



# Executive Director's Recommendation

Commission Meeting: October 6, 2016

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<b>PROJECT</b> <b>Draft Square Guidelines</b> <b>Squares 378 and 379</b> 935 Pennsylvania Avenue, NW Washington, DC	<b>NCPC FILE NUMBER</b> P7713
<b>SUBMITTED BY</b> National Capital Planning Commission	<b>NCPC MAP FILE NUMBER</b> 1.25(38.00)44352
<b>REVIEW AUTHORITY</b> Memorandum of Agreement, § V, 61 Fed. Reg.41789, 41791 (August 12, 1996)	<b>APPLICANT'S REQUEST</b> Preliminary approval of comments for transmittal to GSA and release for public comment
	<b>PROPOSED ACTION</b> Approve comments as requested
	<b>ACTION ITEM TYPE</b> Presentation

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## PROJECT SUMMARY

The General Services Administration (GSA) is in the process of selecting an “exchange partner” to construct a consolidated headquarters facility for the Federal Bureau of Investigation (FBI) outside of the District of Columbia (District). Upon completion and acceptance of the new FBI headquarters facility by GSA in a suburban location in Maryland or Virginia, the exchange partner will receive fee simple title to the J. Edgar Hoover (JEH) Building and land located on Squares 378 and 379, bounded by Pennsylvania Avenue, 9<sup>th</sup>, 10<sup>th</sup>, and E Streets, NW in Washington, DC.

In anticipation of the potential redevelopment of Squares 378 and 379 on Pennsylvania Avenue, National Capital Planning Commission (NCPC) staff is working with agency stakeholders and the public to develop Square Guidelines that will inform the future redevelopment of the site. While the Square Guidelines address critical urban design and land use issues to shape future site development, protecting and enhancing Pennsylvania Avenue’s civic function and character is a national interest and NCPC’s broader priority.

Development on Pennsylvania Avenue between 3rd and 15th Streets, NW is unique in that it is governed by the *1974 Pennsylvania Avenue Development Plan* (the 1974 Plan), in addition to local zoning. The 1974 Plan, created by the Pennsylvania Avenue Development Corporation (PADC), includes Square Guidelines that regulate most of the parcels along this stretch of the Avenue. Square Guidelines influence the size and shape of development and provide guidance on general land use, circulation, and other important planning and urban design components. The 1974 Plan and Square Guidelines also ensure Pennsylvania Avenue’s unified public space, physical framework, iconic vista<sup>1</sup> to the U.S. Capitol, and symbolic role as the nation’s most prominent civic street are retained.

When the PADC was dissolved in 1996, Congress transferred and distributed PADC’s various stewardship roles and responsibilities among NCPC, GSA, and the National Park Service (NPS).

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<sup>1</sup> Vista is a distant view through or along an avenue or opening (Merriam Webster Dictionary)

A 1996 Memorandum of Agreement (1996 Agreement) addresses the process for amending the 1974 Plan and Square Guidelines. Unlike other squares in this area, the 1974 Plan does not include guidelines for Squares 378 and 379 because the JEH Building was under construction during the plan's development and PADC did not anticipate it would become private in the future. Therefore, Square Guidelines must now be created to inform future development of the site.

## KEY INFORMATION

- Pennsylvania Avenue's position between the White House and the U.S. Capitol defines its symbolic and ceremonial role; it is an important national destination and feature within the capital city. Together with its residences, offices, hotels, restaurants, and cultural institutions, it also contributes to the city's network of neighborhoods and work places.
- The purpose of this submission is to review the additional staff analysis, requested by the Commission, of the build-to lines along Pennsylvania Avenue and height analysis for Square 379, take preliminary approval action on the complete draft Square Guidelines, and release the draft guidelines for public comment. Staff anticipates presenting the final draft Square Guidelines to the Commission in December 2016.
- As successors to PADC, NCPC, GSA, and NPS are responsible for implementing the 1974 Plan and have a stewardship responsibility to protect the function and character of the Avenue.
- Federal interest in the redevelopment of this site include: responsibilities to carry out the 1974 Plan and related documents, the Plan of the City of Washington (the L'Enfant and McMillan Plans), the Pennsylvania Avenue Historic District and Historic Site, the Inaugural Parade Plan, and *Comprehensive Plan for the National Capital* policies. Federal interests also include maximizing public value from public investments and implementation of high-quality, high-density mixed-use development and public space appropriate for its context.
- Local interests include creating an exceptional, pedestrian-friendly, high-density mixed-use destination that activates the Avenue and surrounding streets, and physically integrates the site into downtown with new residential, retail, hospitality, cultural, office, and restaurant/entertainment uses that are dynamic and highly visual. City interest also includes ensuring new development at the site promotes economic vitality and revenue.
- Anticipating the site transfer to private ownership, in December 2015 NCPC transmitted an amendment of the 1974 Plan to GSA to allow for high-density mixed-use development on the site. It also includes general development principles if the property is redeveloped or reused for other purposes. GSA forwarded the proposed amendment to four Congressional committees, who had no additional comments; the amendment was approved in March 2016.
- At its June 2, 2016 meeting, the Commission reviewed an early draft of the Square Guidelines and requested additional analysis regarding the build-to-line (*a line set back*

*from the property line with which the exterior wall of a building in a development is required to coincide), and building height on Pennsylvania Avenue. This initial review*

regarding the allowable development on the FBI Headquarters site helped to inform the Consolidation and Exchange offers due to GSA on June 22, 2016. The Commission:

- Commented favorably on restoring D Street, NW to its original L'Enfant Plan configuration and width of 70 feet;
  - Commented favorably on establishing build-to lines at the property line and allowing for a maximum height of 160 feet, as allowed by the Height Act, for Square 378 (the northern square); and
  - Directed staff to further analyze a range of build-to lines for Square 379 along Pennsylvania Avenue from the property line (historic L'Enfant Plan right-of-way) to a 30-foot setback from the property line (resulting in a 27-foot to 57-foot sidewalk).
- NCPC staff worked closely with GSA, NPS, the U.S. Commission of Fine Arts (CFA), and the District of Columbia government (District) on the draft Square Guidelines.
  - On July 14, 2016 and September 15, 2016, CFA reviewed the concept guidelines for building envelopes<sup>2</sup>. Overall, the Commission: (1) opposed moving the build-to line along Pennsylvania Avenue from the 1974 Plan location (a build-to line of 50 feet from the property line with a 75 foot sidewalk) south to the property line (the historic L'Enfant right-of-way, with no setback, establishing a 27-foot sidewalk); and (2) expressed the importance of retaining the integrity of the public space and its ability to support the programming that contributes to the Avenue's role as one of the capital city's most important civic spaces.
  - Generally, there is agreement among agency stakeholders on a majority of the Square Guidelines; however, there are varying opinions on how to balance competing interests around economic, civic, and historic preservation needs related to:
    - The Pennsylvania Avenue build-to line, initial and maximum height, and upper-story setbacks on Square 379; and
    - The initial height and upper-story setbacks on Square 378.
  - Upon final Commission approval and in accordance with Section V of the 1996 Agreement, NCPC will transmit the proposed Square Guidelines to GSA for consideration and acceptance.
  - If GSA does not accept NCPC's proposed Square Guidelines, GSA will work cooperatively with NCPC to reconcile differences and devise acceptable Square Guidelines. If differences are not reconciled, GSA may reject NCPC recommendations and proceed with development in accordance with GSA's preferences.

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<sup>2</sup> For the purpose of these Square Guidelines, a Building Envelope is form by the building wall (build-to line), initial and lower heights, and upper-story setbacks.

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## RECOMMENDATION

**Notes** that these Square Guidelines address many important objectives in the redevelopment of the current FBI Headquarters site. Stewardship of Pennsylvania Avenue, an indelible symbol of the city and nation, is of the highest priority. The Avenue links and symbolizes the separation between the executive and legislative branches of government; contains the city's and nation's most significant and iconic vista to the U.S. Capitol; and serves as a prime location for national and local ceremonies, parades, processions, protests, and events. From its conception, Pennsylvania Avenue was – and continues to be – the most symbolic and ceremonial feature of the nation's capital.

**Notes** that the FBI Consolidation and Exchange project is to contribute to offsetting the cost of the new suburban FBI Headquarters by maximizing the real estate value of the downtown FBI Headquarters site.

**Notes** that the redevelopment of Squares 378 and 379 present an unparalleled opportunity to contribute to the evolution of Pennsylvania Avenue by creating a mixed-use development that generates new economic, social, and cultural activity.

**Notes** that Public Law 104-134 (updated in 2002 via Public Law 107-217) Congressionally mandates GSA, NPS, and NCPC to administer, implement, and enforce the 1974 Plan. The Square Guidelines are intended to implement the 1974 Plan while respecting the principles of the Plan of the City of Washington, considering today's conditions.

**Notes** that GSA, NPS, and NCPC share stewardship responsibility to balance the economic and civic value of Pennsylvania Avenue using the best contemporary urbanism practices to increase the Avenue's economic vitality, improve user experience, and protect and enhance the cultural and historic significance of one of the nation's most important civic spaces.

**Notes** that the Congressionally-authorized 1902 McMillan Plan and the 1974 Plan were the result of deliberate and comprehensive redevelopment efforts to revitalize the Avenue's economic vitality, improve the physical condition of its public spaces and buildings, and restore its prominence as the nation's primary ceremonial street. While respecting the L'Enfant Plan ideas, these plans intentionally introduced development that deviates from the L'Enfant Plan.

**Notes** that since the Pennsylvania Avenue Initiative is in the early stages of assessing how to improve the Avenue; a new vision and physical changes have not been fully identified and evaluated. Therefore, these draft Square Guidelines are based on existing conditions.

**Notes** that deviating from the 1974 Plan principles for one site must be considered in context of the entire Avenue and will likely be applied to other sites with similar conditions.

**Notes** that there is general agreement among agency stakeholders on the draft Square Guidelines listed in items 1-18, below.

**APPROVES** the draft Square Guidelines listed in items 1-18, below for Squares 378 and 379 in accordance with the Memorandum of Agreement, § V, 61 FED. REG.41789 (August 12, 1996), and transmits the preliminary action to the GSA under Section V of the 1996 Memorandum of Agreement:

## **AGREEMENT ON SQUARE GUIDELINES**

### **Square Guidelines – General**

1. Development Goals (*Section D. 1 – D.9*)<sup>3</sup>
2. Coordinated Planning Area (*Section E.1.a*)
3. Development Parcels (*Section E.2.a – e*)
4. Uses (*Section E.3.a – c*)
5. Streets (*Section E.4.a - E.4.f*)
6. Curb Cuts (*Section E.5.a -b*)
7. Off-Street Parking and Loading (*Section E.6a – e*)
8. Site and Building Design (*Section E.7.a – c*)
9. Sidewalks and Open Spaces (*Section E.8.a -g*)
10. Gross Floor Area of Development (*Section E.9.a*)
11. Build-to line and Building Restriction Line (*Section E.10.c-d*)
12. Height of Development (*Section E.11.a and C.1*)
13. Roof Structures (*Section E.12.a-c*)
14. Subsurface Restrictions (*Section E.13.a-c*)
15. Signage and Lighting (*Section E.14.a-e*)
16. Special Design Consideration (*Section E.15.a-h*)
17. Historic Preservation (*Section E.16.a-j*)
18. Phasing of Development (*Section E.17.a-c*)

**Notes** that there are six Square Guidelines that have outstanding issues among agency stakeholders related to building envelopes listed below.

## **OUTSTANDING ISSUES**

### **Square 379 Building Envelope<sup>4</sup>**

1. Square 379 Build-to Line (*Section E.10.a-b*)
2. Square 379 Initial Height of Development (*Section E.11.b.1 and .2*)
3. Square 379 Maximum Height of Development (*Section E.11.b.3*)
4. Square 379 Upper-Story Setbacks (*Section E.11.b.4 and .5*)

### **Square 378 Building Envelope**

5. Square 378 Initial Height of Development (*Section E.11.c.2*)
6. Square 378 Upper-Story Setbacks (*Section E.11.c.3*)

<sup>3</sup> The Section number in parenthesis references the Square Guideline number in Attachment 1.

<sup>4</sup> For the purpose of these Square Guidelines, a Building Envelope is form by the building wall (build-to line), initial and lower heights, and upper-story setbacks.

## Square 379 Building Envelope

**Notes** that stakeholder discussions identified concerns related to the Square 379 building envelope including the build-to lines, initial and maximum height of development, and upper-story setbacks. These concerns stem from important but competing objectives, including the federal government's need to maximize the development potential of the site while also protecting Pennsylvania Avenue's civic role and public space, and how to reconcile the inconsistency between the L'Enfant Plan and 1974 Plan build-to lines.

**Notes** that the amount of developable area and public space available for civic use is affected by the build-to line, building heights and the re-establishment of D Street.

**Notes** that the build-to line conditions, cartway<sup>5</sup> width, and heights contribute to the function, form, and character of the Avenue.

**Notes** that two distinct 20<sup>th</sup> century planning eras have contributed to the spatial dimensions and character of the Avenue today, changing the conditions as originally envisioned by the L'Enfant Plan. The 1901 McMillan Plan and the 1974 Plan – both Congressionally-mandated – respected and built upon the L'Enfant Plan. However, both responded to contemporary issues of their time, intentionally altering some combination of the cartway (*the area between curbs*), build-to lines, and building heights.

**Notes** that the McMillan Plan, along the south side of the Avenue, set taller buildings back from the property line within the building yard; this relationship between the building setback and building height (distance of building face to centerline of the street equals the building height) retains a broad and open view of the U.S. Capitol.

**Notes** that the 1974 Plan, used this principle to site new building along the north side of the Avenue. Taller buildings are set back proportionally from the property line. These conditions result in a generous frame around vista to the U.S. Capitol. The increase in setback from the property line accommodates taller buildings than L'Enfant envisioned. Consequently, this creates inconsistencies between the 1974 Plan and the L'Enfant Plan.

**Notes** that through the 2016 Pennsylvania Avenue, NW - White House to the Capitol, Cultural Landscape Inventory (CLI), developed by NPS, the 1974 Plan is achieving recognition for the significance of the unifying landscape that strengthens the vista and identity of the Avenue. It will likely be eligible for the National Register of Historic Places.

### 1. Square 379 Build-to Line

**Notes that on June 2, 2016, the Commission directed NCPC staff** to work with the public and other local and federal stakeholders to prepare visual and technical studies to analyze the impacts and benefits of a build-to-line on Pennsylvania Avenue ranging from the property line (the L'Enfant Plan historic right-of-way) to 30 feet from the property line (allowing for a 27 foot to 57-foot sidewalk).

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<sup>5</sup> Cartway is the area between the curbs.

Staff structured the build-to line alternatives analysis as follows. A summary of this analysis is provided in the Executive Summary beginning on page 23.

- A 50-foot setback from the property line (the 1974 Plan build-to line; also the existing condition).
- No setback from the property line (the historic L'Enfant Plan right-of-way) and a 10-foot setback from the property line; both have similar impacts and benefits; and
- A 20-foot and 30-foot setback from the property line; both have similar impacts and benefits;

The analysis studied impacts and benefits to:

- the developable area;
- the north building wall of the Avenue and the proportions that form the vista;
- the public realm and landscape;
- the surrounding context; and
- potential impacts to historic properties and applicable plans.

**Notes** that the L'Enfant Plan's build-to-line is the property line. Under today's conditions the property line is located approximately 27.5 feet north of the curb.

**Notes** the 1974 Plan establishes a build-to line of 50 feet from the property line. This creates a 77.5-foot sidewalk between building face and curb.<sup>6</sup> This area between the curb and building face is under the administrative jurisdiction of the NPS.

**Notes** that during initial 106 Consultation meetings, the DC State Historic Preservation Office has stated that if the build-to line on Pennsylvania Avenue is not returned to the L'Enfant Plan right-of-way, it may constitute an adverse effect for the project, even if it is consistent with the 1974 Plan.

**Notes** that based on NCPC's analysis, a build-to-line at the L'Enfant Plan right-of-way (property line) will create the largest developable area. However, given the Avenue's existing conditions, it will change the character and function of the Avenue as follows:

- A constrained 27-foot sidewalk that only accommodates one row of trees;
- A narrow walking zone (due to the alignment of the unified streetscape elements);
- No room for active public space or civic activity between the curb and the building face.

**Notes** to fully re-establish the Avenue as L'Enfant had envisioned (with an 80-foot cartway, flanked by 30-foot walkways under a double row of trees, and 10 feet between the trees and buildings), requires moving the curbs, reducing the entire cartway, and designing and implementing a new streetscape between 3<sup>rd</sup> and 15<sup>th</sup> Streets.

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<sup>6</sup> *Notes that on Square 379, the dimension between curb and property line is 27.5-feet and the building face is 53.5 from the property line, which creates an 80-foot sidewalk between curb and building face).*

**Notes** that re-establishing the L'Enfant Plan in its entirety (not just on Square 379/FBI site), requires reducing the cartway and moving the curbs which need to be studied and funded. Currently, there is no local or federal commitment to fund this infrastructure project.

**Notes** that based on NCPC's analysis, the alternative building setbacks of 20-30 feet (a 47- to 57-foot sidewalk) gives GSA public land (that is not part of the existing FBI site) while maintaining the Avenue's civic function and character intended in the L'Enfant and 1974 Plans.

- It retains adequate pedestrian walks, outdoor activity areas, and two rows of trees, which is consistent with L'Enfant's vision for the Avenue, as well as the 1974 Plan's vision for a unified landscape that frames the vista, provides the framework quality public space, and contributes to the character of the Avenue.
- It can support a diversity of functions within the public space, and accommodate a public realm program that retains a ceremonial character of the Avenue as distinct from other downtown streets;
- It establishes balance with similar build-to-lines of the Federal Triangle on the south side of the Avenue. The Department of Justice's build-to-line setback is 24-feet;
- It increases development area considerably over current conditions;
- It creates greater opportunities to activate and program ground floor uses and the adjacent public realm.

**Notes** that a 30-foot setback moves the building closer to the historic build-to-line and serves as a transition between Market Square and 1001 Pennsylvania Avenue, which is consistent with the 1974 Plan's intent for the site to be a transition area between squares to the east and west.

## ***2. Square 379 Initial Height of Development***

**Notes** that along Pennsylvania Avenue, the 1974 Plan establishes the setback for the initial height of development at 50 feet from the property line and a setback of 100 feet from the property line to reach a maximum height of 160 feet.

**Notes** that the McMillan Plan and the 1974 Plan respect the L'Enfant Plan and one of its central features, the vista to the U.S. Capitol, through the use of a proportional design principle that establishes a 1:1 width to height ratio (distance from the center line of street to the building line as compared to the height of the building) that forms a view cone (the clear zone where no buildings encroach and that defines the unobstructed vista to the U.S. Capitol). This principle establishes a view that is proportionally balanced and helps unify the north and south sides of the Avenue, establishing the vista

that frames the U.S. Capitol, which is a contributing element to the Plan of the City of Washington.

**Notes** that the Plan calls for Square 379 to serve as a transition area between the lower density residential/cultural character to the east and the higher density office and hotel character to the west.

**Notes** that to the east, the western tip of Market Square sits 10 feet from the property line with an initial height of 100 feet that steps up and back to 135 feet. While the building encroaches into the view cone, it is imperceptible because of the building's unique configuration on the lot.

**Notes** that as a transition site and in context with Market Square to the east, a very minor encroachment into the view cone that is perceptually insignificant is allowable.

**Notes** that the maximum initial height of buildings on Square 379, fronting on D Street, should be of a similar height as the initial building heights across the street at Square 378.

### 3. *Square 379 Maximum Height of Development*

**Notes** that the 1974 Plan establishes a 100-foot setback before reaching the maximum height of 160 feet, which falls outside the view cone (the clear zone where no buildings encroach and that defines the unobstructed vista to the U.S. Capitol) established by the proportional design principle<sup>7</sup>. This balances the proportion of development between the Federal Triangle and new development north of the Avenue.

**Notes** that the configuration of the triangular floorplate, established at a 30-foot build-to line, with an initial height below the Capitol view cone, and 1:1 upper-story setbacks, does not yield an upper-story floor plate that is leasable or adequate for mechanical equipment above heights of 140 feet.

**Notes** that the Residences at Market Square West reaches a maximum height of 135 feet and the office building at 1001 Pennsylvania Avenue reaches a height of 135 feet approximately 70-feet from the property line before stepping up to a maximum height of 160 feet.

**Notes** that given the square's configuration, a maximum height of 135-feet complies with the 1974 Plan and is compatible with adjacent development, and may afford buildings on Square 378 visibility to and from Pennsylvania Avenue.

**Notes** that as a transition site and in context with Market Square to the east, a minor encroachment into the view cone between the initial and maximum height that is perceptually insignificant is allowable.

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<sup>7</sup> This principle is explained in Section 2 on the preceding page, in the project analysis, and illustrated in the supplement slides.

#### 4. *Square 379 Upper-Story Setbacks*

**Notes** that office buildings on adjacent blocks employ 1:1 upper-story setbacks, while residential floors, such as Market Square West employ a 0.6:1 upper-story setback.

**Notes** that a 1:1 setback results in upper story floors that are not noticeable to pedestrians on the street. Residential development with less than a 1:1 upper-story setback is designed in a manner to conceal the upper-story mass through the use of terraces or other architectural treatments.

**Notes** that upper-story setbacks on Square 379 should be compatible with surrounding development.

#### **APPROVES the following guidelines for the Square 379:**

***Guideline E.10.a: Pennsylvania Avenue Build-to Line.*** *The Pennsylvania Avenue build-to-line shall be a minimum distance of 30-feet north from the existing property line (the historic L'Enfant right-of-way) to meet the following performance criteria:*

- *locate and configure the Pennsylvania Avenue building wall to respect the vista to the U.S. Capitol;*
- *provide public space that can accommodate at least two rows of trees, pedestrian walkways consistent with the unified streetscape, and an activity zone along the building face;*
- *design the public space with flexibility to accommodate a variety of civic uses.*

*This build-to-line may be moved south, closer to or at the property line provided:*

- *the above stated public space criterion can be met;*
- *an amendment is completed to the 1974 Pennsylvania Avenue Plan to move the curb lines to reduce or reallocate the Pennsylvania Avenue cartway and sidewalk widths between 3<sup>rd</sup> and 15<sup>th</sup> Streets;*
- *a dedicated funding source is confirmed to implement the infrastructure and streetscape changes between 3<sup>rd</sup> and 15<sup>th</sup> Streets, NW associated with reconfiguring Pennsylvania Avenue.*

*The build-to line shall be perpendicular and parallel to the Pennsylvania Avenue property line and is also considered to be the Pennsylvania Avenue building-restriction-line. Pedestrian walkways, public reservations or open spaces on Pennsylvania Avenue may traverse the build-to line and the building restriction line. Minor deviations may be allowed such as recesses or ornamental entrance bays per the General Guidelines and DC Zoning Regulations.*

***Guideline E.11.b.1: Initial Height of Development on Pennsylvania Avenue.*** *The initial height of buildings on Square 379 fronting Pennsylvania Avenue shall not exceed the distance as measured from the center line of the right-of-way, centered on the U.S. Capitol, to the established build-to line to ensure that the vista of the U.S. Capitol remains unobstructed.*

***Guideline E.11.b.2: Initial Height of Development on 9<sup>th</sup>, 10<sup>th</sup> and D Streets.*** The maximum initial height of building(s) fronting 9, 10, and D Streets shall not exceed 115-feet.

***Guideline E.11.b.3: Maximum Height of Development.*** The maximum building height shall not exceed 135 feet, inclusive of penthouses.

***Guideline E.11.b.4: Upper-Story Setbacks.*** Any portion of a building above the initial building height shall be setback at ratio of 1:1.

***Guideline E.11.b.5: Measuring Building Height.*** The building height shall be measured from the Pennsylvania Avenue curb at the middle of the front of the building or structure to the highest point of the roof exclusive of any structure on the roof.

### **Square 378 Building Envelope**

**Notes** that the Commission supported building envelope guidelines that allow for high-density development through the 2016 Plan Amendment approval process.

**Notes** that on June 2, 2016, the Commission commented favorably on the following guidelines included in Agreement of Square Guidelines section (page 5).

- Establishing the build-to lines for 9<sup>th</sup>, 10<sup>th</sup>, D and E Streets at their respective property lines; and
- Allowing the maximum building height on Square 378, north of D Street, to achieve 160 feet, inclusive of penthouses, in accordance with the Height Act, the 1974 Pennsylvania Avenue Plan, and the Zoning Regulations.

