on GSA and we take very seriously our role in the urban design and economic development of the Avenue. In fact, GSA is the principle inheritor of PADC's functions since that agency sunset in 1996. The development opportunity, afforded by the future J. Edgar Hoover site, is an integral part of the Federal government's ability to shape the development of Pennsylvania Avenue and at the same time implement the FBI headquarters consolidation. The Square Guidelines should reconcile the collective interests of the stakeholders by guiding the urban design and development of the future J. Edgar Hoover site. Inherently, guidance on the development opportunity is valuable to the Federal government's Exchange process; consequently there is a great responsibility for appropriately weighing multiple interests.

The consolidation of the FBI Headquarters is a once in a generation project for the Washington DC area, and it will be one of the largest projects in recent memory. But even more important than its size and complexity, is its importance to our country's national security. The ability to consolidate and provide a collaborative state of the art environment for the many different units of the FBI in one location will increase the FBI's abilities and improve its mission to protect all of us here today. The exchange of the J. Edgar Hoover site, defraying a substantial portion of the cost of the FBI consolidation, makes what we do with square guidelines extremely important to our nation for planning and national security reasons. To that end, there are several

recommendations included in the staff recommendations that may inadvertently detract value from the J. Edgar Hoover site, ultimately affecting what is needed for a full FBI headquarters consolidation. We realize that these recommendations have been presented honestly with good intentions, but some of them will have a significant impact on our Exchange's ability to realize the full potential value of the site. It's important to note, too, that by "value", we do not just mean quantity, but rather, quality, as well. Perhaps nowhere more than on Pennsylvania Avenue, GSA recognizes that the quality of what may be built will contribute significantly to its value.

The Square Guidelines must be developed holistically. Individually, each element of the Square Guidelines might have its own merit. However, subjectively combining individual elements that together appear to be internally inconsistent has the potential of negatively impacting the site's design and contribution to the Avenue. From a value perspective, all of the elements should be connected. Absent a holistic approach, GSA might be inclined to employ alternatives outlined in the PADC MOA. That being said, we don't foresee this happening, as GSA is fully committed to the continued improvement of Pennsylvania Avenue and is working diligently with NCPC and other stakeholders to that end.

I would like to take a moment to describe some of our specific concerns.

GSA supports the inclusion of the topics to be considered in the square guidelines, but we are concerned that those topics are addressed in the proposed comments as individual elements rather than a cohesive, coherent whole, resulting in a level of detail and proscription that may impair value and negatively impact urban design quality. GSA also supports achieving a maximum height of 160 feet, but given the recommended Build-to Line range for Square 379 coupled with the desire for upper story setbacks, we do not believe any of these elements can ultimately be accepted in isolation.

A robust and viable mixed use development will generate the desired activity on Pennsylvania Avenue, and we acknowledge the value in restoring D Street from both an urban design and historic preservation perspective. However, the L'Enfant Plan was realized with buildings built to the Pennsylvania Avenue Right-of-way line on the North side into the 1970's. Restoring D Street without also moving the build-to line out to the property line is a condition that runs counter to potential value, historic preservation best practice, good architecture, and planning principles and together compromise the feasibility of redevelopment of this site. The

recommended range for the the Build-to line on Pennsylvania Avenue limits the ability to fully realize the redevelopment benefits of Squares 378 and 379.

We understand that there are varying opinions on the potential redevelopment of Squares 378 and 379, and our goal is to work with all the parties in the coming months to reach consensus on Square Guidelines.

We realize and embrace this effort for its importance in achieve planning objectives, in allowing the FBI HQ Consolidation project to move forward, in helping the City realize a new economic benefit, and for the continued success of America's Main Street.

MC. Chairman, Thank you again for the opportunity to respond to the staff's comments.



# The Association of Oldest Inhabitants of The District of Columbia<sup>1</sup>

Established Dec. 7, 1865 – Celebrating our 151<sup>st</sup> year!

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May 29, 2016

Honorable L. Preston Bryant, Chairman

National Capital Planning Commission

401 9<sup>th</sup> Street, NW, North Lobby, Suite 500

Washington, DC 20004

Dear Chairman Bryant:

The Association of the Oldest Inhabitants of the District of Columbia, the District's oldest civic organization committed to the preservation, maintenance and promotion of both the L'Enfant Plan and McMillan Plan, supports the NCPC Staff's FBI Square Recommendations for Squares 378 and 379.

We were pleased to see the recommendations include the request we made in our June 19, 2013 letter you regarding the restoration of 900 block of D Street, NW when we stated that the AOI would like to see this portion of D Street restored to vehicular use; however, realizing that existing structures in the next couple of blocks west of the site now prohibit total restoration of the right-of-way, the AOI calls for any final plans to reestablish the street view of D Street, open to pedestrian foot traffic and to provide access for public safety vehicles. This would be not unlike the final solution for the 1000 block of I Street, NW at the new City Center complex. As champions of the L'Enfant and McMillan Plans, AOI has always opposed street closures that are contrary to those plans. We called for the re-opening of G Street in front of the MLK, Jr. Library, opposed street closures originally planned for the new Walter E. Washington Convention Center, called for the re-opening of E Street at the Ellipse and testified before Congress to re-open Pennsylvania Avenue in front of the White House.

Although the staff recommendation to establish a "build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the Avenue," is not truly in keeping with either the Pennsylvania Avenue or the L'Enfant Plan guidelines, we believe that this compromise will provide consistency with the adjacent properties along Pennsylvania Avenue.

Thank you for considering our organization's views on this matter

Sincerely,



William N. Brown, President

Cc: Thomas Leubke, Secretary, Commission on Fine Arts

**The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.**

**<sup>1</sup>Effective June 1, 1871, Congress revoked the charters of the cities of Washington, Georgetown and the County of Washington and established a consolidated government of the District of Columbia. For all intents and purposes, on that date Washington -- as far as a jurisdiction -- ceased to exist.**



First I want to address **framing the Avenue's vista of the Capitol**. People don't seem to realize what an **important element of the Pa. Ave. Plan this is and all that contributes to it.**

1. **First, there is the 50 foot setback. Three times in the past, NCPC approved the fifty foot setback** along the north sidewalk

the **1964 President's Council on**

**Pennsylvania Avenue Plan**, (chaired by Nat

Owings, with Frederick Gutheim, Daniel

Patrick Moynihan, Bill Walton, and Dan Kiley

among its members)

2nd the **1969 Report of the President's Temporary Commission on Pennsylvania Avenue** (with Nat Ownings of SOM as chairman and Moynihan as Vice-Chairman), and

3rd **The Pennsylvania Avenue Plan and the Environmental Assessment and 106 Review that accompanied it** before it was submitted to Congress

**All of these plans had a fifty foot setback** along the north side of Pennsylvania Avenue **to help frame the Pa. Ave. vista of the U S Capitol.** All the buildings are built to 135 feet

in height, then set back 50 feet - to frame the vista.

I want to ask you: **are you as a Commission member even aware of the importance given in the Plan to framing that extraordinary vista?**

**Giving up one of several features that frame the vista should not be done without adequate examination in advance of any decision. Along with a lower than maximum building height along the Avenue to stay in balance with the bldgs in the Federal**

**Triangle, the setback with its build-to line and height is one of the most important elements, but one that works with several others, in framing the vista towards the Capitol.**

Others are Build to lines, heights of buildings along both sides of the Avenue, depth of setbacks, trees, ornamental Washington Globes with eagle street lights, how bldgs are lit at night – all are part of a whole and you are just looking at pieces not the whole.

**I mention this because** you may be taking the

Pa. Ave. Plan apart piece by piece and for the wrong reasons. **You are not asked to look at it holistically as did its creators. I'm not saying a lesser setback is not worth looking at but I sure would want to see mock ups of how it would change the vista - and not only from the middle of the street - before moving to endorse a change. I would also want to see what it does to the neighboring sites - including how it might affect their value and ability to lease Avenue space at premium rents, since the Commission is concerned that the Avenue real estate not decline in value.**

## **Second point**

**If you look at the Plan's goals and objectives, the language for various blocks, and the Square Guidelines, you will see that PADC tried its darnedest within what was legal to animate the Avenue.**

**BUT - it seems that there are few one sided streets that retailers find attractive – and there are fewer retailers now than there were when the Plan was created. Most likely the sidewalks will continue to be animated primarily by restaurants and coffee shops**

**that choose to have outdoor cafes,** perhaps with some sculpture here and there, but not by retail. **This is a one sided street in a relatively low density city** – We are not Manhattan, nor are we London, Paris, or Tokyo. **And to animate the sidewalks, you need the lots of people and places they want to go. But you also need the cooperation of the developer and later the building owner. Even if one requires restaurants the ones you want won't happen unless the building owner wants them too.** And he may not be able to afford them.

**If we could have what I just saw on Pa. Ave. By the W and Willard hotels, I would be ecstatic: three outdoor cafes along virtually the entire sidewalk. That is how you will enliven the Avenue.** (Unfortunately, the NPS was unable to maintain the ice skating rink in Pershing Park that would have animated that block when winter came.) PADC did not have in mind an underfunded NPS maintaining its parks and sidewalks when it approved designs.

We have had Bugs Bunny, Palm Trees, and day care centers on The Avenue – we even had offices at Market Square under NCPC's watch

when the Square Guidelines required retail and restaurants.

**3. What is important** to include in the Square Guidelines are the **minimum requirements for uses that many consider less remunerative - residential, restaurants, smaller retail, and the arts** and on a site the size of the FBI blocks, **open space, if any**, that is truly a gathering space but one that does not draw people away from the Avenue. It is also important to **specify the location and number of development parcels**, as the site could be subdivided and

pieces sold to others, **how multiple site owners need to work together, for example, by providing a single loading area on site with one entrance as in the block with the JW Marriott and National Theatre**, that single lots of records be recorded so that property to the rear can attain the 160-foot height measured from Pennsylvania Avenue.

**From:** [Lindsley Williams](#)  
**To:** [Koster, Julia](#)  
**Subject:** Request Opportunity to Speak at NCPC Meeting on "Square Guidelines" (File P7713)  
**Date:** Wednesday, June 1, 2016 11:50:09 AM

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Julia,

I am looking over the documents for the item on Square Guidelines that will be taken up tomorrow by the Commissioners at their June meeting. I am a bit confused about the portion having to do with the setback from Pennsylvania Avenue. L'Enfant was clear: the Avenue was to be 160 wide. For other squares along the north side of Pennsylvania Avenue, PADC requires a 50 foot setback, thus there is more open space on the south side of the present FBI building.

But, FBI spans two squares and closed the full right of way of D Street between 9th and 10th Streets. The proposed Square Guidelines call for D Street to be re-established at a width of 70 feet and had been calling, until the staff report I am now reading, for a setback from Pennsylvania Avenue of zero to twenty feet (0 - 20 ft.); this was changed in the present staff report to 20-30 feet, a range that is less than but somewhat similar to the area of the present setback, a space that is "dead". Inasmuch as the State Historic Preservation Officer has found, as noted in the staff report, that anything other than a zero setback is inconsistent with the L'Enfant plan and thus "adverse," would it not make sense to have the Commission consider either no setback at all or a range that starts with zero and extends for 20, or possibly 30 feet, back?

The Commission should also realize that having area extracted from the historic edges of the Squares diminishes the development potential of the overall site, thus eating into whatever value can be realized from development by the private marketplace in the overall parcel as limited depth will thwart ability to realize the full height potential that flows to properties along Pennsylvania Avenue under the Height Act.

I am not sure that I need to speak, but ask that you put my name down to speak along these lines as an individual citizen/observer. I may speak, or not, when called. Please distribute this request to the Commissioners so they become aware of my confusion at the moment and suggested course of action.

Thank you.

Lindsley



1608D Beekman Place, NW  
Washington, DC 20009-4021  
May 29, 2016

Chairman L. Preston Bryant,  
National Capital Planning Commission  
401 9th Street, NW, North Lobby, Suite 500  
Washington, DC 20004

Dear Chairman Bryant:

I am writing to express my support for the NCPC EDR Recommendations regarding the Guidelines for the FBI Site (Sq. 378 & 379). I have reviewed the Recommendations, especially those for the Build-To-Line for PA Avenue that would strike a balance between the intent of the L'Enfant Plan and the 1974 PA Avenue Plan under existing conditions, and especially agree with the below excerpt from the report:

*Comments favorably on a build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the Avenue which:*

- *Creates additional development potential;*
- *Forms a stronger relationship between the building and the public realm;*
- *Creates a building wall that helps to frame the Avenue and the U.S. Capitol;*
- *Reinforces the ceremonial character of the Avenue as distinct from other downtown streets;*
- *Supports a diversity of functions within the public space.*

I agree that this recommendation is much more apropos in the context of the PA Avenue Plan and existing conditions than returning the build-to-line to the L'Enfant Plan 26' width between the curb and building face, which would limit both ceremonial and pedestrian-friendly uses that would activate the Avenue in front of the proposed building, and allow only one row of street trees, rather than two, which would interrupt the continuity of the public landscape and amenities along PA Avenue as a whole.

My opinions are informed by my work for the NPS, National Capital Region, both as Senior Landscape Architect in the Design Services Office in the 1970's-1980's, when I reviewed the design and construction documents for all of the Pennsylvania Avenue parks, then as Chief of Design Services, and last as Chief of Cultural Resource Preservation Services, when I retired after a 44-year career there.

Thank you for the opportunity to comment.

Sincerely yours,

Darwina L. Neal, FASLA, F.US/ICOMOS, HM.IFLA

cc: Thomas Luebke, Secretary, CFA; David Maloney, DCSHPO; Peter May, Associate Regional Director, NCR, NPS





**Sent VIA, NCPD.com WEBSITE POSTING & US MAIL**

May 13, 2016

**Mr. Marcel Acosta**

Executive Director

**National Capital Planning Commission**

401 9th Street, NW, North Lobby, Suite 500

Washington, DC 20004

Re: **Square Guidelines Public Meeting**

Square(s) 378 & 379

**Public Comment Submission**

**Dear Mr. Acosta:**

On behalf of Federal City Development Partners (FCDP), we would like to offer the following comments to the NCPD public presentations made on April 26<sup>th</sup> & 28<sup>th</sup> for the redevelopment of the FBI Headquarters, Squares 378 & 379.

NCPD's presentation appropriately focused on density, use, set-backs and height issues relating to the proposed redevelopment of the site. In addition to these threshold topics, the presentation also briefly discussed several important broader planning principals that we feel are necessary to reiterate and expand upon.

- **Gateway Location:** This project on Pennsylvania Avenue represents the seam between the Federal Triangle District and the Penn Quarter, and as such, in order to appropriately act as bridge between these two important neighborhoods the project must act as a public destination and create a "sense of place" which is typically accomplished through maximum density and diversity of uses. The site also has the opportunity to facilitate pedestrian circulation between the National Mall and the Downtown by creating a vibrant, mixed-use node of activity that will reduce existing psychological barriers to pedestrian circulation created by the monumental scale of the Federal Triangle. Finally, as a benefit to the overall health of the city, it is imperative that this future development act as a destination that can draw visitors beyond the traditional tourist attractions in order to further enliven this submarket beyond the typical business day hours.
- **Critical Mass:** To reintegrate this site back into the fabric of the city, given its size, scale and location, it is essential to create a critical mass of multiple uses that establishes a "sense of place", similar to the recently completed and successful City Center project.
- **Diversity of Uses:** Increased density on the site is essential to being able to establish a greater mix of uses and activities, i.e. office, hospitality, residential, retail, cultural and public open space that creates a "live, work, play and shop" environment that draws and holds the workforce. residents and visitors alike.

With consideration given to the planning principals described above, we offer the following comments on what we consider to be the three primary factors that will significantly decide the future success of the site:

**1. Restoration of L'Enfant Circulation Patterns ('D' Street)**

- We agree with NCPC staff that recognition of the D Street alignment as a way to reduce the overall bulk and scale of the development so that it relates more to the surrounding context of the neighborhood and improves circulation patterns is an important consideration.
- Looking beyond the site, a full restoration of the former D Street would not restore the true L'Enfant vista to Pennsylvania Avenue since the existing building on the west side of 10<sup>th</sup> Street extends beyond the original L'Enfant Plan. Please refer to the attached diagrams outlining this condition.
- Creating a vehicular D Street does not benefit traffic patterns or circulation, and creates an awkward intersection at 10<sup>th</sup> Street since it lands very near the current signalized intersection of 10<sup>th</sup> Street and Pennsylvania Avenue.
- Therefore, D Street should only be restored as a pedestrian easement, and not necessarily a recorded public street. This pedestrian connection would provide the opportunity for the creation of an interior street frontage that can be designed and programmed to create a sense of destination and arrival.
- The proposed pedestrian easement should be no more than 40 feet wide. As a comparative guide, this is slightly wider than the internal streets of City Center. The existing D Street curb-to-curb width to the east of the site is approximately 40 feet. Establishing a pedestrian easement wider than 40 feet would create a non-intimate urban scale and substantially compromise the development potential of the southern portion of the site (Square 379) when considering potential build-to-line and upper-level setback requirements along Pennsylvania Avenue.
- NCPC's recommendation for reestablishing Virginia Avenue, SW between 9<sup>th</sup> and 11<sup>th</sup> Streets, SW is precedent for reestablishing a L'Enfant right-of-way at a width that is not necessarily the prescribed historic width, but rather seeks to balance the principles of the L'Enfant Plan with other well-established planning considerations related to, among others, transportation and economic development.

**2. Pennsylvania Built-To Line (Setbacks)**

- The NCPC presentation correctly points out that as a result of numerous plans prepared for Pennsylvania Avenue over the centuries, the street wall, vista corridor and pedestrian experience is fragmented. At the public meeting, NCPC staff presented potential options for the site's build-to line relative to existing adjacent buildings and whether views to these existing buildings would be maintained or interrupted. Basing the site's build-to line on whether a view towards an existing building taken from a singular vantage point has the potential to be very detrimental to advancing the sound planning principals described above, as it conveys that maintaining exposed corners of adjacent, non-relevant buildings that currently contribute to the irregularity of the Avenue' streetwall should take precedent over the long-term planning approach of establishing a cohesive streetwall that

is punctuated by nodes of activity such as Market Square and the Navy Memorial. We encourage NCPC to look prospectively, and use this opportunity to correct the urban planning mistakes that have resulted in the current fractured environment along the Avenue.

- During the presentation, NCPC staff also discussed the notion of symmetry along the view corridor. We believe successful view corridors are established through development of consistent street walls and that absolute symmetry is simply a theoretical notion and not a readily perceived one. Therefore, sidewalk/setback widths on the south side of Pennsylvania Avenue should not automatically dictate sidewalk widths on the north side. If the overall intent is to establish view corridors, then NCPC should develop a guideline that is not solely based upon an existing condition, and can be enacted and maintained over time such that a fitting and balanced view corridor will naturally take shape along the length of the Avenue.
- NCPC staff correctly stated that the existing setback of 75 feet does not create a pedestrian friendly environment and requires a re-examination. Commercial and retail uses typically look for setbacks of approx. 20 - 30 feet to create a more inviting environment, and to attract pedestrian flow. Extending beyond these distances, or having three rows of trees, is not necessary to establish the importance of the Avenue. The grandeur of Pennsylvania Avenue is already inherent given the street width and monumental public buildings at each end and along its south side.
- Given the above, and the existing setbacks of the original historical buildings along the north side of this corridor, we recommend the appropriate build-to line to be no more than 25 - 35 feet from the curb along Pennsylvania Avenue, which is very similar to the setbacks recently imposed on the Newseum located further east of the site, which was completed in 2008, and for which NCPC amended the Square Guidelines to eliminate the existing 75 foot setback requirement.
- Lastly, setbacks greater than 35 feet inherently reduce the area and footprint of Square 379 to a point where it is no longer a meaningful developable parcel with a substantive program definition that enhances the city in the ways described earlier. This is especially true when compounded with any requirement to reestablish the D Street view corridor, and whether any kind of open space is required, or contemplated, at the intersection of 10<sup>th</sup> Street and Pennsylvania Avenue.

### **3. Height & Upper-Story Setback (160' Height)**

- Similar to the street wall analysis, NCPC staff's presentation of height and upper-story setbacks was grounded in a comparison of different build-to line options for the site to existing height regulating lines along the Avenue. Rather than relying on past unsuccessful examples, we recommend that NCPC establish and implement new height and upper-story setback guidelines that can inform NCPC's larger Pennsylvania Avenue Initiative and be implemented along the length of the Avenue as it evolves overtime
- Considering the federal government's goals of this redevelopment, and the importance of the site's location along Pennsylvania Avenue, we recommend a street wall of no less than 135 feet in height and an upper-story setback of 10 feet, with a maximum height of 160 feet for Square 379

- We also recommend Square 378 be permitted a maximum height of 160 feet along all sides in order to establish the critical mass that was outlined earlier in the project goals.

We sincerely appreciate NCPC for establishing this public process and the creation of Square Guidelines for this site. The recommendations provided herein in our view provide the appropriate and essential design and development flexibility that is necessary for the successful future redevelopment of this important site. We hope NCPC views our comments as constructive and aligned with NCPC's mission.

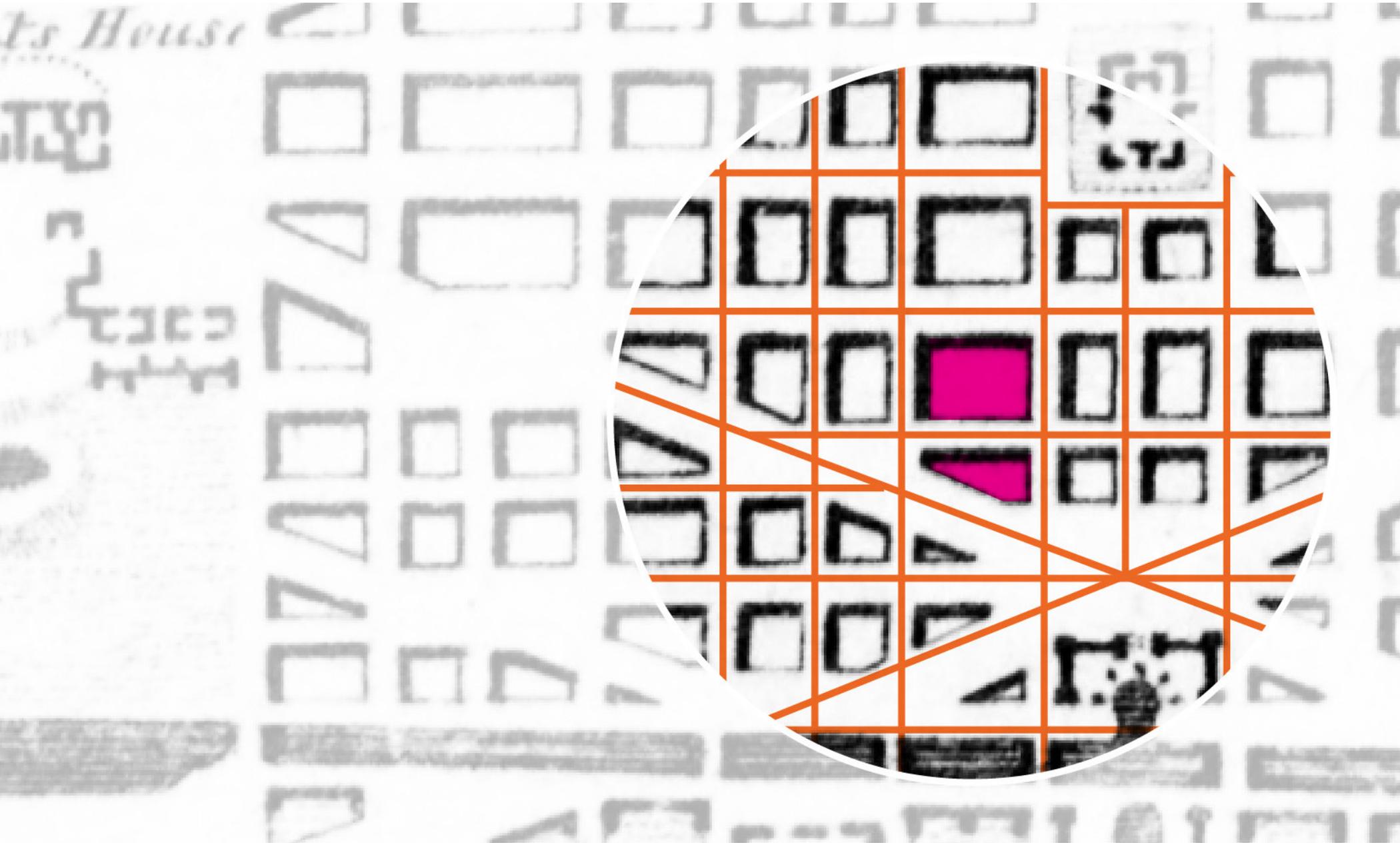
Respectfully,

A handwritten signature in black ink, appearing to read "Serge Demerjian". The signature is fluid and cursive, with a large initial "S" and "D".

