



Executive Director's Recommendation

Commission Meeting: June 2, 2016

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

PROJECT SUMMARY

The General Service 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. 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, 9th, 10th, and E Streets, NW in Washington, DC.

In anticipation of the potential redevelopment of Squares 378 and 379 on Pennsylvania Avenue, NCPC staff is working with agency stakeholders and the public to develop Square Guidelines that will inform the future redevelopment of the site.

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 urban design components.

When the PADC was dissolved in 1996, Congress transferred and distributed PADC's various roles and responsibilities among the National Capital Planning Commission (NCPC), the General Services Administration (GSA), and the National Park Service (NPS). A 1996 Memorandum of 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 be created to inform future development of the site.

KEY INFORMATION

- The 1974 Pennsylvania Avenue Development Plan (1974 Plan), General Guidelines, and Square Guidelines govern development within the PADC boundary that generally consists of the 21 squares on and adjacent to Pennsylvania Avenue, NW between the White House and the US Capitol grounds (15th -3rd Street, NW). Pennsylvania Avenue is a nationally recognized ceremonial and symbolic street at an important downtown location near the National Mall.
- The purpose of the 1974 Plan and Square Guidelines is to ensure that this area is developed and maintained as an economically viable part of downtown Washington and developed in a manner suitable to its civic and ceremonial functions. This includes its physical and historic relationship to the legislative and executive branches of the federal government and its relationship to the governmental buildings, monuments, memorials and parks in the area.
- A 1996 Memorandum of Agreement (MOA)¹ 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 Plan and Square Guidelines. It allows NCPC to submit amendments to the Plan and Square Guidelines to GSA for consideration.
- Square Guidelines are defined in the Federal Code² as detailed urban planning and design requirements and recommendations that are applicable to each Square in the PADC Boundary.
- Square Guidelines serve as the best tool for ensuring that federal interests are met in the redevelopment of the site. As set forth in the MOA, at the building permit stage, NCPC staff review the proposed development plan for consistency with the 1974 Plan, which includes General Guidelines and Square Guidelines.
- Federal interests in the redevelopment of this site include: responsibilities to the 1974 Plan and related documents, the L'Enfant Plan, the Pennsylvania Avenue Historic District Historic Site, and the Inaugural Parade Plan; maximizing value of public investment; and implementation of high-quality and high-density mixed-use development appropriate for the context.
- District of Columbia zoning will also regulate the development of the site; however, zoning must be consistent with the 1974 Plan and Square Guidelines.
- Local interests include creating a unique, truly exceptional, pedestrian-friendly mixed-use project that activates the Avenue and connects it with downtown. This includes residential,

¹ This Memorandum of Agreement is not a Section 106-generated Memorandum of Agreement.

² Federal Code §910.54

retail, office, cultural, and restaurant/entertainment uses and street level uses that are dynamic and highly visual.

- Squares 378 and 379 –currently occupied by the J. Edgar Hoover building – encompass 6.5 acres on Pennsylvania Avenue.
 - Square Guidelines were not developed for Squares 378 and 379 because the J. Edgar Hoover Building was under construction for a federal agency (the FBI) when the PADC created the 1974 Plan. The Plan did not anticipate the site's future transition to a private use.
 - In December 2015, the 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 to redevelop or be reused for other purposes. GSA forwarded the proposed amendment to Congress, who had no additional comments, and it was approved in March 2016.
 - Since the approval of the plan amendment, NCPC staff has been working closely with GSA, NPS, the U.S. Commission of Fine Arts (CFA), the District, and stakeholders to develop Square Guidelines for the site.
 - The purpose of this submission is to solicit the Commission's comments on guidelines primarily related to building envelope. The draft Square Guidelines and the Commission's comments will inform the offers that prospective development teams submit to GSA on June 22, 2016 for the property exchange described in the project summary.
 - Staff held two public meetings in April, presented at the Penn Quarter Neighborhood Association in May, and solicited public input via the NCPC website on the draft Square Guideline topics and conceptual building envelop recommendations. Staff will host another public meeting on the complete draft of the guidelines later this summer and will give an information presentation to the CFA.
 - Staff anticipates presenting a complete draft of the Square Guidelines to the Commission this fall and a final draft towards the end of this year.
 - Upon Commission approval and in accordance with Section V of the 1996 MOA, NCPC transmits the 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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RECOMMENDATION

Approves the following comments on the Draft Square Guidelines for Squares 378 and 379 in accordance with the Memorandum of Agreement, § V, 61 FED. REG.41789 (August 12, 1996), and transmits the comments to the GSA under Section V of the 1996 Memorandum of Agreement:

A. Topics to be Included in the Square Guidelines

Comments favorably on the proposed set of topics to be included in the Square Guidelines:

Land Use

- General overall uses
- Ground floor use

Building Envelope

- Allowable building height
- Upper-story setbacks
- Build-to-lines

Circulation

- L'Enfant Plan
- Site Layout
- Access/Permeability

Sustainability

Special Design Guidance

- Building Composition
- Façade Design
- Signage/Awnings
- Rooftop Structures
- Parking and Loading

Public Realm Guidance

- Overall Character
- Ground Floor Design
- Outdoor Use
- Landscape

B. Building Envelope Guidelines

Notes that NCPC staff has worked diligently with agency stakeholders to produce draft building envelope guidelines for GSA and prospective development teams in advance of June 22, 2016 when proposals are due. This guidance provides greater certainty regarding the value of the site.

Supports building envelope guidelines that allow for high-density development.

Supports achieving a maximum height of 160 feet on both squares to expand development potential. These building heights are unique to Pennsylvania Avenue and are greater than anywhere else in the District.

Notes that for comparison, the nearby CityCenter project is 2.5 million square feet on 10 acres (three L'Enfant blocks and a park reservation). While Square 378 and 379 total approximately 6.6 acres (two L'Enfant blocks), with the additional height, they could accommodate approximately the same square footage.

Notes that a development project of this scale will require circulation throughout the site in the form of streets and alleys and that the proposed Square Guidelines add certainty with regard to the location of primary circulation without being overly prescriptive.

Therefore comments favorably on the following guidelines related to building envelope:

1. **D Street, NW:** The spatial configuration of the D Street Right-of-way as designed in the L'Enfant Plan at 70 feet wide will be re-established if Squares 378 and 379 are redeveloped. The Square Guidelines may provide additional guidance regarding the function of this space later in future drafts.
2. **Allowable Height/Upper-Story Setbacks:** Under certain conditions, the 1910 Height Act allows buildings on Square 378 (north of the D Street Right-of-Way) to achieve 160 feet. The Square Guidelines will support this allowable height (as measured from Pennsylvania Avenue) but will include additional guidance regarding penthouses (if any) and upper-story setbacks for D, 9th, 10th and E Streets, NW that are compatible with surrounding development. Staff will work with stakeholders to develop additional guidance this summer/fall.
3. **Build-to-lines for 9th, 10th, D and E Streets, NW** are as follows:
The build-to-line is the property line on 9th, 10th, E, and D Streets, NW. These property lines are consistent with the L'Enfant Plan rights-of-way.

C. Build-to-line for Pennsylvania Avenue (Square 379):

Notes that the build-to line set forth in the 1974 Plan is 50 feet from the property line (75 feet between the curb and building face³) for new development. This is approximately what exists today on Square 379. The area between the building face and the property line, in addition to the area between the property line and the curb, is under the administrative jurisdiction of the NPS.

Notes that the DC State Historic Preservation Office (DCSHPO) has stated that if the build-to-line on Pennsylvania Avenue is not restored to the L'Enfant Plan right-of-way, it will constitute an adverse effect for the project. Restoring the L'Enfant Plan right-of-way requires moving the build-to-line to the property line. This results in 26 feet between the curb and the building face.

Notes that NCPC, GSA, and the NPS have a Congressionally mandated responsibility to administer, implement, and enforce the 1974 Plan.

³ Existing curb to building face in front of the FBI building is approximately 79 feet based on GSA's survey, DDOT's Transportation Online permitting system and DC Octo.

Notes that the proposed build-to-line in the 1974 Plan is inconsistent with the L'Enfant Plan.

Notes that the Avenue will not be fully restored to the L'Enfant Plan right-of-way in terms of its overall dimension of 160 feet unless the Federal Triangle is redeveloped (the build-to-line on the south side of the Avenue is 24 feet from the property line/L'Enfant right-of-way). Furthermore, to restore L'Enfant's vision of an 80 foot cartway and two 40 foot walkways, the existing cartway of 100 feet will need to be reduced.