### **5. Initial Height of Development on Square 378**

**Notes** that the 1910 Height Act controls the height of buildings throughout the city, resulting in adjacent buildings fronting the same street to be compatible in height. Typically, new buildings adjacent or near a historic building are shaped by stepping down the new building to be compatible.

**Notes** that the initial height of buildings surrounding Square 378 range from 45 feet to 120 feet depending on the location. Buildings with the lowest initial heights are historic (on 10<sup>th</sup> and E Streets, NW) and contemporary buildings are typically higher unless shaped to be compatible with nearby historic buildings.

**Notes** that to be compatible with surrounding development, the Height Act requirements should be used to determine the maximum initial height of a building. Setting an initial maximum height allows flexibility to step a building down to meet or be compatible with historic buildings.

6. *Upper-Story Setbacks on Square 378*

**Notes** that, with one exception, the upper-story setbacks surrounding Square 378 are 1:1 and are primarily office buildings. Residential development at Market Square West uses a 0.6:1 upper-story setback.

**Notes** that a 1:1 setback results in upper story floors that are not noticeable to pedestrians on the street. Nearby residential development with less than a 1:1 upper-story setback is designed in a manner to conceal the upper-story mass through the use of terraces or other architectural treatments.

**Notes** that upper-story setbacks on Square 378 should be compatible with surrounding development.

**APPROVES the following heights for Square 378:**

*Guideline E.11.c.1: On Square 378, height of development shall comply with the following: Using the 1910 Height Act and District Zoning Regulations as a guide, the maximum initial building height for the Square 378 in its entirety shall be 110 feet measured from the highest elevation on E Street, NW.*

*Guideline E.11.c.3: Any portion of the building above the maximum initial height shall setback at a ratio of 1:1 from the building face.*

**DIRECTS** staff to release the Commission-approved draft Square Guidelines for a 30-day public comment period.

<p><b>Previous actions</b></p>	<p><b>December 3, 2015</b> – Accepts the Plan Amendment to the 1974 Pennsylvania Avenue Plan in accordance with Public Law 104-134 (updated in 2002 via Public Law 107-217), and transmits the amendment to GSA and NPS under Section V of the 1996 Memorandum of Agreement.</p> <p><b>June 2, 2016</b> – Commented on the Square Guideline topics, the concept building envelope guidelines, and the re-establishment and configuration of D Street, NW in accordance with Public Law 104-134 (updated in 2002 via Public Law 107-217), and transmits the amendment to GSA under Section V of the 1996 Memorandum of Agreement. § V, 61 Fed. Reg.41789, 41791 (August 12, 1996)</p>
<p><b>Remaining actions (anticipated)</b></p>	<p><b>October 2016</b> - Approval of Preliminary Square Guidelines</p> <p><b>December 2016</b> – Approval of Final Square Guidelines</p>

## PROJECT ANALYSIS

Pennsylvania Avenue is the most iconic, recognizable street in the nation. It is a symbol of the relationship between our government institutions; it is the stage for the inaugural parade and public gatherings, as well as over 100 festival events each year. Pennsylvania Avenue is special, and its design must reflect its symbolic and ceremonial importance, distinct from any other street in the city. For over two centuries, plans related to Pennsylvania Avenue reinforce the U.S. Capitol centered in a view outlined by a wide, gracious, public promenade, and framed with trees and buildings that in height and location reinforce this vista.

The Square Guidelines address federal and local interests to ensure future development of the FBI Headquarters Site meets Washington's wide-ranging urban planning and economic development goals. Redevelopment of the site poses a once-in-a-generation opportunity for the Avenue to evolve and illuminate its unique character and function for the city and nation.

### **Executive Summary**

The purpose of this preliminary submission is to review the complete draft of the Square Guidelines and the building envelope analysis for Squares 378 and 379. Staff anticipates presenting the final guidelines for approval in December 2016.

### **Background**

The General Services Administration (GSA) is in the process of selecting an "exchange partner" by the end of 2016 to develop a consolidated headquarters facility for the Federal Bureau of Investigation (FBI). The new site, located outside of the District, will be developed in exchange for fee simple title to the J. Edgar Hoover (JEH) Building and land located on Squares 378 and 379, bounded by Pennsylvania Avenue, 9th, 10th, and E Streets, NW in Washington, DC. The Squares are located on the western boundary of the Penn Quarter neighborhood, the northern boundary of the Federal Triangle and the southeastern boundary of the Downtown Business Improvement District.

Squares 378 and 379 are located within the Pennsylvania Avenue Development Corporation (PADC) boundary. In 1972, Congress passed Public Law 92-578, which established PADC to "provide for the preparation and carrying out of a development plan for certain areas between the White House and the U.S. Capitol." In 1975, the PADC approved the 1974 Pennsylvania Avenue Development Plan (the 1974 Plan), and subsequently adopted General Guidelines and Square Guidelines. When the Pennsylvania Avenue Development Corporation (PADC) was developing the 1974 Pennsylvania Avenue Plan (1974 Plan), the JEH building was under construction. Therefore, the 1974 Plan did not contemplate redevelopment of Squares 378 and 379, and Square Guidelines were not developed for these blocks.

The PADC Plan is a conceptual planning document that provides general guidance to redevelop and maintain land within the PADC boundary. Generally, this consists of 21 squares between the White House and U.S. Capitol grounds (15th – 3rd Streets, NW). The Federal Code defines Square Guidelines as detailed urban planning and design requirements and recommendations applicable

to each Square in the PADC Boundary. They influence the size and shape of development as well as provide guidance on general land use, circulation, and other important urban design components. When the 1974 Plan was developed, the Advisory Council on Historic Preservation required that Square Guidelines be developed for each square as mitigation for any adverse effects new/redevelopment may have on historic resources. As the FBI site was completed before the PADC Plan and a different use was not anticipated, Square Guidelines were never developed for Squares 378 and 379.

After Congress dissolved the PADC in 1996, a Memorandum of Agreement (1996 Agreement) signed by NCPC, GSA, and NPS, the three delegated agencies, addresses the review process for projects within the PADC boundary and outlines the process for modifying the 1974 Plan and Square Guidelines. It allows NCPC to submit amendments to the Plan and Square Guidelines to GSA for consideration.

### **Site Description and Conditions**

Combined, Squares 378 and 379 comprise approximately 6.6 acres, roughly equal to three to four downtown city blocks. Federal Triangle's distinguished buildings to the south and downtown's contemporary buildings to the north, together with the series of primary parks and plazas linked by a unified landscape, frame the iconic views to the U.S. Capitol. The Avenue's unique character and function consisting of the tree canopy, generous pedestrian walkways, a flexible activity zone for civic events, and the proportional frame to the vista, is not found anywhere else in the city.

The 1974 Plan identifies the site as a transition area between taller high-density office and hotel uses to the west and lower residential and cultural buildings to the east. Currently, the site supports one large single-use office building, has large perimeter setbacks, perimeter security barriers, and significantly lower heights fronting Pennsylvania Avenue, providing a physical transition between the monumental core and downtown, as well as between areas east to west along the Avenue.

Together, the building size, single office use, and large setbacks devoid of ground floor uses, creates an anomalous zone of inactivity along the Avenue. Combined with the distinct development patterns, varied scales between development north, and south of the Avenue, the site currently contributes to creating a barrier between downtown and the Monumental Core. This discourages pedestrian movement and challenges optimizing urban development and vitality along adjoining streets.

Redevelopment of the site presents an exciting opportunity to bring new life and energy to the Avenue, demonstrating the best of contemporary urbanism. A quality, high-density development with a carefully planned mix of uses will enhance both Pennsylvania Avenue and downtown, allowing residents and visitors to enjoy the unique legacy of the Avenue and engage the city and its national monuments in exciting new ways.

Collectively, the agencies are responsible for ensuring that the redevelopment is accomplished in a manner that protects and enhances the civic nature of Pennsylvania Avenue and its ceremonial and symbolic character and function.

Using contemporary best practices in urban planning and design, the Square Guidelines encourage redevelopment to:

- Create an exceptional national and local destination;
- Contribute to a vital living downtown;
- Improve circulation and connectivity;
- Support and enhance public realm character;
- Ensure compatibility with context; and
- Employ high quality urban design best practices in architecture, landscape architecture and sustainability.

### **Plan Amendment and Square Guidelines**

In December 2015, NCPC transmitted an Amendment of the 1974 Plan to GSA to allow for high-density mixed-use development on Squares 378 and 379. It also includes general development principles if the property is to redevelop or be reused for other purposes. GSA forwarded the proposed amendment to four Congressional committees, who had no additional comments, and it was approved in March 2016. The Plan Amendment provides a general framework for development of the Square Guidelines. It encourages development to:

- Reinforce Pennsylvania Avenue's significance as a nationally recognized and lively downtown, mixed-use corridor — a place where people live, work, visit and play;
- Exemplify distinctive, high-quality urban design and architecture, contributing to the Avenue's distinguished character; and
- Design the site, buildings and its ground floor uses to encourage density, commerce, and public use, as well as civic programming of local and national significance to take place in the public realm and generate activity along the Avenue.

The guidelines assume that the future owner will demolish the existing structure to allow for new construction. If the owner retains all or part of the existing building, some of these Square Guidelines will still apply. However, depending on the type, extent and location of what is being retained of the existing buildings, these guidelines may need to be amended.

The proposed Square Guidelines address important development parameters that future development proposals should incorporate to address federal and local interests. The guidelines will be used along with the 1974 Plan to review the proposed redevelopment plan at the time of the building permit application.

To shape development on Squares 378 and 379, NCPC is working with GSA, the National Park Service (NPS), the U.S. Commission of Fine Arts (CFA), and the District of Columbia (District) to finalize Square Guidelines for the site. The resources used to inform the Square Guidelines: Contemporary planning documents such as: The Comprehensive Plan for the National Capital, Federal and District Elements, the 1974 Pennsylvania Avenue Plan and related documents, the

Legacy Plan, the Monumental Core Framework Plan, The District of Columbia's Municipal Regulations, including the Zoning Regulations, and the Building Code.

The guidelines provide the framework for a future redevelopment plan to use contemporary best-practices in urban planning and design to support the Avenue's role as a significant national and a local destination. The guidelines strive to ensure development is compatible with and contributes to enhancing the historic, symbolic, and ceremonial character of Pennsylvania Avenue and its iconic vista to the U.S. Capitol. They also strive to increase economic vitality and contribute to a lively and pedestrian friendly "Living Downtown" in a way that reinforces the rhythm and regularity of the city's development pattern and its important civic spaces.

While Squares 378 and 379 are part of a coordinated development plan that share development goals that inform common guidelines, each square is unique due to its particular context and orientation within the city. Since the Square Guidelines will be developed in advance of the Pennsylvania Avenue Initiative's decisions on the right-of-way allocation, decisions must be based on the current conditions of the cartway because it may never change.

### **Historic Preservation**

In 2014, GSA determined and the District of Columbia State Historic Preservation Office concurred that the J. Edgar Hoover (JEH) Building is not eligible for the National Register of Historic Places. While the JEH Building is not considered historic, there are a number of significant historic properties in the immediate vicinity.

The Section 106 consultation process currently underway focuses on development of the Programmatic Agreement to address effects on historic resources. GSA defined an area of potential effect (APE) to acknowledge the prominence and visibility of the JEH Building and site along Pennsylvania Avenue and to consider the impacts that redevelopment of the property may have on adjacent historic properties. The site of the JEH Building, Squares 378 and 379, is located within the boundaries of several key historic sites and properties including the Plan for the City of Washington (L'Enfant and McMillan Plans) and the Pennsylvania Avenue National Historic Site and District. The Section 106 consultation process for the Square Guidelines and their potential impacts will begin after the Commission acts on the guidelines and they are transmitted to GSA.

As a grand connection between the President's house and the U.S. Capitol, L'Enfant's vision for Pennsylvania Avenue was to be symmetrical and broad, at 160 feet wide, with an 80-foot cartway and two 40-foot sidewalks, each with a double rows of trees.<sup>1 2</sup> This design aligned with the key principles of the L'Enfant Plan, including:

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<sup>1</sup> "a direct and large avenue ...with a middle way paved for heavy carriages and a walk on each side planted with double rows of trees ...a street laid out on a dimension proportioned to the greatness ... which the Capital of a powerful Empire ought to manifest." *L'Enfant and Washington*, by Elizabeth S. Kite; Johns Hopkins Press, 1929, page 54.

<sup>2</sup> "Pennsylvania Avenue was to be 160 feet wide, with ten feet of sidewalk on each side, then thirty feet of gravel walk, planted with trees, and eighty feet in the middle, as a carriageway." *The Avenue of the Presidents*, by Mary Cable; Houghton Mifflin Company, 1969, pages 9 – 10.

- Reciprocal vistas that provide orientation, establish commanding views to and from civic places, and symbolize the structure of civic and community life;
- Avenues that connect major buildings, monuments, and public places;
- A continuous street grid to maintain the scale of the city's development pattern, to encourage pedestrian circulation, support commerce, and preserve an open visual character; and
- A hierarchical system of avenues, streets, and open spaces that form blocks with strong building walls and circles, squares, or parks with important civic landmarks that reinforce the reciprocal vistas.

At the time of the L'Enfant Plan, buildings were only three to four stories tall, creating a horizontally-oriented right-of-way to building height ratio. Over time, the McMillan Plan with development of the Federal Triangle, and the 1974 Plan altered the Avenue's adjacent building heights and physical dimensions. This included the overall width, the cartway, walkways, and tree canopy along the Avenue. As engineering advances allowed for taller buildings, the right-of-way to building height ratio shifted closer to a proportional design principle that establishes a 1:1 width to height ratio (distance from the center line of street to the building line as compared to the height of the building) that forms a view cone (the clear zone where no buildings encroach and that defines the unobstructed vista to the U.S. Capitol). This principle establishes a view that is proportionally balanced and helps unify the north and south sides of the Avenue, establishing the vista that frames the U.S. Capitol, which is a contributing element to the Plan of the City of Washington.

The Square Guidelines rely heavily on Pennsylvania Avenue's historic and current planning foundations. Each of Pennsylvania Avenue's planning legacies, including the L'Enfant Plan, McMillan Plan, and 1974 Plan, remain important and relevant. While these plans provide varying – and sometimes conflicting – guidance for the Avenue's development, they all respect and ensure the Avenue functions as the most symbolically significant street in the city and nation, protecting the Avenue's character-defining vista to the U.S. Capitol and other nationally significant features. Considering each plan's contribution to the conditions of the built environment, all attributes of any one plan cannot be fully restored.

Pennsylvania Avenue is not currently in the original L'Enfant Plan configuration. To return the Avenue to that historic condition, the north curb would need to move south between 14-20 feet, reducing the cartway width and expanding the sidewalk width. The challenge with this approach is that it requires a much broader commitment to move the curb for the entire length of the Avenue, from 3<sup>rd</sup> to 15<sup>th</sup> Street to fully restore the corridor. At this time, a return to the L'Enfant right-of-way has not been studied, including potential impacts to the vista, security, transportation, special events, and the pedestrian experience. Studying and funding implementation of these changes is not part of the Square Guidelines or the consolidation and exchange proposal; therefore, these significant future implementation costs and responsibility for studies such as NEPA and Section 106 are shifted to other parties.

### **Current and Future Planning Efforts**

As the Avenue continues to evolve, current planning efforts continue to build upon prior work shaping the Avenue, including the 1974 Plan, the Legacy Plan and the Monumental Core Framework Plan.

*The 1974 Pennsylvania Avenue Development Corporation Plan.* The 1974 Plan used modernist scales and proportions between building heights, build-to lines, and sidewalk widths deferential to the neoclassical principles used in the Federal Triangle. The 1974 Plan also prioritized the grand scale necessary to frame the Avenue's monumental vista over the more intimate, day-to-day scale of the Victorian era architecture present along portions of the Avenue's north side in the 1960's. This grand scale also highlighted the significance of historic buildings along the Avenue, such as the Evening Star and Old Post Office buildings, by setting contemporary development back from the L'Enfant build-to line.

Building on the historic planning efforts of the L'Enfant Plan and McMillan Plan, the 1974 Plan represents an intentional effort to address contemporary issues. The most relevant principles of the 1974 Plan and its amendments include:

- Reinforce the symbolic link between White House and Capitol;
- Bridge the monumental core and downtown;
- Stimulate street life with commercial and cultural activities;
- Diversify land uses, provide places to live and accommodate needs and amenities for residents and visitors;
- Preserve historic structures and the continuity of city fabric through infill development; and
- Foster economic life and maximize the tax base.

*Pennsylvania Avenue Initiative.* The Pennsylvania Avenue Initiative is in the early stages of planning for Avenue's future, seeking to reconcile unresolved issues from previous eras and address contemporary urban challenges. The Pennsylvania Avenue Initiative will either update the 1974 Plan or develop a new plan altogether. In doing so, agency stakeholders must consider whether reallocating the cartway is feasible in terms of the Avenue's many functions and the significant public investment required for an infrastructure project of this magnitude.

If the Pennsylvania Avenue Initiative determines that reducing the cartway is feasible both in terms of its various functions and in terms of implementation, the opportunity to amend the Square Guidelines exists.

### **Federal Interests**

There are several objectives related to federal interests. As successors to PADDC and stewards of the Pennsylvania Avenue Plan, GSA, NCPC, and NPS are charged with implementing the 1974

Plan.<sup>3</sup> Collectively, the agencies are responsible for ensuring that the redevelopment is accomplished in a manner that protects and enhances the civic nature of Pennsylvania Avenue and its ceremonial and symbolic character and function. This includes protection of the vista to the U.S. Capitol, balancing the sidewalks and building height proportions to the north and south to adequately frame the vista, accommodating at least 2 rows of trees, pedestrian walkways larger than a typical city street, and a flexible area able to accommodate civic activities.

The Square Guidelines must balance varied agency missions. This includes the economic and civic interests of the federal government, as well as the ceremonial, physical, and historic relationship of the Avenue to the Capitol and White House. Federal interests also include the Avenue's unified streetscape character and monumental vista as defined by the tree canopy, building walls, and right-of-way that frame the view of the Capitol and provide a unique proportion and consistency along the Avenue.

Also, federal and national interests in the redevelopment of this site include: responsibilities to enforce the 1974 Plan and related documents, the Plan of the City of Washington (the L'Enfant and McMillan Plans), the Pennsylvania Avenue Historic District, the Inaugural Parade Plan, and Comprehensive Plan policies, as well as maximizing value of public investment and implementation of high-quality and high-density mixed-use development appropriate for its context.

### **Local Interests**

Local interests include a strong desire to revitalize the Avenue; redevelopment of the site provides a significant opportunity to increase the economic vitality within this vicinity of downtown. Based on guidance from the District Elements of the Comprehensive Plan, the District encourages a unique and truly exceptional mixed-use project. The two squares should be distinct and relate to their location and surrounding context. It should be pedestrian-friendly, high-density, and connect the Avenue with downtown.

Residential, retail, office, cultural, and restaurant/entertainment uses and street level uses should create a dynamic and highly visual development. The project should create a place that is for the city and its residents, yet accommodating to downtown workers and visitors. Lastly, the project should reinforce the importance of Pennsylvania Avenue and the principles of the L'Enfant Plan.

### **Commission Action**

The Commission met on June 2, 2016 for a concept review of the Square Guideline topics and initial analysis of general massing and build-to-lines for the site. This provided guidance on the potential value of the site for prospective development teams submitting their offers to GSA on June 22, 2016. The Commission:

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<sup>3</sup> Public Law 104-134, April 26,

1. Commented favorably on restoring D Street, NW to its original L'Enfant Plan configuration of 70 feet and on the build-to-lines and maximum height for Square 378; and
2. Directed staff to further analyze a range of build-to-lines for Pennsylvania Avenue between the property line and 30-feet on Square 379, which fronts Pennsylvania Avenue.

The analysis directed by the Commission is summarized below, along with the analysis for outstanding Square Guideline issues identified in the Executive Director's Recommendation.

### **Square Guidelines Proposal**

The draft Square Guidelines (*Attachment 1*) focus on the urban design and development parameters to frame future site development efforts. The guidelines strive to promote economic vitality, allow for high density development, improve circulation, and encourage a mix of uses, while respecting the function, character and quality of Pennsylvania Avenue's public realm, inclusive of its opens spaces and iconic vista to the U.S. Capitol.

The guidelines have been informed by stakeholder input, staff analysis, historic and current planning documents, and public outreach. Agreement has been reached on a majority of the Square Guidelines, listed in the Executive Director's Recommendation and included on the following pages.

Analysis of guidelines related to the building envelopes for Squares 378 and 379 were requested by the Commission; these also required additional analysis for agency stakeholder discussions this summer, and differences of opinion remain.

Additionally, while the Commission commented favorably on the reestablishment of D Street at its full width, differences of opinion still exist among agency stakeholders. Analysis related to this issue is provided on pages 29-31 that supports the Commission finding.

Based on the October 2016 Commission action, staff will work with agency stakeholders to complete the Square Guidelines. The final version is scheduled for completion in December, at which time staff will present the document to the Commission for final approval and transmittal to GSA.

### **Square Guidelines – General**

The preliminary Square Guidelines were developed based on guidance from the June 2, 2016 Commission meeting and extensive input from federal and local stakeholders. A summary of the content for each of the Square Guideline topics follows.

1. **Coordinated Planning Area:** Establishes the need for a comprehensive redevelopment plan that coordinates development between Squares 378 and 379.

2. **Development Parcels:** Promotes reestablishing D Street and encourages each square to contain more than one, or multiple parcels or buildings to improve the scale of Square 378 and the horizontality of Square 379.
3. **Uses:** Reinforces the 1974 Plan's mixed-use goals by encouraging residential and cultural uses in addition to office space. It also encourages a variety of ground floor uses to support an active streetscape concentrated along the site's perimeter.
4. **Streets<sup>4</sup>:** Addresses D Street's alignment, function, character, and jurisdiction. This section calls for a 70-foot right-of-way for vehicular and pedestrian use, allows street to be public or private, and encourages consolidating access points to the site to minimize pedestrian-vehicular conflicts.
5. **Curb Cuts<sup>4</sup>:** Encourages consolidation of parking and service areas to minimize vehicular access points to the site; limits location of curb cuts to provide for safe and uninterrupted pedestrian access along perimeter streets.
6. **Off-Street Parking and Loading:** Encourages consolidation of parking and loading functions, addresses vehicular circulation to minimize vehicular and pedestrian conflicts, calls for screening of trash collection and loading areas.
7. **Site and Building Design:** Calls for best urban design practices in architecture and landscape architecture. Encourages a high-quality, pedestrian oriented design compatible with the context of adjacent downtown blocks, ranging from the distinctive architecture of Pennsylvania Avenue for Square 379 and neighborhood scale of E Street for Square 378.
8. **Sidewalks and Open Spaces:** Focuses civic activity on Pennsylvania Avenue and active uses along the perimeter of the Squares, and encourages the location and design of open spaces to maximize activation. Calls for new secondary open space to respect the significance of the primary civic spaces and encourages secondary spaces, such as courtyards, for building occupant use.
9. **Gross Floor Area of Development:** Allows a Floor Area Ratio (FAR) of up to 10, which is currently consistent with zoning; it includes provisions that this FAR will not be reduced, even if the zoning regulations change in the future.
10. **Build-to Line and Building Restriction Line:** Establishes a build-to-line a minimum distance of 30-feet from the property line, resulting in a minimum sidewalk dimension of 57 feet and a building restriction line of 30 feet. Allows for a build-to line at or closer to the historic L'Enfant right-of-way provided certain criteria are met. Also allows architectural articulations to provide a visually engaging building façade.

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<sup>4</sup> While the Commission commented favorably on a 70-foot right-of-way in June, further agency stakeholder discussion on the Square Guidelines has identified differences of opinion related to D Street's width and use. This has also prompted discussion on additional curb cuts along 9<sup>th</sup> Street, NW, between D and E Streets. Analysis of these issues is included beginning on page 29.