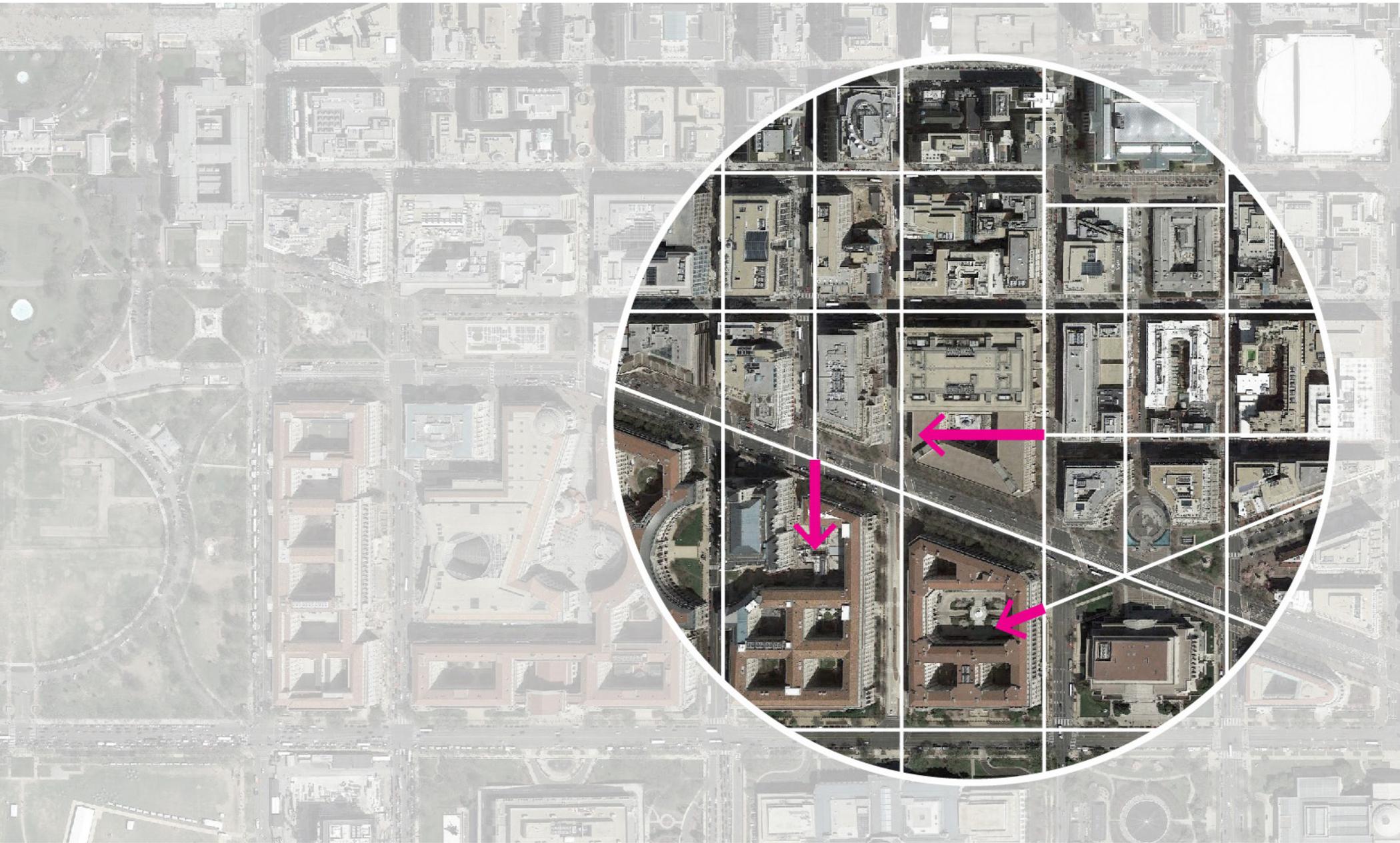
Serge Demerjian, AIA  
Vice President – Development

Enclosure – D Street Diagrams

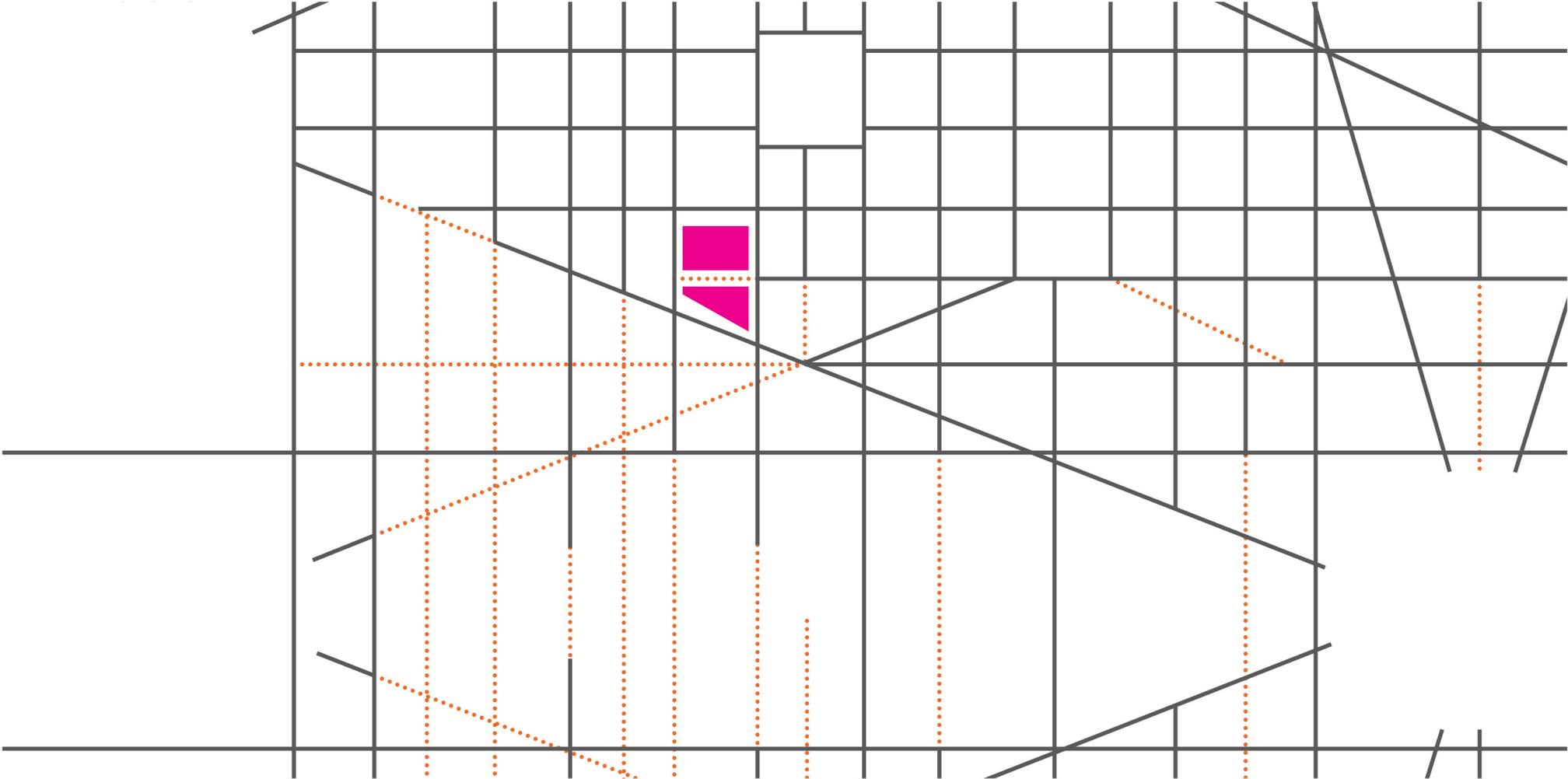
L'ENFANT STREET STUDY



L'ENFANT STREET STUDY



L'ENFANT STREET STUDY  
EXTANT STREETS AND REMOVED SEGMENTS

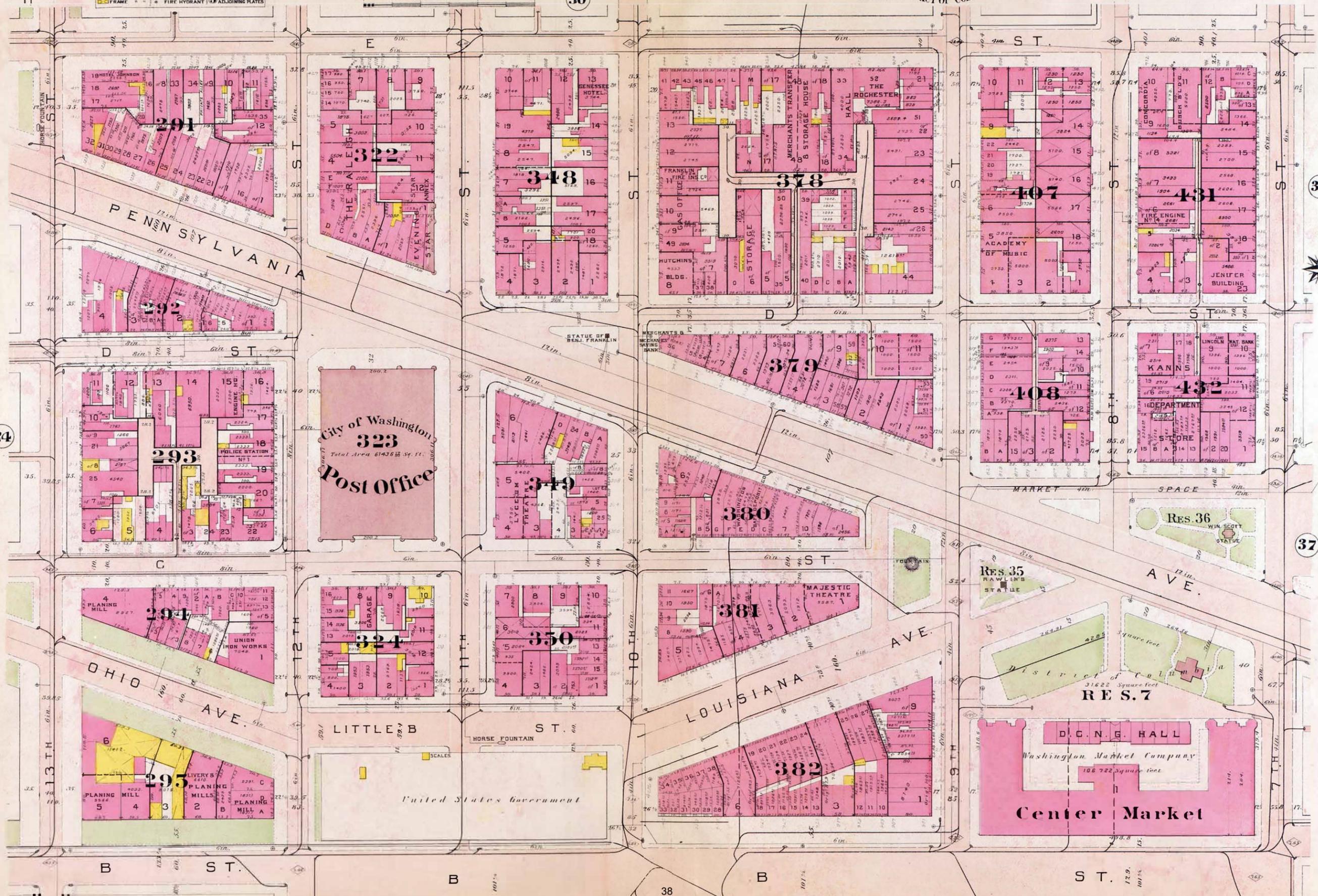


**EXPLANATIONS**

BRICK BUILDING	STONE STABLE	SEWER INLET
FRAME	GREEN HOUSE	ELEVATION
STONE	SEWER	ADJOINING PLATES
BRICK STABLE	WATER MAIN	
FRAME	FIRE HYDRANT	

Scale 80 feet to the Inch.

30



36

37

24

38

291

322

348

378

407

431

292

293

City of Washington  
**323**  
 Post Office  
 Total Area 61436 Sq. Ft.

349

379

408

432

294

324

350

381

295

United States Government

382

RES. 35  
 RAWLINS  
 STATUE

RES. 36  
 WIN SCOTT  
 STATUE

RES. 7  
 31622 Square feet

D.C.N.G. HALL  
 Washington Market Company  
 106722 Square feet  
**Center Market**

Otho Eskin and Therese Keane  
801 Pennsylvania Avenue, NW  
Apartment 1115  
Washington, DC 20004-2618  
Ph: (202) 745-0994  
Email: [takeane@aol.com](mailto:takeane@aol.com)

ADDED to  
Public Comment  
Table -  
updated in  
electronic  
files

TO: NCPC

RE: Public Comments for FBI Building Square Guidelines

FR: Otho Eskin and Therese Keane, Resident/Owners in the  
Residences at Market Square West

We apologize for the lateness of these comments, but we were out of town traveling and missed your May 13th deadline. I hope you will consider the following suggestions at some point when you are reviewing public comments as you proceed with your guidelines.

The existing FBI building creates a dead space in the center of Penn Quarter and prevents it from being a flourishing, lively neighborhood. This is particularly true along Pennsylvania Avenue between 9<sup>th</sup> and 10<sup>th</sup> streets but also on E street.

We urge that the plans for the site include a substantial residential element. Government workers in the area and tourists will not be able to sustain a vital neighborhood as they go home at the end of the day leaving the area deserted in the evening. A substantial number of permanent residents will alleviate that.

We recommend that the Pennsylvania Avenue and E Street sections be zoned for shops and restaurants and, if possible, for theater, bookshop. Most important, provision should be made for a grocery store. These should be on the street, not tucked inside.

Thank you,

Otho Eskin and Therese Keane  
801 Pennsylvania Avenue, NW  
Apartment #1115  
Washington, DC

202-745-0994



# U. S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

29 July 2016

Dear Mr. Acosta:

In its public meeting of 21 July, the Commission of Fine Arts was pleased to hear an information presentation on the formulation of square guidelines for the redevelopment of Squares 378 and 379—the site currently occupied by the headquarters building of the Federal Bureau of Investigation (FBI)—as a revision to the 1974 Pennsylvania Avenue Plan of the Pennsylvania Avenue Development Corporation.

The Commission members affirmed the importance of Pennsylvania Avenue between the Capitol and the White House as the primary symbolic and ceremonial corridor of the nation's capital, and they emphasized that its character as a broad, tree-lined avenue must be maintained. While they commented that the existing 75-foot width of the sidewalk is unusual and may be excessive, they opposed bringing the building fronts of new development forward to the historic right-of-way, which would result in a highly constricted sidewalk space in relation to the existing curb and compromise the avenue's green character along this lengthy frontage. They expressed willingness to consider options for setting a different build-to line that is forward of the existing FBI facade, and they encouraged further study of what could be an appropriate intermediate location; any design—whether with two or three rows of trees—must support public programming and reinforce the role of the avenue as one the capital city's most important civic spaces.

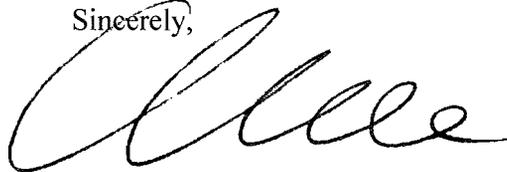
For the future development of the parcel, the Commission members expressed strong support for the reestablishment of D Street between 9th and 10th Streets, the condition that existed from the implementation of the L'Enfant Plan until the mid-20th-century construction of the FBI building. They expressed appreciation for the presentation of the site compared with other downtown blocks, and they agreed that the unusually large block of Square 378 should be broken down with ground-level exterior public circulation within it, in addition to the restoration of D Street; they commented that the resulting development for the parcel as a whole should provide active street frontages on all sides rather than being inwardly focused. They also supported the concept of creating a defined public space at the intersection of Pennsylvania Avenue with 10th and D Streets, and they requested further consideration of how this small reservation would contribute to the sequence of public spaces along the avenue.

Regarding the height of new buildings on the redeveloped site, the Commission members supported the intention to establish a more restrictive height limit for Square 379 along Pennsylvania Avenue, commenting that the tree canopy would be even more significant in establishing the visual character of the sidewalk space and framing the important view corridors toward the Capitol and the Treasury Building. For Square 378, they accepted the proposed 160-foot height limit with the understanding that lower initial heights with step-backs would be required to ensure compatibility

with the surrounding streets; they agreed that additional study of appropriate heights and step-back requirements are necessary for all sides of new development on both squares.

The Commission members expressed appreciation for the opportunity to provide comments to the National Capital Planning Commission for the development of square guidelines for this highly prominent site in central Washington, and they look forward to the opportunity for further comment later this year as the proposal is developed in more detail. They suggested that more sophisticated computer modelling techniques would be helpful in conveying the perspective studies as they are refined. As always, the staff is available to assist you.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Luebke', written in a cursive style.

Thomas E. Luebke, FAIA  
Secretary

Marcel Acosta Executive Director  
National Capital Planning Commission  
401 9th Street, NW, Suite 500-N  
Washington, DC 20004

cc: Mina Wright, General Services Administration  
Peter May, National Park Service  
Eric Shaw, D.C. Office of Planning

# U. S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

22 September 2016

Dear Mr. Acosta:

In its meeting of 15 September, the Commission of Fine Arts was pleased to hear a second information presentation on the development of square guidelines for Squares 378 and 379—the site currently occupied by the Federal Bureau of Investigation (FBI) headquarters building—as a revision to the 1974 Pennsylvania Avenue Plan.

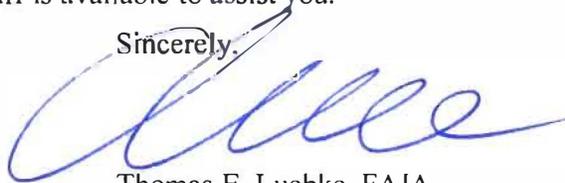
Consistent with their comments from the July 2016 discussion, the Commission members strongly emphasized the importance of the existing streetscape design of Pennsylvania Avenue as a primary public space in the capital city which is dedicated to civic uses, most notably as the setting for presidential inaugural parades. They observed that this block currently maintains continuity with several other blocks along the avenue featuring a large setback and three rows of willow oak trees; they underscored their support for keeping this spatial configuration and preserving the urban landscape masterwork by Dan Kiley and Sasaki & Associates. They urged that the trees and their long-term health be a first priority as any plans are developed for the site.

Regarding the massing of new development on Square 379, the Commission members did not express support for moving the Pennsylvania Avenue frontage of new buildings to the historic property line established under the L'Enfant Plan, and they characterized any line in between as being without historic meaning but generated instead by a desire to maximize development at the expense of public space. In the formulation of specific massing controls for any building facing Pennsylvania Avenue, they recommended that new development generally reflect the prevailing height and stepped massing of the Federal Triangle on the opposite side in order to promote the uniqueness of the avenue as the preeminent civic link between the Capitol and the White House.

The Commission members expressed their appreciation for the thoughtfulness of the presentation, and they suggested that the information might be more understandable to a wider audience if presented more concisely, perhaps as a matrix of diagrams with a preferred alternative. They also advised that these Modern landscape features of the avenue are worthy of protection, and they support efforts to include them in the listing for the Pennsylvania Avenue Historic District on the National Register of Historic Places.

The Commission looks forward to the formal review of square guidelines when they are ready for consideration by the various authorities having jurisdiction over this nationally prominent project. As always, the staff is available to assist you.

Sincerely,



Thomas E. Luebke, FAIA  
Secretary

Marcel Acosta, Executive Director  
National Capital Planning Commission  
401 9th Street, NW, Suite 500-N  
Washington, DC 20004

cc: Mina Wright, General Services Administration  
Peter May, National Park Service  
Eric Shaw, D.C. Office of Planning



# **AUGUST - SEPTEMBER 2016 PUBLIC COMMENTS**



## **COMPILED ONLINE/EMAIL COMMENTS – August 7 – September 20, 2016**

The following comments were received online or by email.

### **Dominick Cardella; Washington, D.C.**

I have been a business owner and resident of the Penn Quarter for 44 years. Development issues of the Penn Quarter are of particular interest to me, especially when it has to do with the most historic street in the Nation, Pennsylvania Ave., NW, the People's Avenue.

I am passionately opposed to any development on the existing FBI site that does not have the interest of the entire Nation as its primary focus !

The smaller of the 2 squares, square 379 is of particular interest to me as it would be to any person visiting our great Capitol. We do not need another office building on this square, nor do we need a building that has a short setback from the street. If maximizing the total number of square feet of the buildings is crucial, then by all means D St. needs to remain closed. Reopening D St would add nothing to improving the traffic flow, and would greatly diminish the total square footage of the development package. If, for some obscure reason, it becomes necessary to reopen D St., perhaps a tunnel passage might be considered, allowing development from the second floor, upward.

A plan should be considered so that any development facing Pennsylvania Ave serves the interests of all people of this nation. My vision is to have a National Museum entitled, "A Nation of Immigrants". Such a museum and such a focus would be particularly timely. I envision a participation from many of Washington, DC's Embassies, and entrepreneurs. I envision a grand Pennsylvania Ave sidewalk, as wide as is already existing, with outdoor cafes serving foods from all over the world, with shops displaying and selling the finest arts, crafts, fashions, and wares from a huge variety of countries. I envision a Pennsylvania Ave entrance leading to the museum above the first floor retail, telling the history and boasting of the many contributions that immigrants from so many of the world's countries have made to make our country the great Nation that it is today.

Such a project would create job opportunities, provide tax revenues to both federal and local governments, and most importantly, create something that would be a major attraction, not only to local residents but to all visitors from all parts of the world. An office building could never do that !

### **Ed Feiner, FAIA; Arlington, VA**

I am submitting comments as the former Chief architect for GSA, and my comments are based on my experience as an architect in the District of Columbia for over 50 years; including my time as Chief Architect for the US General Services Administration.

It would be excellent for the District to reintroduce an active Street Wall along America's Main Street that would provide a vibrant pedestrian friendly experience. This should include restaurants, shops and cafes. The development should be mixed-use with 24-hour activity: hospitality, residential, multi-tenant offices, retail, indoor and outdoor dining.

The design should be "of our time" but have some reference to overall context of the Federal City. In other words, it should be meaningful, with permanent materiality and appropriate proportions. It should also celebrate and communicate environmental responsibility and sustainable design.

I have previous experience regarding the redevelopment of Pennsylvania Avenue during my work on (and officially reviewed for GSA) the Urban Design Criteria for the Ronald Reagan Building as well as the Market Square proposals. Therefore, I have an appreciation for what is needed to finally create the vibrant Main Street that PADC was looking to develop when it was first created.

This is a once in a lifetime opportunity to create a well-planned and executed redevelopment of two keys parcels in the District. We must focus on creating value as well as a lasting connection between two important neighborhoods that have been separated for decades.

The context of the two squares are not currently unified, therefore it does not seem to be logical that so much weight should be given to the context. The current context has created a place that is not particularly vibrant or commercially successful.

It seems that rather than creating very strict guidelines now. It would be better to see what the best designers in the nation can propose that will maximize the vast potential of this site; the last true opportunity to make America's Main Street a showplace of and for the American People.

### **Lindsley Williams**

As you may recall, when the Square Guidelines for the JEH building site were last discussed by the NCPC in open session, I was among those speaking and asking that the guidelines allow projects to *qualify* if they stayed "within the L'Enfant" grid, one of the key planning parameters in downtown Washington, DC (also noting the input you received from the DC Historic Preservation Office). I was not suggesting that zero was best, but it should be allowed, not precluded.

There is, in my mind, no question that the restrictions of the Height Act must be followed, including its exception allowing 160' as measured from the property line's midpoint, along that segment of Pennsylvania Avenue. (Note that the Height Act does not have the 2:1 setback rule for that added height; that's in the PADC guidelines.)

To be sure, there are other guidelines that could be considered, but the existing 55 foot setback creates a dead zone of surface. I am aware of recommendations and options that suggest a 20 foot setback from the property (or L'Enfant) line.

Overall, I am sure NCPC and GSA will develop a final set of guidelines that applicants will be obliged to follow.

But, could the application process expressly advise that applicants may also submit a second proposal that deviates from the non-statutory guidelines in whatever way the applicant feels is appropriate, letting creative juices flow?