Notes that the NPS determined the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape is eligible for the National Register of Historic Places.

Finds that a return to the L'Enfant Plan under the Avenue's current condition will significantly alter the landscape and streetscape, and may have urban design implications that alter the ceremonial character of the Avenue.

Finds that the initial work underway in the Pennsylvania Avenue Initiative has indicated that the build-to-line in the 1974 Plan of 50 feet from the property line contributes to the lack of activity on the Avenue.

Therefore supports a balanced approach for the build-to-line that best meets the intent of the L'Enfant Plan and the 1974 Plan under existing conditions.

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

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

Recommends that NCPC staff work with the public and other local and federal stakeholders to prepare visual and technical studies to analyze the impacts and benefits of moving the build to line within the ranges noted above and provide detailed analysis and recommendations in the fall. The analysis should look at impacts and benefits to the building wall on the north side of the Avenue, the symmetry of building walls on the Avenue, the public realm, landscape, and developable area.

D. Regarding height and upper-story setbacks for Square 379:

Notes staff will recommend the allowable height and upper-story setbacks for Square 379 in coordination with the build-to-line for Pennsylvania Avenue.

PROJECT REVIEW TIMELINE

Previous actions	December 3, 2015 – 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.
Remaining actions (anticipated)	Fall 2016 - Approval of Preliminary Square Guidelines Winter 2016 – Approval of Final Square Guidelines

Prepared by D. Sullivan
05/22/16

PROJECT ANALYSIS

Executive Summary

The General Service Administration (GSA) is in the process of selecting an “exchange partner” to develop, design, construct, and deliver a consolidated headquarters facility for the Federal Bureau of Investigation (FBI) outside of the District. In exchange, upon completion and acceptance of the new FBI headquarters facility by GSA, the exchange partner would receive 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 JEH site is 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. 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 Code⁴ 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.

The guidelines serve as the best tool for ensuring that federal interests are addressed in the redevelopment of the site. As set forth in the MOA, NCPC staff will review the proposed development plan for consistency with the 1974 Plan and Square Guidelines at the building permit stage.

The Plan Amendment for Squares 378 and 379 encourages development to be high-density mixed use with active ground-floor spaces that reinforces the importance of Pennsylvania Avenue as a nationally recognized and lively downtown corridor—a place where people live, work, visit and play. Development should exemplify distinctive, high-quality urban design and architecture, contributing to the avenue’s distinguished character. The development’s design and its ground floor uses would encourage commerce, daily activities, and public use, as well as national and local civic events that take place in the public realm. The proposed Square Guidelines will address important development parameters that future development proposals should incorporate to address federal and local interests.

⁴ Federal Code §910.54

Federal Interests

There are a wide range of federal interests in the redevelopment of Squares 378 and 379 including many interests related to the project's location on Pennsylvania Avenue and proximity to the Capitol in addition to maximizing value and taxpayer money in the property exchange transaction.

Squares 378 and 379 are located on the portion of Pennsylvania Avenue between the White House and Capitol, often referred to as "America's Main Street". This area serves a symbolic role as the physical link between the executive and legislative branches of the Federal Government and is the backdrop for inaugural parades, state funeral processions, celebrations of military victories, protests, and marches. Federal interests include high-density redevelopment of the site to: bring new life to the Avenue that extends beyond the typical work week; provide visitor services and amenities; and bring value to GSA's transaction. Development should occur in a manner suitable to the ceremonial, physical and historic relationship of the Avenue to the Capitol and White House. Federal interests also include the building walls, tree canopy, and landscape that frame the view of the Capitol and provide symmetry and consistency along the Avenue. All of these interests are supported and protected through various plans, federal laws and designations including but not limited to the Inaugural Parade Plan, and the Comprehensive Plan for the Nation's Capital. These interests and related efforts are discussed throughout the report beginning with the section on historic preservation below.

Local Interests

Local interests also include a strong desire to revitalize the Avenue; redevelopment of Squares 378 and 379 provides a significant opportunity to increase the economic vitality within this vicinity of downtown. Based on guidance from the District Elements of the Comprehensive Plan, the District is encouraging a unique, truly-exceptional, pedestrian-friendly high-density mixed-use project that helps to connect the Avenue with downtown. This includes residential, retail, office, cultural, and restaurant/entertainment uses and street level uses that are dynamic and highly visual. The project should create a place that is for the city and its residents, yet accommodating to downtown workers and visitors. The project should also reinforce the importance of Pennsylvania Avenue and the principles of the L'Enfant Plan.

Historic Preservation and Historic Properties

In 2014, GSA determined and the District of Columbia State Historic Preservation Office concurred that the 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.

Through the Section 106 consultation process currently underway, GSA defined a large area of potential effect (APE) to acknowledge the prominence and the visibility of the JEH Building and site along Pennsylvania Avenue and from a variety of adjacent historic properties. The site of the JEH Building, Squares 378 and 379, is located within the boundaries of several key historic properties including the Plan for the City of Washington (L'Enfant and McMillan Plans) and the

Pennsylvania Avenue National Historic Site Historic District. In addition, Squares 378 and 379 are directly adjacent to the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape.

The L'Enfant Plan established the basic framework for the city, by creating a regular orthogonal grid divided into four quadrants, with the U.S. Capitol at the center point. L'Enfant superimposed a series of diagonal avenues on the orthogonal grid, creating a system of open spaces and parks where the two intersected. These open spaces and vistas are as integral to the city's design as the street network. In addition, the width and openness of the L'Enfant Plan's original streets and the extended main axial boulevards establish public space that defines the city's character.

Building upon L'Enfant's Plan, the McMillan Plan reinforced the idea of grand public spaces and civic buildings based on the City Beautiful Movement. The McMillan Plan focused on restoring L'Enfant's original vision of the National Mall as an uninterrupted greensward; creating an enclave for government offices in the triangle bound by Pennsylvania Avenue, 15th Street, NW, and the National Mall; and establishing a comprehensive regional park and recreation system by connecting existing parkland and carrying the park system throughout Washington.

The Pennsylvania Avenue National Historic Site Historic District is listed in the National Register of Historic Places and includes the Pennsylvania Avenue National Historic Site designated in 1965 by the Secretary of the Interior. The portion of Pennsylvania Avenue between the White House and U.S. Capitol, often referred to as "America's Main Street," physically and symbolically links the executive and legislative branches of the Federal Government. Pennsylvania Avenue is also significant for its role in American history as the setting for Presidential inaugural parades, state funeral processions, celebrations of military victories, protests, and marches. Pennsylvania Avenue is also significant as the commercial center of the nation's capital, and its influence on the development of the Federal Triangle.

The Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape, recently inventoried by the National Park Service and determined eligible for the National Register of Historic Places, has a period of significance of 1791 to 1996. This period of significance includes the resources related to the design and development of Pennsylvania Avenue by the Pennsylvania Avenue Development Corporation. The Pennsylvania Avenue, NW cultural landscape is significant in the areas of community planning and development as well as art and landscape architecture. Along with its significance related to the Plan for the City of Washington, Pennsylvania Avenue, NW, cultural landscape is significant as an innovative public-private partnership streetscape improvement campaign first initiated by President John F. Kennedy and carried out by the Pennsylvania Avenue Development Corporation.

The cultural landscape is significant as it represents an innovative approach to urban design that utilized modernistic principles of landscape architecture to unite social, economic, and political issues associated with Pennsylvania Avenue, while also retaining its historic fabric and dignity as a ceremonial route. The design intent for the Avenue was to visually strengthen the link between the Capitol and White House through the creation of a unified streetscape vocabulary of street furniture, paving, and vegetation, with consistent building heights, broad setbacks, and a series of

open spaces. The cultural landscape is also significant as it retains several modern and post-modern parks that were initiated by the Pennsylvania Avenue Development Corporation and executed by leading figures in American architecture and landscape architecture.

Proposal

This initial draft of the Square Guidelines focuses on two components: 1) the major topics that the guidelines will address in varying levels of detail; and 2) specific guidelines related to the allowable building envelope for development on Squares 378 and 379.

Part 1: Topics to be Included in the Square Guidelines:

Except for the building envelope guidelines outlined in item 2 below, staff proposes to address the following topics (in varying levels of detail) in the Square Guidelines. Staff will develop these guidelines over the summer/fall and submit them to the Commission for review later in the fall.