- 11. Build-to Height and Height of Development:** For Square 379, the initial building height is 105-feet on Pennsylvania Avenue to minimize encroachment into the established vista to the U.S. Capitol; the initial building height is capped at 115 feet along 9, 10<sup>th</sup> and D Streets. This section also calls for a 1:1 upper story setback, up to a maximum height of 135 feet. For Square 378, the initial height is that allowed by the 1910 Height Act and DC Zoning Code; using a 1:1 upper story setback, up to a maximum height of 160 feet, inclusive of Penthouses.
- 12. Roof Structures and Penthouses:** Penthouses are included in the maximum building height and roof structures must be set back a minimum of 1:1 from the edge of the building.
- 13. Subsurface Restrictions:** Prohibits installation of vaults and new utility connections along Pennsylvania Avenue and other public spaces throughout the site. Any subsurface construction must accommodate the tree planting for healthy root growth.
- 14. Signage and Lighting:** Respects Square 378 and 379's location within a historic district by encouraging smaller scale signage that does not employ the use of video or digital technology. Lighting should respect the historic viewshed to the U.S. Capitol and follow the lighting plan present on adjacent blocks.
- 15. Design Considerations:** Requires coordination with regulatory agencies on a number of site design details, such as land use, circulation, architectural quality, streetscape design, and security features.
- 16. Historic Preservation:** Addresses parameters to ensure future development is compatible with the site's prominent location within the City Plan of Washington and the Pennsylvania Avenue National Historic Site District, such as: reestablishing D Street, building development patterns commensurate with the city's regulated block pattern, building design that respects and enhances the diverse historic architectural traditions represented in the area, and compatible use of materials befitting the historic Avenue.
- 17. Phasing of Development:** Provides for project phasing with submission and approval of a comprehensive redevelopment plan for the site. Guidelines address temporary fencing and signage and safe access to all sidewalks and the public realm.

### **Building Envelope Guidelines: Analysis and Key Issues**

This section includes a detailed discussion of two topics related to the Square Guidelines:

- Square 379 Building Envelope
- Square 378 Building Envelope

Guidelines related to the building envelopes have direct impacts on the visual character and economic health of Pennsylvania Avenue and the surrounding neighborhood. Analysis of these topics was requested by the Commission in June; it was also necessary to conduct agency stakeholder discussions.

As the guidelines were developed through the summer, agency stakeholder discussions related to the building envelopes revealed differences of opinion. Given varying agency missions, the challenge of balancing the civic and economic expectations of the site is prioritized differently. In addition, the L'Enfant, McMillan, and 1974 Plan provide varying guidance on the build-to line for Pennsylvania Avenue, though all recognize the national significance of framing the iconic vista to the U.S. Capitol.

While the building envelopes are discussed independently below, they require an understanding of each other to determine a solution that balances the civic significance of Pennsylvania Avenue and the economic expectations of the site.

### ***Square 379 Building Envelope***

- 1. Square 379 Build-to Line (Section E.10.a-b)*
- 2. Square 379 Initial Height of Development (Section E.11.b.1 and .2)*
- 3. Square 379 Maximum Height of Development (Section E.11.b.3)*
- 4. Square 379 Upper-Story Setbacks (Section E.11.b.4 and .5)*

### ***Recommendation***

Based on the analysis, staff recommends a build-to line at 30 feet from the property line (57 feet between the curb and building face) to provide the minimum amount of space to:

- Accommodate the Avenue's unique public space program for the pedestrian walk area, activity zone, and 2-row tree canopy;
- Create a stronger relationship between the Square 379 building and the public realm;
- Create a strong building wall and tree canopy that appropriately frames the Avenue and vista to the U.S. Capitol;
- Reinforce the ceremonial character of the Avenue as distinct from other downtown streets;
- Offset the reestablishment of D Street to create a developable parcel;
- Support a diversity of functions, including special events common along the Avenue; and
- It retains the form and character to be on par with great streets around the world.

A 30-foot build-to line provides a leasable floor plate (41,000 sf) with a prominent address and increases the development potential by approximately 108,000 square feet compared to the existing build-to line. While staff recognizes the approach to balance economic and civic needs does not fully maximize the potential developable area of the site, a strong public space program is a priority for this street in the nation's capital. Additionally, a well-designed and functional public realm has shown to increase property values throughout Washington and in other cities. Given the significance of Pennsylvania Avenue's public realm and its distinct role as a place for celebrations, demonstrations, and other activities for the city and nation, it is important to ensure adequate public space is provided to meet the goals of the 1974 Plan and support the Avenue's unique civic role that sets it apart from all other streets. A 30-foot setback / 57-foot sidewalk is the minimum dimension able to accommodate the program and contribute to the unified landscape present along the Avenue as called for in the Cultural Landscape Inventory.

The Avenue's current build-to line and building heights generally conform to a one-to-one relationship (or ratio). This means that the distance between the right-of-way centerline and build-to line, and the build-to line up to the building height, is generally equal. This 1:1 ratio is also referred to as a view cone (*slides 41-43*). To ensure this 1:1 ratio is followed, staff recommends an initial building height not to exceed the distance as measured from the center line of the right-of-way, centered on the U.S. Capitol, to the established build-to line. This ensures that the vista of the U.S. Capitol remains unobstructed. This initial height is compatible with adjacent development, including heights in the Federal Triangle. This height is also consistent with the 1974 Plan's intent for the site to be a transition area between heights to the east and west. This height supports the Avenue's cohesive public realm.

In addition, staff recommends the initial building height along D Street to be set at 115 feet which mirrors the initial building height on Square 378 along D Street.

Staff also recommends a 1:1 upper-story setback and maximum building height of 135 feet for Square 379. This is compatible with adjacent development and is needed to support the proportional design principle that frames the vista to the U.S. Capitol. In addition, a maximum of 135-foot height is consistent with heights along the Avenue that project forward of the established 160-foot building height setback line. Heights at or above 160 feet on Square 379 project forward of the 160-foot height setback line and do not yield a floor plate large enough for mechanical equipment or leasable area. Some agency stakeholders prefer a 160-foot maximum height with an initial building height of 105 feet.

Based on the analysis, staff recommends the following guidelines related to the Square 379 building envelope:

***Guideline E.10.a: Build-to Line on Pennsylvania Avenue:*** *The Pennsylvania Avenue build-to-line shall be a minimum distance of 30-feet north from the existing property line (the historic L'Enfant right-of-way) to meet the following performance criteria:*

- *Locate and configure the Pennsylvania Avenue building wall to respect the vista to the U.S. Capitol;*
- *Provide public space that can accommodate at least two rows of trees, pedestrian walkways consistent with the unified streetscape, and an activity zone along the building face; and*
- *Design the public space with flexibility to accommodate a variety of civic uses.*

*This build-to-line may be moved south closer to or at the property line (provided: the above stated performance criteria are met;*

*an amendment is completed to the 1974 Pennsylvania Avenue Plan to move the curb lines to reduce or reallocate the Pennsylvania Avenue cartway and sidewalk widths between 3rd and 15th Streets; a dedicated funding source is confirmed to implement the infrastructure and streetscape changes between 3rd and 15th Streets, NW associated with reconfiguring Pennsylvania Avenue.*

*The build-to line shall be perpendicular and parallel to the Pennsylvania Avenue property line and is also considered to be the Pennsylvania Avenue building-restriction-line. Pedestrian walkways, public reservations or open spaces on Pennsylvania Avenue may traverse the build-to line and the building restriction line. Minor deviations may be allowed such as recesses or ornamental entrance bays as allowed by the General Guidelines and DC Zoning Regulations.*

**Guideline E.11.b.1: Initial Height of Development on Pennsylvania Avenue.** *The initial height of buildings on Square 379 fronting Pennsylvania Avenue shall not exceed the distance as measured from the center line of the right-of-way, centered on the U.S. Capitol, to the established build-to line to ensure that the vista of the U.S. Capitol remains unobstructed.*

**Guideline E.11.b.2: Initial Height of Development on 9<sup>th</sup>, 10<sup>th</sup> and D Streets.** *The maximum initial height of building(s) fronting 9, 10, and D Streets shall not exceed 115- feet.*

**Guideline E.11.b.3: Maximum Building Height.** *The maximum building height shall not exceed 135 feet, inclusive of penthouses.*

**Guideline E.11.b.4: Upper-Story Setback.** *Any portion of a building above the initial building height shall be setback at a ratio of 1:1 up to a maximum building height of 135.*

**Guideline E.11.b.5: Measuring Building Height.** *The building height shall be measured from the Pennsylvania Avenue curb at the middle of the front of the building or structure to the highest point of the roof exclusive of any structure on the roof.*

### *Analysis*

Square 379 fronts Pennsylvania Avenue, the most prominent civic street in America. The Avenue's right-of-way, landscape, and building walls serve as a frame for one of the most recognizable vistas to the U.S. Capitol, and physically and symbolically connects the executive and legislative branches of government. The cohesive landscape plays a critical role in the character and function of the Avenue, providing public space for day-to-day activities, over 100 special events annually, and national ceremonies. Protection of the vista, character, and function are the most significant factors determining the building envelope for Square 379. Ensuring the Avenue's prominent and high quality public space endures also provides a significant economic benefit to the real estate value of the site.

To properly frame the vista, build-to-lines must be identified to define the point to which a building must be built. Typically, build-to lines coincide with right-of-way or property lines. However, Pennsylvania Avenue is unique in that the north property line is approximately 27 feet from the north curb. With regard to Square 379, the build-to line on the north side of the Avenue is setback over 53 feet from the right-of-way or property line. The setback and sidewalk area (a total of 80 feet between the build-to line and the curb) is currently under the administrative jurisdiction of the National Park Service.

Build-to lines are important because the location of a building in relation to other buildings and the curb can positively or negatively impact vistas, the overall building wall of the street, the height of buildings, developable area of the site, and the quality and function of the public space. Each of these elements contributes to the form, function, and character of the overall Avenue.

The Commission requested an analysis of the build-to line. Staff structured the build-to line alternatives analysis as follows:

- A 50-foot setback from the property line (the 1974 Plan build-to line; also the existing condition).

- No setback from the property line (the historic L'Enfant Plan right-of-way) and a 10-foot setback from the property line; both have similar impacts and benefits;
- A 20-foot and 30-foot setback from the property line; both have similar impacts and benefits

The analysis studied impacts and benefits based on the following urban design and economic criteria:

- *Developable Area.* The square footage each build-to line produces for a leasable floor plate commensurate with other triangular parcel developments in Washington, such as:
  - *601 Massachusetts Avenue, NW (44,400 sf)*
  - *655 K Street, NW (29,000 sf)*
  - *400 Massachusetts Avenue, NW (29,300 sf)*
- *Building Walls and Vista.* How the build-to line relates to building walls along Pennsylvania Avenue and frame the vista to the U.S. Capitol.
- *Streetscape.* How the build-to line provides adequate space for Pennsylvania Avenue's landscape and civic program, including a minimum 14' pedestrian walk, a minimum 14' activity zone, and adequate room for at least 2 rows of large street trees
- *Surrounding Context.* How the build-to line's resulting building envelope relates to adjacent blocks.

**Table 1: Build-to Line Analysis**

<b>Setback Distance</b>	<b>50'</b> <i>(Existing / PADC)</i>	<b>30'</b>	<b>20'</b>	<b>10'</b>	<b>0'</b> <i>(Property Line)</i>
<b>Developable Area on Square 379: Floorplate<sup>5</sup> GSF<sup>6</sup></b>	31,000sf 342,000sf	41,000sf 450,000sf	46,000sf 508,000sf	52,000sf 570,000sf	57,000sf 630,000sf
<b>North Building Wall: 1001 Penn Mkt Square<sup>7</sup></b>	Aligned 40' behind	20' forward 20' behind	30' forward 10' behind	40' forward Aligned	50' forward 10' forward
<b>Balanced Proportion:<sup>8</sup> North Sidewalk/setback South<sup>9</sup> Sidewalk/setback</b>	80' / 53' 57' / 24'	57' / 30' 57' / 24'	47' / 20' 57' / 24'	37' / 10' 57' / 24'	27' / 0' 57' / 24'
<b>Public Realm Space: Pedestrian Walk Activity Zone</b>	28' 34' to 46'	14' 24' to 30'	14' 14' to 20'	14' 10'	14' 0'
<b>Landscape: Tree Rows</b>	3	2	2	1	1
<b>Surrounding Context: Adjacent Blocks  Pennsylvania Avenue from 15<sup>th</sup> to 3<sup>rd</sup> Streets, NW</b>	Similar with 1001 Penn  Similar with 1200, 1100, 1000 blocks, and Canadian Embassy	Compatible with DOJ (24' setback) Compatible with Federal Triangle in a couple locations	Compatible with DOJ (24' setback) Similar <sup>10</sup> with Federal Triangle	Similar with Market Square corner Compatible with Federal Triangle in a couple locations	Dissimilar with adjacent blocks  Similar with Willard and W Hotels, Pennsylvania Building, Evening Star, 600 block, and Newseum overhang
<b>Historic Properties: Pennsylvania Avenue<sup>11</sup></b>	Historic buildings strongly discerned from new development	Historic buildings more discerned from new development	Historic buildings moderately discerned from new development	Historic buildings less discerned from new development	Historic buildings not discerned from new development
<b>Impacts to Plans: 1974 Plan  L'Enfant Plan</b>	Consistent  Potential adverse effect	Inconsistent  Potential adverse effect	Inconsistent  Potential adverse effect	Inconsistent  Potential adverse effect	Inconsistent  Consistent

<sup>5</sup> Numbers are rounded to the nearest thousand for readability and clarity.

<sup>6</sup> Not intended to represent precise area based on a building design. For comparison purposes, the Gross Square Footage (GSF) assumes a 127 foot building height (11 floors) with no upper-story setbacks for example purposes.

<sup>7</sup> The western corner of Market Square is 10 feet north of the right-of-way, creating a 35-foot sidewalk.

<sup>8</sup> The Pennsylvania Avenue cartway is currently 100 feet wide, from curb to curb.

<sup>9</sup> DOJ's build-to-line is 57 feet from the existing curb, and is setback 24 feet from the property line. Federal Triangle build-to-lines setbacks vary.

<sup>10</sup> Over 70% of Federal Triangle facades are located approximately 20 feet from the property line.

<sup>11</sup> This analysis assumes that the build-to-line for Square 379 would inform the build-to-lines of future development on the avenue.

**Table 2: Conclusions from the Analysis of the Range of Build-to-Lines**

<b>Setback Distance</b>	<b>50' (Existing / PADC)</b>	<b>30'</b>	<b>20'</b>	<b>10'</b>	<b>0' (Property Line)</b>
<b>Conclusion:</b>					
<b>Benefits</b>	Build-to-line aligns with 1001 Penn. Generous public realm for pedestrians and special activities. Accommodates 3 rows of trees. Similar with other PADC development. Consistent with '74 Plan.	Increases developable area by 108,000sf. <sup>12</sup> Build-to-line is equally between adjacent north facades. Balances sidewalk and nearly balances setback with DOJ. Sizeable public realm for pedestrians and special activities. Accommodates 2 rows of trees. Compatible with DOJ and Federal Triangle in a couple locations.	Increases developable area by 166,000sf. <sup>12</sup> Build-to-line is roughly between adjacent north facades. Nearly balances sidewalk and setback with DOJ. Adequate public realm for pedestrians and special activities. Accommodates 2 rows of trees. Compatible with DOJ and similar to Federal Triangle.	Increases developable area by 228,000sf. <sup>12</sup> Build-to-line aligns with western corner of Market Square. Compatible with Federal Triangle in a couple locations.	Maximizes developable area; an increase of 288,000sf. <sup>12</sup> Similar to historic buildings (and Newseum overhang) that build at the property line. No adverse effect on L'Enfant Plan.
<b>Impacts</b>	Does not maximize developable area. Not balanced with south side of the avenue. Separates pedestrians from building. Potential adverse effect on L'Enfant Plan.	Dissimilar with PADC development. Inconsistent with '74 Plan. Potential adverse effect on L'Enfant Plan.	Dissimilar with PADC development. Inconsistent with '74 Plan. Potential adverse effect on L'Enfant Plan.	Not balanced with south side of the avenue. Limited public realm for pedestrians and special activities. Reduced to 1 row of trees. Dissimilar with PADC development. Inconsistent with '74 Plan. Potential adverse effect on L'Enfant Plan.	Build-to-line sits forward of adjacent north building walls. Not balanced with south side of the avenue. Inadequate public realm for pedestrians and special activities. Reduced to 1 row of trees. Dissimilar with adjacent blocks, PADC development. Inconsistent with '74 Plan.

<sup>12</sup> Not intended to represent precise area based on a building design. For comparison purposes, the Gross Square Footage (GSF) assumes a 127 foot building height (11 floors) with no upper-story setbacks for example purposes.

Based on staff analysis, the alternative build-to lines yield a variety of benefits and impacts:

- **50' Build-to Line Setback / 75-foot Sidewalk (1974 Plan/Existing Condition).** This option retains the large civic space that accommodates three rows of trees and a significant area for public activities, indicative of many symbolic and ceremonial streets around the world. However, it requires additional maintenance and active programming plan to ensure the area is able to support economic opportunities for the site. This dimension is significantly larger than the Federal Triangle sidewalks on the south side, separates pedestrians from potential ground floor building activation opportunities, and yields the smallest developable floor plate for Square 379.
- **20 – 30' Build-to Line Setback / 47- to 57-foot sidewalk (June 2016 Commission Direction for Additional Analysis).** This option accommodates a public space program that satisfies the principles of the L'Enfant Plan and the 1974 Plan. It also increases the development area of Square 379 and strengthens the relationship between the building's ground floors uses and the public realm. This sidewalk dimension is balanced with the Federal Triangle and has adequate room for pedestrian walks, outdoor activity areas, and two rows of trees, all of which is consistent with L'Enfant's vision for the Avenue and the 1974 Plan for a unified streetscape. These plans also prioritize prominently framing the vista to the U.S. Capitol, which would remain intact with a 20- to 30-foot setback. The architectural and spatial proportions of the Avenue, the tree canopy, and vista define the Avenue and set it apart from any other downtown street. These characteristics also distinguish the Avenue from other streets in the nation, and elevate to be on par with great streets around the world. These characteristics also provide the backdrop to over 100 events, demonstrations, and celebrations annually, not to mention the peaceful transition of governance during the Inaugural every four years.
- **0 – 10' Build-to Line Setback / 27- to 37-foot sidewalk (0 feet = Historic L'Enfant Plan right-of-way).** While this option is grounded in the L'Enfant Plan's 40-foot sidewalk design, Pennsylvania Avenue is not currently in the original L'Enfant Plan configuration. This changes the relationship between the horizontal and vertical elements along the Avenue envisioned by L'Enfant. Therefore, a 27- to 37-foot sidewalk with today's 100-foot cartway and 100- to 135-foot tall buildings significantly changes the vista to the U.S. Capitol, and the function, character, and quality of public space along one of the longest blocks on the Avenue.

This option also requires removal of two of the three existing rows of trees, which is inconsistent with the intent of the L'Enfant Plan (which identifies two rows) and the 1974 Plan (which identifies three rows). This option also transfers almost all functional public use of a National Historic Site to private development.

Furthermore, moving the build-to line to the property line will require moving the curbs and reallocating right-of-way space to accommodate the critical public space program required for the Avenue. During build-to line discussions, it has been noted that a narrower build-to line of 0 to 10 feet could be part of a larger right-of-way reallocation. The Pennsylvania Avenue Initiative will be exploring this opportunity, and the possibility exists that a new build-to line may be established for all Squares fronting the

north side of the Avenue between 3<sup>rd</sup> and 15<sup>th</sup> Streets, NW. However, it is premature to assume that a change will occur; if a 0- to 10-foot option is approved. It requires a funding commitment to implement. Additionally, it requires studies to determine its feasibility, including studies related to transportation, perimeter security, and NEPA and Section 106, necessary to establish a new vision for the Avenue.

### ***Square 378 Building Envelope***

5. *Square 378 Initial Height of Development (Section E.11.c.1)*

6. *Square 378 Upper-Story Setbacks (Section E.11.c.3)*

### ***Recommendation***

Based on the analysis, staff recommends the following Square Guidelines related to building envelope items for Square 378:

***Guideline E.11.c, Initial and Upper Story Setbacks on Square 378: On Square 378, height of development shall comply with the following:***

1. *Using the 1910 Height Act and District Zoning Regulations as a guide, the maximum initial building height for the Square 378 in its entirety shall be 110 feet measured from the highest elevation on E Street, NW.*
3. *Any portion of the building above the maximum initial height shall be setback at a ratio of 1:1 up to a maximum of 160-feet.*

### ***Analysis***

The Commission commented favorably on June 2, 2016 on the build-to line and maximum heights for Square 378. These items achieved consensus among stakeholders and were included in the Executive Director's Recommendation for approval.

Regarding the outstanding guidelines related to initial height, staff recommends an initial height that complies with the 1910 Height Act. It is likely that a maximum initial height of 110 feet can be achieved for a majority of the Square based on the 90-foot right-of-way of E Street, NW. The initial heights of surrounding buildings are varied, ranging from 45 to 120 feet, and Square 378 should integrate into this varied condition, harmonizing with historic buildings along E and 10th Streets, NW. The 1974 Plan is silent with regard to initial building heights and upper-story setbacks on streets other than Pennsylvania Avenue. Square Guidelines do not uniformly address the issue of initial building heights, but rather provide guidance that is unique to each Square and the surrounding context. Some Square Guidelines strictly state the initial heights and setback distances, while others more generally recommend compatibility with context.

Staff recommends a maximum height of 160 feet to ensure consistency with the adjacent blocks. This is consistent with the Height of Buildings Act which allows certain parcels adjacent to Pennsylvania Avenue to take their maximum height from the Avenue itself.

The 1910 Height Act states:

*“where a building or proposed building confronts a public space or reservation formed at the intersection of two or more streets, avenues, or highways, the course of which is not interrupted by said public space or reservation, the limit of height of the building shall be determined from the width of the widest street, avenue, or highway.”*

Staff recommends a 1:1 upper-story setback for the building. This is needed to ensure the development is consistent with adjacent blocks, which vary from 0 (for shorter, historic buildings) to 5:1 (for taller buildings, including penthouse setbacks). Many taller buildings maintain upper-story setbacks at ratio between 0.6:1 and 1:1. There could potentially be instances on the basis of a site-specific design where a steeper setback ratio could be accomplished, without impacts to surrounding properties.

### ***D Street Circulation***

#### ***Recommendation***

Staff recommends the following Square Guidelines related to D Street and curb cuts:

***Guideline E.4.a, D Street, NW configuration:*** *Establish the L’Enfant Plan 70-foot D Street right-of-way through the site as a street to reestablish the two original city squares; use the existing 9<sup>th</sup> and D Street signalized intersection to access and service the interior of these blocks; and to create a physical and visual relationship between Pennsylvania Avenue and the Judiciary Square area.*

***Guideline E.4.b, D Street Function:*** *D Street, as either a public or private street should retain the function and character of a public District street and comply with DC Downtown Streetscape Standards. Any below grade parking and service areas between Squares 378 and 379 shall be designed to allow D Street to retain its street function and character.*

***Guideline E.5.a, Curb Cut on 9<sup>th</sup> Street:*** *No curb cuts are permitted on Pennsylvania Avenue. Any Curb cut on 9<sup>th</sup> Street shall be located at the at the signalized intersection at D and 9<sup>th</sup> Street, NW, unless approved by District Department of Transportation.*

#### ***Analysis***

In June, the Commission commented favorably on the establishment of D Street at 70 feet, the existing condition of the street east of 9<sup>th</sup> Street, NW. The Commission also allowed guidance on the street function to be identified at a later date. As the Guidelines were further developed and refined with agency stakeholders, differing opinions formed regarding the appropriate width and function of the street. Some stakeholders want to reduce the width of the street and limit use to pedestrians. However, the function is related to the width of the street. At a reduced right-of-way, it may be appropriate for pedestrians only. Since the Commission already commented favorably on the reestablishment of D Street, NW at its original 70-foot width, it is not appropriate to limit the function at this time. As street function was discussed in greater detail, differences of opinion regarding curb cuts, especially along 9<sup>th</sup> Street, were also identified.

*D Street Width (Section E.4.a)*

*D Street Function (Section E.4.b)*

*D Street Curb Cuts (Section E.5.a)*

At 6.6 acres, circulation for a site as large as Squares 378 and 379 is critical for establishing physical access, visual connectivity, and walkable city blocks. D Street currently exists to the east of 9<sup>th</sup> Street, NW, but is closed between 9<sup>th</sup> and 10<sup>th</sup> Streets to accommodate the FBI Headquarters Site. Several policies in the Comprehensive Plan's Federal and District Elements aim to protect the integrity, form and design of the L'Enfant Plan's system of streets and reservations. These include policies that seek to restore such streets when they have been disrupted or closed.<sup>13</sup> Reestablishing the final western block of 9<sup>th</sup> Street at the full 70-foot right-of-way has a number of benefits, including:

- Re-establishing the original L'Enfant Plan street and block pattern;
- Retaining consistency with the D Street right-of-way east of 9<sup>th</sup> Street;
- Visually and physically connecting Pennsylvania Avenue and Judiciary Square;
- Providing the ability to create an engaging, walkable, and multiple-functional street;
- Reducing the number of curb cuts on 9<sup>th</sup> and 10<sup>th</sup> Streets needed for parking and loading;
- Providing access to the interior of the site at an existing signalized intersection;
- Improving vehicular and pedestrian circulation and reduces potential conflicts among them; and
- Allowing taller initial building heights along D Street.