To me, alternatives should be allowed and examined, provided they:

- Indicate each parameter of the guideline that is not followed or satisfied, providing metrics in the manner of a BZA variance request.
- Discuss the rationale for each such deviation and "make the case" for why the deviation results in a better design, greater value, or whatever the applicant believes "makes the case." Think PUD's "superior design" aspect or the various "design reviews" the Zoning Commission considers over the course of the years (all with opportunity for NCPC input, the latter typically provided by staff from time to time, not always)

I submit this following yesterday's presentation of the four finalists and winning submission for the Memorials of the Future competition. That underscores the value of allowing creative minds to work with few limits. Great designs can and did emerge.

To adapt a phrase now in play elsewhere in our lives, "Make the FBI Squares Great, Again!"

To the prior, I would now add a third area for narrative: “the ways in which the applicant’s alternative proposal is better than the one submitted conforming to all guidelines.”

**Chris Morrison, FAIA; Washington, D.C.**

As a student, architect, and Fellow of the American Institute of Architects, I have studied and completed several projects within the Pennsylvania Avenue Plan since the late 1980’s. It is with this experience and keen interest in the newly proposed Re-Development Guidelines for Squares 378 & 379, where the J. Edgar Hoover building currently sits, that I offer these observations and comments.

- At the Sept 7th meeting, NCPC Rep Elizabeth Miller said, “...that maximizing the value of the property is one of the goals of the square guidelines”, however the current proposed setbacks do not support that goal. The width of D Street and the width of the sidewalk on Penn Ave erodes the buildable area, and therefore, the value of the property as a whole. We must create a floor plate and area that is developable and attractive – this could be a missed opportunity to create value. Although it was mentioned that there are similar “triangular” shaped parcels in the city that have been developed with a smaller floor plate, the high-visibility / high-value of this location must also be considered in the development?
- It was mentioned that D Street is an important cross street for the District. Why is D Street an important ROW across the City when making it a vehicular street only adds one more block – a short block that also creates an odd intersection and left turn when it hits 10th and Pennsylvania?
- Currently there is parking at the Hoover building, but it is not public. The addition of ample public parking at the new development suggests that parking may be unnecessary on D Street and that if it must be a vehicular street, it could be narrower than 70-feet, without street parking.
- Another goal of the guidelines is to restore pedestrian and economic activity to the area and to connect the Federal Triangle to Penn Quarter. As the development patterns since the PADC implementation of the 75-foot setbacks in the 1970’s demonstrates, pulling the buildings back too far from the street does not support either of those goals. Moderation of these excessive setbacks is appropriate.
- To achieve the stated development goals of NCPC and create a high-quality, vital downtown development, a building high-quality envelope with a bright and vibrant pedestrian realm needs to be created that can support this type of development. \
- The current proposed guidelines restrict the opportunities to create a “special place” rather than encourage an open exploration of actual design options and solutions can be evaluated during the normal PUD process.
- In order to create a truly “special” place, there need to be a maximum number of options explored for the development – allowing for the creativity of design and development team to work with the city zoning, planning on creating that place.
- It is important that the development be successful and not set-up for failure due to overly restrictive guidelines, established before any design options have been proposed for evaluation. The formation of the original PADC was to combat the poor conditions on PA Ave in the 1960’s – 1970’s. After 40 years of challenged development, this area must be given the chance to succeed economically, or it will be a failure for the neighborhood overall.
- In order to achieve a successful development, the new guidelines must compel the city work with the property owner to balance the historic and economic factors that are key to a successful development.
- It was mentioned that many of the design principals found up and down the Avenue are based on different eras. Shouldn’t this development be allowed the same consideration? The new

development designed “of its time.” It can be respectful of its historic context, while accommodating the present day styles, needs, and economics, rather than the unsuccessful guidelines or principals of the past?

- So much of the presentation (it was stated) is based on “observations” of the existing context. Again, shouldn’t the new development being allowed to explore the maximum available options to create the most successful redevelopment, rather than establish planning based on observation and crude blocking models?
- The set-backs create awkward upper levels spaces, where residential would likely be located. A successful design for residential would be impossible with extreme 50-foot set-backs.
- There are many references to “existing conditions” and “what is here today” – this site should anticipate and reflect the future of PA Ave, not a repetition of past mistakes.

### **Serge Demerjian, FCDP; New York, NY**

On behalf of Federal City Development Partners (FCDP), please accept the following comments on the National Capital Planning Commission (“NCPC”) staff’s presentations provided to the public on September 7th & 9th regarding the draft Square Guidelines (the “Square Guidelines”) being prepared by NCPC for Squares 378 & 379, existing site of the J. Edgar Hoover Building, Federal Bureau of Investigation Headquarters (the “JEH Site”).

We again appreciate the opportunity to be involved in the public process and thank you for your interest in the receiving public comments throughout the Square Guidelines development process. We’ve organized our comments to correspond with presentation format

### Part 3 – General Topic Objectives and Content

- Development Goals (Slide 18)
- Ensure compatibility w/ Context: While relating to the surrounding context is an important factor to successfully integrating new developments into the fabric of a well-established city, it is even more important that regulations not be established in a way that results in a new development that mimics its surroundings. This approach should not only be applicable to the guidelines that pertain to the architectural design detail of the redevelopment of the JEH Site, but also to the guidelines that will govern the overall height, mass, and bulk of the JEH site. Therefore, the guidelines regulating initial building heights and upper-story setbacks should not simply replicate existing buildings on adjacent blocks, which reflect specific design decisions made by the designers of those buildings in response to, in part, their own unique set of considerations. Rather, the guidelines should permit a wide range of flexibility with respect to initial heights and setbacks, especially along 9th, 10th, and E Streets, to allow the designers of the JEH Site building(s) to make their own informed decisions as to how best to relate to the surrounding context.
- Future Design, Programming & Planning Flexibility: What appears to be missing from this list is the ability to “Ensure Future Design, Programming and Planning Programming Flexibility”. We encourage NCPC staff to revisit the zoning envelope that has been outlined in order to provide the greatest flexibility possible to the future development team and design architect. As presented by NCPC staff, the bulk, mass and height recommendations clearly only focus on the existing context as the sole basis of staff’s recommendations rather than instead focusing on maximizing the opportunity the JEH Site provides to establish a new design paradigm in the heart of downtown Washington.
- Maximizing Value: Also what appears to be missing is “Maximizing Value”. Although, NCPC staff specifically stated “Maximizing the Value” as the intent of NCPC at the September 7th meeting,

it is clearly not the result as outlined in the presentation and throughout the planning recommendations staff is making for the Square Guidelines. The four recommended planning elements: 1) vehicular 'D' Street, 2) significant setbacks at the Pennsylvania build-to line, 3) limiting street wall heights and, 4) significant upper-story setback requirements, individually, and collectively, will significantly devalue the potential asset in numerous tangible and intangible ways such as:

- Significant reduction of potential FAR
  - Loss of tax revenue to the District
  - Loss of once in a century opportunity for the city to create a special place that is of national importance
  - Limiting the commercial viability of the asset
  - Negative impacts to creating critical mass required to establish a 24-7 active environment
- Gross Floor Area of Development (Slide 22): The Square Guidelines should not specify FAR limitations. Rather, this should be left to District zoning regulations. Within the D7 zone of the 2016 Zoning Regulations, while there is a maximum permitted matter-of-right 10.0 FAR limit on non-residential uses, this amount can be increased through the use of credits. The Square Guidelines should allow the District zoning regulations and the market to dictate whether the JEH Site can have additional nonresidential FAR above what is permitted as a matter-of-right, rather than imposing additional limitations on residential and nonresidential FAR on the JEH Site.
  - Circulation Objectives (Slide 23): The Square Guidelines should not specify whether D Street should, or should not, be reintroduced for vehicular traffic. First, this is a decision that will require very detailed transportation analysis that is unlikely to have already been completed as part of NCPC's development of the draft Square Guidelines. Furthermore, requiring D Street to include vehicular traffic prematurely eliminates what could potentially be a unique pedestrian-oriented attraction of the future redevelopment of the JEH Site. Based on the objectives listed in the presentation, it is clear that NCPC staff views D Street as a vehicular street that supports secondary circulation as a service alley for Squares 378 and 379. On the contrary, we believe D Street has the potential to be something much greater than the functional equivalent of a service alley. With the potential ability to create a pedestrian only D Street, we believe D Street presents an incredible opportunity to create a very special place, a place that creates a public, retail and commercial destination that also serves as a gateway that connects the downtown to Pennsylvania Avenue and the National Mall.
  - Signage and Lighting (Slide 24): The Square Guidelines should be very selective with respect to where additional limitations on signage and lighting are imposed above the limitations that are already imposed through District regulations. With respect to signage, the District is currently in the process of preparing a new set of signage regulations which will also apply to the JEH site. Therefore, the Square Guidelines should only impose additional limitations on signage where there is a legitimate federal interest, such as viewsheds along Pennsylvania Avenue and 10th Street.

#### Part 4A – D Street

- Vehicular D Street (Slide 33): This is the first time we see the introduction of a vehicular D Street. We recommend NCPC staff to share with the public the data as to how this benefits the vehicular patterns and traffic in the immediate area. We also recommend staff to investigate the opportunity of a pedestrian only D Street, and have an open and meaningful dialogue with the public that describes the pros and cons of each approach.

#### Part 4B & 4C – Built-To-Lines and Heights

- Square 378 Maximum Overall Height (Slide 37): Future reviews by GSA, NCPC, CFA, and potentially HPRB will inevitably involve discussions related to how big the public space at 10th Street and Pennsylvania Avenue needs to be in order to allow the building(s) on Square 378 to reach 160 feet. The Height Act does not provide any guidance on this, nor should the Square Guidelines. Rather, the size and function of this space should be determined as part of the overall development plan of the JEH Site, and should be integrally tied to the upper level heights and setbacks allowed/required on Square 379. Given the recommendation to reestablish D Street at its full 70-foot width, the additional setbacks along Pennsylvania Avenue, and normal building efficiencies, the size of this public space could further erode the development potential of Square 379. NCPC needs to maintain a holistic view of the impacts the Square Guideline could have on development of the JEH Site when collectively applied.
- Building Wall Distance From L'Enfant ROW (Slide 43): If you exclude JEH site and the building front yard plazas, over 50% of the remaining structures on the north side of Pennsylvania Avenue comply with the original L'Enfant ROW. In fact, several of these existing compliant structures are historic or landmarked and will be there forever. Instead of working with the original zoning principals developed by L'Enfant, staff has elected to be guided by the PADC principals that have yielded a fragmented and sterile streetscape that is struggling for an identity. The adapted build-to line for the JEH Site needs to look beyond these failed principals such as excessively wide and underutilized setbacks, the number of trees, and uninspiring structures (not landmarked) as a matter of context. Also, small-sized outdoor café establishments as a zoning principal for this nationally significant street cannot sustain themselves as the commercial engine for this high-cost and value property. Given all the factors outlined in the objectives and the commentary above, our recommendation is to adopt the 0' or 10' setback option as outlined in the presentation.
- Preliminary Height Analysis (Slide 64)
  - The regulating line that is established from the centerline of the Avenue and extrapolated at 45 degree angle as a means to dictate building height and upper story setbacks may reflect the intent of the PADC plan, but as stated above, currently does not comply with approximately 50% of the conditions on the north side of the street and is contrary to the historic or landmarked buildings that exist today. In addition, these historic and landmarked structures which create over 50% of the view corridor has been eroded as a result of the implementation of the PADC plan. It is not clear how this arbitrary 45 degree regulating line is effective as a means to enhance the viewshed, in fact we see it further fracturing the urban environment. Instead, we strongly recommend NCPC staff to take another look at defining a consistent street wall that is contextual with the existing relevant, historic structures along the north side of the Avenue.
  - The 45 degree regulating line also is problematic for defining the upper story setback limits. For Square 378, staff has developed a bulk diagram of two buildings that are approximately 220' wide and 400' long. In reality, most traditional, efficient commercial office buildings are typically only 120'-130' wide while traditional, efficient, residential buildings are typically 70'-80' wide. With a street wall recommendation of only 110', in order to achieve the 160' height, the future development would have to setback 50', which for a commercial building would be well beyond the lease span and into the core, and for a residential building it would be beyond the center core. For both Squares, we urge NCPC to consider a higher initial street wall of 135' instead of 110', with a 1 to 2 (60 degree) upper-story setback requirement instead of 1 to 1.

- Alternatively, if the Square Guidelines are going to address upper-story setbacks along streets other than Pennsylvania Avenue, then they should not overly prescribe what these setbacks should be. Rather than stipulate a setback, at most the Square Guidelines should state that the future redevelopment should provide upper-level setbacks above the initial height that relate to the context. This will provide designers with flexibility while establishing what will be expected in the future redevelopment of the JEH Site
- Allowable height and upper-story setbacks again inexplicably focuses on consistency with context. We urge staff to look beyond the context and adjacencies on non-essential, non-trophy buildings as the measure of context. We recommend staff to consider creating Square Guidelines that are in line with the rest of the city, beyond the boundary of the PADC Plan, that has taller street walls, more lenient upper-story setbacks, and reasonable build-to lines.
- D7 Zoning regulations as well as the 1910 Height Act (as recently amended) allows an additional 20' of permissible building height beyond 160' limit for habitable penthouses and mechanical enclosures. The recommendation of limiting all structures, including mechanical areas, to be within the maximum height is again reflective of NCPC staff's strict interpretation of the surrounding context and is not representative of the Squares in the rest of the District to the north. We urge NCPC staff to reconsider this requirement and allow penthouses to exceed the maximum permitted building height consistent with District zoning and the Height Act.

The NCPC staff recommendations in our opinion are too overly specific and severely constricting, and therefore, greatly diminish value and the opportunity to create the unique and special mixed-use destination that is widely needed at this location. In the end, the selected development team, along with a design architect and the demands of the real estate capital markets, will determine how this site is programmed, planned, designed, financed and constructed as a benefit to the city. The Square Guidelines should support that process and not endeavor to restrict it.

**Alex Block; Washington, D.C.**

Thank you for the opportunity to comment on the Square Guidelines for the redevelopment of the FBI Headquarters. The DowntownDC Business Improvement District would like to offer comments on the following areas for your consideration:

**Site Vision:**

The DowntownDC BID supports the general vision to redevelop the Hoover Building as a vibrant, mixed use, high density addition to Downtown DC.

In keeping with the District's vision for a living downtown, the DowntownDC BID strongly encourages the inclusion of residential uses in the redevelopment of the site. Additional downtown residents help further the transformation of Downtown into a vibrant place around the clock; they also help get Downtown to a critical mass of residents to support local-serving retail establishments in addition to the regional-serving destination retail.

**Pennsylvania Avenue Setback:**

The DowntownDC BID supports decreasing the current setback of the FBI building along Pennsylvania Avenue. The current sidewalk is too wide to provide an intimate pedestrian experience; decreasing the setback would also allow for a greater developable area and more design flexibility for a developer to work with the triangular lot on Square 379.

#### Pennsylvania Avenue Building Height:

The Downtown BID supports maximizing the available development capacity on the FBI site; preserving view corridors to the US Capitol on Pennsylvania Avenue is important; using upper story setbacks that take cues from the historic buildings along the north side of Pennsylvania Avenue is a good benchmark, with taller portions set back from that historic cornice line.

#### Internal Circulation:

Due to the large size of the FBI site, adding internal pedestrian and vehicular circulation makes sense. Aside from the restoration of the historic D Street right of way, other internal circulation patterns could be a strong addition to the site.

CityCenterDC provides a model – a consolidated underground loading dock and parking facility allows the entire site to be serviced by just three curb cuts. At the street level, pedestrian-only streets such as Palmer Alley both open additional building space up as viable retail spaces but also provide additional pedestrian pathways through an otherwise large parcel. These principles should be embraced and encouraged for the FBI site, but the specific arrangement and configuration of those spaces will require further analysis from NCPC and District government agencies and partners.

While not an appropriate topic for the Square Guidelines, NCPC should encourage the District Department of Transportation to work with the eventual developer of the site on a comprehensive transportation plan for the area to determine the best traffic arrangement for a newly created D Street, as well as studying the conversion of 10th St NW to two-way operation.

#### **Richard Rodgers; London, England, United Kingdom**

Having been engaged on a number of urban redevelopment proposals for the City, I have been closely following the public debate on the redevelopment guidelines for the J. Edgar Hoover site. As an international architect and having built in Washington, I would like to offer my thoughts and observations as regards your current design guideline parameters and hope these will inform the ongoing debate.

#### Reinstating D Street between 9th and 10th Street

From an urban integration and connectivity perspective, reinstating D Street between 9th and 10th Street creates a wonderful opportunity for the first time in 40 years, to reconnect the urban grid of the City and thereby improve the permeability for the pedestrian environment at street level. This opportunity provides a unique moment in the development history for this area, to penetrate the visual axis of D Street through to Pennsylvania Avenue, whilst also providing the catalyst to open up the site as a dedicated pedestrian route. The JEH site has been for a considerable number of years an impenetrable urban block, where pedestrian access has been limited to the sites perimeter. The reinstatement of D Street will allow pedestrian access to penetrate deep into the heart of the site, potentially transforming the nature of the ground plane with the addition of public uses creating an overlap of functions, all contributing to the urban vitality of the site.

We have seen from the documentation presented that consideration is being given to introduce vehicular movements onto this reinstated section of D street which would in effect turn square 379 into an island site surrounded by roads, where the priority is given to vehicles rather than people. This objective would seem in conflict with creating an active, vibrant public realm which can permeate across

the entire site, without having to be segregated by cars and leaves open the option to unify the site from an urban perspective.

This site offers exceptional possibilities to create a true sense of place. A diverse and rich mix of uses will bring life and vitality to the area, having the capacity to become a new destination within the fabric of the City. The ability to keep D Street as a purely pedestrianised environment will be the route to harnessing this potential and making the site as publicly accessible as possible, whilst unifying the ground plane with retail and commercial activities between squares 378 and 379. Densification of the site will not only maximise the developments true commercial potential but also bring added benefit in energy reductions, created through a diversity of use patterns and overlapping operational periods. Both would positively contribute to the global issue of climate change.

Vehicular movements around the site have functioned effectively for the past 40 years without the extension of D Street and we would recommend the NCPC capture this unique and special opportunity to give the site a special public focus.

The width of D Street at 70 feet follows the street section currently in existence to the east of the site, which has been based on accommodating 4 lanes of traffic. If a truly pedestrian environment were possible for this section of D Street, perhaps a narrower, more intimate width of street section could be investigated, reducing the scale and creating a more people orientated domain.

#### Set Back on Pennsylvania Avenue

Whilst it is very clear that any future proposal for the JEH site must be well rooted and relate to the surrounding context, this should not establish constraints and regulations which are purely deferential to the surrounding fabric and attempt to replicate the existing massing, height and bulk of the neighbouring buildings.

One of the key urban objectives the NCPC guidelines identifies is reinforcing the City's spatial order, by maintaining a scale and presence of the vistas along Pennsylvania Avenue to the Capitol, in a manner befitting the urban significance of the building.

The original L'Enfant plan, in a similar way to Haussmann in Paris, aimed to heighten emphasis and thereby presence by creating a consistent build to line on both sides of the street, focused towards the Capitol. Whilst a considerable number of the buildings which frame the northern edge of Pennsylvania Avenue are positioned on or very close to this notional line, there are also a large number of structures which are set back from this position. This results in a fractured and fragmented perspective when viewing east towards the Capitol. From a streetscape perspective, the lack of façade continuity diminishes the emphasis the buildings provide in reinforcing the visual composition and connectivity to the Capitol.

At a human scale, the continuity of the tree canopy provides a greater consistency to the vista east along the Avenue and provides a landscaped corridor its entire length.

The JEH building, with its façade set back 75 feet from the curb, fails to compliment this urban objective. On the contrary, it creates a side walk which is underutilized, lacking animation and diversity. It is interesting to analyse the studies produced by the NCPC on the various options considered for the positioning of the JEH street wall on Pennsylvania Avenue. It would appear that a façade positioned either on the L'Enfant line or minimally set back no more than 10 feet provides the greatest degree of urban street wall continuity within the existing context. This position is more in keeping with the

buildings which are already positioned on the L'Enfant line and are likely to remain for the foreseeable future.

The current NCPC recommendations for a street wall height of approximately 110 feet is a response to create symmetry, with the building set back level on the opposite side of the street at 105 feet. Nevertheless, this again diminishes the desire from a street wall perspective to maintain continuity in plan position and height with the buildings located at the western end of the Avenue. A height in excess of 130 feet would appear more consistent with the built structures which actually reinforce the L'Enfant line.

The guidelines eventually agreed upon by the NCPC should allow sufficient flexibility for the future design team engaged, to explore a range of options with the City which maximises the sites unique potential rather than limiting the possibilities by establishing constraints based on existing precedents which attempt to anticipate a preconceived urban response.



September 20, 2016

**Mr. Marcel Acosta**  
Executive Director  
**National Capital Planning Commission**  
401 9th Street, NW, North Lobby, Suite 500  
Washington, DC 20004

Re: **Square Guidelines Public Meeting Sept 7 & 9, 2016**  
**Square(s) 378 & 379**  
**Public Comment Submission**

**Dear Mr. Acosta:**

On behalf of Federal City Development Partners (FCDP), please accept the following comments on the National Capital Planning Commission (“NCPC”) staff’s presentations provided to the public on September 7<sup>th</sup> & 9<sup>th</sup> regarding the draft Square Guidelines (the “Square Guidelines”) being prepared by NCPC for Squares 378 & 379, existing site of the J. Edgar Hoover Building, Federal Bureau of Investigation Headquarters (the “JEH Site”).

We again appreciate the opportunity to be involved in the public process and thank you for your interest in the receiving public comments throughout the Square Guidelines development process. We’ve organized our comments to correspond with presentation format

**Part 3 – General Topic Objectives and Content**

**Development Goals (Slide 18)**

**Ensure compatibility w/ Context**

- While relating to the surrounding context is an important factor to successfully integrating new developments into the fabric of a well-established city, it is even more important that regulations not be established in a way that results in a new development that mimics its surroundings. This approach should not only be applicable to the guidelines that pertain to the architectural design detail of the redevelopment of the JEH Site, but also to the guidelines that will govern the overall height, mass, and bulk of the JEH site. Therefore, the guidelines regulating initial building heights and upper-story setbacks should not simply replicate existing buildings on adjacent blocks, which reflect specific design decisions made by the designers of those buildings in response to, in part, their own unique set of considerations. Rather, the guidelines should permit a wide range of flexibility with respect to initial heights and setbacks, especially along 9<sup>th</sup>, 10<sup>th</sup>, and E Streets, to allow the designers of the JEH Site building(s) to make their own informed decisions as to how best to relate to the surrounding context.

#### **Future Design, Programming & Planning Flexibility**

- What appears to be missing from this list is the ability to “Ensure Future Design, Programming and Planning Programming Flexibility”. We encourage NCPC staff to revisit the zoning envelope that has been outlined in order to provide the greatest flexibility possible to the future development team and design architect. As presented by NCPC staff, the bulk, mass and height recommendations clearly only focus on the existing context as the sole basis of staff’s recommendations rather than instead focusing on maximizing the opportunity the JEH Site provides to establish a new design paradigm in the heart of downtown Washington.

#### **Maximizing Value**

- Also what appears to be missing is “Maximizing Value”. Although, NCPC staff specifically stated “Maximizing the Value” as the intent of NCPC at the September 7<sup>th</sup> meeting, it is clearly not the result as outlined in the presentation and throughout the planning recommendations staff is making for the Square Guidelines. The four recommended planning elements: 1) vehicular ‘D’ Street, 2) significant setbacks at the Pennsylvania build-to line, 3) limiting street wall heights and, 4) significant upper-story setback requirements, individually, and collectively, will significantly devalue the potential asset in numerous tangible and intangible ways such as:
  - Significant reduction of potential FAR
  - Loss of tax revenue to the District
  - Loss of once in a century opportunity for the city to create a special place that is of national importance
  - Limiting the commercial viability of the asset
  - Negative impacts to creating critical mass required to establish a 24-7 active environment

#### **Gross Floor Area of Development (Slide 22)**

- The Square Guidelines should not specify FAR limitations. Rather, this should be left to District zoning regulations. Within the D7 zone of the 2016 Zoning Regulations, while there is a maximum permitted matter-of-right 10.0 FAR limit on non-residential uses, this amount can be increased through the use of credits. The Square Guidelines should allow the District zoning regulations and the market to dictate whether the JEH Site can have additional nonresidential FAR above what is permitted as a matter-of-right, rather than imposing additional limitations on residential and nonresidential FAR on the JEH Site.