Land Use

- General overall uses
- Ground floor use

Building Envelope

- Allowable building height
- Upper-story setbacks
- Build-to-lines

Circulation

- L'Enfant Plan
- Site Layout
- Access/Permeability

Sustainability

Special Design Guidance

- Building Composition
- Façade Design
- Signage/Awnings
- Rooftop Structures
- Parking and Loading

Public Realm Guidance

- Overall Character
- Ground Floor Design
- Outdoor Use
- Landscape

Part 2: Building Envelope Guidelines

1. **D Street, NW:** The spatial configuration of the D Street Right-of-way as designed in the L'Enfant Plan at 70' wide will be re-established if Squares 378 and 379 are redeveloped. The Square Guidelines may provide additional guidance regarding the function of this space in future drafts.
2. **Allowable Height/Upper-Story Setbacks:** Under certain conditions, the 1910 Height Act allows buildings on Square 378 (north of the D Street Right-of-Way) to achieve 160 feet. The Square Guidelines will support this allowable height (as measured from Pennsylvania Avenue) but will include additional guidance regarding penthouses (if any) and upper-story setbacks for D, 9th, 10th and E Streets, NW that are compatible with surrounding

development. Staff will work with stakeholders to develop additional guidance this summer.

3. **Build-to-lines for 9th, 10th, D and E Streets, NW** are as follows:
The build-to-line is the property line on 9th, 10th, E, and D Streets, NW. The property lines are consistent with the L'Enfant Plan rights-of-way.
4. **Build-to-line for Pennsylvania Avenue (Square 379):** Staff recommends a build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the Avenue to:
 - Create a stronger relationship between the building and the public realm;
 - Create a building wall that helps to frame the Avenue and the U.S. Capitol;
 - Reinforce the ceremonial character of the Avenue as distinct from other downtown streets;
 - Support a diversity of functions; and maintain the landscape.

Staff will make a more specific recommendation this fall after additional analysis and discussions with stakeholders and the public.

5. **Allowable Height/Upper-Story Setbacks (Square 379):** Staff will recommend the allowable height and upper-story setbacks for Square 379 in coordination with the build-to-line for Pennsylvania Avenue.

Analysis

Part 1: Topics to be Included in the Square Guidelines

Throughout the PADC boundary, the level of detail of each set of Square Guidelines is fairly consistent. The PADC drafted most of the Square Guidelines that are in existence today; however, there are some instances when a developer has proposed amendments to a particular set of guidelines in coordination with a development plan and these tend to be more detailed. In the case of Squares 378 and 379, NCPC staff is working with agency stakeholders to propose Square Guidelines before GSA selects a development team. Agency stakeholders can identify important local and federal interests and inform the development plan.

In general, the Square Guideline topics proposed for Squares 378 and 379 reflect those in other sets of Square Guidelines. The level of detail of Square Guidelines depends on when they are developed in relation to the overall development process. Since the guidelines for Squares 378 and 379 will be created before a development team is selected and well in advance of actual construction (the selected developer will not receive title to the J. Edgar Hoover site until the new FBI campus is complete), it is difficult to propose a specific develop program or parcelization plan. Market conditions and the developer's specific use program will ultimately influence the building design, configuration, and orientation, and the relationship among buildings, open spaces, and operational requirements.

That said, the 1974 Plan and current market studies, in addition to the context of surrounding blocks and buildings, will help inform the initial guidance regarding land use, building envelope, circulation, special design guidance, public realm, and sustainability.

Part 2: Building Envelope Guidelines

Overview: NCPC staff has worked diligently with agency stakeholders to produce draft building envelope guidelines for GSA and prospective development teams in advance of June 22, 2016 when proposals are due. While the Commission is only providing comments at this time, staff believes that the draft guidance and comments will provide greater certainty regarding the value of the site.

The building envelope guidelines allow for very high-density development. Staff has worked closely with the District to determine how buildings on both squares can achieve a maximum height of 160 feet – a maximum allowable height unique to Pennsylvania Avenue and greater than anywhere in the District. The proposed guidelines allow a scale of development that is substantial—well over 2 million square feet. For comparison, the nearby CityCenter project is 10 acres and supports 2.5 million square feet on three L'Enfant blocks. While Square 378 and 379 is only 6.6 acres and results in two L'Enfant blocks, the additional height allows the site to accommodate approximately the same square footage.

In addition to the amount of development, the location and development program also influence value. The ability to attain additional height at this location provides an opportunity to step or tier development to maximize the amount of development that has iconic views to and along the Avenue, the National Mall, the Potomac River, and to the U.S. Capitol.

The guidelines also begin to address circulation. Unless a single use is proposed, like 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, which also increases development frontage, as well as light and air into and between buildings. The proposed Square Guidelines add certainty with regard to the location of primary circulation without being overly prescriptive.

Staff's analysis and justification for the initial guidelines related to building envelope follows:

- 1) ***D STREET, NW:*** *The spatial configuration of the D Street Right-of-way as designed in the L'Enfant Plan at 70 feet wide will be re-established if Squares 378 and 379 are redeveloped. The Square Guidelines may provide additional guidance regarding the function of this space later in the process.*

Staff Analysis: D Street NW between 9th and 10th Streets was closed for the construction of the J. Edgar Hoover Building in 1974. With the consolidation of the FBI at another location, there is the opportunity for the redevelopment of the site to re-establish D Street as originally envisioned and implemented in the L'Enfant Plan at 70 feet wide. There are several policies in the Comprehensive Plan, both the Federal and District Elements, that aim to protect the

integrity, form and design of the L'Enfant Plan's system of streets and reservations including policies that seek to restore such streets when they have been disrupted or closed.⁵

Re-establishing the spatial configuration of D Street has several benefits: it opens up views to Pennsylvania Avenue and to the Old Post Office building; adds permeability to the site; improves circulation; and helps to define the developable area of the overall site. It is premature to suggest more detailed guidelines regarding the function of the space until additional planning work is conducted, such as identifying a development program, preparing a conceptual site plan, and conducting a preliminary traffic analysis. The term "spatial configuration" in this context relates to function: the 70' space could be a dedicated right-of-way or an easement; it could accommodate full or limited vehicular use or be devoted to pedestrian circulation. Additional detail regarding the spatial configuration of D Street may be added in the next draft of Square Guidelines to be developed this summer/fall.

- 2) **ALLOWABLE HEIGHT/UPPER-STORY SETBACKS:** *Under certain conditions, the 1910 Height Act allows buildings on Square 378 (north of the D Street Right-of-Way) to achieve 160 feet. The Square Guidelines will support this allowable height (as measured from Pennsylvania Avenue) but will include additional guidance regarding penthouses (if any) and upper-story setbacks for D, 9th, 10th and E Streets, NW that are compatible with surrounding development. Staff will work with stakeholders to develop additional guidance this summer/fall.*

Staff Analysis: Per the 1910 Height Act, development on Square 379, which immediately abuts Pennsylvania Avenue, is allowed a maximum height of 160 feet. The 1974 Plan requires that the building height must be on a horizontal plan drawn from the Avenue.

Staff has worked closely with the District Office of Planning to determine the maximum allowable height of development on Square 378 per the Height Act if D Street is re-established. This condition would separate Square 378 from Square 379 and development north of D Street would no longer immediately abut Pennsylvania Avenue. After significant analysis, NCPC and District staff agree that a building located on Square 378 at 10th and D Streets would be allowed a maximum height up to 160' if a reservation or public space occurs at the intersection of Pennsylvania Avenue, 10th, and D Streets, NW on the western portion of the triangular parcel that makes up Square 379.

This analysis is based on Section 5 of the 1910 Height Act that 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 and stakeholder agencies also agree that a meaningful connection, as defined by the District's zoning regulations, can apply to development on Square 378. It would allow all

⁵ District Elements: Policies HP – 2.3.1, 2.3.3, 2.3.4
Federal Elements Policies UD.B.3.1 and B.3.4

buildings on this square to attain up to a maximum 160 feet in height where appropriate. It is not likely that staff will recommend allowing a meaningful connection over the spatial configuration of D Street, but staff will offer additional guidance on this issue in the next draft of the Square Guidelines this fall.

While staff has determined the maximum allowable building height per the 1910 Height Act, the Square Guidelines have the ability to further regulate height. Interestingly, the J. Edgar Hoover building is a transition point in terms of building height along the Avenue. Several buildings to the west on Pennsylvania Avenue reach 160' in height as measured from Pennsylvania Avenue. East of the site, building height decreases toward the Capitol (the Newseum for example only reaches 140').