Unless a single use is proposed, such as an arena, a development project of this scale will require circulation throughout the site in the form of streets and alleys to access multiple buildings. As the site is now slated for redevelopment, the opportunity exists to reconnect D Street with Pennsylvania Avenue at its full 70-foot condition currently established to the east.

The Guidelines prioritize pedestrian access to and through the site by advocating for a minimal number of curb cuts. This concentrates access for functional activities such as parking and loading, and provides a safer pedestrian experience by reducing the potential for conflicts with cars and delivery vehicles.

Due to high traffic volumes moving south towards I-395/695, the District Department of Transportation (DDOT) anticipates limiting curb cuts along 9<sup>th</sup> Street between E Street and Pennsylvania Avenue to the existing signalized intersection at D Street. This makes D Street a crucial component for accessing the development site for functional needs such as parking, loading, and interior circulation.

The width of D Street effects developable area, views, and space available for street program elements. By maintaining the function and character of a city street, sidewalks, and tree plantings, D Street provides continuity with its function and configuration east of the site,

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<sup>13</sup> District Elements: Policies HP – 2.3.1, 2.3.3, 2.3.4; Federal Elements Policies UD.B.3.1 and B.3.4

currently extending from Squares 378 and 379 at 9<sup>th</sup> Street, NW to Judiciary Square and the DC Courthouse at 5<sup>th</sup> Street, NW.

Since the desire to maximize developable area prompted discussion on the width of D Street, staff analyzed a variety of street widths ranging from 30 to 70 feet:

- At 70 feet, the L'Enfant right-of-way has the capacity to look and function as a District street, including parking and service access.
- At 30 – 50 feet, D Street is a pedestrian-only street and provides GSA with additional development area.
- At 0 feet (the existing condition), the development area is maximized but there is a limited opportunity for east-west access between the property line and the interior of the site.

This topic generated a significant amount of discussion among stakeholders and the public about its impacts to the developable area and limitations from the existing circulation patterns on the north-south streets.

Staff recommends the following Square Guidelines related to D Street and curb cuts:

***Guideline E.4.a, D Street, NW configuration:*** Establish the L'Enfant Plan 70-foot D Street right-of-way through the site as a street to reestablish the two original city squares; use the existing 9<sup>th</sup> and D Street signalized intersection to access and service the interior of these blocks; and to create a physical and visual relationship between Pennsylvania Avenue and the Judiciary Square area.

***Guideline E.4.b, D Street Function:*** D Street, as either a public or private street should retain the function and character of a public District street and comply with DC Downtown Streetscape Standards. Any below grade parking and service areas between Squares 378 and 379 shall be designed to allow D Street to retain its street function and character.

***Guideline E.5.a, Curb Cut on 9<sup>th</sup> Street:*** No curb cuts are permitted on Pennsylvania Avenue. Any Curb cut on 9<sup>th</sup> Street shall be located at the at the signalized intersection at D and 9<sup>th</sup> Street, NW, unless approved by District Department of Transportation.

## CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

### Comprehensive Plan for the National Capital

The Square Guidelines align with many of the goals of the Comprehensive Plan. While the Plan does not provide specific guidance in terms of the build-to-line on Pennsylvania Avenue, it does support the goal of balancing its civic and economic health. As mentioned in the Executive Summary, both the Federal and District Elements of the Comprehensive Plan contain policies that aim to protect the integrity, form and design of the L'Enfant Plan's system of streets and reservations. Additionally, District Element policies support public and private efforts to provide and maintain street trees to help frame axial views of L'Enfant streets.

Both the Federal and District Elements contain policies that support a unified and prominent Pennsylvania Avenue as set forth in the PADC and L'Enfant Plans:

- District Elements, include the Historic Preservation, Urban Design, and Central Washington Area Elements, support the urban design and planning legacy of Washington.<sup>14</sup>

Most notably, Policy CW-1.1.13 states:

“Promote active street life throughout Central Washington through the design of buildings, streets, and public spaces. This should include:

- h. Continuing the effort started more than 45 years ago to revitalize Pennsylvania Avenue through measures such as improved lighting, landscaping, and better use of Freedom Plaza.”

- Federal Elements of the Comprehensive Plan, including the Historic Preservation and Urban Design Elements, include policies related to implementing the 1974 Pennsylvania Avenue Plan.<sup>15</sup> The policies encourage a cohesive planning process to ensure a unified streetscape between 3rd and 15th Streets, NW. Policy UD.B.5.9 states:

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<sup>14</sup> Relevant District Element policies include:

- Historic Preservation Element, Table 10.1: Listing of Historic Districts (1005.2)
- Policy HP-2.3.1: The Plan of the City of Washington
- Policy HP-2.3.3: Spatial Character of L'Enfant Plan Streets
- Policy HP-2.3.4: Public Space Design in the L'Enfant Plan
- Policy HP-2.3.5: Enhancing Washington's Urban Design Legacy
- Action HP-2.3.A: Review of Alterations to the Historic City Plan
- Action HP-2.3.B: Review of Public Improvements
- Policy CW-1.1.10: Central Washington Hotels and Hospitality Services
- Policy CW-1.1.13: Creating Active Street Life and Public Spaces
- Action CW-1.1.D: Focused Planning for “Catalytic” Sites
- Policy CW-2.2.2: East End Theater District
- Policy CW-2.2.3: Penn Quarter Neighborhood
- Policy CW-2.2.5: Links to Adjacent Areas

<sup>15</sup> Relevant Federal Element policies include:

- Historic Preservation Element Policies 1, 2, 3, 5, 6, and 7, located on p. 161
- UD.B.3.1
- UD.B.3.3

“new uses or improvements on Pennsylvania Avenue between 3rd and 15th Streets, NW are cohesively planned, improved, and maintained in a manner befitting the avenue’s national and local role in a 21st century capital city, reflecting the ceremonial heart of the nation and the daily vibrancy of the city.

1. The Pennsylvania Avenue Development Corporation Plan’s (1974), General Guidelines and Square Guidelines, as amended, ensure that the siting and massing of any structure or landscape elements strengthen the sweeping open frame around the U.S. Capitol.” and are compatible with building massing and the public realm within its surroundings.”

While the Comprehensive Plan supports both plans with policies that address a strong building wall, unified landscape and symmetry as it relates to vistas, it does not address the inherent conflict of the two build-to-lines nor does it prioritize one build-to-line over the other.

### **The 1974 Pennsylvania Avenue Development Plan**

As noted above, this early draft of the Squares Guidelines meets the goals of the 1974 Pennsylvania Avenue Development Plan; however, it deviates from the proposed 50-foot build-to-line that is recommended for new development. Alternatively, staff is supporting a build-to line setback of 20 feet (sidewalk width of 47 feet) to meet the intent of the Plan’s goals and unique program for the public realm.

### **The Monumental Core Framework Plan and Legacy Plan**

The Square Guidelines are supported by recommendations in the Legacy Plan and Monumental Core Framework Plan (MCFP). The MCFP proposed reuse or redevelopment of the FBI Headquarters site to better connect downtown Washington and the monumental core, as well as reestablish D Street.

### **National Historic Preservation Act**

NCPC does not have a National Environmental Policy Act (NEPA) responsibility related to the proposed square guidelines because the Commission is not taking a formal approval action. GSA is preparing a Draft Environmental Impact Statement (DEIS) on the FBI Headquarters Consolidation project in accordance with NEPA. GSA released the DEIS for public comment on November 6, 2015 and the comment period closed January 6, 2016. GSA anticipates releasing the Final EIS at the end of 2016 for a 30-day public review.

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- UD.B.3.4
  - UD.B.3.5
  - UD.B.3.6
  - UD.B.3.7
  - UD.B.4.4
  - UD.B.5.9

## **National Environmental Policy Act**

NCPC does not have a Section 106 responsibility related to the proposed square guidelines as the Commission is not taking a formal approval action. GSA is conducting consultation under Section 106 of the National Historic Preservation Act (NHPA) for its approval of the proposed square guidelines and the larger FBI Headquarters Consolidation project. GSA is currently in the process of preparing a Programmatic Agreement pursuant to the Section 106 regulations with NCPC, the National Park Service, the Advisory Council on Historic Preservation, the District of Columbia State Historic Preservation Officer, the Maryland Historic Preservation Officer, the Virginia Historic Preservation Officer and other consulting parties.

## **CONSULTATION**

The 1996 MOA that dissolved the PADC and transferred responsibilities to NCPC, GSA and the NPS requires that the development of Square Guidelines be done in close coordination with the District to ensure that local interests are addressed as well. DC zoning will also regulate the site, however, the zoning regulations cannot be inconsistent with the Square Guidelines.

Staff has coordinated closely with GSA, NPS, the Commission of Fine Arts, the District Departments of Planning and Transportation, and the DC State Historic Preservation Office throughout the Square Guideline process.

## **Coordinating Committee**

The Coordinating Committee reviewed the proposal at its September 14, 2016 meeting. Without objection, the Committee forwarded the preliminary Square Guidelines to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were: NCPC; the District of Columbia Office of Planning; the District of Columbia Department of Transportation, the General Services Administration; the National Park Service and the Washington Metropolitan Area Transit Authority.

## **U.S. Commission of Fine Arts**

Staff presented the Draft Square Guidelines during information presentations to the U.S. Commission of Fine Arts on July 14, and September 15, 2016.

On July 14, 2016 the Commission of Fine Arts, with 5 of 7 members present, reviewed the concept building envelope guidelines and commented as follows:

- Opposed bringing the building fronts of new development forward to the property line (historic right-of-way).
- Willingness to consider options for setting a different build-to line that is forward of the existing FBI façade.

- 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.
- Movement of the build-to-line closer to the property line must correspond to a reduction in building height.

On September 15, 2016 the Commission of Fine Arts, with 4 of 7 members present, reviewed the building envelope analysis and commented as follows:

- Emphasized the significance of the 1974 PADC Plan and its deliberate, cohesive design composition for the streetscape, build-to lines, and building heights.
- Advocated retaining the current build-to-line (75' sidewalk) and building heights, and that any changes to the line are “without historic meaning...generated instead by a desire to maximize development at the expense of public space.”
- New development should take cues from the Federal Triangle's massing, including the building height and upper story setbacks.
- The tree canopy is a critical component of the streetscape and viewshed, and their health should remain a “priority as any plans are developed for the site.”

### **Public Meetings**

Before the June Commission meeting, NCPC staff held a public meeting for the Draft Square Guidelines on April 26<sup>th</sup> and April 28<sup>th</sup>. Staff also presented at the Penn Quarter Neighborhood Association meeting on May 11<sup>th</sup>. A total of 173 people attended the three meetings.

After the June Commission meeting, staff held public meetings on the site's redevelopment potential. Outreach included two public meetings on September 7<sup>th</sup> and 9<sup>th</sup>, and a presentation to the Penn Quarter Neighborhood Association on September 13<sup>th</sup>. A total of 108 people attended the three meetings.

Public input was also solicited via the NCPC website. All public comments from the events and website are included in Attachment 2. In general, comments advocated for a variety of build-to lines along Pennsylvania Avenue ranging from 0-feet to 30-feet, with some requesting the build-to remain at its current 50-foot setback. Other comments included greater recognition and respect for existing views along the Avenue, and a variety of positions on density ranging from retaining the current building heights and upper story setbacks to maximizing the development on site by allowing for 160 foot buildings at the property line.

## **ONLINE REFERENCE**

The following supporting documents for this project are available online:

- Project Synopsis
  - Background Information on the FBI Exchange Project; the Pennsylvania Avenue Initiative; the Pennsylvania Avenue, NW - White House to the Capitol Cultural Landscape Inventory; and Public Meeting Presentation Materials, and Public Comments.
  - Draft Environmental Impact Statement for the FBI Headquarters Consolidation
- 

Prepared by Elizabeth Miller  
09/29/2016

## **Attachments**

- 1. Preliminary Square 378/379 Guidelines**
- 2. Summary of Public Comments to Date**

# Draft Square Guidelines Squares 378 / 379 935 Pennsylvania Avenue, NW

Project Number P7713

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National Capital Planning Commission

Preliminary for transmittal to GSA

This attachment includes images that illustrate the building envelop for Squares 378 and 379 to assist in the Commission's review of the Executive Director Report.

**Commission meeting date:** October 6, 2016

**NCPC review authority:** Memorandum of Agreement, § V, 61 Fed. Reg.41789 , 41791 (August 12, 1996)

**Applicant request:** Approval of comments for transmittal to GSA

**Delegated / consent / open / executive session:** Open Session

**NCPC Review Officer:** Miller

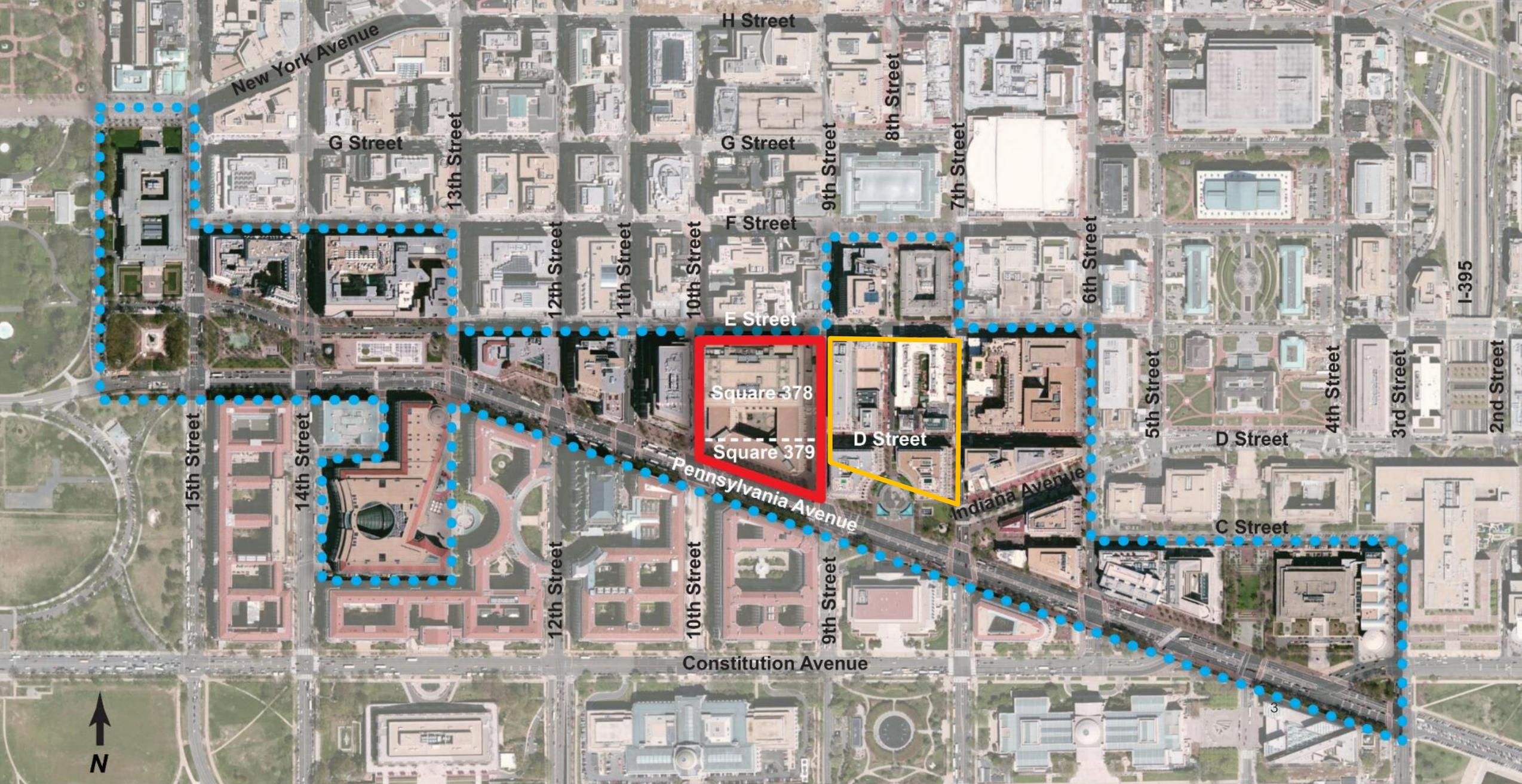
**NCPC File number:** P7713

**Project summary:**

The General Services Administration (GSA) is in the process of selecting an “exchange partner” to construct a consolidated headquarters facility for the Federal Bureau of Investigation (FBI) on one of three sites outside of the District. Upon completion and acceptance of the new FBI headquarters facility by GSA, the exchange partner will receive fee simple title to the J. Edgar Hoover (JEH) Building and land located on Squares 378 and 379, bounded by Pennsylvania Avenue, 9<sup>th</sup>, 10<sup>th</sup>, and E Streets, NW in Washington, DC.

In anticipation of the potential reuse or redevelopment of Squares 378 and 379, NCPC staff is working with agency stakeholders and the public to develop square guidelines that will help inform how the site is redeveloped. NCPC staff submitted a high level concept of the Square Guidelines for the JEH site for comments in June. Staff is currently presenting draft guidelines for preliminary approval. Staff will present a final draft of the guidelines to the Commission later this year.

Development on Pennsylvania Avenue between 1st and 15th Streets, NW is unique in that it is governed by the *1974 Pennsylvania Avenue Development Plan*, in addition to local zoning. The 1974 Plan includes Square Guidelines, which regulate most of the parcels along this stretch of the avenue. Square guidelines influence the size and shape of develop as well as provide guidance on general land use, circulation, and other important urban design components. NCPC, the General Services Administration (GSA), and the National Park Service (NPS) have authority to propose changes to the 1974 Plan and develop square guidelines. Unlike other squares in this area, the 1974 Plan does not include guidelines for Squares 378 and 379 because the JEH Building was under construction during the plan’s development.



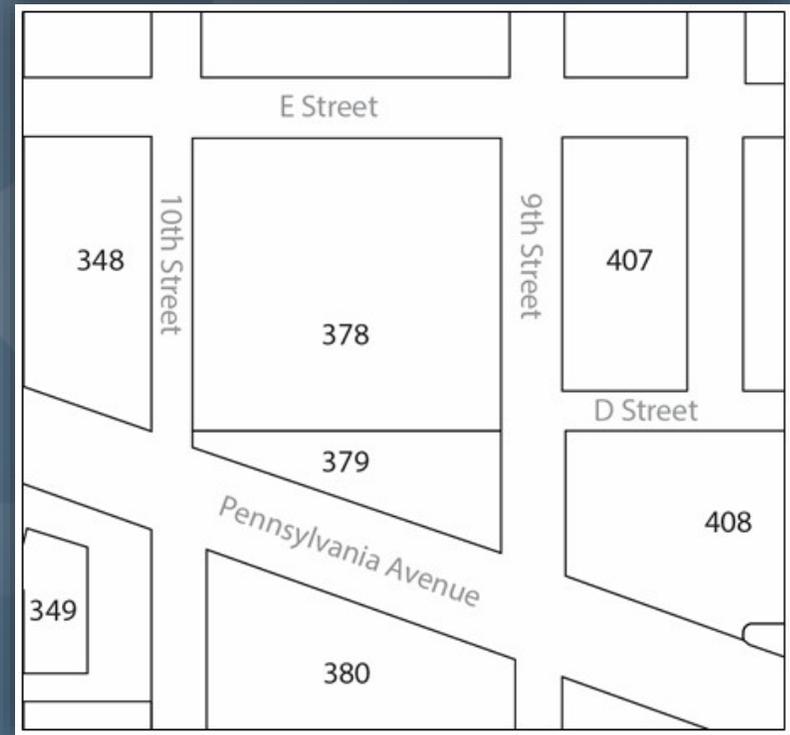
**LEGEND**

..... PADC BOUNDARY

———— FBI SITE

## How are Square Guidelines Used in the Development Review Process?

- Squares Guidelines are created for the site (either before or after the site becomes private. In this case, it will be before).
- Zoning applies to the site, but it must be consistent with the Square Guidelines.
- Historic Preservation Review Board and Commission of Fine Arts review processes still apply.
- Before a building permit is issued, NCPC and GSA review the development plan for consistency with the Square Guidelines.



## On June 2, 2016 at Concept Review, the Commission:

Commented favorably on the following guidelines related to building envelope:

- **D Street, NW Right-of-way's** spatial configuration, as designed in the L'Enfant Plan, at 70 feet wide will be re-established if Squares 378 and 379 are redeveloped.
- **Square 378 Build-to-lines for 9<sup>th</sup>, 10<sup>th</sup>, D and E Streets, NW** is the property line which coincides with the L'Enfant Plan rights-of-way.
- **Square 378 Allowable Height/Upper-Story Setbacks** is a maximum of 160 feet w/ upper-story setbacks for D, 9<sup>th</sup>, 10<sup>th</sup> and E Streets, NW that are compatible with surrounding development.
- **Directed staff** to prepare additional analysis for Square 379 build-to-line as outline on the next slide.

## June 2, 2016 Commission Recommendation on Square 379

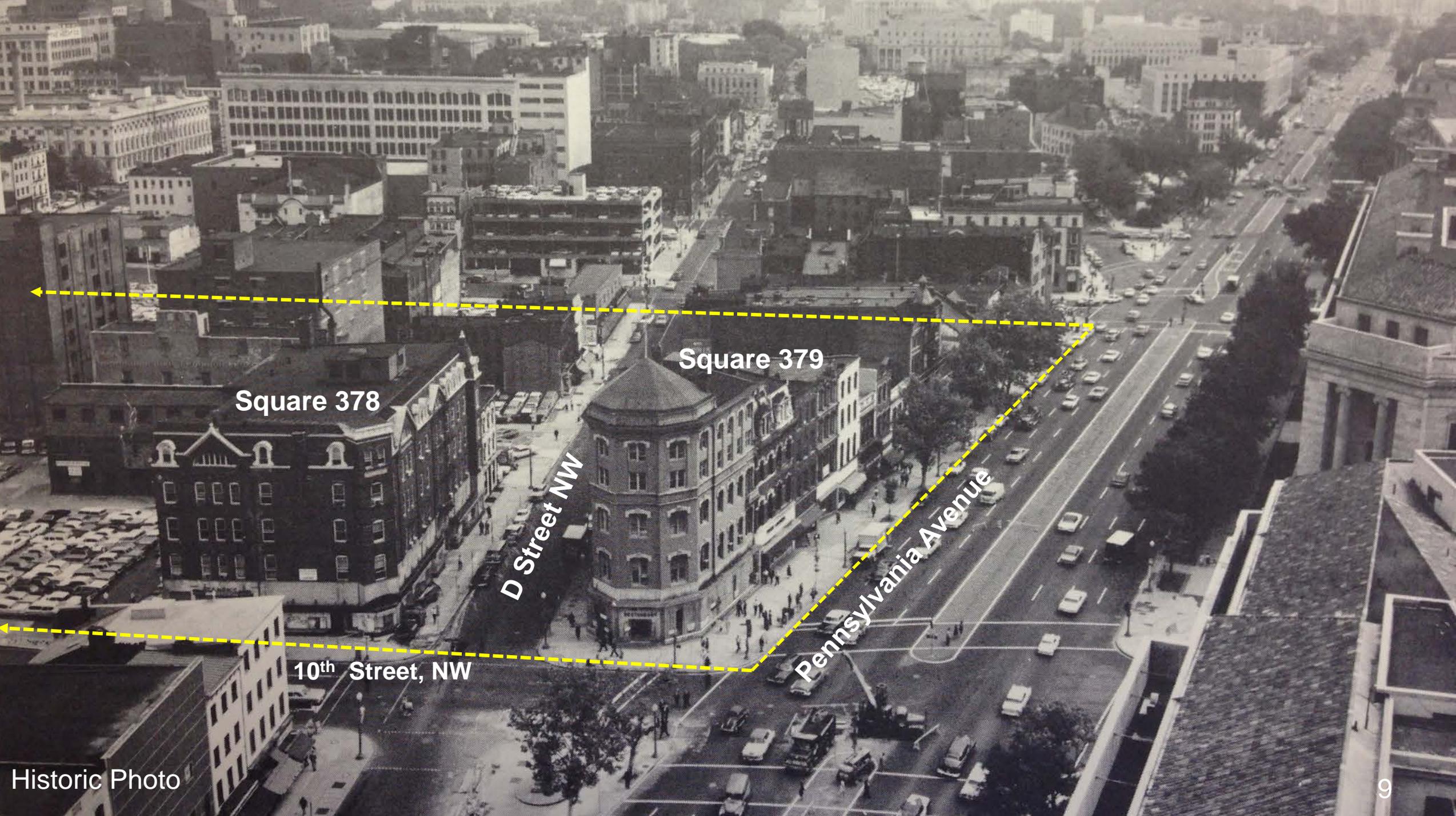
Prepare visual and technical studies to analyze the impacts and benefits of moving the build-to-line from the L'Enfant Plan configuration 0-feet to 30-feet from the property line and provide detailed analysis and recommendations in the fall. The analysis should look at:

- Developable area
- North building wall
- Urban landscape and public realm
- Symmetry
- Surrounding context
- Potential impacts to historic properties and applicable plans

The following slides are key diagrams that contribute to the build-to-line and height analysis.