#### **Circulation Objectives (Slide 23)**

- The Square Guidelines should not specify whether D Street should, or should not, be reintroduced for vehicular traffic. First, this is a decision that will require very detailed transportation analysis that is unlikely to have already been completed as part of NCPC’s development of the draft Square Guidelines. Furthermore, requiring D Street to include vehicular traffic prematurely eliminates what could potentially be a unique pedestrian-oriented attraction of the future redevelopment of the JEH Site.

- Based on the objectives listed in the presentation, it is clear that NCPC staff views D Street as a vehicular street that supports secondary circulation as a service alley for Squares 378 and 379. On the contrary, we believe D Street has the potential to be something much greater than the functional equivalent of a service alley. With the potential ability to create a pedestrian only D Street, we believe D Street presents an incredible opportunity to create a very special place, a place that creates a public, retail and commercial destination that also serves as a gateway that connects the downtown to Pennsylvania Avenue and the National Mall.

#### **Signage and Lighting (Slide 24)**

- The Square Guidelines should be very selective with respect to where additional limitations on signage and lighting are imposed above the limitations that are already imposed through District regulations. With respect to signage, the District is currently in the process of preparing a new set of signage regulations which will also apply to the JEH site. Therefore, the Square Guidelines should only impose additional limitations on signage where there is a legitimate federal interest, such as viewsheds along Pennsylvania Avenue and 10<sup>th</sup> Street.

#### **Part 4A – D Street**

##### **Vehicular D Street (Slide 33)**

- This is the first time we see the introduction of a vehicular D Street. We recommend NCPC staff to share with the public the data as to how this benefits the vehicular patterns and traffic in the immediate area. We also recommend staff to investigate the opportunity of a pedestrian only D Street, and have an open and meaningful dialogue with the public that describes the pros and cons of each approach.

#### **Part 4B & 4C – Built-To-Lines and Heights**

##### **Square 378 Maximum Overall Height (Slide 37)**

- Future reviews by GSA, NCPC, CFA, and potentially HPRB will inevitably involve discussions related to how big the public space at 10<sup>th</sup> Street and Pennsylvania Avenue needs to be in order to allow the building(s) on Square 378 to reach 160 feet. The Height Act does not provide any guidance on this, nor should the Square Guidelines. Rather, the size and function of this space should be determined as part of the overall development plan of the JEH Site, and should be integrally tied to the upper level heights and setbacks allowed/required on Square 379. Given the recommendation to reestablish D Street at its full 70-foot width, the additional setbacks along Pennsylvania Avenue, and normal building efficiencies, the size of this public space could further erode the development potential of Square 379. NCPC needs to maintain a holistic view of the impacts the Square Guideline could have on development of the JEH Site when collectively applied.

**Building Wall Distance From L'Enfant ROW (Slide 43)**

- If you exclude JEH site and the building front yard plazas, over 50% of the remaining structures on the north side of Pennsylvania Avenue comply with the original L'Enfant ROW. In fact, several of these existing compliant structures are historic or landmarked and will be there forever. Instead of working with the original zoning principals developed by L'Enfant, staff has elected to be guided by the PADC principals that have yielded a fragmented and sterile streetscape that is struggling for an identity. The adapted build-to line for the JEH Site needs to look beyond these failed principals such as excessively wide and underutilized setbacks, the number of trees, and uninspiring structures (not landmarked) as a matter of context. Also, small-sized outdoor café establishments as a zoning principal for this nationally significant street cannot sustain themselves as the commercial engine for this high-cost and value property. Given all the factors outlined in the objectives and the commentary above, our recommendation is to adopt the 0' or 10' setback option as outlined in the presentation.

**Preliminary Height Analysis (Slide 64)**

- The regulating line that is established from the centerline of the Avenue and extrapolated at 45 degree angle as a means to dictate building height and upper story setbacks may reflect the intent of the PADC plan, but as stated above, currently does not comply with approximately 50% of the conditions on the north side of the street and is contrary to the historic or landmarked buildings that exist today. In addition, these historic and landmarked structures which create over 50% of the view corridor has been eroded as a result of the implementation of the PADC plan. It is not clear how this arbitrary 45 degree regulating line is effective as a means to enhance the viewshed, in fact we see it further fracturing the urban environment. Instead, we strongly recommend NCPC staff to take another look at defining a consistent street wall that is contextual with the existing relevant, historic structures along the north side of the Avenue.
- The 45 degree regulating line also is problematic for defining the upper story setback limits. For Square 378, staff has developed a bulk diagram of two buildings that are approximately 220' wide and 400' long. In reality, most traditional, efficient commercial office buildings are typically only 120'-130' wide while traditional, efficient, residential buildings are typically 70'-80' wide. With a street wall recommendation of only 110', in order to achieve the 160' height, the future development would have to setback 50', which for a commercial building would be well beyond the lease span and into the core, and for a residential building it would be beyond the center core. For both Squares, we urge NCPC to consider a higher initial street wall of 135' instead of 110', with a 1 to 2 (60 degree) upper-story setback requirement instead of 1 to 1.
- Alternatively, if the Square Guidelines are going to address upper-story setbacks along streets other than Pennsylvania Avenue, then they should not overly prescribe what these setbacks should be. Rather than stipulate a setback, at most the Square Guidelines should state that the future redevelopment should provide upper-level setbacks above the initial height that relate to the context. This will provide designers with flexibility while establishing what will be expected in the future redevelopment of the JEH Site

- Allowable height and upper-story setbacks again inexplicably focuses on consistency with context. We urge staff to look beyond the context and adjacencies of non-essential, non-trophy buildings as the measure of context. We recommend staff to consider creating Square Guidelines that are in line with the rest of the city, beyond the boundary of the PADC Plan, that has taller street walls, more lenient upper-story setbacks, and reasonable build-to lines.
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The NCPC staff recommendations in our opinion are too overly specific and severely constricting, and therefore, greatly diminish value and the opportunity to create the unique and special mixed-use destination that is widely needed at this location. In the end, the selected development team, along with a design architect and the demands of the real estate capital markets, will determine how this site is programmed, planned, designed, financed and constructed as a benefit to the city. The Square Guidelines should support that process and not endeavor to restrict it.

Respectfully,



Serge Demerjian, AIA  
Vice President - Development



DATE: September 20, 2016  
TO: Elizabeth Miller  
FROM: Alex Block  
SUBJECT: DowntownDC BID comments on the Pennsylvania Ave Square Guidelines

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Thank you for the opportunity to comment on the Square Guidelines for the redevelopment of the FBI Headquarters. The DowntownDC Business Improvement District would like to offer comments on the following areas for your consideration:

**Site Vision:**

The DowntownDC BID supports the general vision to redevelop the Hoover Building as a vibrant, mixed use, high density addition to Downtown DC.

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The DowntownDC BID supports decreasing the current setback of the FBI building along Pennsylvania Avenue. The current sidewalk is too wide to provide an intimate pedestrian experience; decreasing the setback would also allow for a greater developable area and more design flexibility for a developer to work with the triangular lot on Square 379.

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**Internal Circulation:**

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CityCenterDC provides a model – a consolidated underground loading dock and parking facility allows the entire site to be serviced by just three curb cuts. At the street level, pedestrian-only streets such as Palmer Alley both open additional building space up as viable retail spaces but also provide additional pedestrian pathways through an otherwise large parcel. These principles should be embraced and encouraged for the FBI site, but the specific arrangement and configuration of those spaces will require further analysis from NCPC and District government agencies and partners.

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**Subject:** RE: FBI Square Guidelines Feedback

-----Original Message-----

From: dominick cardella [mailto:info@ncpc.gov]  
Sent: Tuesday, September 13, 2016 3:03 PM  
To: NCPC General Information <info@ncpc.gov>  
Subject: FBI Square Guidelines Feedback

A new comment has been submitted online.

To approve this comment for publication, click the link below:  
<http://www.ncpc.gov/comment/approve.php?cid=669>

Name: dominick cardella  
Location: WASHINGTON DC  
Email: ARTIFACTORYDC@MSN.COM

Comments:

I have been a business owner and resident of the Penn Quarter for 44 years. Development issues of the Penn Quarter are of particular interest to me, especially when it has to do with the most historic street in the Nation, Pennsylvania Ave., NW, the People's Avenue.

I am passionately opposed to any development on the existing FBI site that does not have the interest of the entire Nation as its primary focus !

The smaller of the 2 squares, square 379 is of particular interest to me as it would be to any person visiting our great Capitol. We do not need another office building on this square, nor do we need a building that has a short setback from the street. If maximizing the total number of square feet of the buildings is crucial, then by all means D St. needs to remain closed. Reopening D St would add nothing to improving the traffic flow, and would greatly diminish the total square footage of the development package. If, for some obscure reason, it becomes necessary to reopen D St., perhaps a tunnel passage might be considered, allowing development from the second floor, upward.

A plan should be considered so that any development facing Pennsylvania Ave serves the interests of all people of this nation. My vision is to have a National Museum entitled, "A Nation of Immigrants". Such a museum and such a focus would be particularly timely. I envision a participation from many of Washington, DC's Embassies, and entrepreneurs. I envision a grand Pennsylvania Ave sidewalk, as wide as is already existing, with outdoor cafes serving foods from all over the world, with shops displaying and selling the finest arts, crafts, fashions, and wares from a huge variety of countries. I envision a Pennsylvania Ave entrance leading to the museum above the first floor retail, telling the history and boasting of the many contributions that immigrants from so many of the world's countries have made to make our country the great Nation that it is today.

Such a project would create job opportunities, provide tax revenues to both federal and local governments, and most importantly, create something that would be a major attraction, not only to local residents but to all visitors from all parts of the world. An office building could never do that !



September 19, 2016

Mr. Marcel Acosta, Executive Director  
**National Capital Planning Commission**  
401 9th Street, NW, North Lobby, Suite 500  
Washington, DC 20004

**Re: Squares 378 & 379 Re-Development Guidelines  
Public Comments Submission**

Dear Mr. Acosta,

As a student, architect, and Fellow of the American Institute of Architects, I have studied and completed several projects within the Pennsylvania Avenue Plan since the late 1980's. It is with this experience and keen interest in the newly proposed Re-Development Guidelines for Squares 378 & 379, where the J. Edgar Hoover building currently sits, that I offer these observations and comments.

- At the Sept 7th meeting, NCPC Rep Elizabeth Miller said, "...that maximizing the value of the property is one of the goals of the square guidelines", however the current proposed setbacks do not support that goal. The width of D Street and the width of the sidewalk on Penn Ave erodes the buildable area, and therefore, the value of the property as a whole. We must create a floor plate and area that is developable and attractive – this could be a missed opportunity to create value. Although it was mentioned that there are similar "triangular" shaped parcels in the city that have been developed with a smaller floor plate, the high-visibility / high-value of this location must also be considered in the development?
- It was mentioned that D Street is an important cross street for the District. Why is D Street an important ROW across the City when making it a vehicular street only adds one more block – a short block that also creates an odd intersection and left turn when it hits 10<sup>th</sup> and Pennsylvania?
- Currently there is parking at the Hoover building, but it is not public. The addition of ample public parking at the new development suggests that parking may be unnecessary on D Street and that if it must be a vehicular street, it could be narrower than 70-feet, without street parking.
- Another goal of the guidelines is to restore pedestrian and economic activity to the area and to connect the Federal Triangle to Penn Quarter. As the development patterns since the PADC implementation of the 75-foot setbacks in the 1970's demonstrates, pulling the buildings back too far from the street does not support either of those goals. Moderation of these excessive setbacks is appropriate.
- To achieve the stated development goals of NCPC and create a high-quality, vital downtown development, a building high-quality envelope with a bright and vibrant pedestrian realm needs to be created that can support this type of development.
- The current proposed guidelines restrict the opportunities to create a "special place" rather than encourage an open exploration of actual design options and solutions can be evaluated during the normal PUD process.
- In order to create a truly "special" place, there need to be a maximum number of options explored for the development – allowing for the creativity of design and development team to work with the city zoning, planning on creating that place.

- It is important that the development be successful and not set-up for failure due to overly restrictive guidelines, established before any design options have been proposed for evaluation. The formation of the original PADC was to combat the poor conditions on PA Ave in the 1960's – 1970's. After 40 years of challenged development, this area must be given the chance to succeed economically, or it will be a failure for the neighborhood overall.
- In order to achieve a successful development, the new guidelines must compel the city work with the property owner to balance the historic and economic factors that are key to a successful development.
- It was mentioned that many of the design principals found up and down the Avenue are based on different eras. Shouldn't this development be allowed the same consideration? The new development designed "of its time." It can be respectful of its historic context, while accommodating the present day styles, needs, and economics, rather than the unsuccessful guidelines or principals of the past?
- So much of the presentation (it was stated) is based on "observations" of the existing context. Again, shouldn't the new development being allowed to explore the maximum available options to create the most successful redevelopment, rather than establish planning based on observation and crude blocking models?
- The set-backs create awkward upper levels spaces, where residential would likely be located. A successful design for residential would be impossible with extreme 50-foot set-backs.
- There are many references to "existing conditions" and "what is here today" – this site should anticipate and reflect the future of PA Ave, not a repetition of past mistakes.

Sincerely,



Chris Morrison FAIA  
Managing Director, Principal

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**To:** NCPC General Information  
**Subject:** RE: FBI Square Guidelines Feedback

-----Original Message-----

From: Ed.Feiner@jefferson.ncpc.gov [mailto:Ed.Feiner@jefferson.ncpc.gov]  
Sent: Friday, September 16, 2016 10:15 AM  
To: NCPC General Information <info@ncpc.gov>  
Subject: FBI Square Guidelines Feedback

A new comment has been submitted online.

To approve this comment for publication, click the link below:  
<http://www.ncpc.gov/comment/approve.php?cid=670>

Name: Ed Feiner, FAIA  
Location: Arlington, VA  
Email: Edward.Feiner@perkinswill.com

Comments:

I am submitting comments as the former Chief architect for GSA, and my comments are based on my experience as an architect in the District of Columbia for over 50 years; including my time as Chief Architect for the US General Services Administration.

It would be excellent for the District to reintroduce an active Street Wall along America's Main Street that would provide a vibrant pedestrian friendly experience. This should include restaurants, shops and cafes. The development should be mixed-use with 24-hour activity: hospitality, residential, multi-tenant offices, retail, indoor and outdoor dining.

The design should be "of our time" but have some reference to overall context of the Federal City. In other words, it should be meaningful, with permanent materiality and appropriate proportions. It should also celebrate and communicate environmental responsibility and sustainable design.

I have previous experience regarding the redevelopment of Pennsylvania Avenue during my work on (and officially reviewed for GSA) the Urban Design Criteria for the Ronald Reagan Building as well as the Market Square proposals. Therefore, I have an appreciation for what is needed to finally create the vibrant Main Street that PADC was looking to develop when it was first created.

This is a once in a lifetime opportunity to create a well-planned and executed redevelopment of two keys parcels in the District. We must focus on creating value as well as a lasting connection between two important neighborhoods that have been separated for decades.

The context of the two squares are not currently unified, therefore it does not seem to be logical that so much weight should be given to the context. The current context has created a place that is not particularly vibrant or commercially successful.

It seems that rather than creating very strict guidelines now. It would be better to see what the best designers in the nation can propose that will maximize the vast potential of this site; the last true opportunity to make America's Main Street a showplace of and for the American People.



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**Subject:** RE: FBI Square Guidelines: Comment and Recommendation

**From:** Lindsley Williams [<mailto:LWilliams@his.com>]

**Sent:** Friday, September 9, 2016 3:21 PM

**To:** Wright, Mina <[mina.wright@gsa.gov](mailto:mina.wright@gsa.gov)>; Miller, Elizabeth <[elizabeth.miller@ncpc.gov](mailto:elizabeth.miller@ncpc.gov)>

**Subject:** Re: FBI Square Guidelines: Comment and Recommendation

To the prior, I would now add a third area for narrative: “the ways in which the applicant’s alternative proposal is better than the one submitted conforming to all guidelines.”

Regards,

Lindsley

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**From:** Lindsley Williams <[LWilliams@his.com](mailto:LWilliams@his.com)>

**Reply-To:** Lindsley Williams <[LWilliams@his.com](mailto:LWilliams@his.com)>

**Date:** Friday, September 09, 2016 at 10:21 AM

**To:** Elizabeth Miller <[Elizabeth.Miller@ncpc.gov](mailto:Elizabeth.Miller@ncpc.gov)>

**Cc:** "Mina Wright (WPD)" <[mina.wright@gsa.gov](mailto:mina.wright@gsa.gov)>

**Subject:** FBI Square Guidelines: Comment and Recommendation

Elizabeth and Mina,

As you may recall, when the Square Guidelines for the JEH building site were last discussed by the NCPC in open session, I was among those speaking and asking that the guidelines allow projects to *qualify* if they stayed "within the L'Enfant" grid, one of the key planning parameters in downtown Washington, DC (also noting the input you received from the DC Historic Preservation Office). I was not suggesting that zero was best, but it should be allowed, not precluded.

There is, in my mind, no question that the restrictions of the Height Act must be followed, including its exception allowing 160' as measured from the property line's midpoint, along that segment of Pennsylvania Avenue. (Note that the Height Act does not have the 2:1 setback rule for that added height; that's in the PADC guidelines.)

To be sure, there are other guidelines that could be considered, but the existing 55 foot setback creates a dead zone of surface. I am aware of recommendations and options that suggest a 20 foot setback from the property (or L'Enfant) line.

Overall, I am sure NCPC and GSA will develop a final set of guidelines that applicants will be obliged to follow.

But, could the application process expressly advise that applicants may also submit a second proposal that deviates from the non-statutory guidelines in whatever way the applicant feels is appropriate, letting creative juices flow?

To me, alternatives should be allowed and examined, provided they:

- Indicate each parameter of the guideline that is not followed or satisfied, providing metrics in the manner of a BZA variance request.
- Discuss the rationale for each such deviation and "make the case" for why the deviation results in a better design, greater value, or whatever the applicant believes "makes the case." Think PUD's "superior design" aspect or the various "design reviews" the Zoning Commission considers over the course of the years (all with opportunity for NCPC input, the latter typically provided by staff from time to time, not always)

I submit this following yesterday's presentation of the four finalists and winning submission for the Memorials of the Future competition. That underscores the value of allowing creative minds to work with few limits. Great designs can and did emerge.

To adapt a phrase now in play elsewhere in our lives, "Make the FBI Squares Great, Again!"



Mr M Acosta  
National Capital Planning Commission  
401 9<sup>th</sup> Street, NW, North Lobby, Suite 500  
Washington DC 20004  
USA

29<sup>th</sup> September 2016

Dear Mr Acosta,

**Re: Squares 378 & 379 Re-Development Guidelines, Public Comments Submission**

Having been engaged on a number of urban redevelopment proposals for the City, I have been closely following the public debate on the redevelopment guidelines for the J. Edgar Hoover site. As an international architect and having built in Washington, I would like to offer my thoughts and observations as regards your current design guideline parameters and hope these will inform the ongoing debate.

**Reinstating D Street between 9<sup>th</sup> and 10<sup>th</sup> Street**

From an urban integration and connectivity perspective, reinstating D Street between 9<sup>th</sup> and 10<sup>th</sup> Street creates a wonderful opportunity for the first time in 40 years, to reconnect the urban grid of the City and thereby improve the permeability for the pedestrian environment at street level. This opportunity provides a unique moment in the development history for this area, to penetrate the visual axis of D Street through to Pennsylvania Avenue, whilst also providing the catalyst to open up the site as a dedicated pedestrian route. The JEH site has been for a considerable number of years an impenetrable urban block, where pedestrian access has been limited to the sites perimeter. The reinstatement of D Street will allow pedestrian access to penetrate deep into the heart of the site, potentially transforming the nature of the ground plane with the addition of public uses creating an overlap of functions, all contributing to the urban vitality of the site.

We have seen from the documentation presented that consideration is being given to introduce vehicular movements onto this reinstated section of D street which would in effect turn square 379 into an island site surrounded by roads, where the priority is given to vehicles rather than people. This objective would seem in conflict with creating an active, vibrant public realm which can permeate across the entire site, without having to be segregated by cars and leaves open the option to unify the site from an urban perspective.

This site offers exceptional possibilities to create a true sense of place. A diverse and rich mix of uses will bring life and vitality to the area, having the capacity to become a new destination within the fabric of the City. The ability to keep D Street as a purely pedestrianised environment will be the route to harnessing this potential and making the site as publicly accessible as possible, whilst unifying the ground plane with retail and commercial activities between squares 378 and 379. Densification of the site will not only maximise the developments true commercial potential but also bring added benefit in

energy reductions, created through a diversity of use patterns and overlapping operational periods. Both would positively contribute to the global issue of climate change.

Vehicular movements around the site have functioned effectively for the past 40 years without the extension of D Street and we would recommend the NCPC capture this unique and special opportunity to give the site a special public focus.

The width of D Street at 70 feet follows the street section currently in existence to the east of the site, which has been based on accommodating 4 lanes of traffic. If a truly pedestrian environment were possible for this section of D Street, perhaps a narrower, more intimate width of street section could be investigated, reducing the scale and creating a more people orientated domain.

### **Set Back on Pennsylvania Avenue**

Whilst it is very clear that any future proposal for the JEH site must be well rooted and relate to the surrounding context, this should not establish constraints and regulations which are purely deferential to the surrounding fabric and attempt to replicate the existing massing, height and bulk of the neighbouring buildings.

One of the key urban objectives the NCPC guidelines identifies is reinforcing the City's spatial order, by maintaining a scale and presence of the vistas along Pennsylvania Avenue to the Capitol, in a manner befitting the urban significance of the building.

The original L'Enfant plan, in a similar way to Haussmann in Paris, aimed to heighten emphasis and thereby presence by creating a consistent build to line on both sides of the street, focused towards the Capitol. Whilst a considerable number of the buildings which frame the northern edge of Pennsylvania Avenue are positioned on or very close to this notional line, there are also a large number of structures which are set back from this position. This results in a fractured and fragmented perspective when viewing east towards the Capitol. From a streetscape perspective, the lack of façade continuity diminishes the emphasis the buildings provide in reinforcing the visual composition and connectivity to the Capitol.

At a human scale, the continuity of the tree canopy provides a greater consistency to the vista east along the Avenue and provides a landscaped corridor its entire length.

The JEH building, with its façade set back 75 feet from the curb, fails to compliment this urban objective. On the contrary, it creates a side walk which is underutilized, lacking animation and diversity. It is interesting to analyse the studies produced by the NCPC on the various options considered for the positioning of the JEH street wall on Pennsylvania Avenue. It would appear that a façade positioned either on the L'Enfant line or minimally set back no more than 10 feet provides the greatest degree of urban street wall continuity within the existing context. This position is more in keeping with the buildings which are already positioned on the L'Enfant line and are likely to remain for the foreseeable future.

The current NCPC recommendations for a street wall height of approximately 110 feet is a response to create symmetry, with the building set back level on the opposite side of the

street at 105 feet. Nevertheless, this again diminishes the desire from a street wall perspective to maintain continuity in plan position and height with the buildings located at the western end of the Avenue. A height in excess of 130 feet would appear more consistent with the built structures which actually reinforce the L'Enfant line.

The guidelines eventually agreed upon by the NCPC should allow sufficient flexibility for the future design team engaged, to explore a range of options with the City which maximises the sites unique potential rather than limiting the possibilities by establishing constraints based on existing precedents which attempt to anticipate a preconceived urban response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Rogers', with a large, stylized flourish at the end.

Richard Rogers

on behalf of  
Rogers Stirk Harbour + Partners



## SEPTEMBER 7 AND 9, 2016 PUBLIC MEETING COMMENT FORMS

These comments were typed from handwritten comment forms.

### Unknown

Really appreciate these open, informative meetings as a Penn Quarter resident. A few things for you:

- Do we need cars on D St.? What about a pedestrian walkway? No parking? Bike lanes? Sidewalk cafes? I see the merit of reopening D St., but it kills me to invite more vehicles in.
- Way too heavy a focus on the viewshed. 20' here or there makes so little difference to the viewshed but a TON of difference to what could be there... cafes, residences, etc.
- Why should I, as an individual, care about the L'Enfant Plan? Seems *so* important to you, but I just don't get it. And you let it determine so much...
- The table was filled with three groups: your team, Jo-Ann, and men in suits. These men in suits asked a lot of pointed questions. They seemed like entitled, possibly misogynistic dicks; nonetheless, your team seemed really defensive and dismissive. Felt like a bummer, b/c it set a negative tone and made the rest of us attendees afraid of speaking up for fear your team would shoot us down, too.
- THANK YOU for prioritizing pedestrians and favoring mixed-use development. The last thing we need is just more office buildings.