The 1974 Plan supports 160 feet development on Pennsylvania Avenue; however, it requires that buildings reach 160 feet after stepping back from a lower height that is compatible with development to the east, west, and south and across the Avenue. The Plan does not specifically discuss penthouses; however, it clearly establishes the maximum extreme height at 160 feet as set forth in the Height Act. There is established precedent requiring mechanical penthouses and structures that provide roof access to be within the maximum height limit.

In addition to general support from the Plan, greater height is also consistent with the recent amendment for Squares 378 and 379 which envisions the site as a high density mixed-use development. Therefore, staff proposes a maximum height of 160 feet for new development. Staff will propose initial building heights, upper-story setbacks compatible with surrounding development, and guidelines regarding penthouses in the next draft of the Square Guidelines later this fall.

3) ***BUILD-TO-LINES FOR 9TH, 10TH, D AND E STREETS, NW*** are as follows:

The build-to-lines for 9th, 10th, D and E Streets, NW are the property line. The property lines are consistent with the L'Enfant Plan rights-of-way.

Staff Analysis: The build-to-line indicates the line with which the exterior wall of a building in a development is required to coincide. In general, the build-to-line may be the property line or it may be set back from the property line. In the City of Washington, property lines coincide with the L'Enfant Plan right-of-way lines. As mentioned above, both the District and Federal Elements of the Comprehensive Plan contain policies that support constructing to the L'Enfant Plan right-of-way line. Therefore, staff's proposal to make the build-to-lines for 9th, 10th, D and E Streets the property line is consistent with overall policy for the City of Washington. This creates a consistent street wall from block to block.

4) ***BUILD-TO-LINE FOR PENNSYLVANIA AVENUE (SQUARE 379):*** *Staff recommends a build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the Avenue to:*

- *Create a stronger relationship between the building and the public realm;*
- *Create a building wall that helps to frame the Avenue and the U.S. Capitol;*
- *Reinforce the ceremonial character of the Avenue as distinct from other*

- downtown streets;*
- *Support a diversity of functions; and maintain the landscape.*

Overview: Build-to-lines are important because the location of a building in relation to other buildings and the curb can positively or negatively impact viewsheds, 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. With regard to Square 379, the area between the building face and the property line is under the administrative jurisdiction of the National Park Service in addition to the area between the property line and the curb.

Determining the build-to-line for Square 379 on Pennsylvania Avenue is not as straightforward as it is for other streets surrounding the site. While the L'Enfant Plan guides development throughout the City (including Pennsylvania Avenue), the avenue is unique in that it is also governed by the Congressionally accepted 1974 Pennsylvania Avenue Plan. The build-to-lines and overall width of the right-of-way are inconsistent between the two plans. A summary of these plans and the evolution of the avenue follows.

Evolution of the Avenue Over Time

Pierre L'Enfant envisioned Pennsylvania Avenue as “*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.*”⁶ A grand connection between the President's house and the U.S. Capitol, the Avenue was to be symmetrical and broad at 160 feet wide with an 80 foot cartway and with two 40 foot walkways with a double rows of trees. Over time, the McMillan Plan and development of the Federal Triangle, and the 1974 Plan changed the Avenue's adjacent building heights and physical dimensions including the overall width, the cartway, walkways, and landscape along the Avenue.

The 1974 Plan was an effort to 1) revitalize the Avenue after years of neglect; 2) address contemporary land use and transportation challenges; 3) mitigate varying building heights and setbacks on both sides of the street; and 4) to reclaim the Avenue's unique role as the physical, symbolic and ceremonial link between the White House and Capitol. As a result, the Plan widened and reconfigured the cartway and established a build-to-line that resulted in approximately 75 feet sidewalks for new private development. Today, the north side of the Avenue has a varying building wall. Sidewalks range from 26 feet to 79 feet wide with one, two and three rows of trees respectively; the south side has a more consistent setback and is largely lined with a double row of trees. While the 1974 Plan was a significant departure from the

⁶*L'Enfant and Washington*, by Elizabeth S. Kite; Johns Hopkins Press, 1929, page 54.
The Avenue of the Presidents, by Mary Cable; Houghton Mifflin Company, 1969, pages 9 – 10.
Pennsylvania Avenue: Report of the President's Council on Pennsylvania Avenue, 1964, page 9.

L'Enfant Plan, especially in terms of a consistent building wall that frames the Capitol and overall width of the Avenue, both plans recognize the civic and ceremonial importance of the Avenue.

As successful as the 1974 Plan and its many improvements were in sparking the revitalization of downtown DC in the mid-70s, the larger Pennsylvania Avenue Initiative currently underway has acknowledged that the Avenue is not generating the daily street life or economic vibrancy that the Plan envisioned, especially at the pedestrian scale. Initial analysis indicates that both market forces and the type of land uses, including ground floor uses, and the relationship of the building to the street, contribute to the success or failure of street level activity. This is apparent today in front of the FBI building and other places on the Avenue where the 79 feet between the curb and the building face creates a large space that weakens the building wall and is not conducive to an active urban street. Staff explores this further in the upcoming analysis section.

The Comprehensive Plan

The Comprehensive Plan does not provide clear guidance in terms of the build-to-line discussion. As mentioned earlier 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. District policy supports public and private efforts to provide and maintain street trees to help frame axial views of L'Enfant streets.

Both Federal and District Elements also contain policies that support the PADC Plan.

The Historic Preservation and Urban Design Chapters of the Federal Elements encourage a cohesive planning process to ensure a unified streetscape between 3rd and 15th Streets, NW in addition to other policies that support the Plan.⁷

The District Element includes a policy *“to continue 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 (CW-1.1.13).”*

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

Analysis of the L'Enfant Plan and 1974 Pennsylvania Avenue Build-to-lines:

NCPC staff prepared a visual analysis that examines the impacts of the build-to-lines for the L'Enfant Plan and the 1974 Plan. This technical study informs staff recommendations for the build-to-lines at Square 379. It is important to note that if the build-to-line changes for Square 379, it is going to influence the decision to move the build-to-line for several other Squares on

⁷ Federal Element of the Comprehensive Plan UD.B.5.9

the north side of the Avenue (the historic buildings already build to the L'Enfant Plan right-of-way). Therefore, staff has included this assumption in its analysis. The visual modeling study was prepared from four locations along the Avenue. Staff also looked closely at the context of adjacent buildings which was the same approach used for the development of Square Guidelines for the Newseum in 2003.

The DCSHPO has indicated that if the build-to-line on Pennsylvania Avenue is not restored to the L'Enfant Plan right-of-way, it will constitute an adverse effect for the project. NCPC staff heavily weighs the DCSHPO's determination; however, staff also acknowledges that NCPC, GSA and NPS have a Congressionally mandated responsibility to administer, implement, and enforce the 1974 Plan. In addition, NPS has determined that the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape is eligible for the National Register of Historic Places. It has a period of significance of 1791 to 1996, including resources related to the design and development of Pennsylvania Avenue by the PADC. As such, a decision regarding the build-to-line should be made based on an analysis of both plans and in terms of impacts to the site and the overall Avenue.

After analyzing the impacts of the build-to-lines for both plans, staff concludes that there are benefits and drawbacks to both alternatives from a historic preservation and urban design perspective. However, neither plan is an ideal solution under today's conditions. It is uncommon for staff to question a return to the L'Enfant Plan or a departure from the Congressionally approved 1974 Pennsylvania Avenue Plan; however, because of existing conditions and the uncertainty regarding reducing the cartway in the future, staff recommends a build-to-line that meets the intent of both plans. Staff supports a build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the avenue. This moves the building wall closer to the L'Enfant Plan and respects the basis of the cultural landscape of the 1974 Plan. This range should be analyzed to ensure that the build-to-line:

- Reinforces the ceremonial character of the Avenue as distinct from other downtown streets;
- Reinforces urban design principles as set forth in the Comprehensive Plan, including the quality of the public space; streetscape symmetry along preeminent viewsheds;
- Supports a diversity of functions within the public space; and
- Maintains a strong landscape presence that reinforces views of the Capitol.

Finally, if the size of the cartway were to reduce in the future, the build-to-line could be moved as well.