Diagram shows numbered squares and streets.  
The FBI currently occupies Square 378 & 379.





Square 378

Square 379

D Street NW

10th Street, NW

Pennsylvania Avenue

# Build-to-Line Analysis

# Build-to-lines



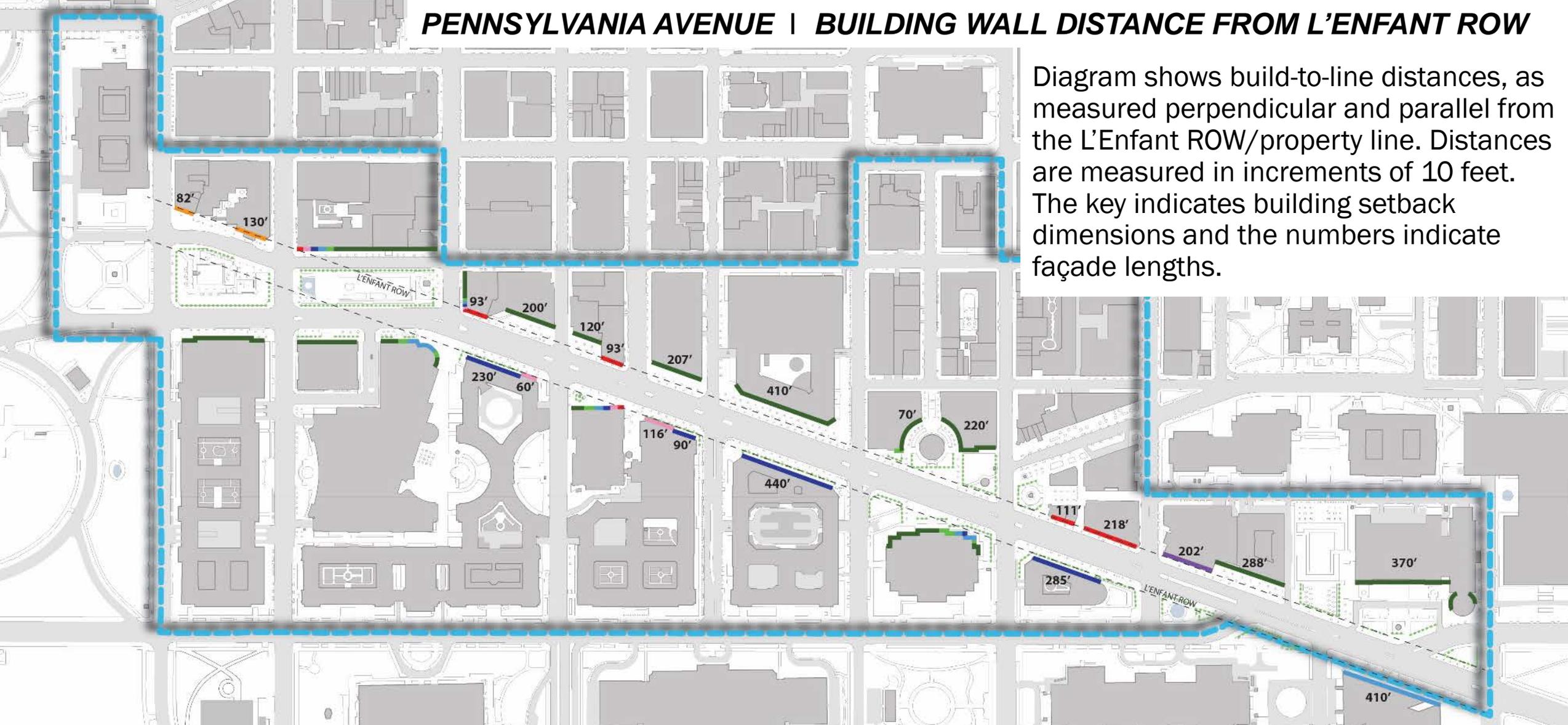
Current distance between building and curb is 79.5' (80').

Build-to-line

L'Enfant ROW line/ Property Line

# PENNSYLVANIA AVENUE | BUILDING WALL DISTANCE FROM L'ENFANT ROW

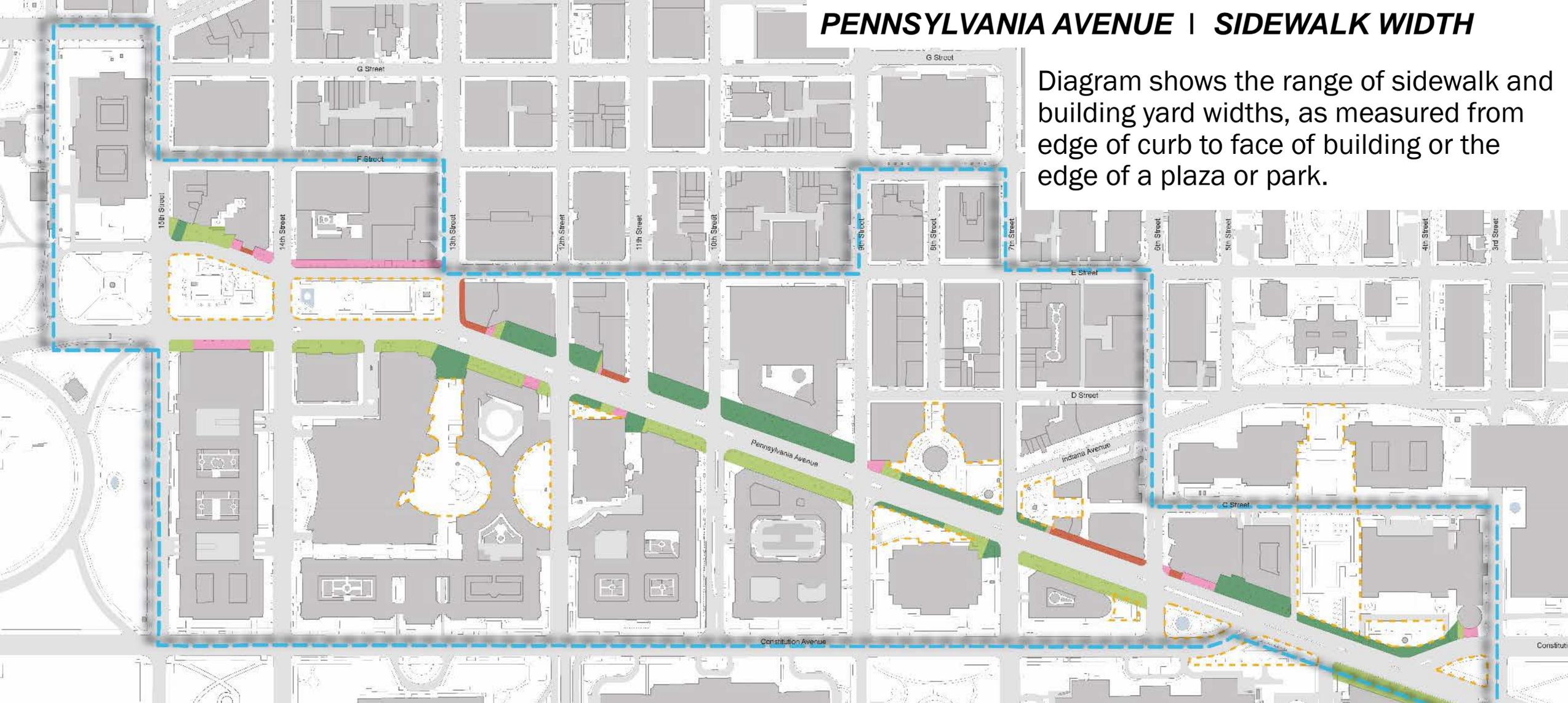
Diagram shows build-to-line distances, as measured perpendicular and parallel from the L'Enfant ROW/property line. Distances are measured in increments of 10 feet. The key indicates building setback dimensions and the numbers indicate façade lengths.



- |                           |                                         |                                         |                                                                   |
|---------------------------|-----------------------------------------|-----------------------------------------|-------------------------------------------------------------------|
| Buildings on L'Enfant ROW | Buildings Setback 10' from L'Enfant ROW | Buildings Setback 30' from L'Enfant ROW | Buildings Setback 50' from L'Enfant ROW                           |
| Buildings on L'Enfant ROW | Overhang on L'Enfant ROW                | Buildings Setback 20' from L'Enfant ROW | Buildings Setback 40' from L'Enfant ROW                           |
|                           |                                         |                                         | landscape walls and other vertical elements, not building facades |

# PENNSYLVANIA AVENUE | SIDEWALK WIDTH

Diagram shows the range of sidewalk and building yard widths, as measured from edge of curb to face of building or the edge of a plaza or park.



## LEGEND

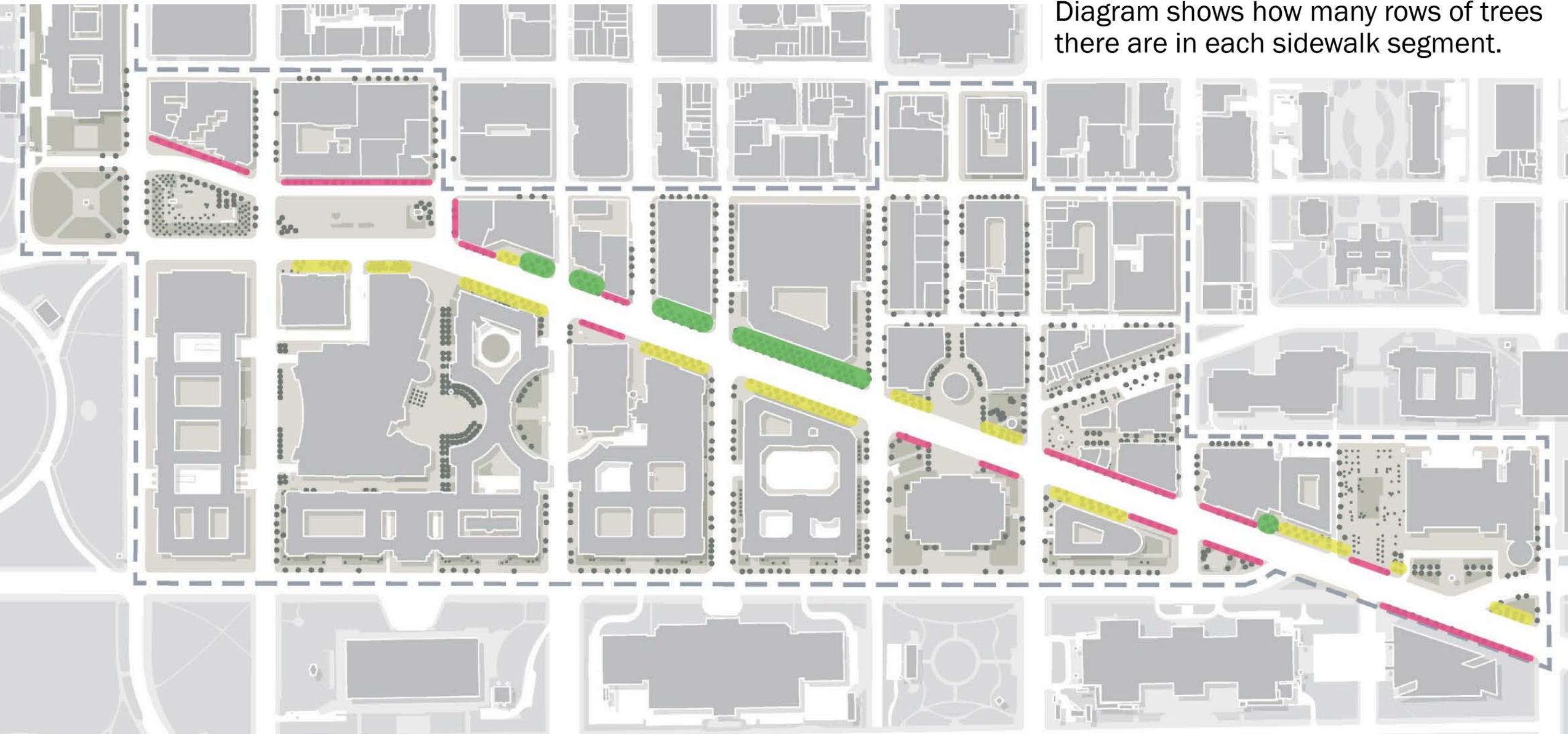
- PROPOSED INVENTORY AREA
- 75' or more
- Approximately 50'
- 26' - 44'
- 25' or less
- PLAZA / PARK

# Tree Canopy



# PENNSYLVANIA AVENUE | TREE ROWS

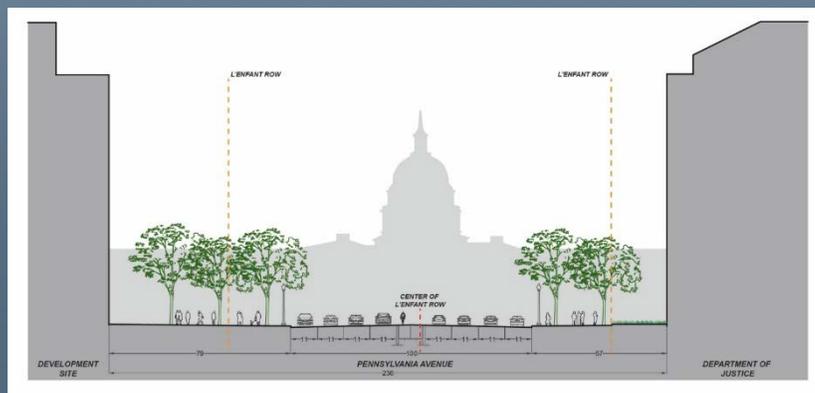
Diagram shows how many rows of trees there are in each sidewalk segment.



1 Row of Trees

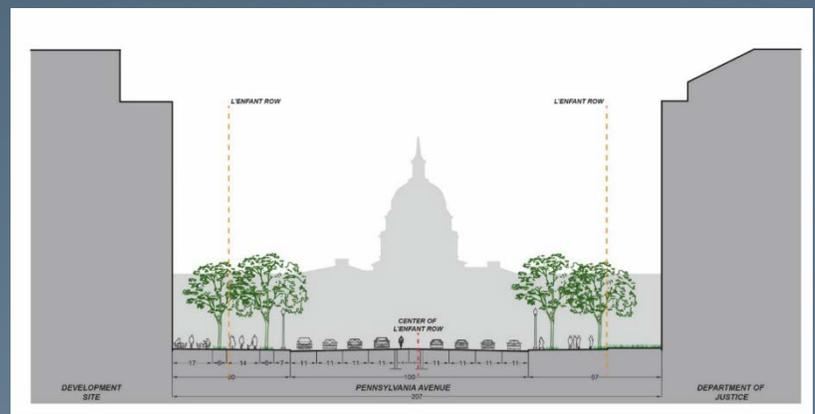
2 Rows of Trees

3 Rows of Trees



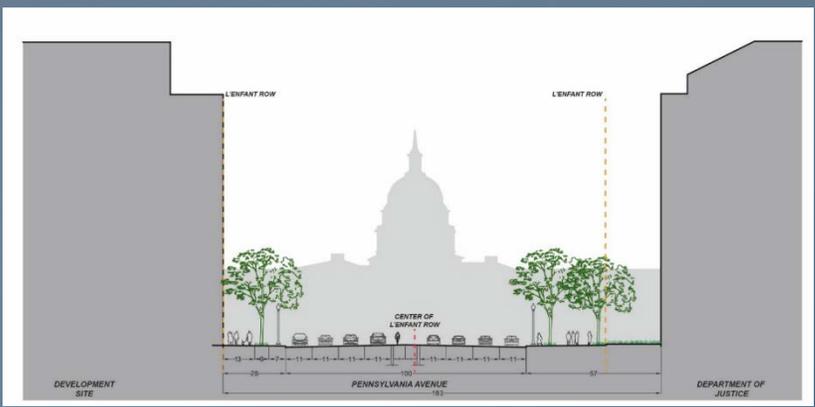
# Build-to-Line Analysis

50' from L'Enfant ROW (75' sidewalk)  
Existing Condition



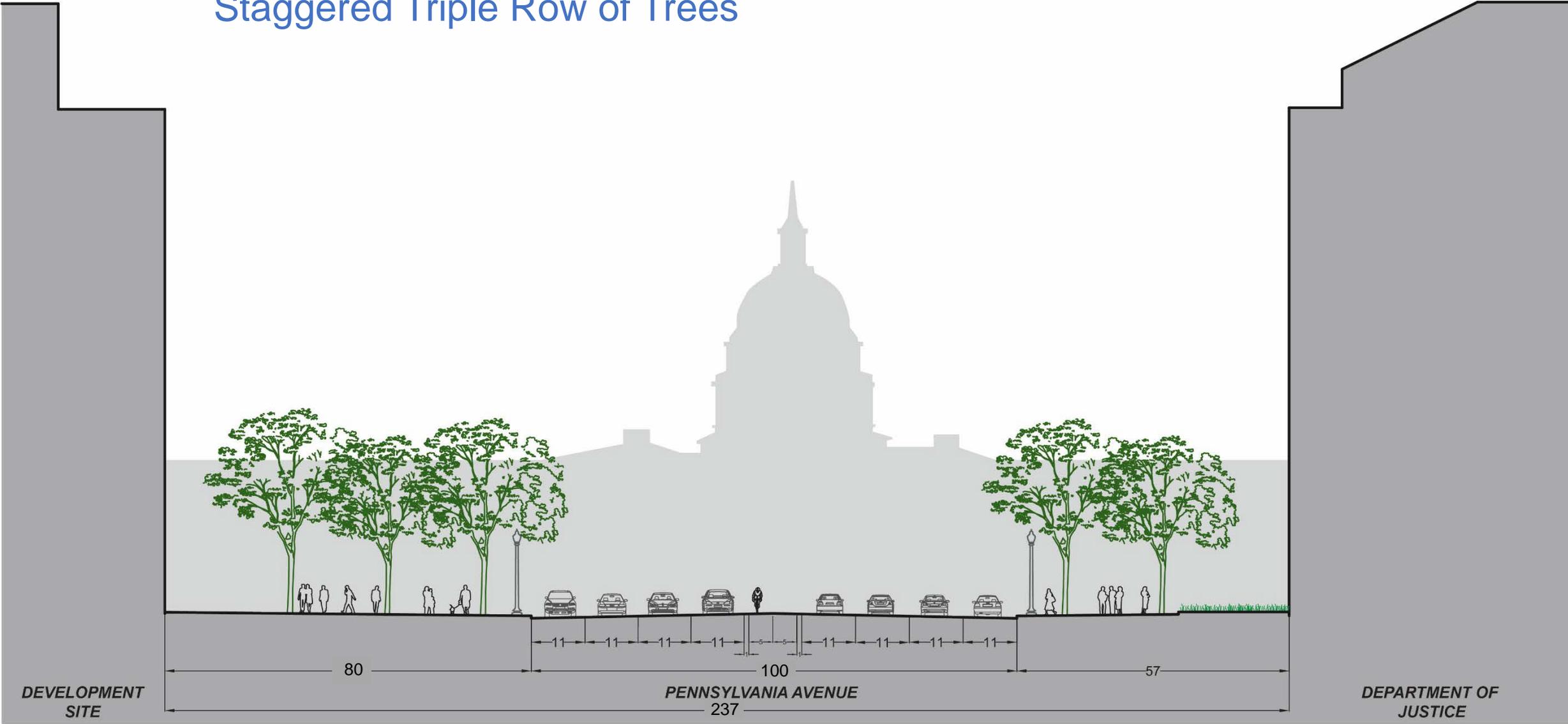
## Specific to Square 379

30' from L'Enfant ROW (57' Sidewalk)  
20' from L'Enfant ROW (47' Sidewalk)



10' from L'Enfant ROW (37' Sidewalk)  
0' at L'Enfant ROW (27' Sidewalk)

The 194 Pennsylvania Avenue Plan  
Existing Sidewalk = 80'  
Staggered Triple Row of Trees





North side Pennsylvania Ave between 9<sup>th</sup> & 10<sup>th</sup> Streets



North side Pennsylvania Ave between 10<sup>th</sup> & 11<sup>th</sup> Streets

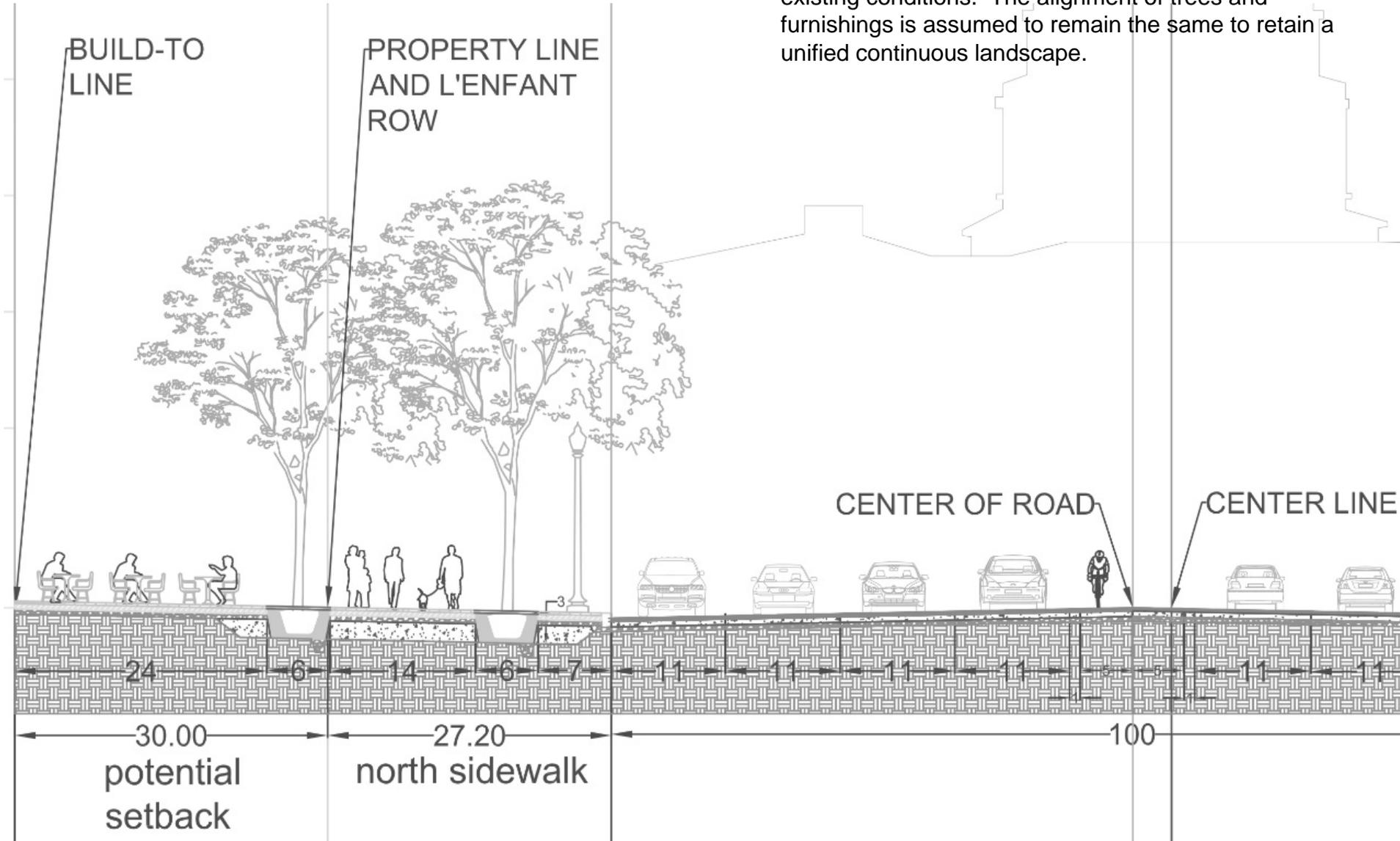


# 30' setback from property line 57' Sidewalk

For purpose of this project, in absence of a new vision for the Avenue, the based the landscape program on these existing conditions. The alignment of trees and furnishings is assumed to remain the same to retain a unified continuous landscape.