## COMMENTS FROM FBI PUBLIC MEETING – SEPTEMBER 7, 2016

Comment 1 (*Male*): Draft Guidelines comments: correct Oct 6 to Sept 26

Comment 2 (*Jo-Ann Neuhaus*): When can people start signing up to testify for the Oct. 6 Commission meeting? Please make sure the link is highly visible on our website.

Comment 3 (*Jon Fitch*): Be clear about parameters and prioritization for the square guidelines. What are the parameters being used to determine if a proposal is a good one? Is maximizing the real estate property value a goal for NCPC?

Comment 4 (*Jo-Ann Neuhaus*): The urban design plan was to frame the vista to the Capitol - the height of 160' is setback 100' from the Avenue - that principle should not be violated! There are PADC Lighting and Signage Guidelines as resources - in PADC's era, they did not allow digital signs. DDOT has studied making 10th street 2 ways. It doubles the area for on/off loading buses if 2 ways.

Comment 5 (*Jon Fitch*): Square 378 is fronting on Pennsylvania Avenue? How? 9th Street rises to the north.

Comment 6 (*Mark Eckenweiler*): Circulation and surrounding streets- are you presuming the same traffic flow on 9th and 10th, or is it fluid? It's a suboptimal traffic pattern.

Comment 7 (*Serge Demerjian*): Have there been considerations for something other than traffic on D Street? There is no view corridor to the west. I understand it to the east. Can you show data pro and against D Street being vehicular vs pedestrian? *Nia's response*: Are you asking if D Street could be pedestrian only while still maintaining desired setbacks?

Comment 8 (*Jo-Ann Neuhaus*): Initial height on 378 would be a new feature not required on other sites (such as: 1001 or Evening Star or Presidential Building). Do you need this limitation? 1001 had historic buildings which Hartman Cox chose to meet in initial heights. I understand - There is a lot of historic preservation on E Street and 10th. In the Plan, the height was supposed to be measured from Pennsylvania Avenue, not any other street.

Comment 9 (*Serge Demerjian*): Questions stepping back 50' (Initial height 110' up to 160')? - Why are we looking to context instead of prescribing guidelines? The context is created from fractured zoning regulations - why replicate this?

Comment 10 (*Mark Eckenweiler*): Are you bound to 11' wide travel lanes? For this street, 11' wide lanes seems too much.

Comment 11 (*Jon Fitch*): There are areas of the city (SE / Ballston) where parcel sizes have crippled development. Limit parcel size is one approach. Making one large parcel could cause issues in terms of character - would be great to mention in the guidelines. Branding: for this to go to a single developer, there is the temptation to brand it - like City Center. While the buildings are not huge, there's the potential to diminish the diversity and sensory richness of street front character. Anthony Lanier has tried smaller parcels with different architects (bringing Europe to Washington DC: [http://www.eastbanc.com/assets/files/pdf/OnSite\\_CoverProfileonAnthonyLanier.pdf](http://www.eastbanc.com/assets/files/pdf/OnSite_CoverProfileonAnthonyLanier.pdf)). Can you address parcel size to combat the drawbacks of branding.

Comment 12 (*Serge Demerjian*): Confused about why blue lines are set back shorter. Where are these guiding principles (1:1) coming from? Seem arbitrary.

Comment 13 (*Jon Fitch*): There's got to be a relationship between buildings - there is variability in FAR. I would presume that regardless of heights and setbacks that the FAR limits development. Is this really a matter of controlling office density? Is there currently any residential on Pennsylvania Avenue? (*Market Square and Newseum*)

Comment 14 (*Female*): If you're asking about use, residential and mixed use seems important. Encouraging developers to make use of the space seems important. Respectfully disagree with Jo-Ann on the build-to lines - would love to see a smaller sidewalk and cafes and ground floor activity. Some visuals make it look like its encroaching on the viewshed- but only at the end of the options.

Comment 15 (*Jo-Ann Neuhaus*): No other new building on Pennsylvania Avenue comes forward of that alignment of 160' height. Great Job! I wish you had these models to show the Commission if the building were not at the current setback. It doesn't fit in with the current unifying treatment of the Avenue. When you put a building of this size up to 20' from the property line it's too much, it takes over the Avenue. A building of this size overpowers, even 20 or 30' back. Good urban design is design you don't even know is there. I would like to see the 30' setback, too. To violate the 1:1 ratio would be a disaster. The use of the ground floor is really important to the experience of the outdoor space. (Like the 600 block isn't nice). The setback isn't what makes it desolate, it's the use of the space. The cafes tend to go where there are not high end cafes, but more bistro types of restaurants. Setbacks matter for the entire avenue, not blocks.

Comment 16 (*Serge Demerjian*): How did the Newseum achieve a build-to-line on L'Enfant ROW?

Comment 17 (*Male*): When will materials be put up on the website? (*Friday*)

## COMMENTS FROM FBI PUBLIC MEETING – SEPTEMBER 9, 2016

Comment 1 (*John Fondersmith*): The immediate timeline is clear, but what about the redevelopment timeline? (*The development of the new HQ will depend on site selection, but we anticipate 5-10 years for the downtown site*)

Comment 2 (*Female*): Are NCPC's guidelines advisory? (*Square Guidelines are a requirement - developers can amend them*) What about NHPA and Section 106? (*NCPC's action is advisory to GSA*)

Comment 3 (*Gerry Widdicombe*): With a zoning of 10 or unlimited (with residential), is it equivalent to 6 floors of residential? (*It will be a challenge to achieve a 10 FAR*)

Comment 4 (*Bill Bradley*): You made a comparison to City Center (inward focus), and that this site would be externally focused, in terms of scale how does 378 and 379 compare to City Center? I'm trying to picture a scale comparison between FBI and City Center.

Comment 5 (*Patricia Zingsheim*): City Center is 10.2 acres if all phases are included. Between H and I, there is 6 acres and 6 buildings.

Comment 6 (*Sarah Bartlow*): Do you foresee the Square Guidelines for the FBI site to expand to Penn Ave thru the Initiative?

Comment 7 (*Dominic Cardella*): Made comment on potential uses for the site. Penn Ave is the most historic in the nation and belongs to everyone in the country. I'd be unhappy to see another office here - my vision is to have something appealing to all people in this country e.g. A museum like Nation of Immigrants. It wouldn't need to take up the whole parcel, but a part. And a grand cafe like the Willard. Bring people across Penn to the north side. A museum could bridge over to 378 - this museum could be a wonderful splash.

Comment 8 (*John Fondersmith*): Where are you now on the 379 setback? D Street -some have questions about the traffic value.

Comment 9 (*Gerry Widdicombe*): What is the initial and overall height of 401 9<sup>th</sup> Street? (*120' / 139'*) How wide are the sidewalks on surrounding DC streets (9<sup>th</sup>, 10<sup>th</sup>, and E)? (*16 to 20 feet*)

Comment 10 (*Female*): The west side of Market Square is missing in distance from L'Enfant ROW diagram. (*Diagram needs to be corrected*)

Comment 11 (*Male*): If the block is one of the longest at 500' could NCPC recommend breaking the block up? Not necessarily with 1 or 2 walkways - but this could give it some visual break.

Comment 12 (*Female*): The FBI building will be demolished? - it is such a hulk and you need a visual break up. What would you have along that area to make it nice to walk - like Paris (trees, bookstores, etc). Right now this is just full of office buildings – hulks.

Comment 13 (*Male*): When and how will you publish recommendations on heights and build-to lines? (*Sept 29th*)

Comment 14 (*Male*): When you show different heights and setbacks - can show the build able area? To make sure you have a build able area. Show this figure along with how it affects the viewshed. What if you took trees off of D Street? -one alternative would be to narrow D Street. How do you handle the flexibility of narrowing Penn Ave to create a narrower sidewalk?

Comment 15 (*Female*): Are the examples all office or are there any residential? The cart way is related to the Penn Ave Initiative or not?

Comment 16 (*Male*): Original PADC guidelines of 160' included the PH, will new SGs also include PH in max height?

Comment 17 (*John Fondersmith*): Can you clarify the schedule again for comment? The NPS CLI could not be found online - is it available? (*Monday, September 12, 2016*)

## COMMENTS FROM THE PENN QUARTER NEIGHBORHOOD ASSOCIATION (PQNA) MEETING – SEPTEMBER 15, 2016

Comment 1 (*Male*): D street would be vehicular or pedestrian or both? Have you talked about pedestrian only streets? Is that because the initial feeling is that City Center alleys are not working?

Comment 2 (*Female*): What is the existing height of FBI now?

Comment 3 (*Male*): If you bring the building closer to Penn Ave, it appears you're not maintaining the 45 degree angle? Do you have to maintain the 45 degree? I hope it's not being steepened... Because of the historical nature of Penn Ave, is there any way that Sq 379 can be used for a purpose that has national interest?

Comment 4 (*Female*): On the E street side of the FBI, the street is very dark at night. Can you work to light the whole street in addition to the FBI site?

Comment 5 (*Male*): I appreciate what you do has to be commercially viable for a developer. I was interested in the discussion of dead space. Coming forward some, but not as far as the Evening Star. I'd hate to see another massive block building that comes as far forward as Evening Star.

Comment 6 (*Male*): During PADC, there were mandates on use mixes. Can we recommend another agency to oversee this rather than GSA who is just trying to maximize the dollar? Are you giving the government preferential treatment?

Comment 7 (*Male*): Does the FBI consolidation includes the FBI building east of Pension Building/NBM? GSA says there is not a decision yet.

Comment 8 (*Female*): Are you considering the impacts to Market Square's views to the west?

Comment 9 (*Female*): Are the two squares both going to be Penn Ave? Or will Square 378 be D Street? The Penn Ave address will be worth more than a D Street address. *Joanne N.* Answer: the 601 and Warner buildings have Penn Ave address - it's up to the developer working out with the post office. Does D street go all the way to Penn or does it stop at 10th?

Comment 10 (*Jo-Ann Neuhaus*): First, most people will look at the site in isolation and that's wrong. The Avenue plan was developed as a strong vista. D street was closed because it supported the vista and the traffic was awful. You can't just look at that one block. The street was wide to create the vista. The street lighting was done at 3 levels, the decorative features on the lights accent the vista. This is 500 feet and to have that move forward is detrimental to the whole plan of creating that vista. The corner at Market Square was allowed to go up- developers weren't aware of that vista. Good urban design is unnoticed, it just exists. The lower height of FBI was set to balance the Federal Triangle. The historic buildings were 135' not 160' except for the Willard (162'). But the Willard if further away and you don't notice it as much. The 160' setback is critical as is the setback and the row of trees. PADC requires uses- you would not have the residential uses and theaters without mandates and GSA worked with PADC to accomplish that. Another reason for closing D street was to make up for lost FAR. PADC did that in a number of cases. The Presidential building - above the 2nd story there is an overhang on 12th. That SF made up for the setback on Penn Ave.

Comment 11 (*Male*): I realize you want to maximize GSF, but you can't take away from the vista. D street has no value as a street. Use D street for building area.

# **APRIL - JUNE 2016 PUBLIC COMMENTS**



## Compiled Online/Email Comments – April 26 – June 1, 2016

The following comments were received online or by email.

**Sydney White, 801 Pennsylvania Avenue NW, Washington, DC** – I am a life-long resident of Washington, DC and have lived in Market Square West (801 Pennsylvania Avenue NW) since 2002. I am also Secretary of the Market Square West Board of Directors. The Build-To-Line for the new Square Guidelines should not be moved from the current 75' on Pennsylvania Avenue between 9th Street NW and 10th Street NW. Further, the activity/public space focused outward configuration of D Street should remain, which is in accordance with original designs of Pennsylvania Avenue and which maximizes the character of Pennsylvania Avenue as the segue between the Capitol and White House.

An inward facing focus is not appropriate here where the overall streetscape the entire length of Penn Avenue is what makes the area such a valued historical treasure. The value and attraction of the area is directly tied to accessible open space and vistas. An inside focus is only appropriate where the area outside a building is unattractive, unlike Pennsylvania Avenue. A City Center like development is not appropriate here. Further, the sidewalk should not be moved closer to the curb unless you want Pennsylvania Avenue to lose its special character.

The building wall at setback should not exceed the current 134'. Further, 601 Pennsylvania Avenue is only 130' and the Newseum is only 140' as is Market Square West. Increasing the building wall setback beyond 134' will destroy Pennsylvania Avenue as we know it today by ruining the vistas for all the surrounding buildings. It will also completely block all direct sunlight to Market Square West. This would be the most devastating impact of all for both the residents and the commercial tenants of Market Square West. I appreciate your consideration of my comments.

**Matthew, Greenbelt, MD** - Include a substantial amount of housing - some of it should be affordable

**Judy Ingros, Punxsutawney PA** - Where is the money going to come from for the new FBI building? Also, why do they need a new building??

**Colton Brown, Georgetown, DC** - Concerning the FBI Square Guidelines, maybe the east side of square 379 could be considered for the location for a small monument or memorial. If D street was opened this would be a difficult place to situate a building, but would probably be an ideal place for a small memorial.

**Brad, Washington, DC** - When determining what to do with the FBI Building site, there are a few important considerations to make:

- 1) Symmetry along Pennsylvania Avenue is the single most important aspect to consider.
- 2) Symmetry in both building wall and tree canopy, though I would argue that the three dimensions, a) building wall setback, b) building wall height and c) tree canopy can be modified with some adjustments.
- 3) pedestrian experience on penn ave/commerce
- 4) D Street needs
- 5) Usable space in parcel between D street and Penn Ave
- 6) Usable space between D Street and E Street

So my proposal is allow setback from curb to move to 50' which will allow room for commercial space and sidewalk cafe on ground level at penn but to cap height to 108-110, not 160, as a compromise for more usable space on the avenue Allow easier restrictions behind Pennsylvania avenue, to '30 Feet or

less on new D Street frontage and up to 160' to E Street, 9th to 11th Street parcel. Alternatively, the parcel that is defined by Penn Ave to new D Street pass-through becomes a ground level park and location for Penn Quarter farmers market, Which I would argue fits within the historical character of the neighborhood that was displaced when Central Market was razed to create the National Archives.

**David, Washington, DC** - In terms of the setback on Penn Ave., I think NCPC is too concerned with how many rows of trees can fit across the sidewalk. This is too much of a top down view. Think more about what creates a pleasurable experience for a pedestrian on that block. The answer is activity, not shade. The setback (and square guidelines as a whole) should be to encourage activity along the block. Activity being things like shops and restaurants. Room for sidewalk cafes might be nice, but do a study to evaluate whether or not that increases or decreases activity, and use that to decide if it's an important concern. If you decide sidewalk cafes are important, think about how much space you really need. Look at Oyamel's sidewalk café along D St. NW, near 7th and D. The sidewalk can't be more than 20 feet wide (ignoring the tree boxes), but the sidewalk seating there works. It might not accommodate the kind of traffic you'd expect on Penn Ave., but it certainly creates a lively feel because it forces you to see that there is sidewalk seating and activity on that block.

**Brett Rodgers, Location: Washington, DC** - One thing missing from current efforts to continue revitalizing Pennsylvania Avenue and surrounding blocks is attractions for pedestrians. The blocks look pretty but are cold, desolate, and dead. Even mid-day on a weekday, they are rarely lively with people except for the heaviest tourist times. When we see historic photos from 19th and early 20th centuries, we see an exciting "hustle and bustle" of activity on the avenue and its surrounding sidewalks. All of that is completely missing now, as there's absolutely nothing to attract people to walk there. Just well barricaded government and office buildings. Maybe the odd hot dog cart and a few restaurants - either high-end ones, or chains. There are no shops, very few casual cafes, no food trucks, no street vendors, no street performers or buskers, hardly any art, no daily life at all.

**Jonathan McIntyre, Silver Spring, MD** - Strategic ground floor activation (users) will be important in order to help bring life back to the public realm around the entire site and possibly even internally to the site. This is especially important to help enliven Pennsylvania Avenue (in contrast to the south (federal) side of Pennsylvania Ave). While the extensive building height analysis was informative, the potential massing/zoning envelope for the entire site would help provide a holistic view of how the range of Pennsylvania Avenue building heights would be compatible (or not) with the development potential.

**Robert Harpring, Washington, DC** - The main problem with the existing building is with light. It casts a looming shadow, and the facade is not varied enough in texture to provide a free feeling on surrounding sidewalks. Does the existing building need to be demolished? I think adding green walls to the facade, modifying the glazing, and opening up the inner courtyard to foot traffic, with retail and outdoor patios, would go a long way. I don't think D St should be extended, unless it is for a pedestrian only walkway or delivery access. Adding a street there is probably going to be worse for traffic due to the proximity to the existing intersection with Pennsylvania and left turns off of D St. I think the intent of the City Center Development is a good benchmark, but I don't think the architectural style of City Center will mesh well with the other structures along the Pennsylvania Avenue corridor. Newseum does a good job of not contrasting too sharply with the museums and monuments. The building facade should create the line along Pennsylvania, but I think a heavily landscaped inner walkway with good light (in place of a vehicle traffic D Street), should be the main focus of any new Development. The size and height of the actual construction should be less than the existing FBI building. A final comment would be that DC could use an avant-garde structure, the new African American History museum is somewhat bold, but I think a grouping of smaller buildings with an unorthodox shaped centerpiece would be a dream come

true in this location. A sloping park on the lower part of any structure (to provide an easy stroll to a great vista right off the sidewalk-maybe 50 feet total elevation on a 20-30-degree slope), and a small water feature (something like the SW duck pond), would also be ideal if money was no object.

**Willard Hillegeist, Washington DC 20001** - I attended the Penn Quarter Neighborhood Association meeting and appreciate the NCPC briefing on the FBI Headquarters building. The mixed use of that space could do much to improve the ambiance and liveliness of PA Avenue that is a very dead zone at night. I favor a compromise with a 50-foot setback on PA Avenue, allowing plenty of space for outdoor seating for restaurants and well as pedestrians. It will not inhibit the sight lines to the Capitol Building. I also strongly favor reopening D Street to from 9th to 10th, yet making this a pedestrian only street, thus creating a livelier scene for restaurants and shops. The combination of the compromise set back and opening up D Street will enable the southern square to be commercially viable for a building that will, of necessity, be limited in height. The northern square could benefit from a space similar to the plaza of City Center.

**Dominick Cardella, WASHINGTON DC** - Pennsylvania Ave, between the US Capitol and the White House, the most historic few blocks in the Nation, is NOT the Developers Ave, it is NOT where DC Government should be focusing on maximizing its tax base, and it is NOT where the US Government should be concerned about receiving a few extra \$\$\$ for the sale of this property. This small 15 block strip is the PEOPLE'S AVENUE! As such, it should be a showcase for the millions of people living and visiting the Nation's Capitol. The 70' sidewalk setback MUST be maintained! An urban park, a grand promenade, a place to watch important and historic parades, grand cafes, a welcoming space for residents and visitors alike - that's what we need and deserve to have instead of extra office space !!! We have enough office space! Take that extra bit of office space somewhere else! DON'T SELL US SHORT ON OUR HISTORIC AVENUE!!!

**Brian Love, Washington, DC** – The current 75ft setback along Pennsylvania Avenue is too much. I think that a 50ft setback would be the best – anything less would be too narrow. Reducing the setback to 50ft also increases developable space while not significantly impacting the pedestrian circulation space available and still making sidewalk cafes feasible for restaurants that want them. Regarding D Street, while I definitely feel that D Street should be open to pedestrians, I don't think that it should be open to vehicular traffic. The existing road network should be sufficient for traffic, and fully reopening D Street could complicate the intersection of 10th Street and Pennsylvania. However, opening up D Street as a pedestrian mall would lead to large benefits in terms of the accessibility of the neighborhood.

The western corner of Square 379 would be an ideal place for a small park, giving people a place to gather and bringing a nice bit of green to this part of Downtown. This is also the part of the site that would have the least space for a building, so this is the logical place to put a park. The eastern part of Square 379 should have a building with street-level retail. Due to the location (both views and Pennsylvania Avenue address), this is probably the best spot for a higher-end condo or hotel.

Square 378 could either have multiple smaller buildings or one large building. Before attending the 26 April meeting, I had been thinking that multiple buildings would be best, but following a suggestion by a man at the meeting, I now think one larger building would be best. Once again, there should be street-level retail, ideally surrounding a grocery store. Downtown does not have a large grocery store, and while the current number of residents may not support one, with the recent completion of City Center DC and the redevelopment of this site, the area will be well on its way to having a sizeable residential population capable of supporting a grocery store. The presence of this store will likely also encourage

more residential development in the area, which will be good for encouraging a heterogeneous development pattern that can make the most use of the District's transportation resources.

At the meeting, the man I mentioned before suggested that this site would be a good location for a major attraction, such as a stage theater or opera house. I like this idea. This facility could be built at the center of Square 378, above the grocery store, and provide a destination to bring residents and visitors to not only the neighborhood but also the stores lining the streets of the site. This man also suggested making the roof of the building into a publicly-accessible park. I also like this idea. This would be a feature that is not (to my knowledge) available in the region, and would surely attract many people due to the views that it would offer.

The street-facing edges of the site should be either purely residential or a combination of residential and hotel (but still mostly residential). This site is a prime location for residential development, and the District already has plenty of available office space (there are several office buildings in nearby NoMa that still appear to be vacant years after being built). Included in this residential development should be the requirement that at least 10% of the units be affordable housing. It is essential that not only the total stock of housing in the District increase, but also that affordable housing increase as well. Additionally, while the Square 379 building would likely be the best one for condos, a significant portion of the Square 378 residential units should be apartments, in order to ensure that a wide range of people will benefit from the development.

Regarding the height of the buildings on this site, I think that Square 379 should be similar in height to the southern portion of the FBI building (I believe somewhere in the 130-140ft range). This will reduce the disruption to neighbors and keep the existing scale of buildings relatively intact. Square 378, being further north, should go as high as possible, which I believe is 160ft. This will maximize the development potential of the site (and therefore the tax revenue), and will minimize the disruption since the current FBI building is already nearing the 160ft height. Additionally, this arrangement for building heights will maintain the gradual slope of building roofs rising away from Pennsylvania Avenue.

As the FBI site is along Pennsylvania, the façade of the building should match that of nearby buildings – namely making substantial use of brick and stone. While “modern” glass-faced buildings can be nice to look at, for this site it is best to stick with stone and brick. Parking and loading would likely be done on either E Street or on 9th or 10th Streets, not on Pennsylvania.

It is also important that the new building be sustainably designed, built, and maintained. Ideally the building would be certified at least to the LEED Silver level, although a higher level would certainly be nice.

**Perkins+Will, 1250 24<sup>th</sup> Street NW, Suite 800, Washington, DC 20037** – As one of the leading architecture and urban design firms in the country, and the American Planning Association's 2015 Firm of the Year, we hereby submit our thoughts on the Square Guidelines for Squares 378 & 379. Our thoughts follow accepted good urban design principles that will aid in the redevelopment of this important parcel in Washington, DC.

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Square 378 & 379, or how and when you will be able to provide input?*

- Since NCPD does not plan on submitting their opinion on the Guidelines until early June, how does NCPD expect the developer teams to react given the fact that the RFP was released on

January and is due in late June, in other words, teams have spent months working on assumptions for the redevelopment, what if NCPC runs counter to these assumptions?