Alternative 1 = L’Enfant Plan	Alternative 2 = PADC Plan
Build-to-line = the property line	Build-to-line = 50’ from the property line
Distance between existing curb and building face = 26’	Distance between existing curb and building face = 75’

Analysis of the Pennsylvania Avenue Build-to Line: Urban Design

From an urban design and public realm perspective staff believes that a return to the L’Enfant Plan as it was envisioned – 160 feet from building face to building face with a double rows of trees lining each side of the Avenue with ample sidewalk space – has merit and the L’Enfant Plan principles are a fundamental element in NCPC’s policy framework. It is unlikely however that the L’Enfant vision of a 160 feet wide Avenue will ever be fully restored because the Federal Triangle would either need to be redeveloped or lined with development to move the building wall forward. The true dimensions of the L’Enfant plan are also not attainable because the cartway is now 100 feet wide.⁸

Even so, staff acknowledges that from an urban design perspective there is merit to returning the north side of the Avenue to the L’Enfant Plan dimensions in terms of the location of the building wall. Should other buildings ever redevelop (such as the 1201 block or the Canadian Embassy for example); there would be a stronger building wall along the north side of the Avenue in addition to the opportunity for more development. Depending on the height of the buildings, the building wall could help frame the view of the Capitol and strengthen the public space.

However, it would not create a symmetrical view of the Capitol in terms of the north and south building walls. Neither the L’Enfant Plan nor the 1974 Plan build-to-lines would achieve this because the build-to-line for the Federal Triangle sits in between these two plans. To create a symmetrical view of the Capitol, which was also part of L’Enfant’s vision, the space between the curb and building face on the north side of the streets should be closer to that of the south side of the Street currently occupied by the Department of Justice. Today the distance between the curb and building face of the Department of Justice is 57 feet. The rest of the south side of the avenue ranges from approximately 45 – 57 feet.

Analysis of the Pennsylvania Avenue Build-to Line: Public Realm/Landscape

Staff’s other concern with the L’Enfant Plan build-to-line is the impact on the public realm, character, and overall sidewalk space of the Avenue under today’s conditions. As previously discussed, work underway in the Pennsylvania Avenue Initiative has indicated that the 75 foot sidewalk in the 1974 Plan (79 feet in front of FBI) has contributed to the lack of activity on

⁸ While it is possible that the cartway may be reduced, it is premature to assume this can be achieved until the appropriate land use and transportation planning and traffic studies can be completed.

the Avenue. Establishing the build-to-line at the L'Enfant Plan right-of-way under current conditions will reduce the sidewalk space to 26 feet. Based on downtown standards, this may seem like a wide sidewalk. However, because the first row of trees sits 13 feet in from the curb and because there is no curb-side parking to shield pedestrians from moving vehicles, this part of the sidewalk is mostly unusable. Quite often, this space is filled with security planters on federal property. Therefore, a 26 foot sidewalk actually feels and functions like a 13 foot sidewalk.

Both the L'Enfant Plan and the 1974 Plan envision the Avenue as a symbolic link between the White House and the Capitol, and a promenade with trees that is unique from other downtown streets. However, based on the visual and technical analysis, staff concludes that it is less likely that the smaller sidewalk and single row of trees would achieve this intent. Establishing a build-to-line between 20'-30' from the property line (a 46-56' sidewalk) would accommodate a double row of trees and more sidewalk space for pedestrian circulation and outdoor activities (such as special events) that typically occur on the Avenue. Not only would this build-to-line help mediate the varied building lines that exist along the Avenue and contribute to a sense of symmetry but it would also create a more symmetrical public realm with the double row of trees on the south side of the Avenue. Staff believes that both of these symmetries contribute to the character of Pennsylvania Avenue.

In addition to greater symmetry with the other side of the street, the double row of trees, additional space, and a larger tree canopy would elevate the Avenue beyond a typical downtown street, which is consistent with L'Enfant's vision. Today the majority of the Avenue has at least a double row of trees that create a tree canopy just as influential in framing the views of the Capitol as the building wall. From a pedestrian perspective, a 46'-56' sidewalk would provide more consistency from block to block on the north side of the street with the exception of the 26' sidewalks which narrow to 26' in front of the buildings (mostly historic) that are already built to the L'Enfant right-of-way.

Analysis of the Pennsylvania Avenue Build-to Line: Developable Area

In terms of the development parcel size, the closer the build-to-line is to the property line, the greater the number of square feet that will be available for development. The table below shows the differences in the footprint and overall gross square footage for three alternatives:

Alternative 1 = L’Enfant Plan	Alternative 2 = 1974 Plan	Alternative 3 = Balanced Approach
Build-to-line = the property line	Build-to-line = 50’ from the property line	Build-to-line = 20’ from the property line
Distance between existing curb and building face = 26’	Distance between existing curb and building face = 76’	Distance between existing curb and building face = 46’
Floor plate = 57,965sf	Floor plate = 32,195 sf	Floor plate = 46,410 sf
GSF* = 637,615sf	GSF = 354,145 sf	GSF = 510,510 sf

**The Gross Square Footage (GSF) assumes a 127 foot building height (11 floors) with no upper-story setbacks for example purposes.*

For discussion purposes, staff calculated the GSF of the three alternatives assuming 127 feet in height (11 stories) with no upper-story setbacks. While the difference between the L’Enfant Plan and the 1974 Plan is larger in terms of overall gross square footage (delta = 283,470 sf), the difference between the balanced approach (Alternative 3) and the L’Enfant Plan is much less at 127,000 sf. The floorplate of Alternative 3 is large enough for residential and office development. There are several examples of comparable development parcels in DC. A typical urban grocery store has a floorplate of 50,000 sf similar to that of Alternative 3. Other factors may also reduce the overall difference between Alternative 1 and 3 including the size of the public space/reservation needed on Square 379 for Square 378 to have a maximum allowable of 160 feet. Staff will analyze whether the larger sidewalk space in Alternative 3 could include the public space/reservation, thereby minimizing the loss of buildable area. Also, if the building wall moves forward it could have an impact on views of the Capitol. This can be mitigated with reduced height. Therefore a building at the L’Enfant Plan right-of-way may be required to have an initial height that is lower than a building that sits at 20’ from the property line for example.

Analysis of the Pennsylvania Avenue Build-to Line: Cultural and Historic Resources

As mentioned earlier in the report, the site of the JEH Building, Squares 378 and 379, are located within the boundaries of several key historic properties including the Plan for the City of Washington (L’Enfant and McMillan Plans) and the Pennsylvania Avenue National Historic Site Historic District; and they are directly adjacent to the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape.

The L’Enfant Plan established the basic framework for the city, by creating a regular orthogonal grid divided into four quadrants, with the U.S. Capitol at the center point. The width and openness of the L’Enfant Plan’s original streets and the extended main axial boulevards established public space that defines the city’s character. As previously discussed, it would be very difficult to return Pennsylvania Avenue to the 160 foot right-of-way as envisioned by L’Enfant. Nonetheless, establishing a build-to-line at the L’Enfant right-of-way

for the north side of the avenue would be feasible over many decades as properties redevelop. The DCSHPO has indicated that if the build-to-line for Square 379 is not restored to the L'Enfant Plan right-of-way, it will constitute an adverse effect. This would require mitigation for the project.

The National Park Service, who has administrative jurisdiction of the land in question, has determined that the resources related to the design and development of Pennsylvania Avenue by the PADC (in addition to other resources) are eligible for the National Register of Historic Places. The cultural landscape is significant as it represents an innovative approach to urban design that utilized modernistic principles of landscape architecture to unite social, economic, and political issues associated with Pennsylvania Avenue, while also retaining its historic fabric and dignity as a ceremonial route. The design intent for the avenue was to visually strengthen the link between the Capitol and White House through the creation of a unified streetscape vocabulary of street furniture, paving, and vegetation, with consistent building heights, broad setbacks, and a series of open spaces. The cultural landscape is also significant as it retains several modern and post-modern parks that were initiated by the Pennsylvania Avenue Development Corporation and executed by leading figures in American architecture and landscape architecture.

Staff believes that a return to the L'Enfant Plan on the north side of the Avenue would alter the public space and landscape as discussed in the public realm section above. Depending on the National Park Service's position regarding the build-to-line, they may find that a return to the L'Enfant Plan right-of-way has the potential to cause an adverse effect on the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape.

Analysis of the Pennsylvania Avenue Build-to Line: Special Events/Inaugural Parade

Staff has consulted with representatives from the Inaugural Parade Committee and confirmed that a change in the width of the sidewalks on the north side of the Avenue would not impact the Parade. Most of the bleachers and staging areas occur on the south side. Staff still needs to perform additional analysis on whether reducing the sidewalks would impact special events (about 20 festivals, races, and parades annually).