## L'Enfant ROW + 30'

- 57' sidewalk
- 24' activity zone/café space
- 14' pedestrian zone
- Double row of trees (aligned with trees on other blocks)





24'

55'

9'

Massachusetts Avenue, between 6<sup>th</sup> and 7<sup>th</sup> Streets

# Café Space

21'

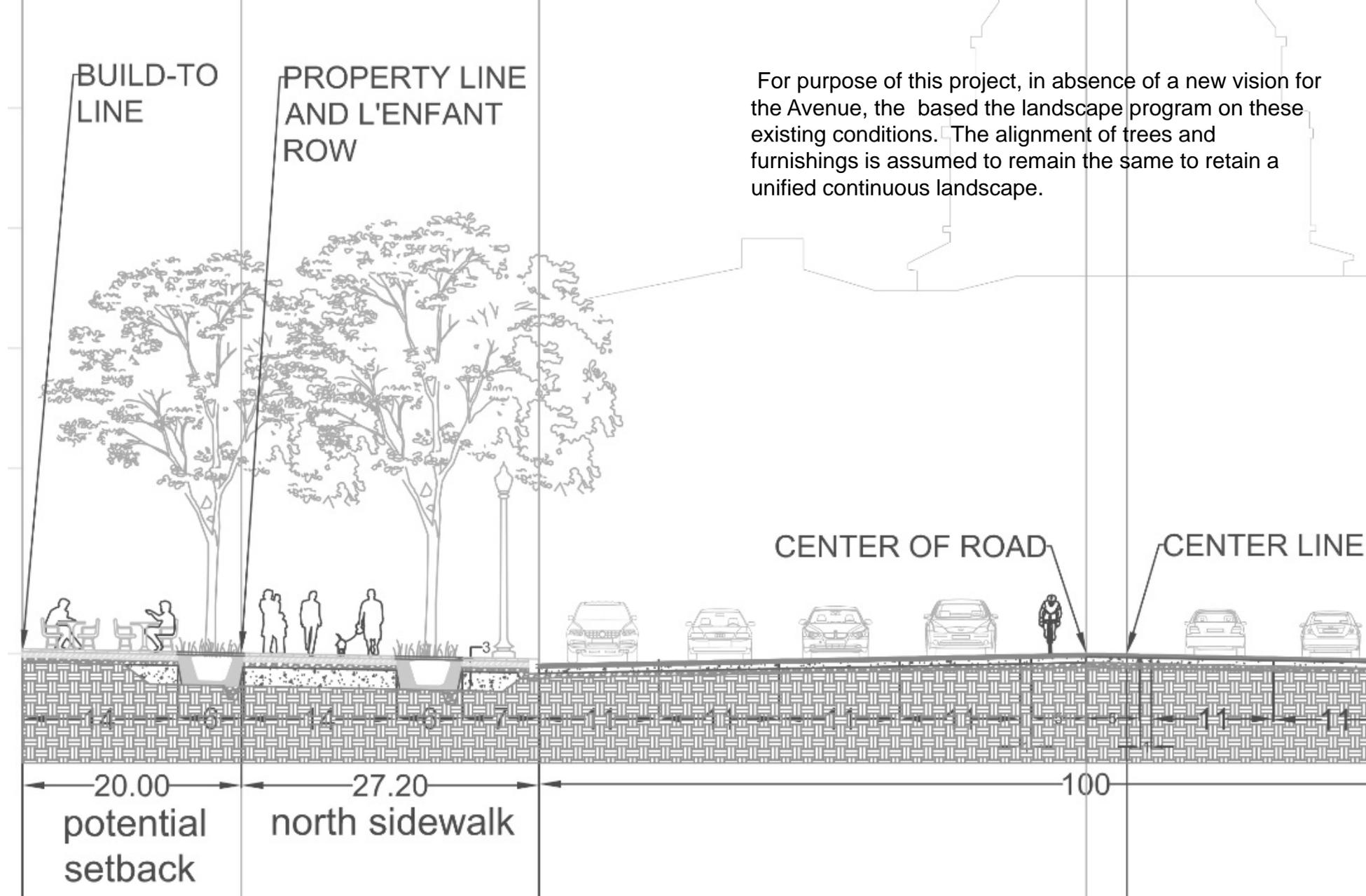


Circa, I Street and 23<sup>rd</sup> Street.

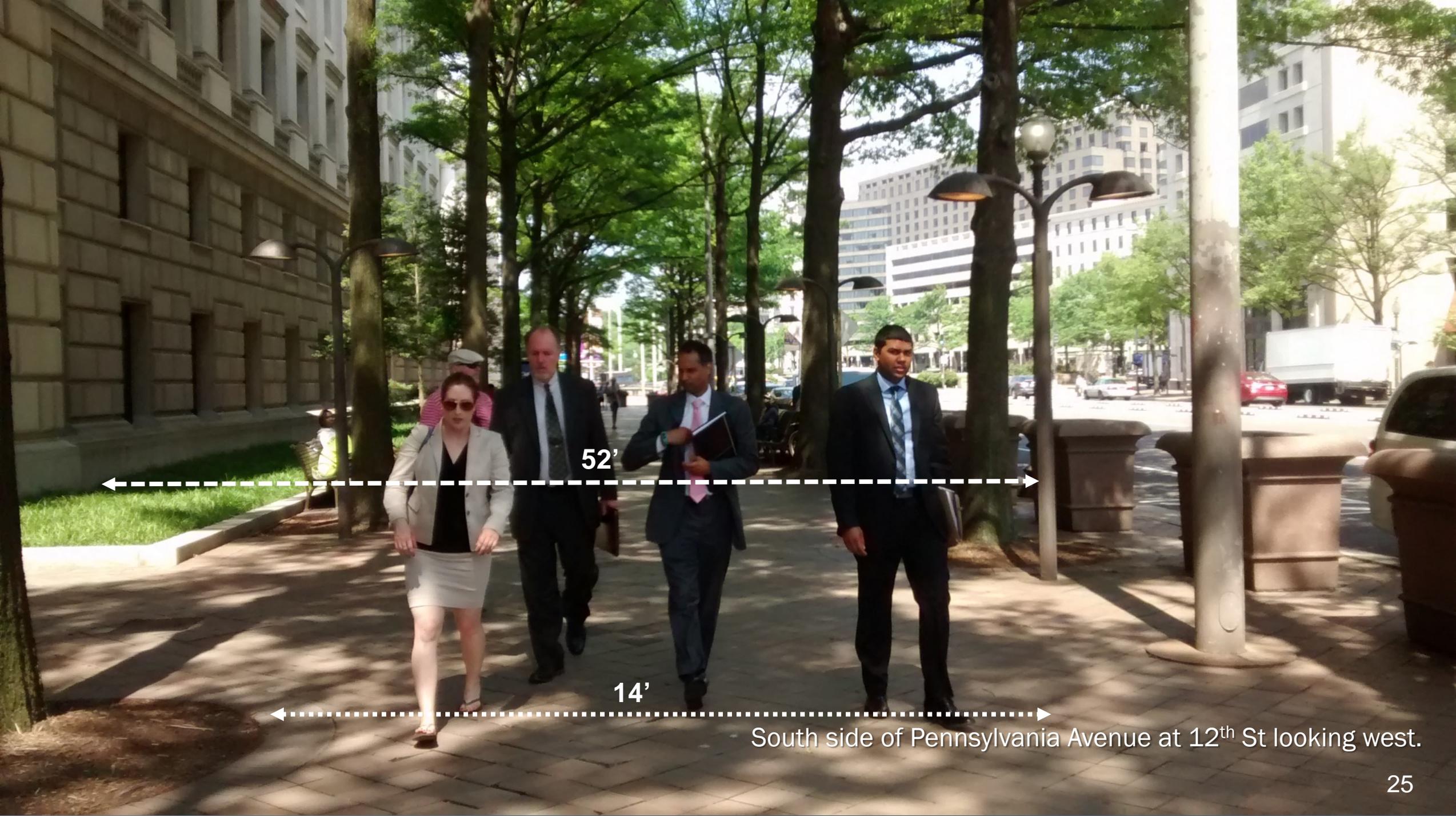
20' setback  
from property line  
47' Sidewalk

L'Enfant ROW  
+ 20'

- 47' sidewalk
- 14' activity zone/café space
- 14' pedestrian zone
- Double row of trees (aligned with trees on other blocks)



For purpose of this project, in absence of a new vision for the Avenue, the based the landscape program on these existing conditions. The alignment of trees and furnishings is assumed to remain the same to retain a unified continuous landscape.



52'

14'

South side of Pennsylvania Avenue at 12<sup>th</sup> St looking west.

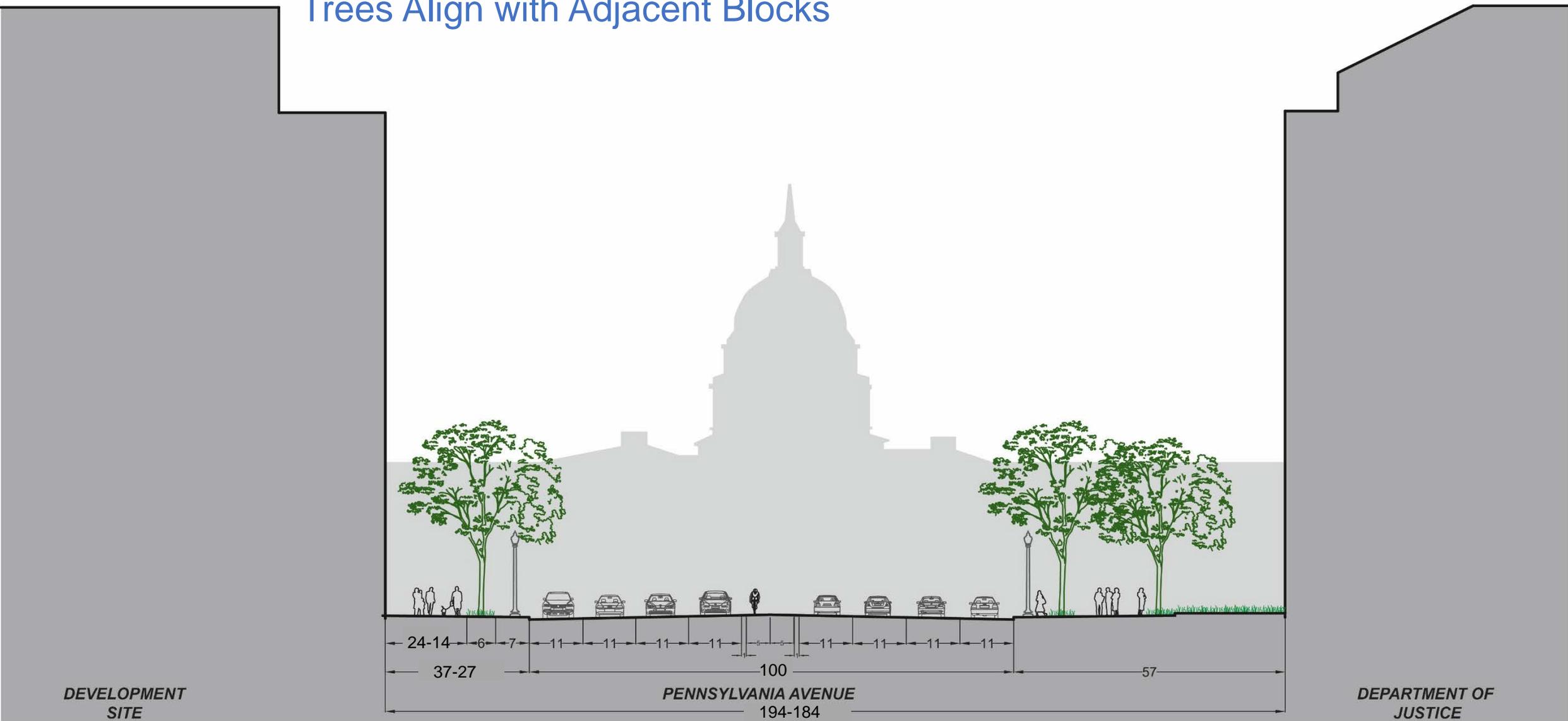
# Café Space



16'

Elephant & Castle, Pennsylvania Avenue & 12<sup>th</sup> Street.

L'Enfant Plan  
Sidewalk = 37' to 27'  
Trees Align with Adjacent Blocks



DEVELOPMENT SITE

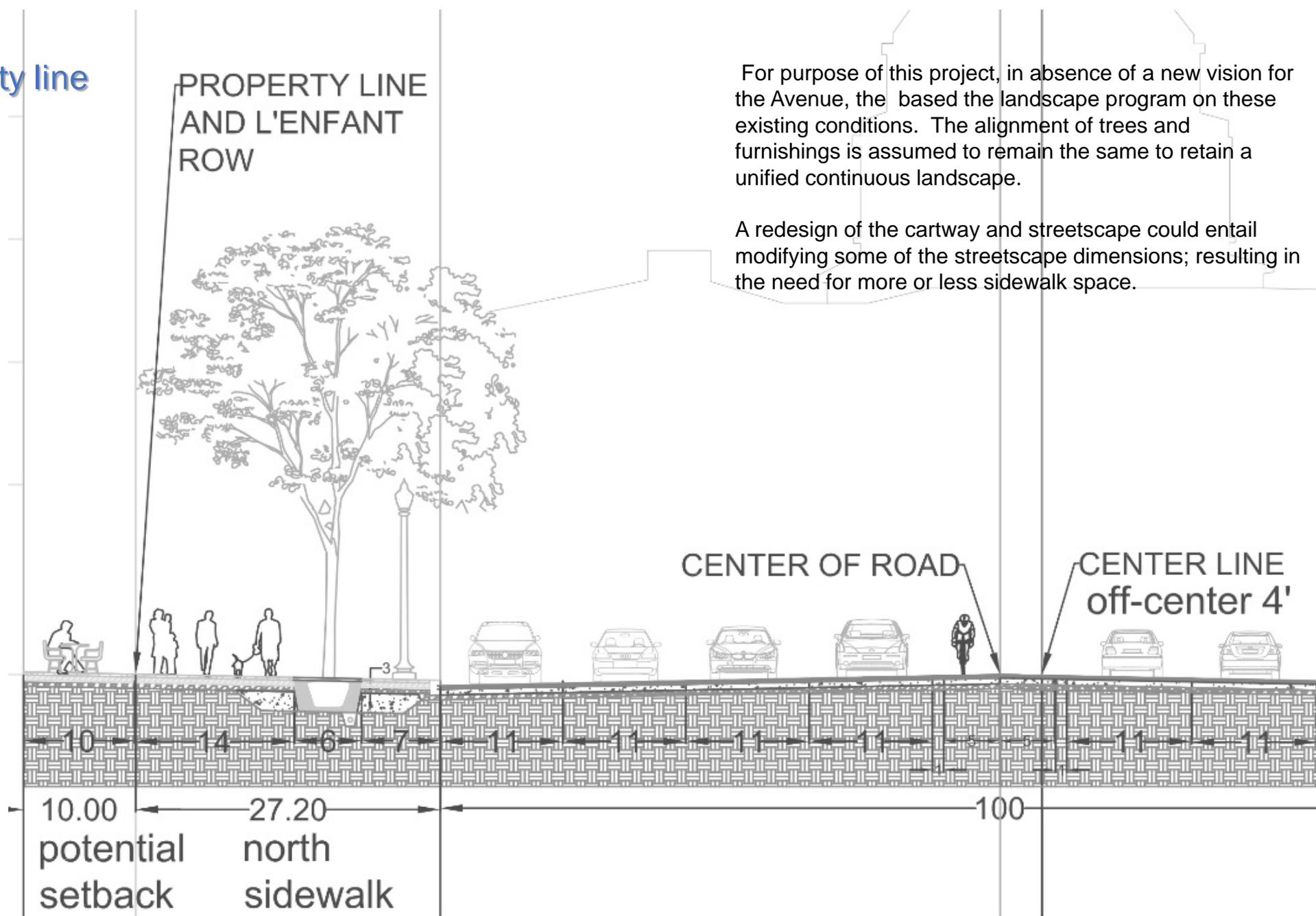
PENNSYLVANIA AVENUE  
194-184

DEPARTMENT OF JUSTICE

10' setback from property line  
37' Sidewalk

L'Enfant ROW  
+ 10'

- 37' sidewalk
- 10' café space
- Single row of larger trees (aligned with trees on other blocks)
- 14' pedestrian zone



For purpose of this project, in absence of a new vision for the Avenue, the based the landscape program on these existing conditions. The alignment of trees and furnishings is assumed to remain the same to retain a unified continuous landscape.

A redesign of the cartway and streetscape could entail modifying some of the streetscape dimensions; resulting in the need for more or less sidewalk space.

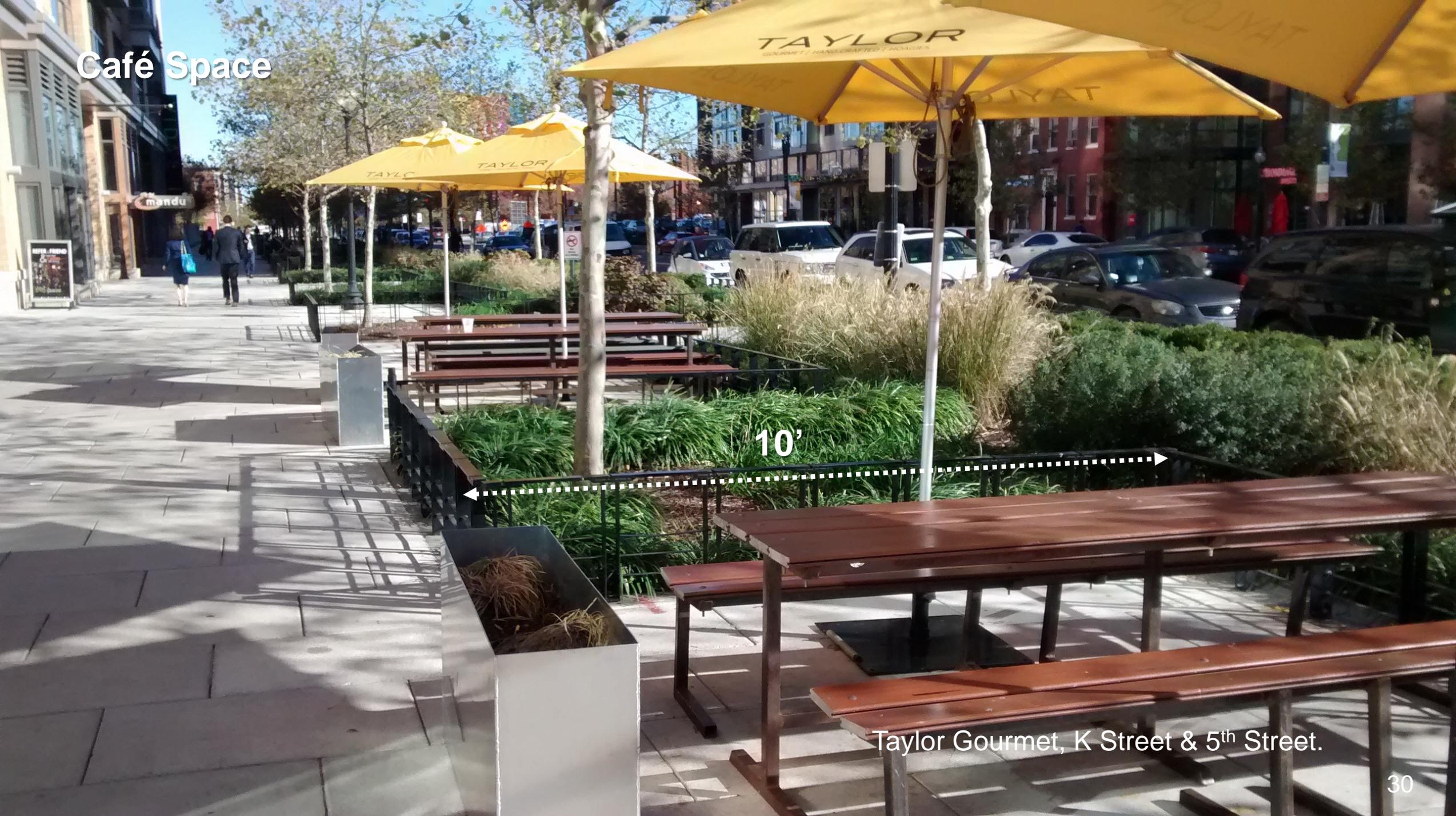


36'

15'

New Hampshire Avenue NW, between O Street and DuPont Circle

# Café Space



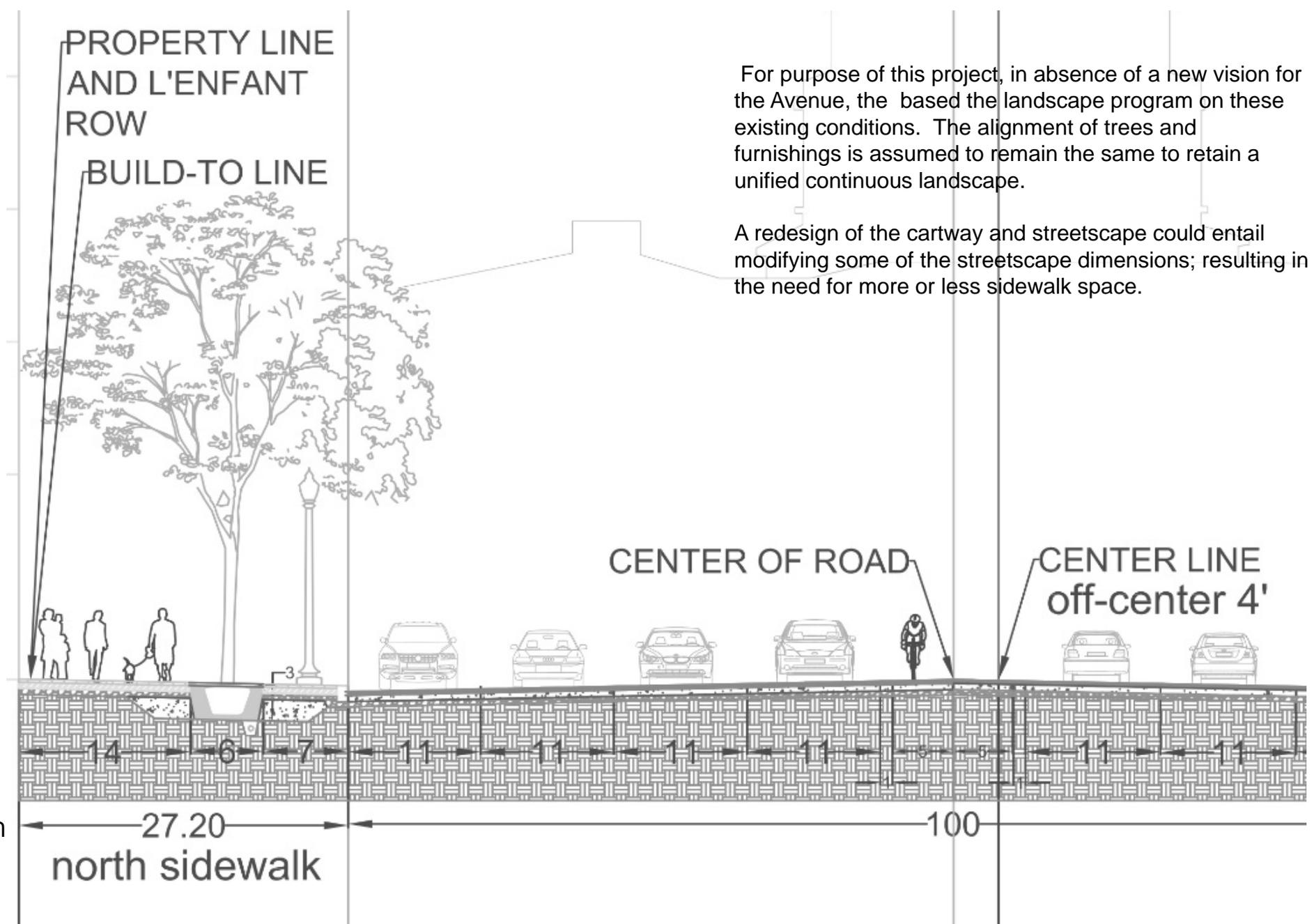
10'

Taylor Gourmet, K Street & 5th Street.