*NCPC will consider these topics in developing Square Guidelines: Land Use, Building Massing, Build-to-lines, Building Height, Upper-story Setbacks, Penthouses, D Street, Ground Floor Use, General Design Guidelines, Public Realm, Sustainability, Circulation/Access/Loading:*

- The buildings that are located on either side of the squares on Pennsylvania Avenue each follow a different set of design guidelines; this should mean that the Hoover site should follow what's best for the redevelopment, not so much trying to follow an insistent set of guidelines or taking queues from neighboring sites that inconsistent with each other.
- The current sidewalk at this location is extremely wide, creating a zone of little to no activity, especially given the lack of ground floor retail, this would be a more successful mixed use destination if the façade was brought much closer to the curb and the sidewalk was not as deep as it currently is. 30 feet seems appropriate.
- There was mention in the NCPC presentation about the rows of trees (are one, two or three appropriate) – it seems that just adding width to the sidewalk to accommodate trees is not the ideal use of prime urban space. If the building can have the maximum allowable high and is pulled close to the sidewalk the street will be well shaded with just one row of trees, while still maintaining a street line on PA Ave that is consistent with other blocks nearby.
- For years the neighborhoods around the Hoover Site have become livelier, live work and play neighborhoods, but the area immediately surrounding Hoover has been left behind because the block is a super-block with no ground floor activity and an almost ominous design presence at the ground level. Because of this the neighborhoods remain separate by the “Berlin Wall” that is the Hoover Site. The redevelopment from the monolithic version of the site to a lively, high density, mixed use site that connects the federal triangle and the Penn Quarter in a way that does not exist today.
- The goal of the redevelopment of the Hoover site should be to create a true place, the best example being the new City Center neighborhood. There was concern during the NCPC public meeting that a developer can't be “forced” to create a lively mixed use neighborhood with ground floor activity, however, it is in the best interest of a developer to create a successful urban environment – with this in mind the Square Guidelines should allow the maximum flexibility for the redevelopment.
- The best scenario for D Street would be to restore it as a pedestrian only street that creates a welcoming space for walkers to move from the Penn Quarter and the Federal Triangle area that is also interesting and safe. A pedestrian only street would make sense to align with the existing D Street that terminates at the building while also avoiding an awkward intersection at 10th street if it was to be a vehicular street.
- While Pennsylvania Ave is an important ceremonial and historic street we should remember that older photos show a very live, busy street scape that is currently not there, the goal of these guidelines should ensure that the redevelopment brings life back to the block and those immediately surrounding it (both on and off PA Ave).
- While we understand that the inaugural parade runs by this site every four years, it does not seem prudent to design an entire block around a once in 4 years, for a few hours, event. The Avenue is so wide at this point, and with security on lookers are already kept at a great distance from the parade, forcing very wide sidewalks will not create a better space for the parade.  
*Are these the right topics to include on the guidelines?*
- Given the fact that this is going from government use (tax free) to private (taxable land) there should be consideration to how these site guidelines might affect the future taxable value of the

land. Yes, we need to pay attention to history and urban design but we can't totally ignore value.

**Committee of 100, 945 G Street, NW, Washington, DC 20001 – John Fondersmith (April 26) and Carol Aten (April 28)**

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future development of Squares 378 & 379, or how and when you will be able to provide input?*

The Committee of 100 believes that the schedule for developing the Square Guidelines, presented at the April 26th and 28th meetings, is clear. However, it is summary in nature. As this important project proceeds, there may be revisions to the schedule. We request that NCPC keep the public, especially individuals and organizations making comments, informed of any program and schedule revisions. Since some issues, such as building massing—heights, setbacks, and build-to-lines—are so important, it would be helpful to provide any additional information on those issues as soon as possible.

*Are these the right comments to include in the guidelines?*

The Committee of 100 believes all these topics are appropriate for inclusion in the Guidelines and that some additional topics should be added, as noted below.

*Are there additional topics NCPC should consider?*

Land Use is a key issue with redevelopment to this site, and a full variety of land uses should be considered.

The Committee of 100 believes that, while the design and activity along Pennsylvania Avenue is of key importance, it is also important to consider relationships and activity along the three other adjacent streets (E Street, 9th Street and 10th Street, NW) and the impacts on adjacent areas, probably extending out for several blocks. The District's Downtown Plan has indicated the importance of activities along E Street, but that role has been somewhat limited by the presence of the FBI Building. This relationship to adjacent areas includes consideration of land use, ground floor use, general design guidelines, the design of the public realm, and the location of parking and loading access points.

The Square Guidelines should address the question of uses on the top of the future building(s) on this site, including recreational areas, possible restaurant use, the use of solar panels, green roofs, etc., as well as the location and design of penthouses.

The Square Guidelines should suggest/provide for interior pedestrian circulation on the site, probably mainly at the ground floor level, and suggest creation of some special interior spaces, open to the public, within the overall building site. If D Street is extended in some way as a pedestrian promenade or an arcade, that space should be linked with other interior passages.

The Square Guidelines should consider the location of parking and loading access points, which will have to be on E, 9th and 10th Streets. Considering the major traffic function of 9th Street, that street may not be available for such access points.

*Are certain topics more important to you and, if so, why?*

The improved design and animation of the Pennsylvania Avenue frontage of the future building complex is of key concern. In part, this relates to the Avenue originally having been outlined in the L'Enfant Plan and the continuing design and animation of the Avenue (and sometimes lack of animation) over many years. We note another feature that is being discussed is the reopening of the section of D Street

between 9th and 10th Streets based on its inclusion in the L'Enfant Plan and it being closed for the development of the FBI Building. As you know, the Committee of 100 is a strong supporter of the L'Enfant Plan and of maintaining its street patterns. Nevertheless, we agree that opening that section of D Street for vehicular traffic would not be desirable since it would create an awkward intersection at 10th Street, D Street and Pennsylvania Avenue. We would support reopening D Street to provide a path for pedestrian circulation. However, we believe that the Pennsylvania Avenue frontage is very important and should take priority in considering design and uses. Perhaps it might be possible to continue D Street west from 9th Street as an attractive pedestrian arcade.

Considering the importance of Pennsylvania Avenue, we believe that a major effort is needed to animate that section (9th to 10th Streets) on the north side of the Avenue. This includes adding a variety of active retail uses, especially restaurants that could create sidewalk cafes. The open space between the future building and the street line might be improved by special landscaping, and perhaps some retail kiosks and art works.

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Squares 278 and 379?*

Building heights and build-to-lines will be very important in establishing the character of the future building complex, and obtaining optimum economic value and activity generating uses. Care must be taken not to overwhelm the adjacent streets (9th, 10th and E Streets) since building lines should probably be extended outward on those streets.

The present setback of the FBI Building is 75 feet from the curb. NCPC seems to be considering decreasing this to 50 feet in order to gain more development potential for the future building complex. This would decrease the width of the landscaped open space along this section of Pennsylvania Avenue. The Committee of 100 believes that the amount of setback needs very careful study and that it should not be less than 50 feet.

*Do you have any additional comments?*

The Committee of 100 does not have any additional comments at this time. We look forward to learning about other comments on this project and to learning about the more detailed analysis as the design work by the NCPC staff continues.

**Otho Eskin and Therese Keane, 801 Pennsylvania Avenue, NW Apt. 1115 Washington, DC 20004**

We apologize for the lateness of these comments, but we were out of town traveling and missed your May 13<sup>th</sup> deadline. I hope you will consider the following suggestions at some point when you are reviewing public comments as you proceed with your guidelines.

The existing FBI building creates a dead space in the center of Penn Quarter and prevents it from being a flourishing, lively neighborhood. This is particularly true along Pennsylvania Avenue between 9<sup>th</sup> and 10<sup>th</sup> Streets but also on E Street.

We urge that the plans for the site include a substantial residential element. Government workers in the area and tourists will not be able to sustain a vital neighborhood as they go home at the end of the day leaving the area deserted in the evening. A substantial number of permanent residents will alleviate that.

We recommend that the Pennsylvania Avenue and E Street sections be zoned for shops and restaurants and, if possible, for theater, bookshop. Most important, provision should be made for a grocery store. These should be on the street, not tucked inside.

Thanks you,

Otho Eskin and Therese Keane



## **April 26 and April 28, 2016 Public Meeting Comment Forms**

These comments were typed from handwritten comment forms.

### **Jessica Rosenberg, Washington, DC 20004 –**

*Are these the right topics to include in the guidelines?*

Public realm! Ground floor use! We need a more active area- day and night.

*Are there additional topics NCPC should consider?*

Night-time usage/density. E Street, 10<sup>th</sup> Street. You discussed 9<sup>th</sup> and Penn, but not these. These also need some retail.

*Are certain topics more important to you, and if so, why?*

Public realm guidelines. 50-foot build-to-lines. Nice balance of public use space but not too much dead space. Retail and restaurant should activate the street! Night-time usage. Function over look (see below for more details on this).

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Square 378 and 379?*

This was great. Very informative, accessible, and positive.

*Do you have any additional comments?*

Symmetry – you asked if it's important. Sure, but not as important as the public realm guidelines. It's a matter of how things look (to tourists, e.g.) vs how things function (to residents, workers). Function is so, so much more important than look. A rooftop would be GREAT! D Street between 9<sup>th</sup> and 10<sup>th</sup> as a pedestrian walkway (vs vehicular street) is compelling! Retail on all sides.

### **David Rosenberg, Washington, DC 20004 –**

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Squares 378 & 379, or how and when you will be able to provide input?*

It looks fine. I'd like frequent updates (through the website is fine).

*Are these the right topics to include in the guidelines?*

I don't think any are inappropriate.

*Are there additional topics NCPC should consider?*

Night-time usage of the space. Currently Penn Ave. is dead at night. I'd like to see it more lively in the evening.

*Are certain topics more important to you, and if so, why?*

Grocery stores, night-time activity, maximize residential usage.

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Squares 378 and 379?*

Don't lose sight of how things feel for a pedestrian walking on the Square 378 & 379 blocks. Don't worry too much about sightlines versus a good feel to a pedestrian on the block. Also, don't forget about usage on 9<sup>th</sup>, 10<sup>th</sup>, E Streets. E already has night-time activity, so encouraging that with more retail on E Street would be good.

If you have any control over height limits, this would be a great location for a skyscraper (300+ ft).

*Do you have any additional comments?*

Adding more residences in the area will help to create a better neighborhood feel. So I think adding housing should be a priority. To that end, anything that reduces the available square footage of the

building (height limits, setbacks, D street) may push a developer closer to building more office space, which doesn't contribute anything to the neighborhood after 5pm. I'm not saying that I want the max height and smallest setback, I just want to maximize residential space (and retail). Listen to what the local residences want, but ignore what they say they don't want. There are plenty of NIMBYs in the area, that are convinced they know what will alter their property values. I'd love to see department stores (store bigger than one floor). I don't know what kind of control you have over that. There was a question of whether commercial activity should be isolated to Market Square & Evening Star, or if it should span both. The best retail districts are just that. Districts. Encourage retail to go on this block and stretch from Market Square to Evening Star (and beyond).

**Craig Vaughn—**

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Squares 378 & 379, or how and when you will be able to provide input?*

Animation and video gaming museum will be a designation attraction in Washington, DC conventions, workshops, education, concerts, festivals, cosplay café and other events/activities planned for this new museum at the FBI site. The existing Newseum is a great example of mixed use designation attraction on Pennsylvania Avenue.

*Are these the right topics to include in the guidelines?*

Split use of lots. Lot 1 for animation and video gaming museum, Lot 2 for mixed use residential retail.

*Are there additional topics NCPD should consider?*

Animation and video gaming museum will education and inspire with exhibits, events open to the public. Baltimore has Geppi's entertainment museum, Washington DC will have animation and video gaming museum.

**Maxime Devilliers, ANC 6C, Washington, DC 20002 –**

*Are these the right topics to include in the guidelines?*

Yes. Save all trees. Extend D Street. As little setback as possible. Build as high as allowable. Divide the Squares into as many parcels as possible to encourage buildings from multiple developers and to discourage a monolith. As many small retail bays as possible. Encourage residential and discourage office space. Reduce or eliminate parking minimum. If the NCPD is so worried about the Capitol vista, then tear down the stoplights and prohibit cars from driving on Penn Ave.

*Are certain topics more important to you, and if so, why?*

Bringing the build-to line as close to the street (Penn Ave) as possible because the street and sidewalks are so wide, they feel like a desert.

*Do you have comments on NCPD's initial discussion of possible building heights and build-to-lines for Squares 378 and 379?*

Build as high as possible (160 ft.) and as close to the street as possible (25-30 ft.).

**Jared Alves, ANC 6C, Washington, DC 20002 –**

*Are these the right topics to include in the guidelines?*

Yes.

*Are certain topics more important to you, and if so, why?*

Walkability. To ensure the area is walkable the development needs diversity of design (sub-dividing the block) and ground floor retail. I do not own a car, so prioritizing walkability from a public health and community relations perspective is essential.

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Squares 378 and 379?*

Establish the minimum build-to-line. Wide sidewalks are no guarantee of street life, and in this case, appear to be detrimental to pedestrian activity. Example of narrow sidewalks but active areas abound in this city, including U Street and 7<sup>th</sup> Street NW in Chinatown. Over time the sidewalk may even enlarge again if Pennsylvania Avenue NW is put on a road diet. Ultimately, the 100ft wide street or desert is the greatest barrier to activity on the Avenue. As for building height, the NCPC should specify the maximum. This location is in the heart of the city, downtown and should be a vibrant, mixed use area.

**Annie V–**

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Squares 378 & 379, or how and when you will be able to provide input?*

When will the developer be selected? How can NCPC & GSA require a certain development use to happen in the ground floor usage?

*Are these the right topics to include in the guidelines?*

Yes.

*Are there additional topics NCPC should consider?*

How would Green Area Ratio apply? How would green infrastructure standards apply?

*Are certain topics more important to you, and if so, why?*

Public realm & row of trees– lots of tourist visit, not much of activated streetscape right now, important to preserve tree line.

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Square 378 & 379?*

Tree line is a part of the vista / interim tree canopy coverage?

**Unidentified–**

*Do you have any questions regarding the schedule for developing the Square Guidelines, the review process for future redevelopment of Squares 378 & 379, or how and when you will be able to provide input?*

No.

*Are these the right topics to include in the guidelines?*

Yes.

*Are there additional topics NCPC should consider?*

I think everything is covered.

*Are certain topics more important to you, and if so, why?*

No.

*Do you have comments on NCPC's initial discussion of possible building heights and build-to-lines for Square 378 & 379?*

The current sidewalk width feels cavernous unless redeveloped to incorporate large outdoor dining or entertainment space it will continue to feel this way. I think the street life and vibrancy of the block will be improved by moving the build-to-line forward. I think this will also improve the directed views down the Avenue to the Capitol based on the models and examples shown. The range between 30-50 feet feels most comfortable.

*Do you have any additional comments?*

Square guidelines as proposed focus solely on full redevelopment of the site. What happens if selected developer chooses to rehab the existing structure? How will Sq. Guidelines shape/influence reuse proposal to enliven the existing building and reconnect it to the surrounding blocks and re-engage the public realm?

## April 26 and April 28, 2016 Public Meeting Comments

These comments were transcribed from the audio recordings.

### April 26<sup>th</sup> Meeting:

1	<ul style="list-style-type: none"> <li>- Urban design is critical to the Avenue. This needs to be considered when thinking about the setback. The setback had to do with two earlier plans developed by the Council/Committee (right before PADC). The 75' setback predated the PADC Plan and definitely created the vista of the Capitol. Only buildings that popped out were the historic buildings. L'Enfant has planned a square at Market Square so there was supposed to be a cut-out there.</li> <li>- Square 460 between 6<sup>th</sup> and 7<sup>th</sup> is the deadest block on the Avenue but this is one with a very narrow sidewalk. Narrowing the sidewalk doesn't necessarily mean more activity. You can't tell a developer to activate the ground floor. It's a one-sided street so you'll probably only have restaurants on one side and not the other. You also need to take into account the inaugural parade. The 75' setback allows for stands.</li> <li>- A lot of the guidelines call for masonry buildings to complement the south side. PADC did not want all glass buildings. Good urban design is the urban design you don't recognize.</li> <li>- No penthouses were allowed on the 160'. You could have just a small space so you could stand up on the roof – about 10' above the roof for a stairwell.</li> </ul>
2	<ul style="list-style-type: none"> <li>- If we're so concerned about the Capitol vista we should tear down traffic lights and get rid of traffic on Pennsylvania Avenue. This is the ugliest thing about Pennsylvania Avenue.</li> </ul>
3	<ul style="list-style-type: none"> <li>- There is an interesting relationship for a couple of blocks...Market Square on one end and Evening Star on the other. Relationship to the surrounding blocks is very important. The FBI building has a deadly effect on other blocks around it. It's a great opportunity for new uses, pedestrian access.</li> </ul>
4	<ul style="list-style-type: none"> <li>- Sight lines are important but I'm a big fan of no more dead areas. We want our city to be beautiful but the most important thing is to have a functioning area. What would excite me is not how close to the road the building is but what is happening there. We need a park for kids and a grocery store.</li> </ul>
5	<ul style="list-style-type: none"> <li>- There is a reason for FBI's initial height. This area was designated mixed-use residential and 160' in height was not deemed appropriate for residential. Now obviously we've seen this change and this may not be an issue anymore.</li> <li>- Everyone would love a grocery store – several attempts have been made but there isn't enough density here.</li> </ul>
6	<ul style="list-style-type: none"> <li>- We would like to have it be more busy/bustling but I don't understand the concept of putting the build-to-line closer to the road. Market Square really comes alive with outdoor cafes. You really do need the outdoor space.</li> </ul>
7	<ul style="list-style-type: none"> <li>- One of the busiest pedestrian traffic areas is 7<sup>th</sup> street in Chinatown and it also has some of the narrowest sidewalks so I don't think it's necessary that having wide sidewalks is</li> </ul>

	necessary to have pedestrian life. Often wide sidewalks can be detrimental. City Center has activity both on the interim and the exterior.
8	- Reducing the 75' sidewalk does not mean no more sidewalk cafes. 30' is still quite wide.
9	- I'm not saying it should be 75' but going back to other comments – the 601 block is so dead. 7 <sup>th</sup> Street is so busy because people are crowded into such a small space just trying to go from A to B not because they're trying to access retail on the street. I avoid 7 <sup>th</sup> because it is so busy. So maybe something less than 75' that still leaves room for people.
10	- I'm concerned about how the massing will impact views from my units at Market Square, especially as you look west on Pennsylvania Avenue.
11	- Regarding the setbacks – 75 is too much and 30 is too little so 50 seems about right. - D Street – I wouldn't bring it back for vehicular traffic but definitely for pedestrian traffic. - Western tip of 379 could be a park/plaza
12	- I'm in favor of large buildings – maximum height and public roof gardens.
13	- I agree with the rooftop comment but we also need to consider the noise ordinance.
14	- My question is about the symmetry of the view of the vista and protecting it through zoning or individual sites. Set the guidelines as time progresses, and then all redevelopment will meet those guidelines. Setting the building in accordance with confused guidelines seems odd to me.

#### April 28<sup>th</sup> Meeting:

1	- Ground floor uses on Penn Ave to encourage everyday use. Should also be articulated for E, 9 <sup>th</sup> and 10 <sup>th</sup> Streets in the square guidelines.
2	- Are there opportunities to change the land use for the site? - <i>The plan amendment identified a mixed use development. If something different is proposed, both the square guidelines and plan would have to be amended.</i>
3	- What about 9 <sup>th</sup> and 10 <sup>th</sup> Streets? You have those moats...are you also pushing out on those sides? - <i>We haven't gotten that far yet, but will be looking at what it means to be compatible with adjacent sites.</i>
4	- What about alignment to D Street? Is there the potential to have nothing on Square 379? We except Square 379 will be developed and that the D Street alignment will follow the original L'Enfant Plan alignment.
5	- You raised a question about continuous retail and the economics of it. This is so far ahead of when the project will be complete. Is it possible to build in some economic analysis in the interim? - <i>NCPC is working on a market study as part of the larger Penn Ave Initiative. It will be helpful in terms of exploring feasibility of different uses on the Avenue. Big pieces include residential feasibility and ground floor uses. It will be available this fall.</i>
6	- Does NCPC have the ability to require a higher level of residential uses in the square guidelines, or is that beyond the scope?

	<ul style="list-style-type: none"> <li>- <i>In terms of the square guidelines, there have been other instances where they specifically identify land use mix. Most of them do not go into that level of detail. We could talk generally about the types of uses, and the plan amendment already does that. Also, zoning could also require additional land uses, but it doesn't currently do that. Since we are working on this prior to development occurring, our goal is to identify what is important to federal and local interests. As the development program takes shape, there's an opportunity to for the developer to come back in and propose more detailed square guidelines.</i></li> </ul>
7	<ul style="list-style-type: none"> <li>- On-street parking: it's not anywhere along that (FBI) block. Will there be any more detail on this issue? <ul style="list-style-type: none"> <li>- <i>There's the issue of the street parking, as well as loading and other circulation issues. There is no program for the site, so it's difficult to identify circulation and access. Parking availability has been reduced over time, but we will be looking at this issue and set some objectives.</i></li> </ul> </li> </ul>
8	<ul style="list-style-type: none"> <li>- Walking along Penn Avenue for a long distance...what it's intended to do is one thing, but the feeling is much different. Trying to recreate a boulevard in Paris, but the street is too wide and the buildings too short. 75 foot sidewalks impairs activation. The volume of people needed and sustainability issues (impervious surface) are difficult to overcome. Also need to consider timespan of active café use. Promote shorter/narrower distances...50 feet feels like a good compromise as there is enough elbow room. The narrower existing sidewalks has a lot going on with building entrances, tree pits, and cars dropping people off. Same with 9<sup>th</sup> and 10<sup>th</sup> Streets – it's so vast.</li> </ul>
9	<ul style="list-style-type: none"> <li>- How does the public get to comment on the GSA developer selection process and championing a specific design proposal for the site? <ul style="list-style-type: none"> <li>- <i>GSA will select the developer in accordance with their procurement procedures. CFA and HPRB will have public review processes, as well as a to-be-determined zoning process.</i></li> </ul> </li> </ul>
10	<ul style="list-style-type: none"> <li>- Doing a good job of explaining physical issues, but it's also important to understand that there are a whole lot of answers that are possible. Goal is to get to a clear vision for the site, and there are a number of federal and local interests to balance, such as: setbacks, parade use, ground floor activation, retail types, and overall uses along the entire Avenue are all items to consider and be balanced.</li> </ul>
11	<ul style="list-style-type: none"> <li>- GSA has an incentive to maximize the value as part of the trade for the new headquarters. Has NCPC participated in setting any assumptions as to the value? <ul style="list-style-type: none"> <li>- <i>The square guidelines will set the general building massing for the site (setback, height, etc.), which contributes to setting the value. The NCPC meeting in June gives potential developers the opportunity to hear from the Commission on items such as D Street, maximum allowable heights, etc.</i></li> </ul> </li> </ul>
12	<ul style="list-style-type: none"> <li>- The option to develop the squares together and separately both on the table. Has the decision been made that it will be two squares? <ul style="list-style-type: none"> <li>- <i>Only proposal is that the spatial configuration of D Street should be included. It could be pedestrian, car, or something else. We will develop guidelines for both squares concurrently. There will be no parcelization proposed at this time.</i></li> </ul> </li> </ul>
13	<ul style="list-style-type: none"> <li>- Map shows D Street access coming out at the corner of the next building on the Avenue. Does that impact your massing projections? It looks intrusive. <ul style="list-style-type: none"> <li>- <i>That's the original D Street location. When combined with the sidewalk setback, it does impact the space for development on a front parcel.</i></li> </ul> </li> </ul>
14	<ul style="list-style-type: none"> <li>- Would a connection over D Street be entertained? <ul style="list-style-type: none"> <li>- <i>Yes, it is possible and is one way to achieve height on buildings to the north of the site.</i></li> </ul> </li> </ul>



## Comments from the Penn Quarter Neighborhood Association Meeting – May 11, 2016

**Comment 1 (M):** I'm hoping the 75' setback will be maintained. Any discussion about opening D Street, and making the Penn Ave/D Street intersection a nice plaza – or the entire square as an urban plaza. What will the function of D Street be? Answer – We are considering reopening D Street; early discussions have included the possibility of maintaining it as a pedestrian oriented street with limited vehicular activity.

**Comment 2 (M):** I love the idea of reopening D Street and making it like a City Center type thing with retail on the inside. But I suspect that that will require the developer to go at least 50' set back in order to make the numbers work.

**Comment 3 (F):** I have lived in PQ almost 20 years – we need a playground, a dog park and a place to do food shopping (in order to avoid becoming a geriatric quarter).

**Comment 4 (M):** What kind of tenants do you project based on market conditions? Answer: We anticipate that development is still 7-10 years out, and market conditions will change. Today, we know the office market is changing and the residential population is growing and there is a demand for hotels. There is also a need for cultural space. Retail will need to serve the land use that are in demand at the time.

**Comment 5 (F):** I like City Center, but there is a lot going in the middle of the development but not always easy to see from the street. It also pulls people in and away from the street where we need more activity in this area. Also would like to see green roofs!

**Comment 6 (F):** If you want Penn Ave to be active, then need to think about the what's on it. Look at hotel Washington and the Willard – that has restaurants and feels alive.

**Comment 7 (M):** What bodies will have influence on this process? Answer: NCPC, GSA, NCPC, CFA, HPRB, DCOP/ZC

**Comment 8 (M):** If you extend D street, you are not getting benefit of the southern exposure. But if you did a north south cut you could get maybe more light.

**Comment 9 (F):** Will the bicycle path in the middle of Pennsylvania avenue stay the same? Is there existing developer interest in this? Answer – There is no plan to change the bike lanes as part of this redevelopment plan.

**Comment 10 (M):** What happened to the Reagan ITC vision? Original concept was to have cultural interface with consulates / get visas / USAID etc. Can you dust off the plans by Senator Percy to make this area an international center for public interface (not embassies) but visas etc.