Analysis of the Pennsylvania Avenue Build-to Line: Avenue's Future

Finally, it is important to acknowledge the uncertainty of the Avenue's future and the role this plays in the build-to-line discussion. Ultimately, the Pennsylvania Avenue Initiative will either update the 1974 Plan or develop a new plan altogether. In doing so, agency stakeholders will consider whether reducing the cartway is feasible in terms of the Avenue's many functions and the significant public investment required for an infrastructure project of this size.

Since the Square Guidelines will be developed well in advance of the Pennsylvania Avenue Initiative, staff believes that the decision regarding the build-to-line needs to be based on the current conditions of the cartway because it may never change. If the Pennsylvania Avenue

Initiative determines that reducing the cartway is feasible both in terms of its many functions and in terms of implementation, there is the opportunity to amend the Square Guidelines. Reducing the cartway would allow the landscape, cartway, and sidewalk to return to the L'Enfant Plan to the greatest extent possible while also allowing the building wall to exist at the L'Enfant Plan right-of-way.

- 5) **ALLOWABLE HEIGHT/UPPER-STORY SETBACKS (SQUARE 379):** Staff will recommend the allowable height and upper-story setbacks for Square 379 in coordination with the build-to-line for Pennsylvania Avenue.

Staff Analysis: In terms of viewsheds and building walls, the height of a building is integrally related to the build-to-line. When looking at the view of the Capitol, if a building moves closer to the center of Pennsylvania Avenue, it could start to narrow the view of the Capitol depending on the building's height. This could then be mitigated with a lower height. Today the initial height of all the buildings on the north side of the Avenue ranges approximately from 100 feet - 135 feet. On the south side, it ranges from approximately from 100 feet - 120 feet. Staff will recommend the allowable height and upper-story setback for Square 379 once the build-to-line for Pennsylvania Avenue has been determined.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

As noted above, this project meets basic goals of the Comprehensive Plan.

The 1974 Pennsylvania Avenue Development Plan

As noted above, this early draft of the Squares Guidelines meets the basic goals of the 1974 Pennsylvania Avenue Development Plan; however, it deviates from the proposed 75 foot sidewalks that are recommended for new development. Alternatively, staff is supporting a sidewalk area between 46-56 feet to meet the intent of the Plan's goals for the public realm while addressing the drawbacks of the 75 foot sidewalk. Staff's analysis in the EDR discusses this rationale in more detail.

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 public review.

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 negotiating 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 MOU 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 thus far.

Coordinating Committee

The Coordinating Committee reviewed the proposal at its May 11, 2016 meeting. Without objection, the Committee forwarded the early concepts for 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 anticipates presenting the Draft Square Guidelines to the U.S. Commission of Fine Arts in June for an information presentation.

Public Meetings

NCPC staff held a public meeting for the Draft Square Guidelines on April 26th and April 28th. Staff also presented at the Penn Quarter Neighborhood Association meeting on May 11th. A total of 173 people attended the three meetings. A summary of all public comments can be found in the attachment in addition to a list of every comment received to date.

ONLINE REFERENCE

The following supporting documents for this project are available online:

- Submission Package
- Project Synopsis
- Draft Environmental Impact Statement for the FBI Headquarters Consolidation

Prepared by Diane Sullivan
05/22/2016

Attachments

1. **Powerpoint**
2. **Plan Amendment for Squares 378 and 379**
3. **Summary of Public Comments to Date**

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

Project Number P7713

National Capital Planning Commission

Concept

Commission meeting date: June 2, 2016

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

Applicant request: Approval of Comments on Concept Square Guidelines

Delegated / consent / open / executive session: Open Session

NCPC Review Officer: Sullivan

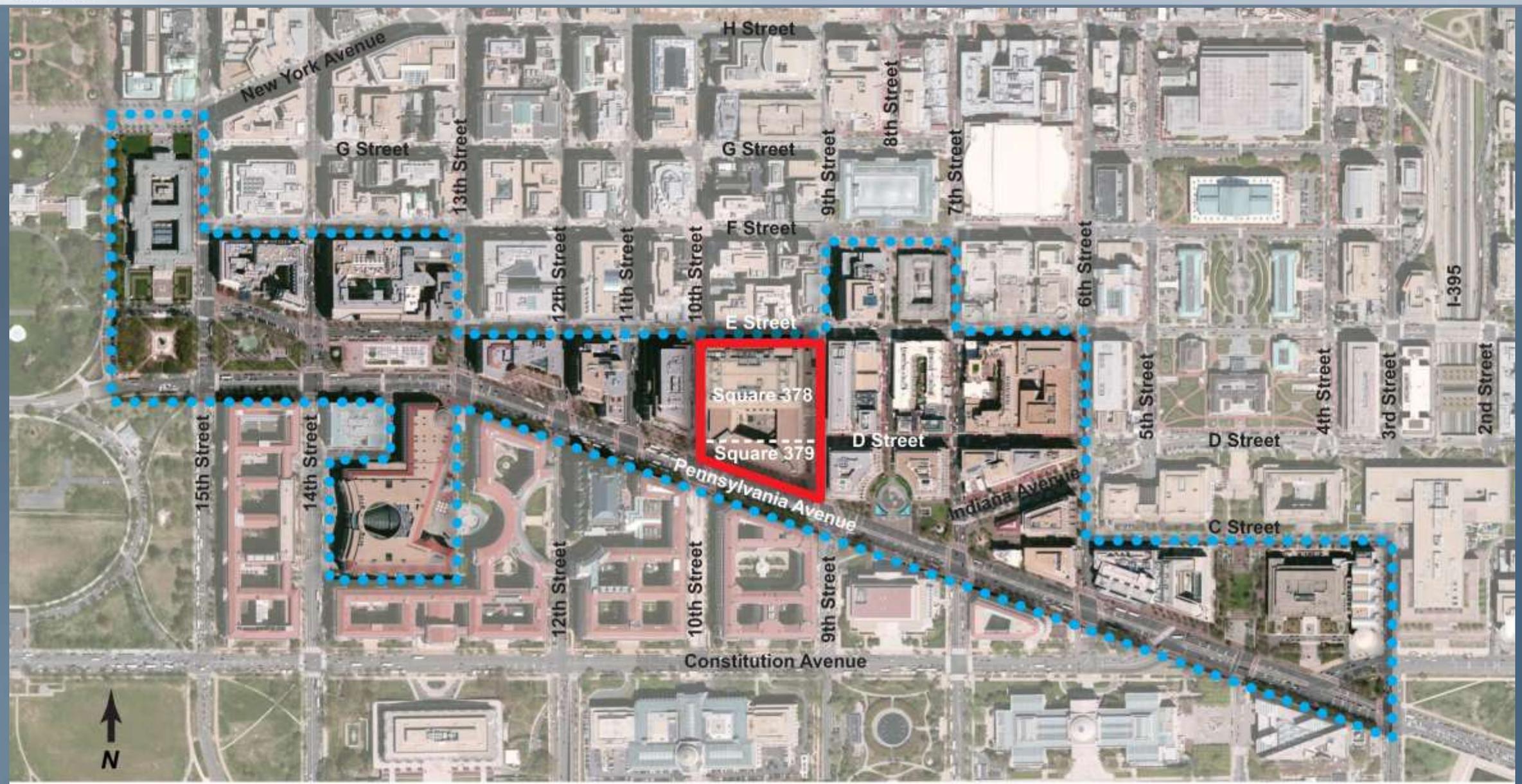
NCPC File number: P7713

Project summary:

The General Service 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, 9th, 10th, 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 is submitting a high level concept of the Square Guidelines for the JEH site for comments in June. Staff will present a full draft of the guidelines to the Commission this fall and a final draft 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