0' setback from property line  
27' Sidewalk

## L'Enfant ROW + 0'

- 27' sidewalk
- No outdoor activity area/café space
- Little room for street furniture
- 14' pedestrian zone
- Single row of smaller trees (aligned with trees on other blocks)



For purpose of this project, in absence of a new vision for the Avenue, the based the landscape program on these existing conditions. The alignment of trees and furnishings is assumed to remain the same to retain a unified continuous landscape.

A redesign of the cartway and streetscape could entail modifying some of the streetscape dimensions; resulting in the need for more or less sidewalk space.



North Side of Pennsylvania Ave between 10<sup>th</sup> & 11<sup>th</sup> Streets.



North Side of Pennsylvania Avenue at 6<sup>th</sup> St looking west.

# Height Analysis



Department of Justice

1001 Pennsylvania

FBI

Market Square

160

137

114

135

156

157

108

122

140

102

127

110

105

140

100

156

80



FBI

1001 Pennsylvania

9th Street

10th Street

E Street, NW

148'  
135'  
100'  
98'  
139'  
120'

124'  
102'

114'  
135'  
156'  
161'  
152'  
88'  
110'  
108'

131'  
80'

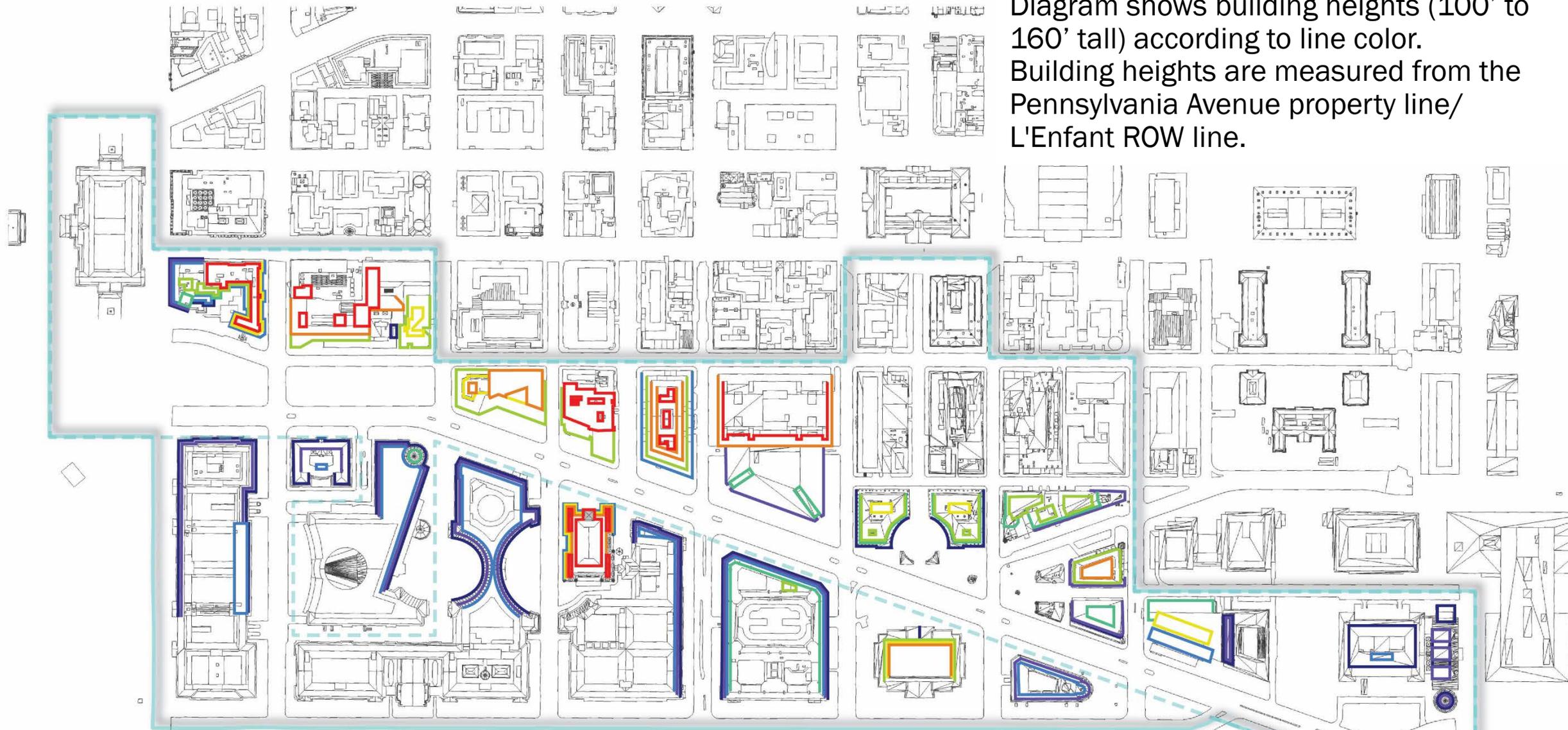
74'

45'

98'  
112'  
131'

# PENNSYLVANIA AVENUE | BUILDING HEIGHTS

Diagram shows building heights (100' to 160' tall) according to line color. Building heights are measured from the Pennsylvania Avenue property line/ L'Enfant ROW line.



	PADC BOUNDARY	160'		125'	
	PROPOSED INVENTORY AREA	155'		115'	
		145'		105'	
		135'		100'	



# Vista Analysis

# Building Wall and Vista

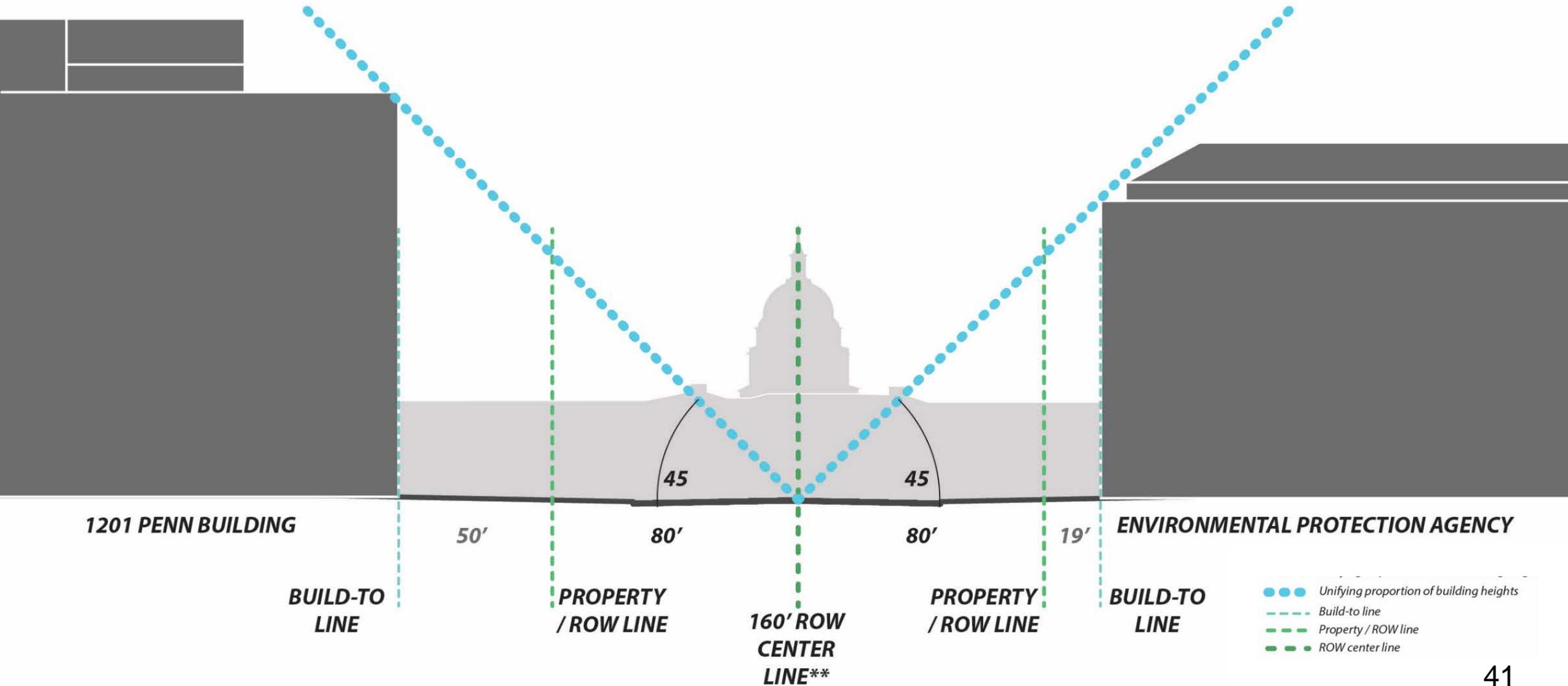


# 1201 PENN BUILDING AND ENVIRONMENTAL PROTECTION AGENCY

The section cut is taken from the middle of the 1201 Pennsylvania block and the Environmental Protection Agency building.

\*Buildings reach a height of 160' at a point 100' north of the property line/ROW line per the 1974 Plan. Square Guidelines regulate this as 50' from the new building line, which is setback 50' north of the property line/ROW line.

\*\*The center of the cartway is offset 4' north of the ROW center line.



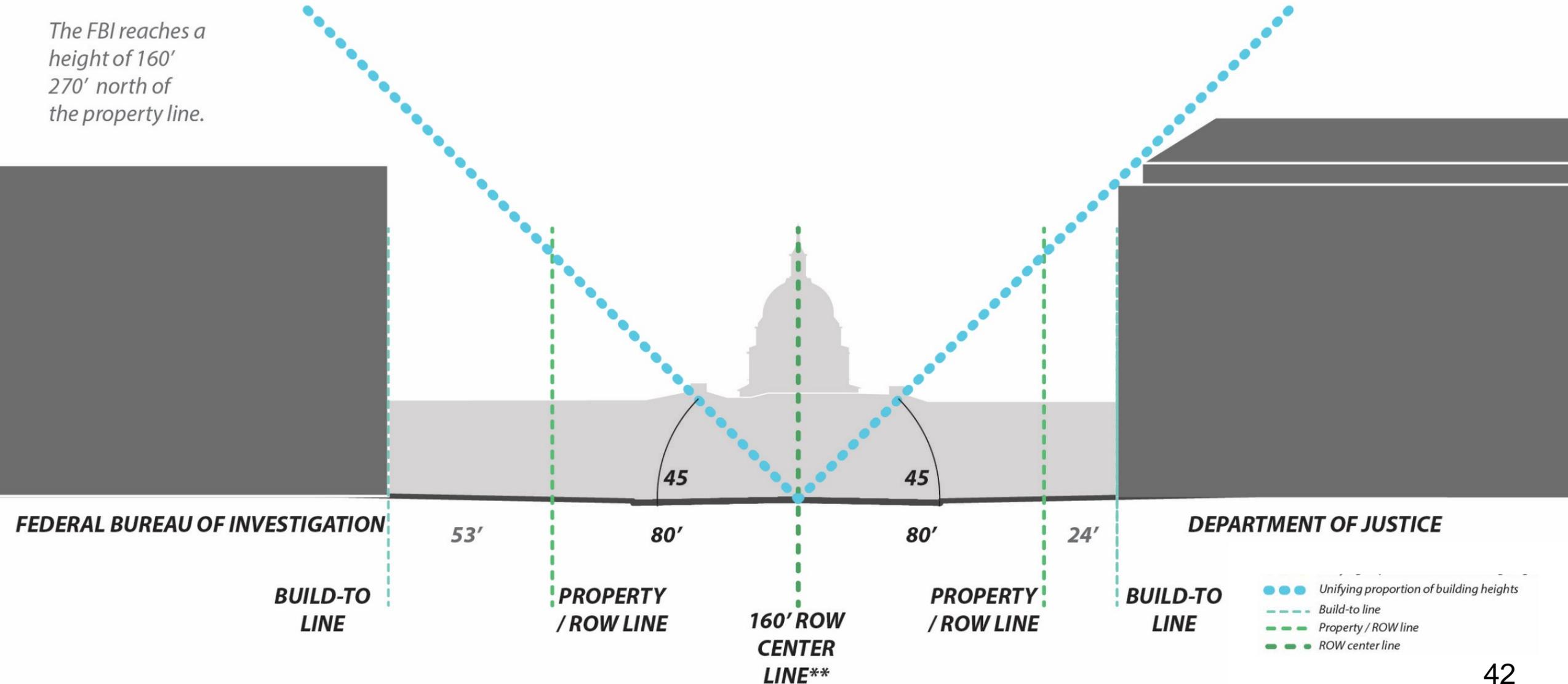
# EXISTING FBI AND DEPARTMENT OF JUSTICE

The section cut is taken from the middle of the Federal Bureau of Investigation and the Department of Justice buildings.

\*Buildings reach a height of 160' at a point 100' north of the property line/ROW line per the 1974 Plan. Square Guidelines regulate this as 50' from the new building line, which is setback 50' north of the property line/ROW line.

\*\* The center of the cartway is offset 4' north of the ROW center line.

The FBI reaches a height of 160' 270' north of the property line.

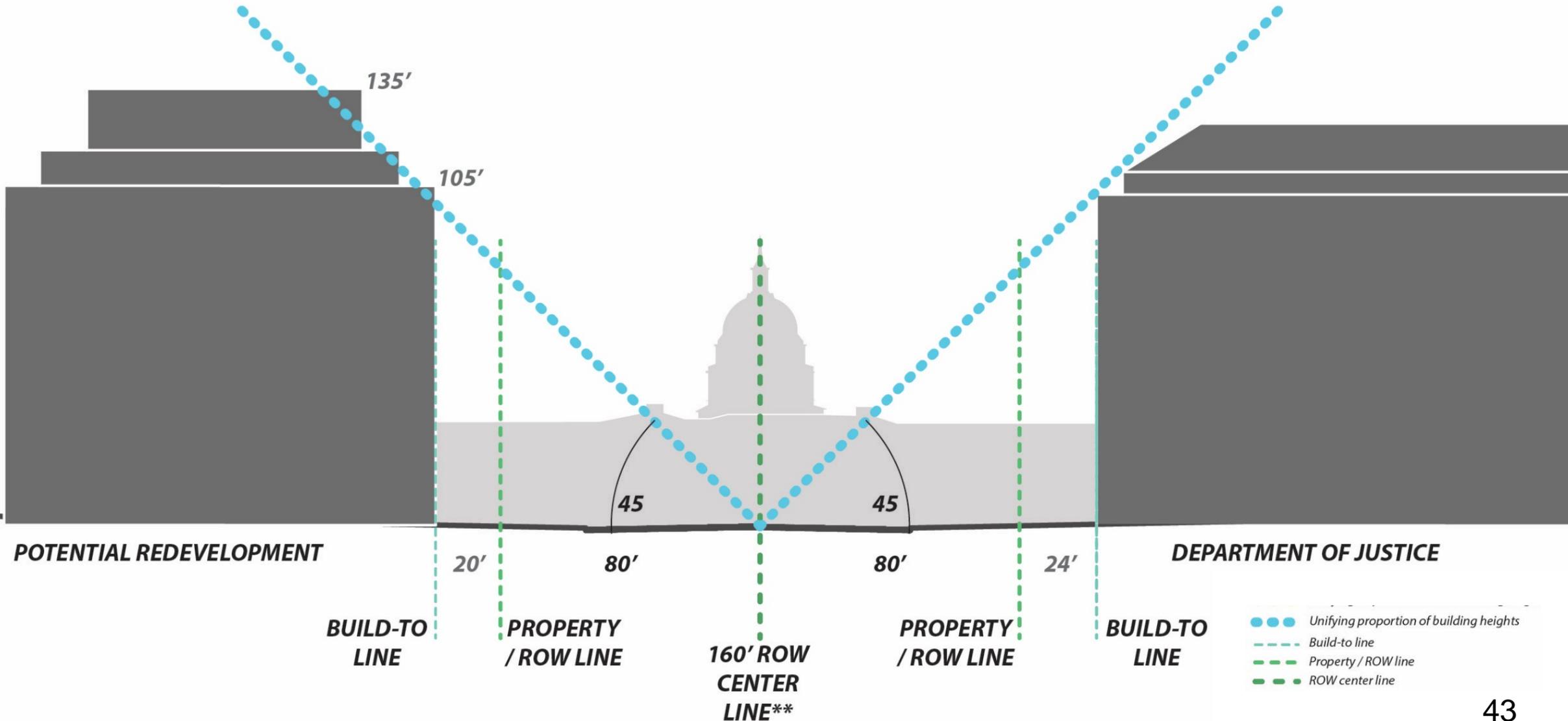


# SQUARE 379 POTENTIAL REDEVELOPMENT AND DEPARTMENT OF JUSTICE

The section cut is taken from the middle of the potential redevelopment on Square 379 and the Department of Justice.

\* Buildings reach a height of 160' at a point 100' north of the property line/ROW line per the 1974 Plan. Square Guidelines regulate this as 50' from the new building line, which is setback 50' north of the property line/ROW line.

\*\* The center of the cartway is offset 4' north of the ROW center line.



# Height Modeling

Diagram shows viewpoint locations for subsequent 3D model views.



- 1. Freedom Plaza
- 2. EPA
- 3. Old Post Office
- 4. Mellon Fountain
- 5. National Archives
- 6. Restored D Street



FBI  
↓

Looking east towards the Capitol.

# Height Modeling



The  
Pennsylvania  
Building

Evening  
Star

EPA

- Build-to-line setback 20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1

The modeled images in this section are for analysis purposes only. They do not represent a proposal.



FBI



Looking East towards the Capital



Evening  
Star

OPO

- Build-to-line setback 20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1

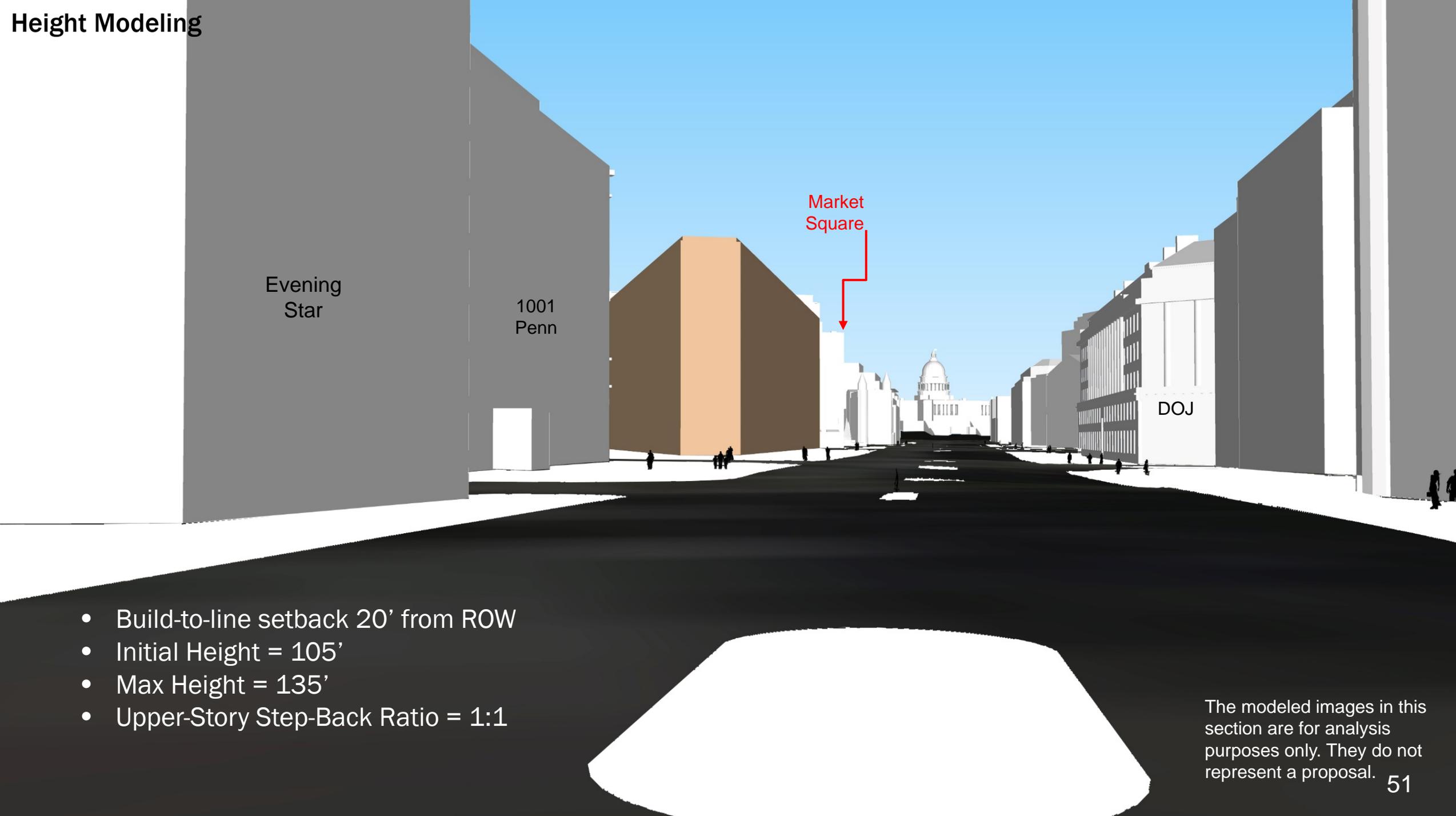
The modeled images in this section are for analysis purposes only. They do not represent a proposal.



FBI  
↓

Looking east towards the Capitol.

# Height Modeling



- Build-to-line setback 20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1

The modeled images in this section are for analysis purposes only. They do not represent a proposal.

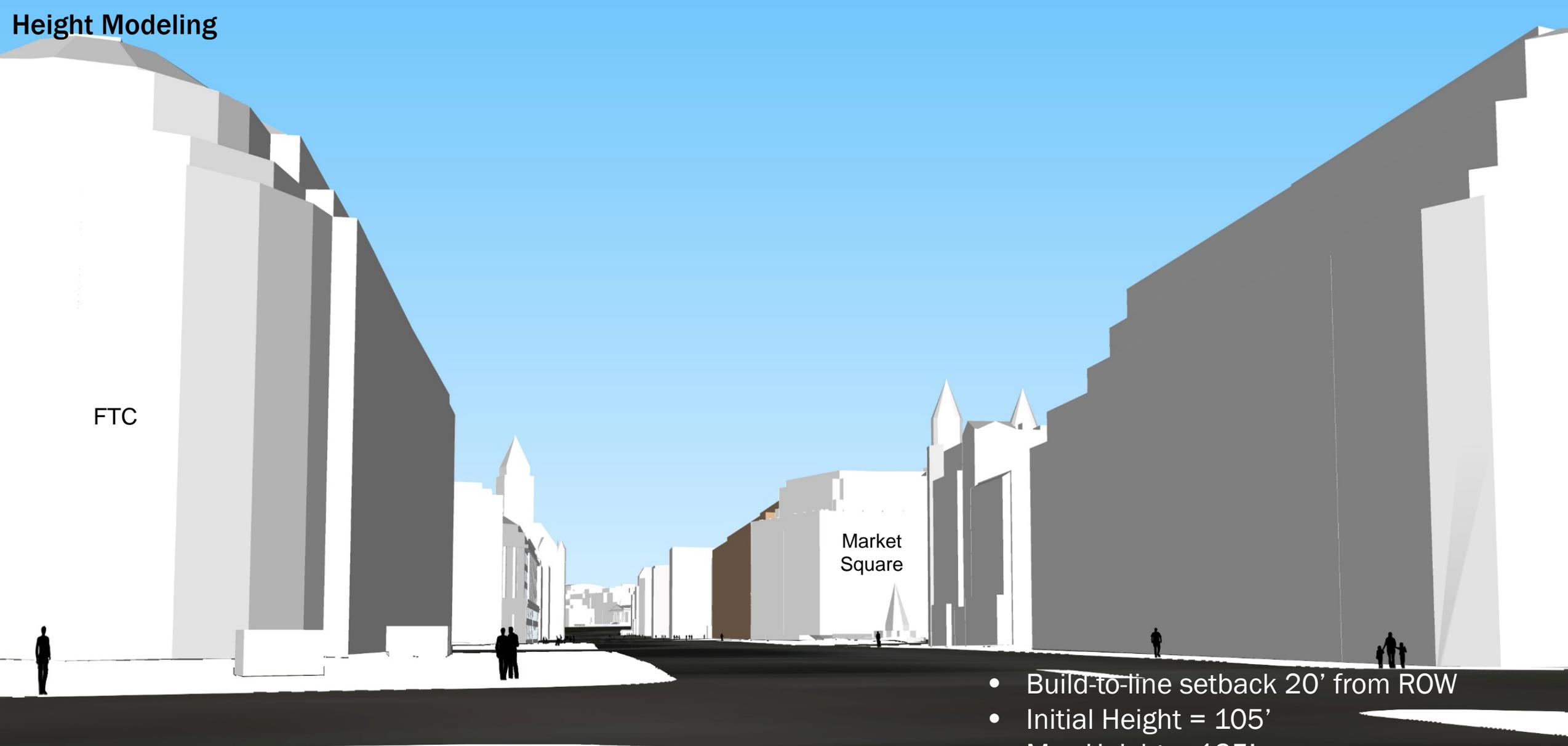


FBI



Looking west towards Freedom Plaza.