**Comment 11 (F):** It's possible for developer that wins the GSA contract could sell part of the site, or could develop only part of it. Can the Square Guidelines make sure that there is a minimum developable site? Answer – It is possible that the winning developer could sell all or a part of the site. The Square Guidelines should address the phasing to the degree possible.

**Comment 12 (F):** By what entity are construction activities (dust noise etc.) be regulated? Answer – Once the property is deeded to the developer, it will be subject to DC permit review and construction standards, but only after NCPC reviews plans to ensure compliance with Sq. Guidelines.

**Comment 13 (M)**

Part 1. Any consideration to retrofitting the building? Answer- As of today the building is not eligible for Historic Designation, but that could change by the time the developer is ready to redevelop. If this is the case, it is possible the building could be retrofitted. The Plan Amendment contemplated this and encourages that the courtyard be open up for public access and that the ground floors be retrofitted to encourage active ground floor uses.

Part 2: If you were to take a general consensus most would take the 75-foot setback, so it could be used for urban parks restaurants etc. So if we do a vote about it, will that matter?? (or are you just going to do what you want?). Answer - We are going to continue to take public input and analyze the competing factors to help inform this decision.

**Comment 14 (F):** Lessons learned from former mixed use like in gallery place – will there be an opportunity to provide feedback on those? Answer – If anyone has good information or lessons learned, please share it with us. We definitely want to learn from what has worked or not worked in other projects.

# **Suburban Headquarters Site Parking Comments**



March 30, 2016



Ms. Mary Gibert  
Regional Commissioner for the National Capital Region  
Public Buildings Service  
U.S. General Services Administration  
301 Seventh Street, SW  
Washington, DC 20407

**Re: Clarification of WMATA Comments on Draft Environmental Impact Statement for the FBI Headquarters Consolidation**

Dear Ms. Gibert:

This letter is intended to clarify WMATA's comment letter of January 6, 2016 on the Draft Environmental Impact Statement (DEIS) and Notice of Public Hearings for the FBI Headquarters Consolidation.

In the letter, WMATA provided ranges for transit mode shares for the sites, based on our experience with mode splits at various stations in the system. The letter also noted that the mode shares in the DEIS for the sites that required shuttle buses or longer walks to/from Metro appeared to be higher than our experience would indicate, while the mode shares for sites immediately adjacent to Metro seemed consistent with our experience. It was not our intention to comment on what *could* be achieved with a combination of parking policy, fleet management, incentives, or other Transportation Demand Management policies. Specifically, we did not, in any way, intend to suggest increasing parking requirements, nor would it have been analytically appropriate to apply transit mode share discussion to derive a parking requirement.

With respect to Greenbelt and Franconia/Springfield sites, WMATA's analysis yielded mode shares for Metrorail as high as 40 percent, or as high as 49 percent when combined with bus and commuter rail - confirming the original mode shares estimated in the DEIS. To this point, our letter stated clearly that "these sites may actually achieve the high end of the ridership estimate ranges."

The letter also stated that WMATA's tools for estimating ridership are "not likely calibrated to this level of parking scarcity." What we are saying is, WMATA's analytical tools have not been calibrated to measure this level of constrained parking at a terminus station. In this regard, the FBI may certainly use parking and other policy measures to drive additional levels of transit ridership, which WMATA would be happy to support and serve.

**Washington  
Metropolitan Area  
Transit Authority**

600 Fifth Street, NW  
Washington, D.C. 20001  
202/962-1234

By Metrorail:  
Judiciary Square-Red Line  
Gallery Place-Chinatown  
Red, Green and  
Yellow Lines

A District of Columbia  
Maryland and Virginia  
Transit Partnership

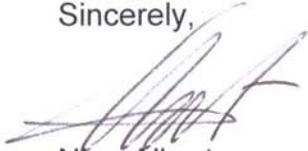
Ms. Mary Gibert, GSA  
Page 2

Finally, parking demand management is an integrated part of transportation and land use planning. Such elements were beyond the scope of WMATA's letter, and most appropriately the subject of GSA's internal site management and design purview. Parking requirements should not be derived from the analysis or comments provided by WMATA, but could be reasonably applied in a resource-constrained environment as a policy tool to achieve particular mode splits and manage transportation demand.

The FBI has an important mission with particular needs. We think that it is possible and desirable to align desired transportation outcomes with the needs and policies of the FBI, GSA, and the stakeholders in the region and we hope that Metro will be a large part of the transportation solution.

These caveats and explanations should have been clearly stated in our January 6, 2016 letter and we regret the omissions. On behalf of WMATA, we recognize the longstanding partnership between Metro and the Federal Government and thank you again for this opportunity to clarify our letter. Please do not hesitate to contact me if you have further questions. I can be reached at 202-962-2616 or [nmalbert@wmata.com](mailto:nmalbert@wmata.com)

Sincerely,



Nina Albert  
Director  
Office of Real Estate and Station Planning

cc: Marcel Acosta, Executive Director, National Capital Planning Commission  
Anthony Costa, Senior Advisor to the Administrator  
Denise Decker, Office of Planning and Design Quality, GSA Public Buildings Service, National Capital Region  
William Dowd, Project Executive, GSA  
Norman Dong, Commissioner of the Public Buildings Service, GSA  
Nia Francis, Project Manager, GSA  
Dennis Anosike, Chief Financial Officer, WMATA  
Shyam Kannan, Managing Director, Office of Planning, WMATA

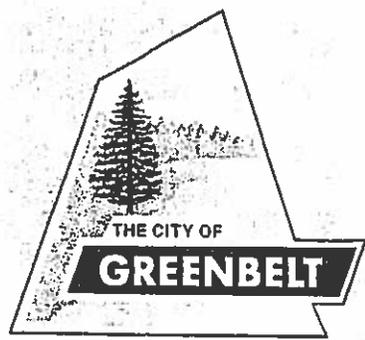
MILLER  
KEMPF  
Schuyler  
Hirsch  
Weil ✓

FILE 101

# CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886

April 12, 2016



Via email to [fbi-hq-consolidation@gsa.gov](mailto:fbi-hq-consolidation@gsa.gov) and certified mail, return receipt requested

U.S. General Services Administration  
Attention: Denise Decker, NEPA Team Lead  
301 7th Street, SW, Room 4004  
Washington, D.C. 20407

**CITY COUNCIL**  
Emmett V. Jordan, Mayor  
Judith F. Davis, Mayor Pro Tem  
Konrad E. Herling  
Leta M. Mach  
Silke I. Pope  
Edward V.J. Putens  
Rodney M. Roberts

RE: Federal Bureau of Investigation (FBI) Headquarters Consolidation Solicitation Number: FBIHQSiteEOI

Dear Ms. Decker:

This letter is sent in regard to the revised FBI employee parking requirement announced at the Information Presentation to the National Capital Planning Commission (NCPC) on March 3, 2016. Specifically, this letter concerns the announced increase in FBI employee parking from 3,600 to 6,076 parking spaces to be located at the proposed consolidated FBI Headquarters in Greenbelt. Greenbelt is one of the three shortlisted sites eligible to compete for the award of the consolidated FBI Headquarters.

We request this letter be included as a supplement to our letter of December 18, 2015, submitted to provide comments to the Draft Federal Bureau of Investigation (FBI) Headquarters Consolidation Environmental Impact Statement prepared by the U.S. General Services Administration (GSA) and dated November 6, 2015 (the "Draft EIS"). As the increased parking requirements were not included in the Draft EIS, the City of Greenbelt was unable to comment during the public comment period.

The City opposes GSA's decision to increase required parking at the Greenbelt site beyond the parking ratio recommended by NCPC guidance. A failure to limit on-site parking at the proposed FBI Headquarters (as recommended by NCPC guidelines) is inconsistent with the direction of Executive Orders issued by the President as well as GSA's own Order issued on October 6, 2015 (ADM 1097.1 CHGE 1). Excess parking at the Greenbelt site substantially increases the cost of the new headquarters to the Government, imposes substantial and ongoing costs to Metro and local jurisdictions, promotes increased road congestion and greenhouse gas emissions, and does not maximize the transit opportunities at this site.

Constraining parking at federal facilities is a critical part of a Transportation Management Plan (TMP) that generally includes carpool/van pool incentives, transit incentives, telecommuting programs and bicycling/walking to work incentives. While we understand that, given the nature of the facilities, FBI employees may have less ability to telecommute than many other federal employees, it is precisely that reason that GSA and FBI should place greater emphasis on other aspects of a comprehensive TMP, including providing a robust transit incentive and prioritizing public transportation over driving.

**A NATIONAL HISTORIC LANDMARK**

(301) 474-8000 FAX: (301) 441-8248  
www.greenbeltmd.gov



U.S. General Services Administration  
Attention: Denise Decker, NEPA Team Lead  
301 7th Street, SW, Room 4004  
Washington, D.C. 20407  
April 12, 2016  
Page 2

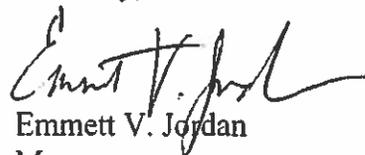
On October 5, 2009, the President issued Executive Order (E.O.) 13514, *Federal Leadership in Environmental, Energy and Economic Performance*. E.O. 13514 states that “It is the policy of the United States that Federal agencies shall...design, construct, maintain, and operate high performance sustainable buildings in sustainable locations.” E.O. 13514 also resulted in the issuance of *Implementing Instructions - Sustainable Locations for Federal Facilities* by the White House Council on Environmental Quality (CEQ) included in the implementing instructions is a direction that “Agency location decisions should take into consideration the promotion of a variety of transportation choices with a focus on encouraging public transportation and transit oriented development (TOD).”

On March 19, 2015, the President issued Executive Order 13693, *Planning for Federal Sustainability in the Next Decade, reaffirming earlier guidance*. Directly, that executive order requires agencies to “consider the development of policies to promote sustainable commuting and work-related travel practices for Federal employees.” It also resulted in the issuance of *Guiding Principles for Sustainable Federal Buildings and Associated Instructions* instructing agencies to “prioritize sites that offer robust transportation options, including walking, biking, and transit, and minimize the combined greenhouse gas emissions of the building and associated commuter and visitor transportation emissions over the project’s life.”

At \$18,000/space, the almost additional 2,500 parking spaces will increase the cost of the new Headquarters by approximately \$45 million - a cost that will be borne directly by taxpayers. That cost does not include the cost of additional facilities to screen incoming vehicles and additional infrastructure that will be required to accommodate the additional traffic that will certainly accompany the vehicle occupying those spaces.

The proposed campus for the FBI at the Greenbelt location is just 284 feet from the Greenbelt Metro Station, bus stops, and the MARC train station, creating a model transit-oriented campus. The ease of commuting by mass transit to this location is an objective directly in line with Presidential Executive Orders, GSA directives, and NCPC goals. Requiring additional parking spaces, as suggested, runs counter to all of this and harms the region. Besides being unnecessary, it would increase the environmental impact of the project. The number of parking spaces should be no more than the 3,600 originally designated.

Sincerely,

  
Emmett V. Jordan  
Mayor

U.S. General Services Administration  
Attention: Denise Decker, NEPA Team Lead  
301 7th Street, SW, Room 4004  
Washington, D.C. 20407  
April 12, 2016  
Page 3

cc: Marcel Acosta, Executive Director, National Capital Planning Commission  
Anthony Costa, Senior Advisor to the Administrator  
William Dowd, Project Executive, GSA  
Norman Dong, Commissioner of the Public Buildings Service, GSA  
Nia Francis, Project Manager, GSA  
Shyam Kannan, Managing Director, Office of Planning, WMATA  
City Council  
Honorable Barbara Mikulski  
Honorable Benjamin Cardin  
Honorable Steny Hoyer  
Honorable Paul Pinsky  
Honorable Anne Healey  
Honorable Tawanna Gaines  
Honorable Alonzo Washington  
Honorable Rushern Baker  
Honorable Derrick Leon Davis  
Honorable Todd Turner  
Honorable Jodie Kulpa-Eddy  
Honorable Patrick Wojahn  
Honorable Andrew Hanko  
Garth Beall, Renard Development  
Bob Rosenbush, Maryland Department of Planning  
David Iannucci, Prince George's County  
Celia Craze, Director of Planning & Community Development  
Jessica Bellah, Community Planner  
*Greenbelt News Review*



IN REPLY REFER TO:  
NCPC FILE No. 7613

May 27, 2016

Ms. Mary Gibert  
Public Building Service Regional Commissioner  
US General Services Administration  
National Capital Region  
301 7<sup>th</sup> Street, SW  
Washington, DC 20407

Ms. Gibert:

Thank you for your leadership as Regional Commissioner of the Public Building Services for the National Capital Region, which we understand now has purview over the Federal Bureau of Investigation (FBI) Headquarters Consolidation. This public project is one of the most critical in the National Capital Region. It will lead to the construction of a modern and secure campus that supports the FBI's mission and the redevelopment of the existing headquarters site in downtown Washington, DC. I am writing to express concerns about GSA's approach to parking for the new headquarters, which may have implications for local and regional transportation goals, environmental goals, and overall project costs.

The National Capital Planning Commission (NCPC or Commission) is pleased to work with the FBI and the General Services Administration (GSA) as a cooperating agency on the Environmental Impact Statement (EIS), as a party to the National Historic Preservation Act Section 106 Consulting Process, and through our role administering the *1974 Pennsylvania Avenue Development Plan* (1974 Plan). The Commission will review the Master Plan for the future headquarters development. In its review of the Master Plan, NCPC will weigh a variety of planning principles and federal interests, including interests related to federal lands, operations, and security, as well as the symbolic elements that establish the form and character of the nation's capital. NCPC will also evaluate the Master Plan against the policies in the *Comprehensive Plan for the National Capital* (Comprehensive Plan). The Comprehensive Plan establishes best industry practices for the development of federal lands, and anticipates related implications for the surrounding community and region. The Comprehensive Plan includes parking ratios that are applied region-wide and promote transit accessibility, operational efficiencies, and enhanced environmental performance on-site.

The Draft Environmental Impact Statement (DEIS), which was issued on November 6, 2015, used the Comprehensive Plan parking ratio goals for the sites under consideration as the future home of the Consolidated FBI Headquarters. Therefore, we were surprised to learn from GSA prior to a March 2016 information presentation to the Commission on the consolidation, that new parking requirements had been established for the project. Specifically, GSA has now established parking requirements of 6,076 spaces at the Greenbelt site and 6,408 spaces at the Springfield site, which

Ms. Mary Gibert  
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exceed the parking goal of the Comprehensive Plan by 2,409 and 2,741 spaces, respectively. In addition, these parking numbers exceed those set forth in the December 8, 2011 United States Senate Resolution (Resolution), which sets a limit of no more than the 4,300 parking spaces.

In the March information presentation to the Commission, GSA staff noted that the proposed parking increase relied in part on a January 6, 2016, letter from the Washington Metropolitan Area Transit Authority (WMATA). However, WMATA has since clarified its position, via letter dated March 30, 2016, stating, “. . . we did not in any way intend to suggest increasing parking requirements, nor would it have been analytically appropriate to apply transit mode share discussion to derive a parking requirement.” See both letters enclosed for your reference.

GSA’s presentation to the Commission; the WMATA letter; and the Resolution all raise important questions that we encourage GSA to address as soon as possible: particularly, why GSA chose not to follow the Comprehensive Plan parking ratios. Given the scope and complexity of this consolidation project, it is important for decision-makers to understand whether and to what extent the current parking approach will require the public to bear greater short and long-term costs, such as traffic congestion and mitigation; infrastructure construction and maintenance costs; loss of open space; and related impacts to the environment.

Given the unique and interrelated nature of the exchange process, the impact of the additional parking on the value of the current FBI headquarters must also be considered and weighed against the future redevelopment of this prominent site on Pennsylvania Avenue. In accordance with our delegated responsibilities, GSA, NCPC and the National Park Service are collectively responsible for implementing and ensuring compliance with the 1974 Plan. The 1974 Plan includes planning and design principles befitting our nation’s most symbolic and ceremonial avenue and other important goals for economic vitality, accessibility, urban design, and visitor experience.

NCPC urges GSA to reconsider its current approach to requiring parking in excess of the Comprehensive Plan ratios. As part of the reconsideration process, we encourage GSA to evaluate the costs and opportunities associated with the parking requirements presented to our Commission in March when compared to those contained in the Comprehensive Plan. This comparative analysis will provide valuable cost-differential information for constructing, maintaining, and mitigating the additional, excess parking at the consolidation sites and support the decision-making process. Given the importance of determining the best value for public investment, the proposals should represent the often-overlooked costs of parking policies to federal and local governments, and the communities where facilities are situated. This approach meets the principles set forth in Executive Order 13693: Planning for Federal Sustainability in the Next Decade, which directs all federal agencies to meet sustainability goals across a range of operational areas that includes sustainable commuting and work-related travel practices for federal employees.

Ms. Mary Gibert  
Page 3

Many federal agencies with varied missions meet the Comprehensive Plan parking ratios; others have designed long-term strategies to meet them. The FBI is in a strong position today to plan for its needs with a clean slate, rather than assuming the burden of retrofitting its buildings, policies, and programs in the future. We strongly urge the GSA and FBI to reconsider the current approach to parking, in consideration of its program goals and the broader public interest in this consolidation and relocation effort.

I appreciate your attention to the issues raised in this letter. Should you wish to discuss this matter further, please have a member of your staff contact my assistant, Marcella Brown, at 202-482-7200.

Regards,



Marcel C. Acosta  
Executive Director

Enclosures

cc: L. Preston Bryant, Jr., Chair, National Capital Planning Commission  
Paul J. Wiedefeld, General Manager and Chief Executive, WMATA  
Nina Albert, Director, Office of Real Estate and Station Planning, WMATA  
Aaron D. Hassinger, Project Manager, GSA  
Rushern L. Baker, III, Prince George's County Executive  
Fern Piret, Director, Prince George's County Department of Planning  
Sharon Bulova, Chair, Fairfax County Board of Supervisors  
Fred R. Selden, Director, Fairfax County Department of Planning and Zoning  
Emmett V. Jordan, Mayor, City of Greenbelt





JUN 30 2016

Mr. Marcel C. Acosta  
Executive Director  
National Capital Planning Commission  
Washington, DC 20004

Dear Mr. Acosta:

Thank you for your letter, NCPC File No. 7613, dated May 27, 2016, presenting the National Capital Planning Commission's (NCPC) concerns regarding the U.S. General Services Administration's (GSA) approach to parking for the new U.S. Department of Justice - Federal Bureau of Investigation (FBI) Consolidated Headquarters and how parking may impact regional transportation goals, environmental goals, and overall project goals. We appreciate our relationship with NCPC and want to continue to be a responsive and engaged partner. Specifically, we would like to address your concerns surrounding our approach to determining the revised parking requirements for the new FBI Headquarters.

GSA acknowledges NCPC's reservations about potential transportation impacts of the future FBI headquarters. GSA concurs that FBI is in a strong position today to plan for its unique mission-influenced requirements with a clean slate, rather than assuming the burden of retrofitting its buildings, policies, and program in the future. To ensure that GSA takes into account today the real life potential impacts of the FBI's mission-driven requirements, GSA, along with FBI, implemented a methodology for determining parking requirements that gave special consideration to facilities near "end of the line" stations, as prescribed in the Transportation Element of NCPC's Comprehensive Plan.

The Comprehensive Plan recognizes the challenges of a spoke-based transit network, current commuting patterns, and the possibility for those patterns to change over time. The plan allows every Federal facility to consider parking relative to its own unique situation. Therefore, as GSA continues to evaluate the FBI program, we will continue to work with NCPC to expand GSA's understanding of the opportunities NCPC's guidelines offer "end of the line" transit stops, such as Greenbelt and Springfield.

GSA appreciates the goals and policies surrounding parking in the Comprehensive Plan and, in the spirit of those guidelines, GSA considered a reasoned and tailored approach to be appropriate.

GSA noted in the Draft Environmental Impact Statement (EIS) a change in parking requirements would be forthcoming and that further Government analysis would be completed for inclusion in the offeror proposals and ultimately the Final EIS.

Thus, after issuance of the Draft EIS, GSA and FBI engaged in an updated modal split study to develop a reasonable real-life estimate of the future parking demand for the consolidated FBI headquarters at all three sites. The GSA/FBI modal split study drew from multiple data sources including:

- Metropolitan Washington Council of Governments' (MWCOG) regional travel demand model
- Outreach to Employer Transportation Coordinators (ETC) at Federal sites similarly situated to each of the three short-listed sites (i.e., "proxy sites")
- A WMATA study, Estimating Metrorail Ridership from the FBI Headquarters Sites, was conducted to assist the project in developing appropriate Metro use percentages for each site. The WMATA study suggested GSA's assumed Metro usage at the three sites, in the Draft EIS, was too high. GSA found WMATA's study compelling and subsequently used it to reevaluate the FBI parking requirements.

The outcome of the additional modal study indicated that the FBI need for parking at the Landover site remained consistent with NCPC's recommended parking ratios. Conversely, the study identified additional parking was needed at both the Greenbelt and Springfield sites to support FBI's mission-influenced requirements, thus the modal splits were updated. Through its Request for Proposals, GSA directed the offerors bidding on the project to use the updated modal splits when developing proposed transportation mitigation strategies for the respective sites.

GSA will then use the updated modal splits and the proposed mitigation solutions as the basis for the transportation analysis in the Final EIS.

Prior to issuing the revised parking requirements, GSA and FBI met with transportation officials for Maryland, Virginia, and WMATA to discuss the methodology used for determining the revised parking requirements, outlined above. While GSA and FBI feel the methodology used to determine the parking approach is consistent with the guidance in NCPC's Comprehensive Plan, there will be additional opportunities for stakeholder input on parking.

Issuance of the Final EIS will convey the methodology used to determine the revised modal splits, the traffic impacts of the revised parking, and the mitigations that will reduce the traffic impacts on the selected site. GSA will host several transportation working group meetings with interested community members and transportation agency representatives to discuss the changes in parking prior to the release of the Final EIS. Upon release of the Final EIS, there will be a 30-day public review period, in which stakeholders will be able to make comments for GSA's consideration in the Record of Decision.

Following the National Environmental Policy Act (NEPA) process and during the Master Planning phase, FBI will develop a transportation management plan specific to the selected site. NCPC will have requisite reviews of the master plan and transportation management plan for the selected site. GSA and FBI look forward to receiving valuable feedback from NCPC as these elements are presented.

GSA appreciates and welcomes NCPA's continued involvement with the FBI Headquarters Consolidation project planning process. We believe that a coordinated planning and design process is important for the local and regional transportation goals, the environmental goals, and the overall project goals of all the project's stakeholders.

If you have any questions or need additional information, please contact me at (202) 708-5891.

Sincerely,



Mary D. Gibert  
Regional Commissioner  
Public Buildings Service

cc: L. Preston Bryant, Jr., Chair, National Capital Planning Commission  
Paul J. Wiedefeld, General Manager and Chief Executive, WMATA  
Nina Albert, Director, Office of Real Estate and Station Planning, WMATA  
Aaron Hassinger, Project Executive, GSA  
Rushern L. Baker, III, Prince George's County Executive  
Fern Piret, Director, Prince George's County Department of Planning  
Sharon Bulova, Chair, Fairfax County Board of Supervisors  
Fred R. Selden, Director, Fairfax County Department of Planning and Zoning  
Emmett V. Jordan, Mayor, City of Greenbelt





**CHESAPEAKE BAY FOUNDATION**  
*Saving a National Treasure*

July 11, 2016

Denise Turner Roth  
Administrator  
U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405

Norman Dong  
Commissioner  
Public Buildings Service  
U.S. General Services Administration  
1800 F Street, NW  
Washington, DC 20405

Mary Gibert  
Regional Commissioner for the National Capital Region  
Public Buildings Service  
U.S. General Services Administration  
301 Seventh Street, SW  
Washington, DC 20407

**RE: Metro Station Location and Parking Requirement for FBI Consolidation**

Encl: Joint comments on FBI Headquarters Relocation DEIS

Dear Administrator Roth and Commissioners Dong and Gibert:

**For the reasons described below, the undersigned strongly urge the General Services Administration to reverse its proposed significant increase in parking to be required at an FBI headquarters consolidation, and urge instead the re-adoption of the parking requirements originally set out in the Draft Environmental Impact Statement. We also strongly encourage a reconsideration and reversal of the recent declaration by GSA that Metro proximity will no longer be a factor or important criterion in the consideration by the agency of where best to relocate an FBI headquarters in the region.**

The undersigned groups have long supported the federal executive orders and implementing regulations which make transit accessibility a core criterion for location of federal facilities and for meeting federal sustainability goals. We have been engaged in local and regional land use and transportation for over three decades, during which time our organizations, in partnership with the Metropolitan Washington Council of Governments, National Capital Planning Commission, and local governments, have substantiated the benefits and importance

of focusing growth in walkable, mixed-use transit-oriented activity centers at Metro and other high-capacity transit.