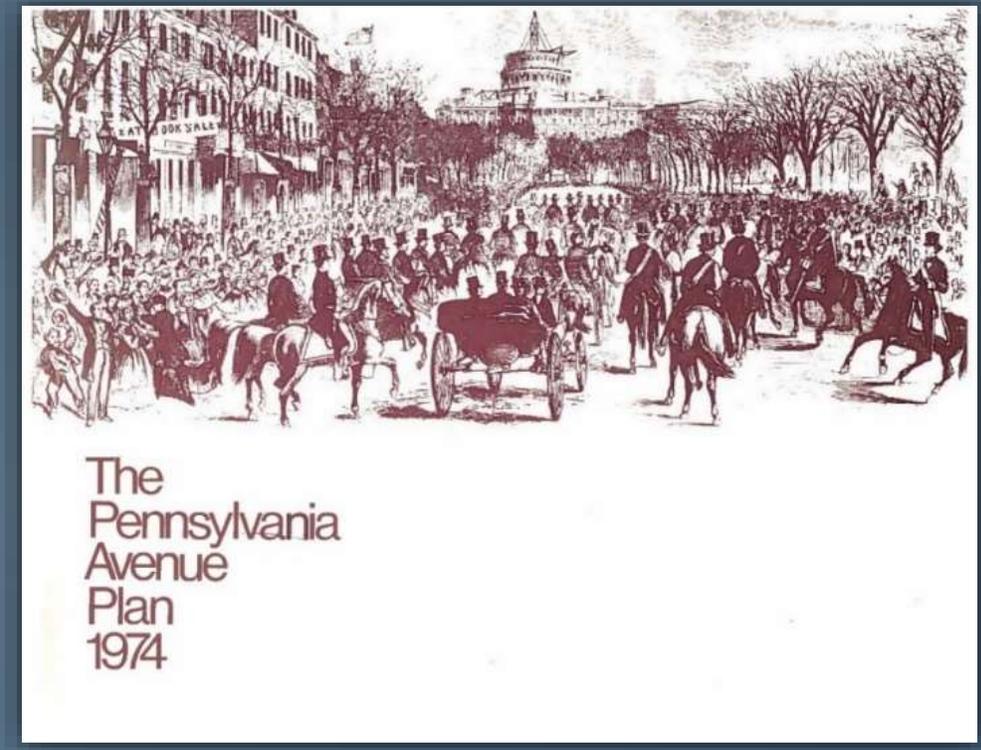
FBI Headquarters circa 1974



Pennsylvania Avenue Development Corporation (PADC)

Key Planning Documents

- **1974 Plan** - Provides a conceptual planning and development framework
- **General Guidelines** - Provides uniform standards for development
- **Square Guidelines** - Site specific detail guidance for each square (circulation, use mix, massing, setbacks, curb cuts, loading, etc.)

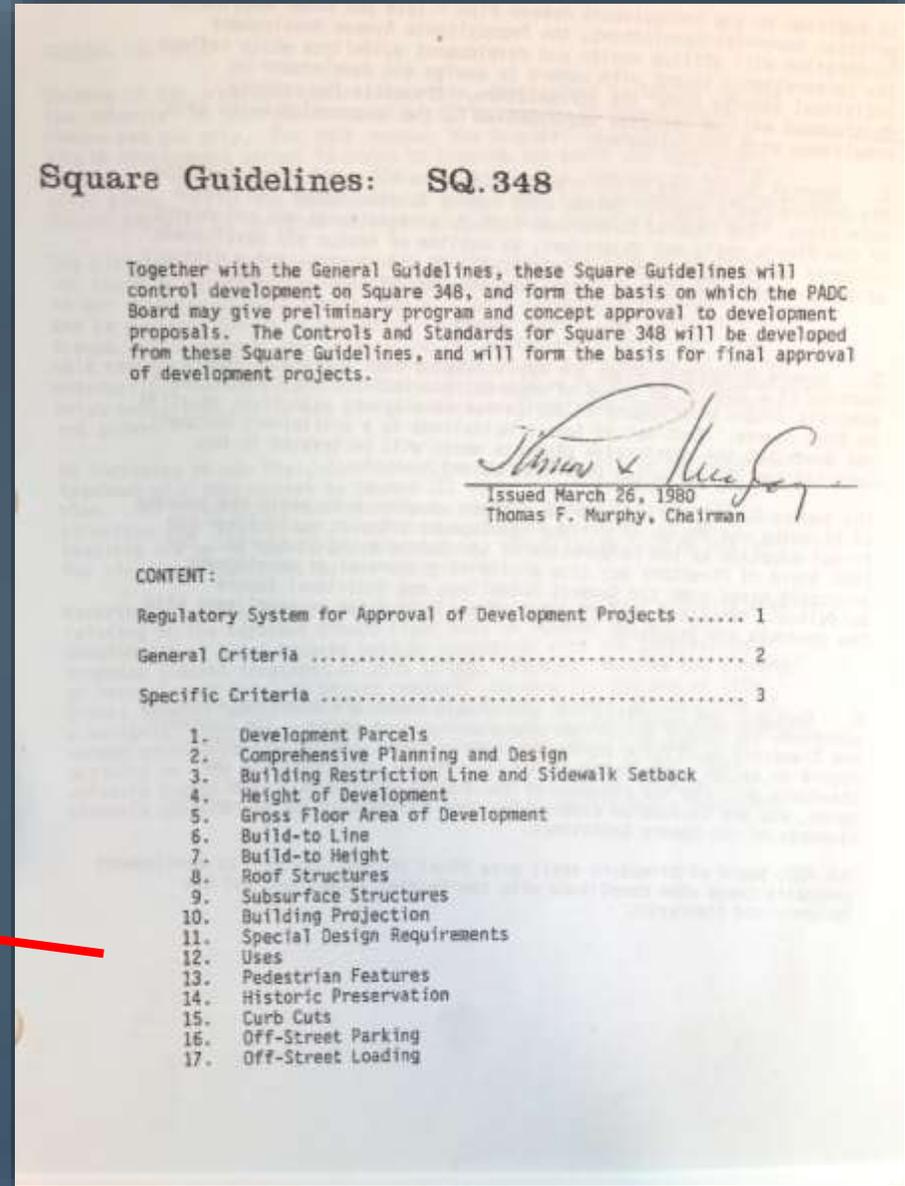


What are Square Guidelines?

*“Detailed urban planning and design requirements and recommendations which are applicable to each square”**

- Square Guidelines help to implement the Pennsylvania Avenue Plan.

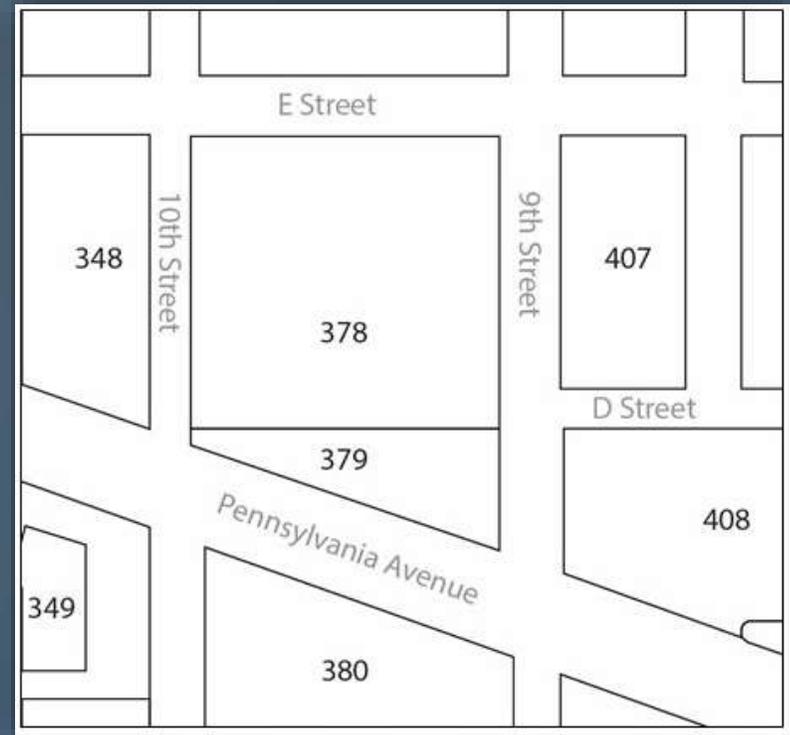
1. Development Parcels
2. Comprehensive Planning and Design
3. Building Restriction Line and Sidewalk Setback
4. Height of Development
5. Gross Floor Area of Development
6. Build-to Line
7. Build-to Height
8. Roof Structures
9. Subsurface Structures
10. Building Projection
11. Special Design Requirements
12. Uses
13. Pedestrian Features
14. Historic Preservation
15. Curb Cuts
16. Off-Street Parking
17. Off-Street Loading