# Height Modeling



FTC

Market Square

- Build-to-line setback 20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1

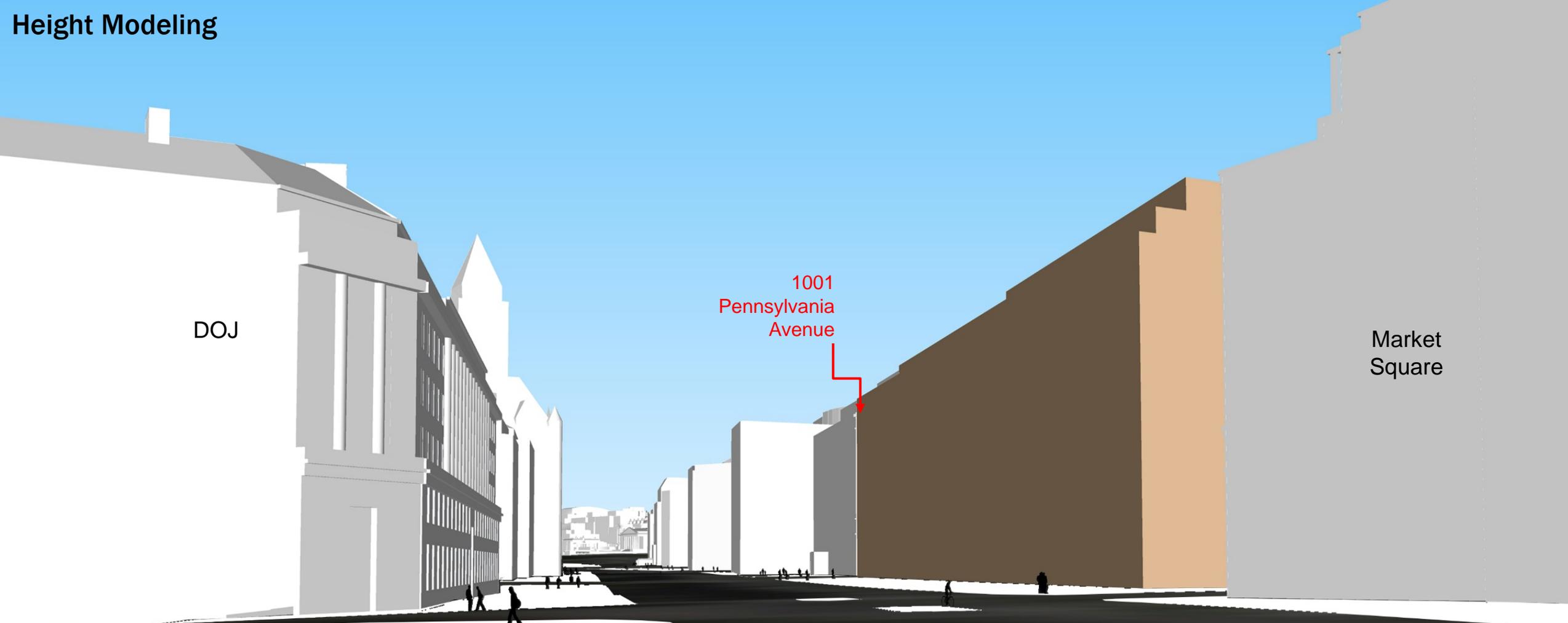
The modeled images in this section are for analysis purposes only. They do not represent a proposal.



FBI  
↓

Looking west towards Freedom Plaza.

# Height Modeling



DOJ

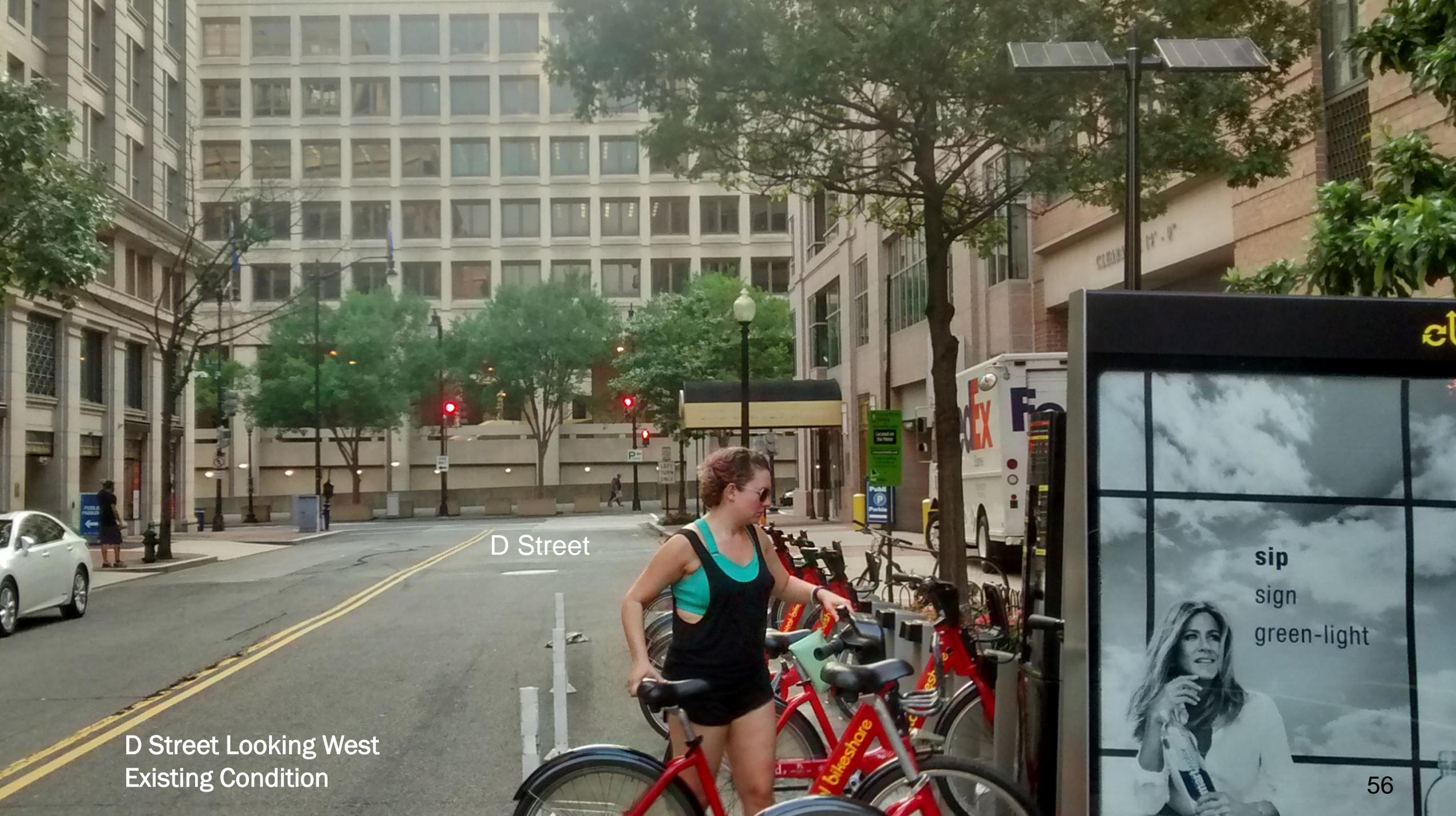
1001  
Pennsylvania  
Avenue

Market  
Square

- Build-to-line setback  
20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1



The modeled images in this section are for analysis purposes only. They do not represent a proposal.



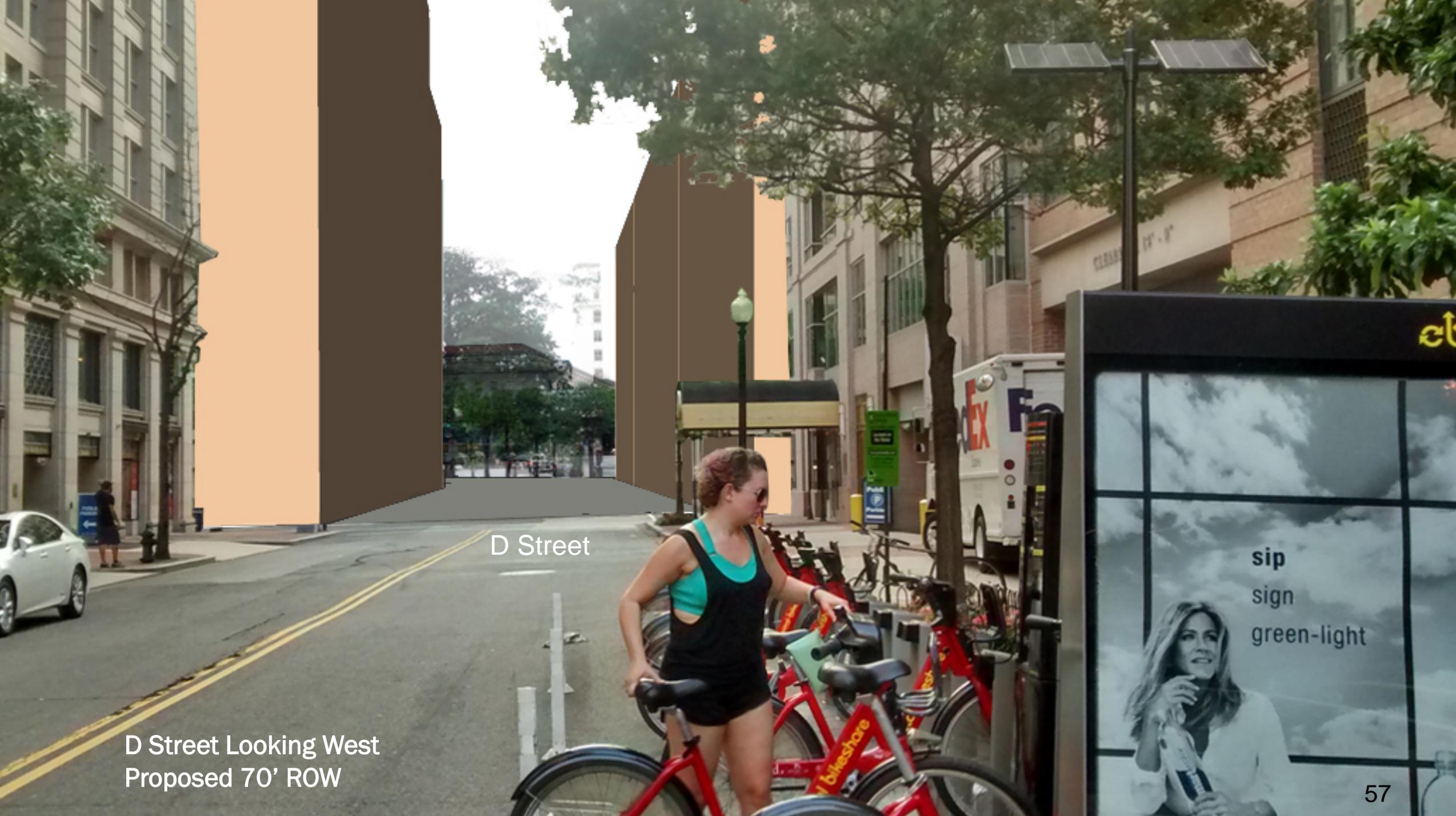
D Street

D Street Looking West  
Existing Condition

el

sip  
sign  
green-light

56

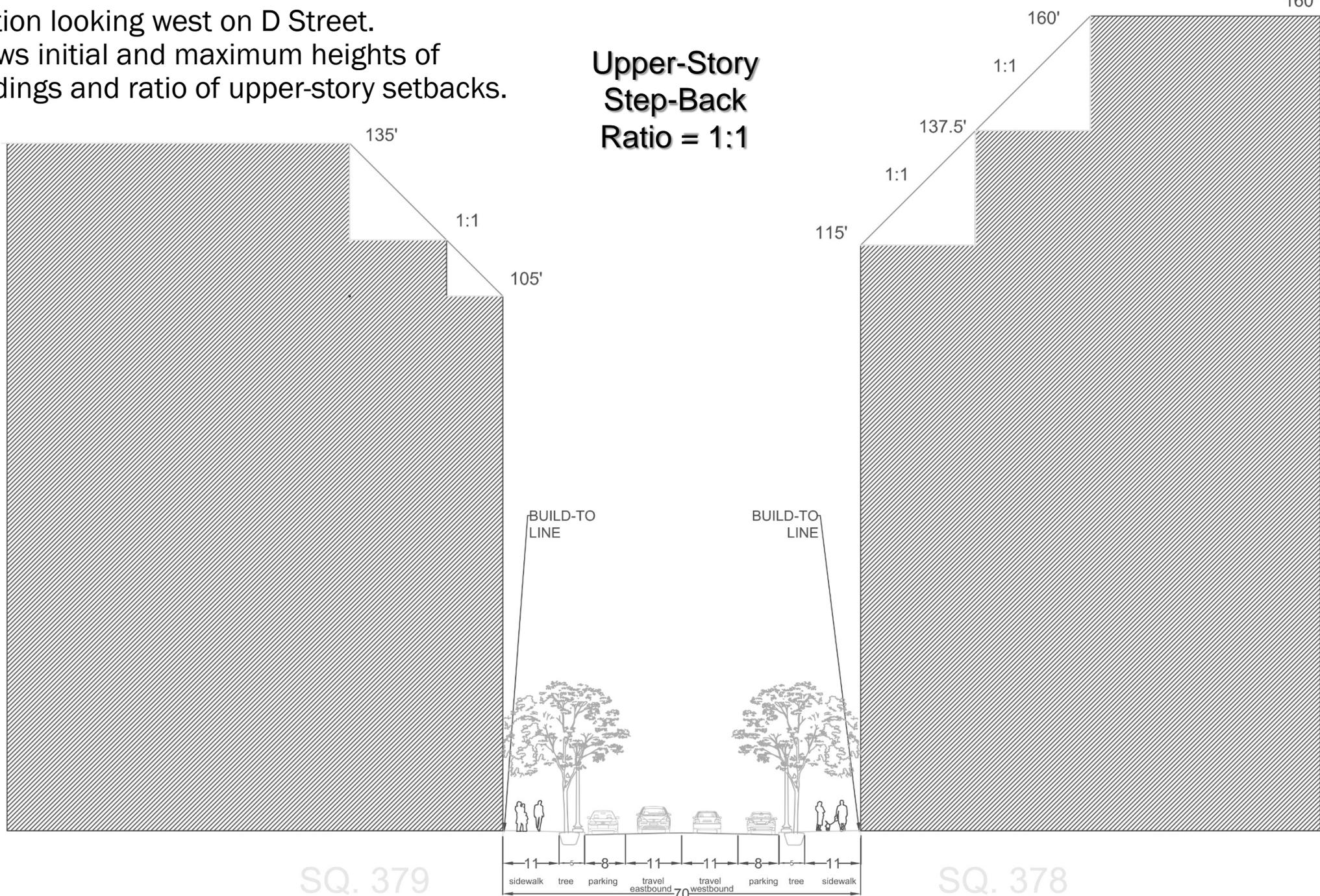


D Street

D Street Looking West  
Proposed 70' ROW

Section looking west on D Street.  
Shows initial and maximum heights of buildings and ratio of upper-story setbacks.

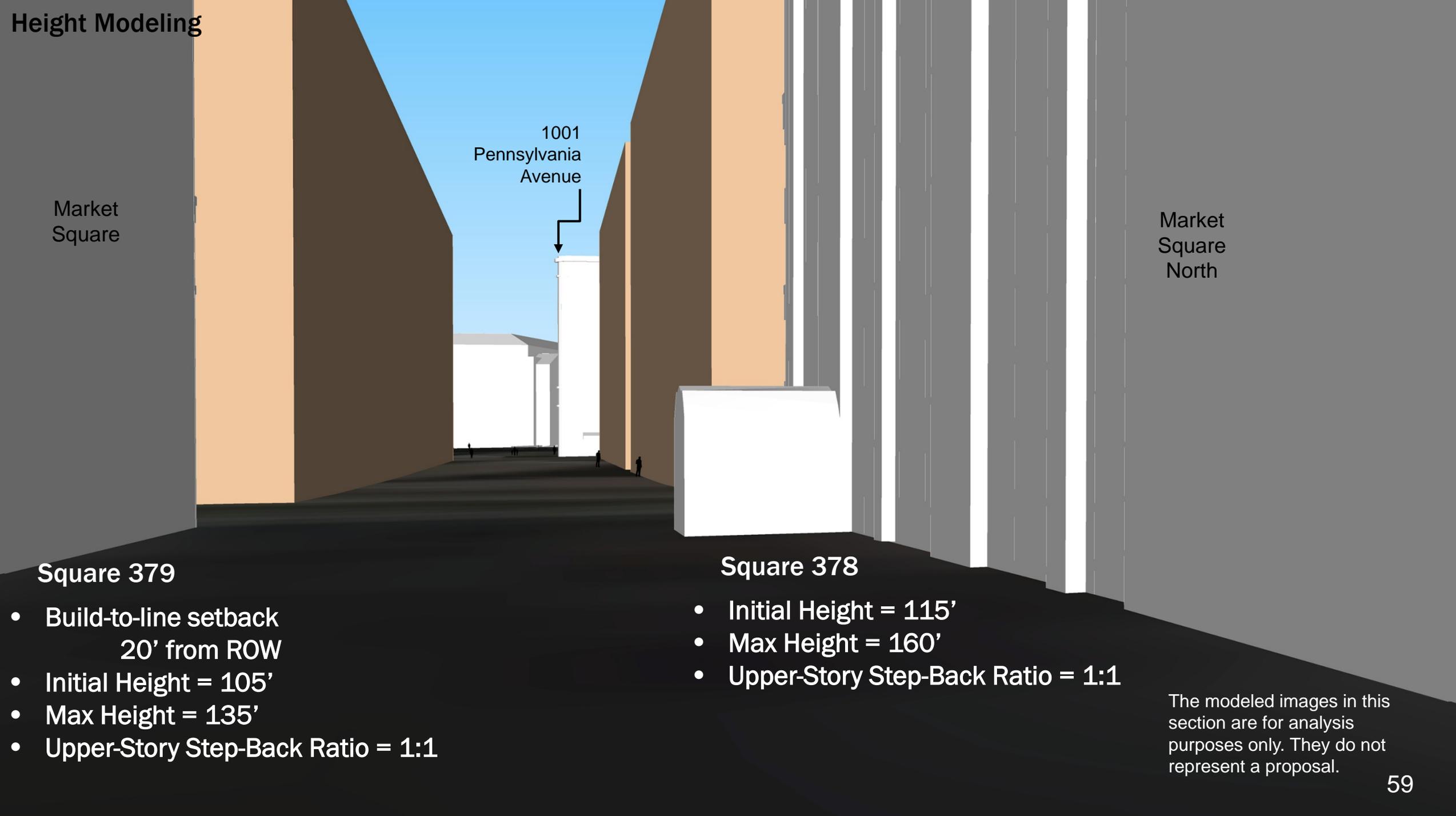
**Upper-Story  
Step-Back  
Ratio = 1:1**



SQ. 379

SQ. 378

# Height Modeling



Market Square

Market Square North

1001 Pennsylvania Avenue

## Square 379

## Square 378

- Build-to-line setback  
20' from ROW
- Initial Height = 105'
- Max Height = 135'
- Upper-Story Step-Back Ratio = 1:1

- Initial Height = 115'
- Max Height = 160'
- Upper-Story Step-Back Ratio = 1:1

The modeled images in this section are for analysis purposes only. They do not represent a proposal.





- Upper-Story Step-Back Ratio = 1:1
- Initial Height at E & 10<sup>th</sup> Streets = 110'
- Upper-Story Step-Back = 50' total

The modeled images in this section are for analysis purposes only. They do not represent a proposal.





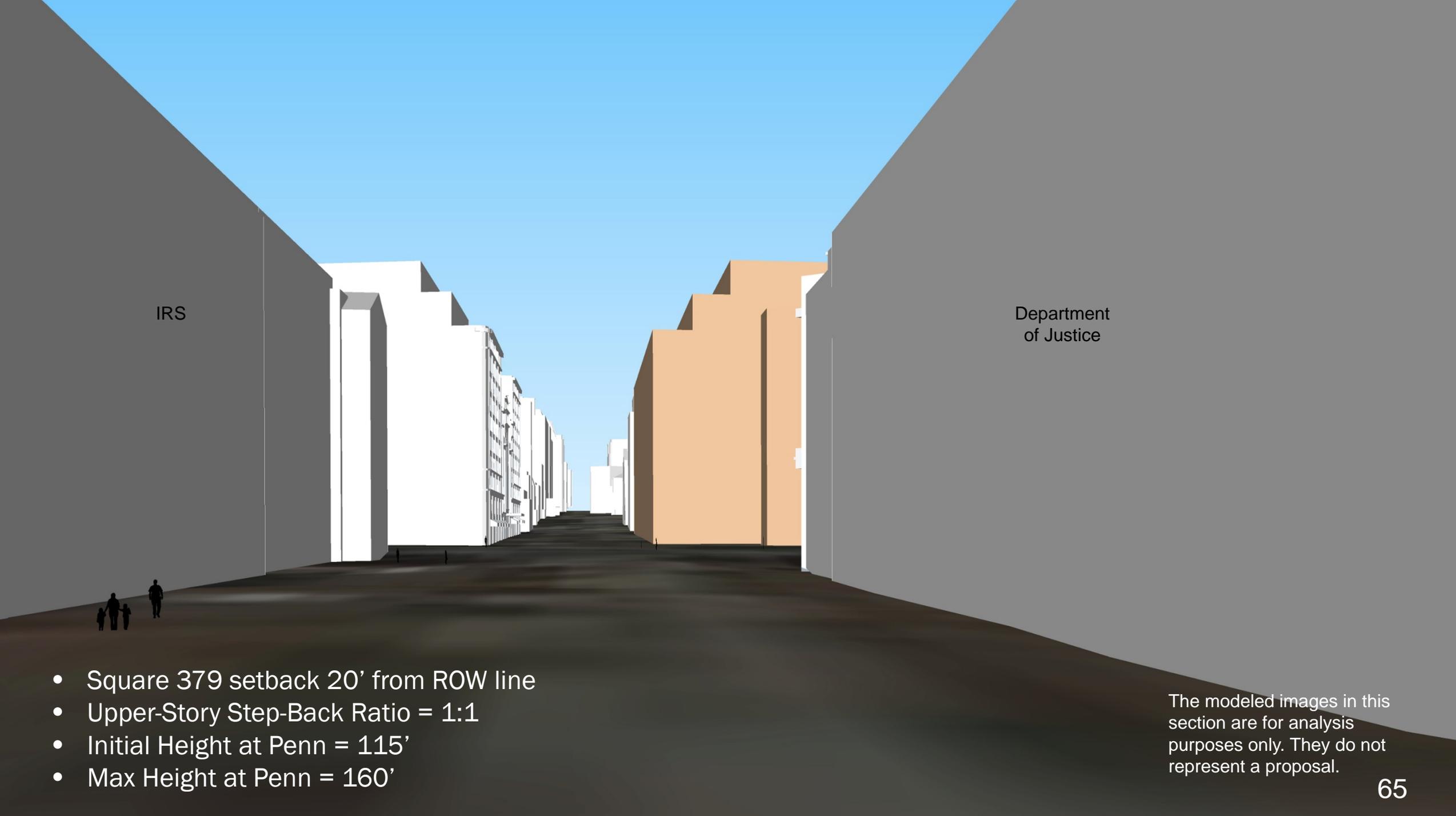
- Upper-Story Step-Back Ratio = 1:1
- Initial Height at E & 9<sup>th</sup> Streets = 104'
- Upper-Story Step-Back = 50' total

The modeled images in this section are for analysis purposes only. They do not represent a proposal.



FBI





IRS

Department  
of Justice

- Square 379 setback 20' from ROW line
- Upper-Story Step-Back Ratio = 1:1
- Initial Height at Penn = 115'
- Max Height at Penn = 160'

The modeled images in this section are for analysis purposes only. They do not represent a proposal.