We submitted joint comments (enclosed) on the Draft Environmental Impact Statement (DEIS) on the potential relocation and consolidation of the FBI Headquarters (HQ). However, since the closure of the comment period for the DEIS, a representative of the General Services Administration has stated that proximity to Metro will not be an evaluation factor and the GSA has also substantially increased the proposed amount of parking.

We strongly concur with the objections registered by the National Capital Planning Commission to the proposed parking increase in their letter to you on May 27, 2016. The proposed increase in parking will lead directly to significantly increased traffic and road infrastructure costs, reduced transit use, and increased air pollution and greenhouse gas emissions. The increase in land area dedicated to roads and parking facilities will increase negative impacts on important forested areas, wetlands, water quality and stream habitat. The proposed increase represents a substantial change in the scope and impacts of the project from the one we and other members of the public reviewed, meriting a Supplemental DEIS. Moreover, the higher costs in traffic and infrastructure needs raises questions about the net value to the taxpayers (federal, state and local) of this major relocation outside the District of Columbia and its extensive transit connections, to a suburban site.

To state that proximity to Metro will not be a factor in GSA's decision, and to substantially increase parking for the two sites adjacent to Metro, is at odds with several past Executive Orders (EO) including EO 13514 and the one that replaced it, EO 13693, dated March 19, 2015, and relevant implementing regulations and guidance. In Section 3(h)(vi), EO 13693 states that in implementing the policy and goals of the EO, agency heads shall "improve building efficiency, performance and management by: ... consideration of community transportation planning and infrastructure, including access to public transit." Section 7(f) requires agency heads to: "consider the development of policies to promote sustainable commuting and work-related travel practices for Federal employees that foster workplace vehicle charging, encourage telecommuting, teleconferencing, and reward carpooling and the use of public transportation, where consistent with agency authority and Federal appropriations law;"

Council on Environmental Quality (CEQ) implementing guidance of June 10, 2015 includes a number of provisions requiring attention to sustainable locations. In responding to the requirements of Section 4(g) of EO 13693, the CEQ specifically states that the *Implementing Instructions – Sustainable Locations for Federal Facilities* are still applicable and will continue to serve as guidance under E.O. 13693:

"These Instructions include a detailed delineation of the Principles for Sustainable Federal Locations which ensures that agencies find the appropriate balance of sustainability, cost, and security. Concepts to consider include:

- Advance Local and Regional Planning Goals
  - Consider sustainable locations from a regional perspective, consulting with local officials and considering their recommendations.
  - Consider recommendations of local officials in light of Federal sustainability goals.
- Seek Location-Efficient Sites
  - Prioritize central business districts and rural town centers.
  - Prioritize locations that promote transportation choice.
  - Promote walkable and bike-able sites.

- ◻ Locate in areas that are accessible to a diverse range of employees and visitors.
- Maximize Use of Existing Resources
  - ◻ Leverage Investment in Existing Infrastructure.
  - ◻ Prioritize Brownfield/Grayfield and Infill Development.
  - ◻ Promote the Preservation of Historic Resources and other Existing Buildings.
- Foster Protection of the Natural Environment
  - ◻ Preserve Existing Ecosystems.
  - ◻ Avoid Development of Green Space.
  - ◻ Promote Climate Change Adaptation Planning.”

GSA’s implementing guidance of October 6, 2015 titled “Incorporating Principles of Sustainability, Economic Development and Efficiency into GSA Business Practices and Location Decision-making” states that:

E.O. 13693 incorporates the principles previously laid out in the Implementing Instructions – Sustainable Locations for Federal Facilities, which called for Federal agencies to consider locating resources in sustainable locations in order to strengthen the vitality and livability of the communities in which they exist.

b. In particular, E.O. 13693 requires the development of policies to “promote sustainable commuting and work-related travel practices for Federal employees that foster workplace vehicle charging, encourage telecommuting, teleconferencing, and reward carpooling and the use of public transportation where consistent with agency authority and Federal appropriations law” as well as the implementation of “cost effective strategies to optimize sustainable space usage and consideration of existing community transportation planning and infrastructure including access to public transit.”

The guidance issued by the National Capital Planning Commission regarding parking near Metro stations is fully in keeping with EO 13693, and CEQ and GSA implementing guidance for Sustainable Locations for Federal Facilities. The DEIS cites the NCPC requirement in Section 3.10.3 Regulatory Requirements and Agreements:

**National Capital Planning Commission Requirements**

There a number of other assumptions that are considered in transportation analysis including those determined by regulatory requirement. An example of one assumption of this nature is the parking ratios developed for each alternative site as stated in the Federal Elements section of the Comprehensive Plan for the National Capital (NCPC 2004). In response to regional congestion and air quality levels, the National Capital Planning Commission (NCPC) has recommended that parking be provided only for those Federal employees who are unable to use other travel modes. To accomplish this policy, NCPC has created parking ratio goals for Federal facilities based on their location to available transit services, walking distances and conditions in the surrounding area, and other criteria. Parking ratios are the number of parking spaces available per employee population. Suburban facilities within 2,000 feet of Metrorail should have one parking space for every three employees (1:3) according to NCPC; therefore, the amount of parking at the Greenbelt and Springfield sites has been determined based on this requirement. Suburban facilities beyond 2,000 feet of Metrorail should have 1.5 parking spaces for every employee (1.5:1) phasing to two parking spaces for every employee; therefore, the amount of parking at the Landover site has been determined based on this 1.5:1 requirement.

If GSA arbitrarily increases on-site parking supply, there is no doubt that road congestion will increase, transit usage will decrease, and air pollution will also rise.

The Washington DC region faces substantial challenges with traffic congestion. In response, the Metropolitan Washington Council of Governments and local jurisdictions have made transit-oriented development (TOD) a

top priority as reflected in their Region Forward Compact and implementing documents, and in local comprehensive plans. To support this goal, localities are incentivizing development near Metro and reducing parking requirements.

Metrorail and TOD are essential for reducing driving and congestion. Planners at the Washington Metropolitan Area Transit Authority have demonstrated the benefits of Metro for reducing demand on the roadways. They've also demonstrated that completing TOD at existing Metro stations, particularly those on the east side of the region, will move Metro from an operating deficit to a surplus because trains will be fully utilized in both directions.

The troubling experience with the Base Realignment and Closure Commission (BRAC) decisions, which moved over 20,000 jobs from transit accessible locations to car dependent locations, illustrates the high costs in traffic and road infrastructure that results from not focusing federal facilities at transit and not applying strong incentives to use transit. We do not want to repeat the mistakes of BRAC.

Therefore, we urge you to select a Metro station location and to keep the number of parking spaces at the levels specified in the DEIS. We also recommend that you adopt additional actions to further reduce the amount of parking needed. These measures include ensuring the maximum number of employees take advantage of the commuter transit benefit, extensive carpool and vanpool matching and special reserved spaces for carpools and vanpools, along with flex-time, and telecommuting. Having shared use vehicles on site for mid-day meetings at locations not near transit will also be helpful. Finally, the benefits of supporting bicycle commuting and live-near-your-work incentives should not be underestimated.

Should you wish to increase the number of parking spaces from that specified in the DEIS, we request that you initiate a Supplemental DEIS and update your traffic modeling. Your evaluation of the benefits and costs of the potential move from the District of Columbia should fully account for the increased traffic impacts and costs of road infrastructure to local, state, and federal governments that will result from increasing the amount of parking.

We look forward to hearing your response to our concerns. Thank you.

Sincerely,



Lee R. Epstein  
Director, Lands Program  
Chesapeake Bay Foundation

FOR:

1000 Friends of Maryland  
Anacostia Watershed Society  
Clean Water Action  
Coalition for Smarter Growth  
(Cont.)

Natural Resources Defense Council  
Piedmont Environmental Council

Cc:

Marcel Acosta, Executive Director, National Capital Planning Commission

Anthony Costa, Senior Advisor to the Administrator

Denise Decker, Office of Planning and Design Quality, GSA Public Buildings Service, National Capital Region

Nia Francis, Project Manager, GSA

Councilmember Roger Berliner, Chair, Metropolitan Washington Council of Governments

Chuck Bean, Executive Director, Metropolitan Washington Council of Governments

Shyam Kannan, Managing Director, Office of Planning, WMATA



August 12, 2016

Ms. Mary Gibert  
Public Building Service Regional Commissioner  
US General Services Administration  
National Capital Region  
301 7<sup>th</sup> Street, SW  
Washington, DC 20407

Dear Ms. Gibert:

Thank you for the June 30<sup>th</sup> letter in response to NCPC's concerns regarding the proposed parking ratios for the Greenbelt and Springfield sites. We appreciate your acknowledging that this "clean slate" project affords us the opportunity to collaborate and prepare a Travel Demand Management Plan (TMP) that is fully consistent with the Comprehensive Plan and its transportation and parking policies and goals.

We also appreciate that the Final Environmental Impact Statement (FEIS) will incorporate an analysis of the updated modal splits and proposed mitigation measures. While we understand that GSA will host several transportation working group meetings and provide a 30-day public comment period for the FEIS, NCPC staff believes that questions and concerns regarding the new parking ratios should be addressed *now* while GSA is negotiating terms with prospective developers. If NCPC staff were to review the master plan for the Greenbelt or Springfield site today, we would raise the following concerns with the Commission.

As discussed in our initial letter dated May 27<sup>th</sup>, we have concerns regarding the proposed parking ratios of 1:1.8 employees at the Greenbelt location and 1:1.7 employees at the Springfield location. These ratios deviate significantly from the recommended 1:3 ratio in the Comprehensive Plan. Additionally, they are only a small improvement over the proposed parking ratio of 1:1.5 for the Landover site – the only site that is not near a metro station.

GSA's June 30<sup>th</sup> letter broadly cites Comprehensive Plan policies regarding end-of-the-line stations in support of the proposed parking ratios. We understand that end-of-the-line locations (especially those that are existing) require special consideration, in part, due to the Metrorail's hub-spoke configuration. An existing end-of-the-line location that does not meet the Comprehensive Plan's 1:3 parking ratio would require a campus to gradually redevelop to attain this goal, with the support of a substantive TMP. Two of the sites that GSA and FBI used as proxy sites in their modal split study are very good examples:

- NSA-Bethesda (proxy site for determining the Greenbelt ratio) is complying with the 1:3 ratio per their recent master plan reviewed by the Commission.

- NIH (proxy site for determining the Springfield ratio) capped its employee parking to transition toward a 1:2.6 ratio per their recent master plan reviewed by the Commission.

If these existing proxy sites for the FBI campus study are able to meet or come close to the 1:3 ratio, it is not clear why GSA/FBI are unable to do the same for a new campus with a 6-year lead time for design and development. We understand that the parking ratios were also based on WMATA's original DEIS comments (and not entirely on the proxy sites alone); however, given WMATA's recent clarification letter regarding their initial DEIS comments, we question the accuracy of the proposed parking ratios.

As such, we continue to have the following concerns regarding the methodology used to derive the parking ratios and the additional costs related to the increase in parking and infrastructure.

**Questions Regarding Methodology and Cost:**

- 1) GSA's response states that the GSA/FBI modal split study drew from multiple data sources including the Metropolitan Washington Council of Governments' (MWCOG) regional travel demand model; however, GSA's memorandums on the updated modal split study (both dated 3/14/16) state that after review of this model, GSA determined that its use was not applicable to the modal split study. Please clarify this inconsistency.
- 2) GSA has indicated that the modal split study was inspired, in part, by WMATA's DEIS comments, which were made without knowledge of the Comprehensive Plan's parking policies and recommended revising the modal split assumptions. As GSA is aware, WMATA issued a follow-up letter (March 30, 2016) stating that the Agency "did not in any way intend to suggest increasing parking requirements, nor would it have been analytically appropriate to apply transit mode share discussion to derive a parking requirement." Will GSA use WMATA's clarification as a reason to modify its current proposed parking levels at these two sites in the future?
- 3) Given the nature of the exchange process, the entitlement negotiations for the JEH site and the design (and financing) of the new campus are integrally related. As a result, the same principles should drive each aspect of the project. GSA has been very clear about the need to maximize development on the JEH site to be a responsible steward of taxpayer money and to help pay for the cost of the new campus. In support of this need,

Ms. Mary Gibert

Page 3

NCPC and regulatory stakeholders are committed to high density development on the JEH site. The responsibility to maximize taxpayer dollars must also extend to the new campus. NCPC staff have concerns regarding the significant cost of additional parking and infrastructure especially when similar campuses have less parking. NCPC encourages GSA to evaluate the costs and opportunities associated with the proposed parking ratios and the 1:3 Comprehensive Plan ratio. This comparative analysis will provide valuable cost-differential information for the increased parking requirements related to construction, maintenance, and mitigation in support of the decision-making process.

As you may know, our appointed Commission reviews TMPs very closely – and they historically have demonstrated keen interest in parking ratios. The Commission, you will recall, discussed the Greenbelt and Springfield proxy sites' respective parking ratios quite extensively at its meeting on March 3, 2016. Staff does not expect that the Commission will review these proxy sites' parking ratios any less critically in the future.

NCPC staff very much want to work with GSA and the FBI on achieving a reasonable solution; however, without a better understanding and justification for the proposed ratios, we will continue to have these concerns. As always, we are happy to continue the dialogue with GSA. Should you or your staff wish to discuss this matter further, please have a member of your staff contact my assistant, Marcella Brown, at 202-482-7200.

Regards,



Marcel C. Acosta  
Executive Director

cc: L. Preston Bryant, Jr., Chair, National Capital Planning Commission  
Paul J. Wiedefeld, General Manager and Chief Executive, WMATA  
Nina Albert, Director, Office of Real Estate and Station Planning, WMATA  
Aaron Hassinger, Project Executive, GSA  
Rushern L. Baker, III, Prince George's County Executive  
Fern Piret, Director, Prince George's County Department of Planning  
Sharon Bulova, Chair, Fairfax County Department of Planning and Zoning  
Fred R. Selden, Director, Fairfax  
Emmett V. Jordan, Mayor, City of Greenbelt





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COMMONWEALTH OF VIRGINIA  
**COUNTY OF FAIRFAX**



6121 Franconia Road  
Alexandria, VA 22310

**JEFFREY C. MCKAY**  
LEE DISTRICT SUPERVISOR

August 22, 2016

Mary Gilbert  
Public Building Service Regional Commissioner  
US General Services Administration  
National Capital Region  
301 7<sup>th</sup> Street, SW  
Washington, D.C. 20407

Dear Ms. Gilbert:

I write today to echo the concerns of the National Capital Planning Commission (NCPC) regarding the proposed parking ratios for the sites in consideration to house the future Federal Bureau of Investigation (FBI) headquarters.

In its letter dated August 12, the agency raised three serious questions that I too believe must be addressed before the process continues further. As you well know, we're in the late stages of this relocation process, so any drastic changes (such as those made to the parking ratios) have a tremendous impact on the counties, states, and developers vying to build and house the FBI.

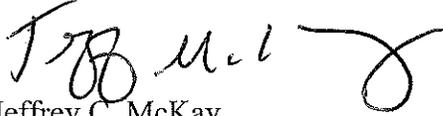
Like NCPC, Fairfax County believes a solution to the amended General Services Administration (GSA) parking ratio determination is achievable if corrections are made before the process advances too far. I have long said that the Springfield site is head and shoulders above the other sites in contention – assuming the process remains a fair one – but even the change to the Greenbelt site's parking ratio makes little sense.

A site's proximity to Metro should be recognized and rewarded in this process rather than used as a late-innings penalty based in part on a WMATA study which the agency later said it "did not, in any way, intend to suggest increasing parking requirements, nor would it have been analytically appropriate to apply transit mode share discussion to derive a parking requirement."

It is my hope that this, coupled with the once-in-a-lifetime opportunity we have to promote mass transit and actually get cars off our interstates, is recognized and supported by the GSA. A 1:3 parking ratio, as defined in the comprehensive plan, makes perfect sense.

I look forward to continuing to work with you and the GSA on this important project and await your answers to NCPC's concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey C. McKay', with a stylized flourish at the end.

Jeffrey C. McKay  
Lee District Supervisor  
Fairfax County Board of Supervisors

cc: Sharon Bulova, Chair, Fairfax County Board of Supervisors  
Tom Biesiadny, Director, Fairfax County Department of Transportation  
Fred R. Selden, Director, Fairfax County Department of Planning and Zoning  
Paul J. Wiedefeld, General Manager and Chief Executive, WMATA  
Nina Albert, Director, Office of Real Estate and Station Planning, WMATA  
Aaron Hassinger, Project Executive, GSA  
L. Preston Bryant, Jr., Chair, National Capital Planning Commission  
Marcel C. Acosta, Executive Director, National Capital Planning Commission



**GSA National Capital Region**

SEP 13 2016

Mr. Lee R. Epstein  
Director, Lands Program  
Chesapeake Bay Foundation  
Philip Merrill Environmental Center  
6 Herndon Avenue  
Annapolis, MD 21403

Dear Mr. Epstein:

Thank you for your letter dated July 11, 2016, to Administrator Denise Turner Roth, regarding joint comments from the Chesapeake Bay Foundation (Foundation), along with the undersigned groups, regarding the increase in parking for the new U.S. Department of Justice - Federal Bureau of Investigation (FBI) Headquarters. The Administrator requested I respond to your inquiry.

The U.S. General Services Administration (GSA) acknowledges the Foundation's reservations about potential transportation impacts from the consolidation of the FBI Headquarters. However, to ensure that GSA takes into account today the real-life potential impacts of the FBI's mission-driven requirements, GSA and FBI considered a reasoned and tailored approach to determining the parking need for this facility. The Draft Environmental Impact Statement (EIS), dated November 6, 2015, indicated that FBI recently completed a detailed analysis that points to a need for more parking. Since that time, GSA and FBI developed a methodology for estimating the parking demand, described herein, and consulted with the transportation officials in Maryland and Virginia, as well as the National Capital Planning Commission (NCPC) and the Washington Metropolitan Area Transit Authority (WMATA) on the process and analysis. GSA concluded that it was reasonable to evaluate potential impacts resulting from an increase in parking.

Following issuance of the Draft EIS, GSA and FBI engaged in an updated modal split study to develop a reasonable real-life estimate of the future parking demand for the consolidated FBI Headquarters at all three sites. The methodology for updating the modal splits took into account the FBI's mission-driven requirements; the proximity of the sites to Metro stations; and gave special consideration to facilities near "end of the line" stations, as prescribed in NCPC's Transportation Element of the Comprehensive Plan. The GSA/FBI modal split study drew from multiple data sources including:

- Metropolitan Washington Council of Governments' (MWCOC) regional travel demand model,
- Outreach to Employer Transportation Coordinators (ETC) at Federal sites similarly situated to each of the three short-listed sites (i.e., "proxy sites"), and

**U.S. General Services Administration**  
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- A WMATA study, Estimating Metrorail Ridership from the FBI Headquarters Sites, conducted to assist the project in developing appropriate Metro use percentages for each site. The WMATA study indicated GSA's assumed Metro usage at the three sites, in the Draft EIS, was too high.

The outcome of the updated modal split study indicated that the FBI need for parking at the Landover site remained consistent with NCPC's recommended parking ratios. Conversely, the study identified that additional parking was needed at both the Greenbelt and Springfield sites to support FBI's mission requirements, thus the modal splits were updated.

Following discussions with the transportation officials, NCPC invited GSA to give an informational presentation on the project at its March 3, 2016 commission meeting. GSA provided a summary of the results from the modal split study. During the question and answer session following the presentation, GSA indicated that "there is not a specific credit for being located close to transit" within the developer Request for Proposals (RFP) process - nevertheless, Metro proximity remains an important consideration. Metro proximity was a significant factor when determining the short-listed sites pursuant to the Request for Expressions of Interest issued on November 15, 2013. Sites with better transit accessibility will require less on-site parking and likely less off-site transportation infrastructure. In the context of the RFP, offerors have the opportunity to present proposals for enhancing mission performance, minimizing costs and maximizing value to the Government. Offerors were instructed to address site attributes, advantages and challenges of utilizing sites for development of the project, and other factors related to the site (and infrastructure) proving advantageous or challenging. GSA directed the offerors bidding on the project to use the updated modal splits when developing proposed transportation mitigation strategies for the respective sites. GSA will then use the modal splits and the proposal mitigation solutions as the basis for the transportation analysis in the Final EIS.

A supplemental Draft EIS is not required as the Draft EIS identified transportation as a major adverse impact. As the transportation impact will remain significant, there will not be a substantial change and transportation will continue to be a concern (40 C.F.R. § 1502.9). The Final EIS will convey the methodology used to determine the revised modal splits, the traffic impacts of the revised parking, and the mitigations that will reduce the traffic impacts for the alternative sites. In addition, GSA will be hosting several transportation working group meetings with interested community members and transportation agency representatives to discuss the changes in parking prior to the release of the Final EIS. Please let us know if you would like to receive information regarding these meetings. Upon release of the Final EIS, there will be a 30-day public review period, in which stakeholders will be able to make comments for GSA's consideration in the Record of Decision.

The FBI Headquarters Consolidation remains in compliance with Executive Order 13693. The FBI will still be using multi-modal options to get to the selected site. There will be vehicle charging stations and transit benefits. FBI will promote carpool and vanpool usage. All of these strategies as well as others will be summarized in FBI's Transportation Management Plan (which will be submitted with the selected site master plan to NCPD). The plan will identify various Transportation Demand Management strategies that the Government intends to use to help promote alternatives to single occupancy vehicle usage. Please note that due to stringent network security requirements, the potential for telecommuting is extremely limited for the employees at this facility. Both GSA and FBI are working together to find an appropriate balance of sustainability, cost, and security, in compliance with applicable law, regulation and Executive Orders.

If you have any additional questions or concerns, please contact me at (202) 708-5891.

Sincerely,



Mary D. Gibert  
Regional Commissioner  
Public Buildings Service

cc: Dru Schmidt-Perkins, President and CEO, 1000 Friends of Maryland  
James Foster, President, Anacostia Watershed Society  
Brent Bolin, Chesapeake Regional Director, Clean Water Action  
Stewart Schwartz, Executive Director, Coalition for Smarter Growth  
Rhea Suh, President, Natural Resources Defense Council  
Chris Miller, President, Piedmont Environment Council  
Marcel Acosta, Executive Director, National Capital Planning Commission  
Councilmember Roger Berliner, Chair, MWCOG  
Chuck Bean, Executive Director, MWCOG  
Shyam Kannan, Managing Director, Office of Planning, WMATA  
Aaron Hassinger, Project Executive, GSA





GSA National Capital Region

SEP 16 2016

Mr. Marcel C. Acosta  
Executive Director  
National Capital Planning Commission  
Washington, DC 20004

Dear Mr. Acosta:

Thank you for your letter dated August 12, 2016, expressing the National Capital Planning Commission's (NCPC) concerns regarding the U.S. General Services Administration's (GSA) approach to parking for the new Federal Bureau of Investigation (FBI) Consolidated Headquarters.

GSA and FBI continue to support the methodology used to determine the parking approach. GSA acknowledges NCPC's concerns regarding the timing of addressing NCPC's questions/concerns on the proposed parking ratios, the methodology that was used to develop the parking ratios, and the potential transportation impacts (including the potential costs of additional parking and infrastructure) from the consolidation of the FBI Headquarters.

As stated in GSA's June 30, 2016, letter to NCPC, there will be opportunities for stakeholders to make comments for GSA's consideration throughout this process including hosting several transportation working group meetings and the 30-day public review period after the issuance of the Final Environmental Impact Statement. The Master Plan and Traffic Management Plan development process will also provide opportunities for public engagement and stakeholder input. GSA and FBI look forward to receiving valuable feedback from NCPC as these opportunities are presented.

If you have any further questions or need additional information, please contact me at (202) 708-5891.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary D. Gibert".

Mary D. Gibert  
Regional Commissioner  
Public Buildings Service

U.S. General Services Administration  
301 7th Street, SW  
Washington, DC 20407-0001  
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cc: L. Preston Bryant, Jr., Chair, National Capital Planning Commission  
Paul J. Wiedefeld, General Manager and Chief Executive, WMATA  
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Fern Piret, Director, Prince George's County Department of Planning  
Sharon Bulova, Chair, Fairfax County Board of Supervisors  
Fred R. Selden, Director, Fairfax County Department of Planning and Zoning  
Emmett V. Jordan, Mayor, City of Greenbelt