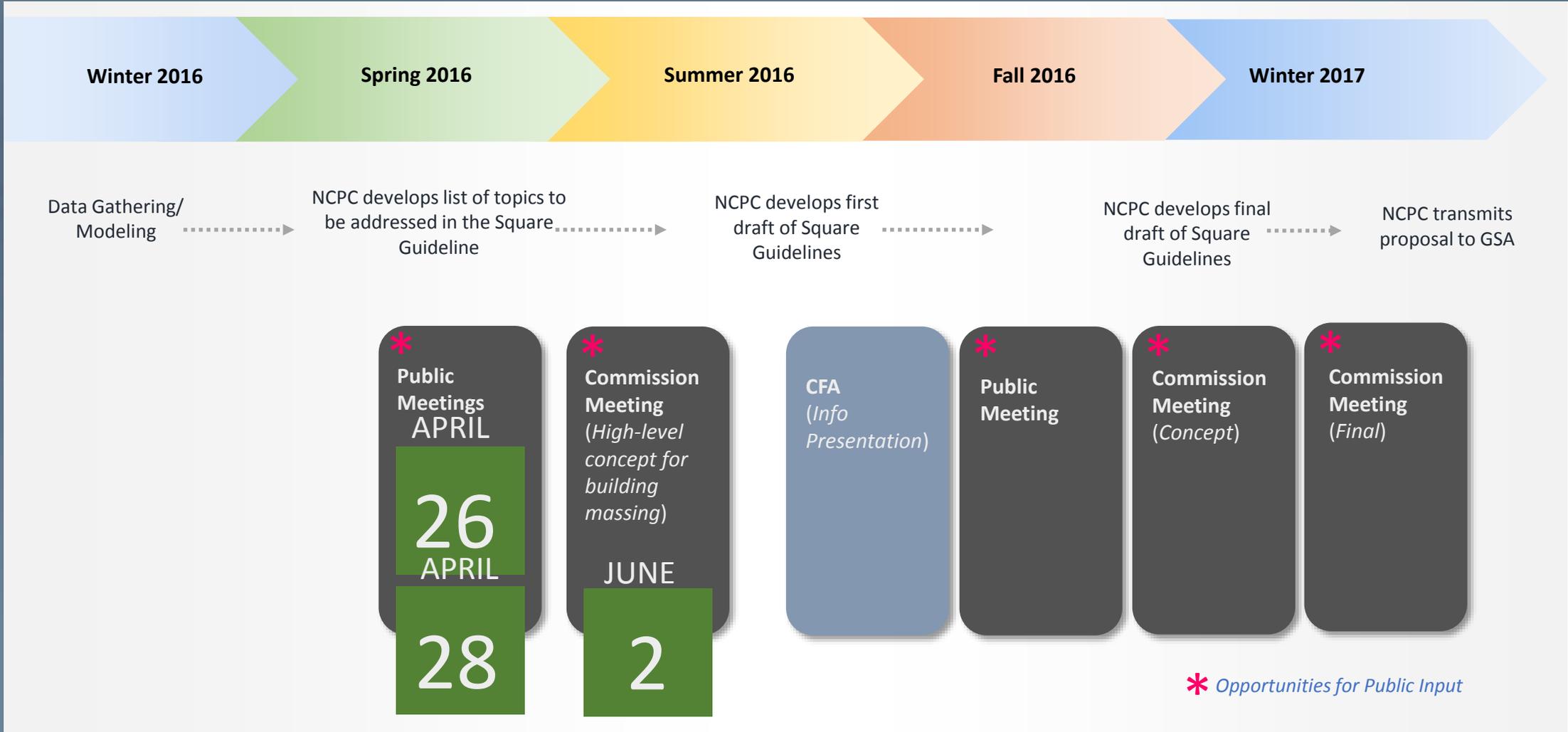
*Federal Code §910.54:

How are Square Guidelines Used in the Development Review Process?

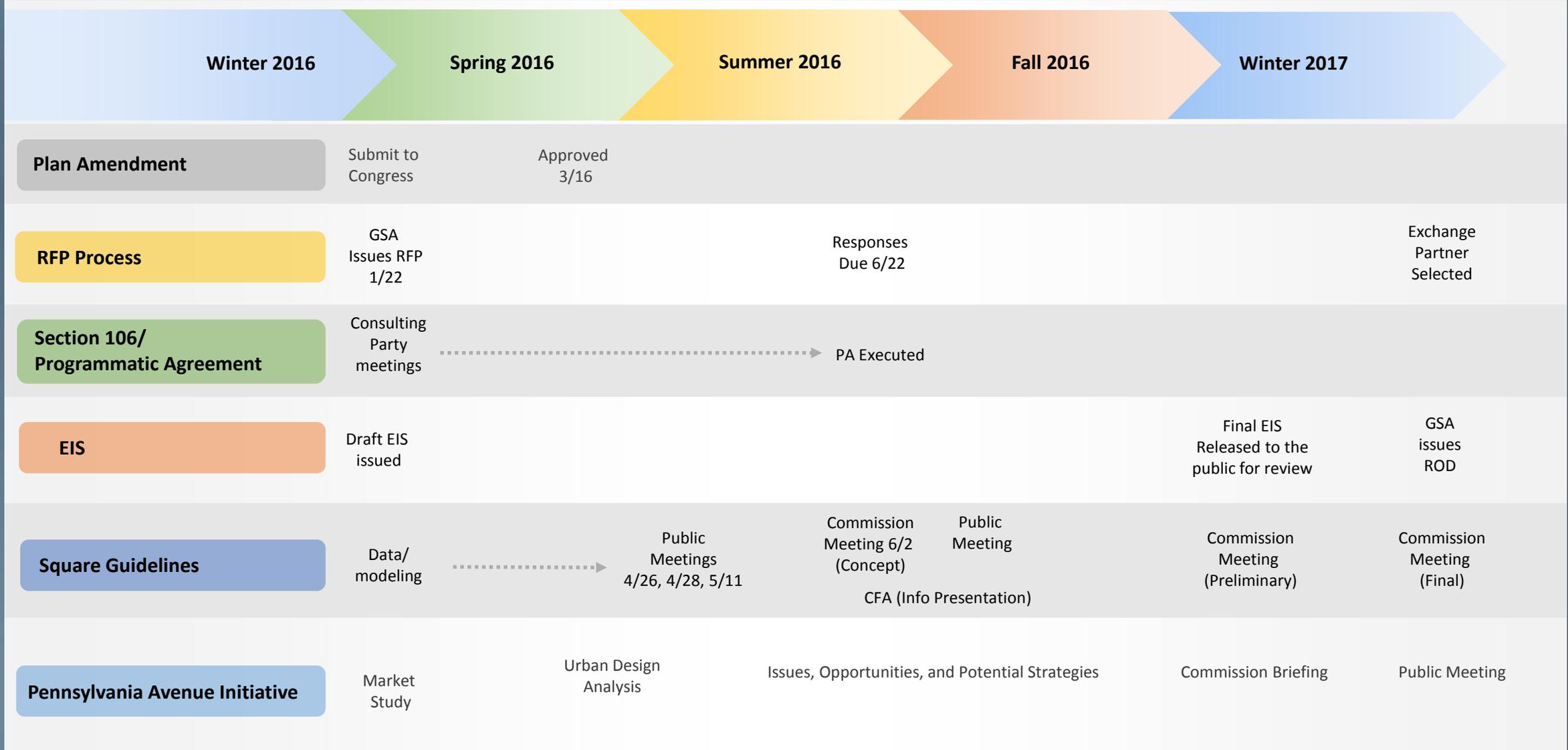
- Squares Guidelines are created for the site (either before or after the site becomes private. In this case, it will be before).
- Zoning applies to the site, but it must be consistent with the Square Guidelines. (Note: zoning may be more detailed as long as it is not inconsistent with the Guidelines).
- 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.



Square Guidelines Development Process



Big Overview of Related Processes Underway in 2016



Square Guideline Topics (level of detail will vary)

Land Use

- General Overall Uses
- Ground Floor Use

Building Massing

- Allowable Building Height
- Upper-story setbacks
- Build-to-lines

Circulation

- L'Enfant Plan
- Other Access/Permeability

Special Design Guidance

- Building Composition
- Façade Design
- Signage/Awnings
- Rooftop Structures
- Parking and Loading

Public Realm Guidance

- Overall Character
- Ground Floor Design
- Outdoor Use
- Landscape

Sustainability

Land Use

Plan Amendment:

- Accommodate high-density development with a mix of uses, such as commercial, residential and cultural uses.
- Complement and enhance all of the surrounding downtown blocks.
- Design ground floor uses on Pennsylvania Avenue to accommodate and encourage everyday activities, commerce and public uses.



Circulation

Plan Amendment:

- Respect the principles of the L'Enfant Plan by restoring circulation patterns.

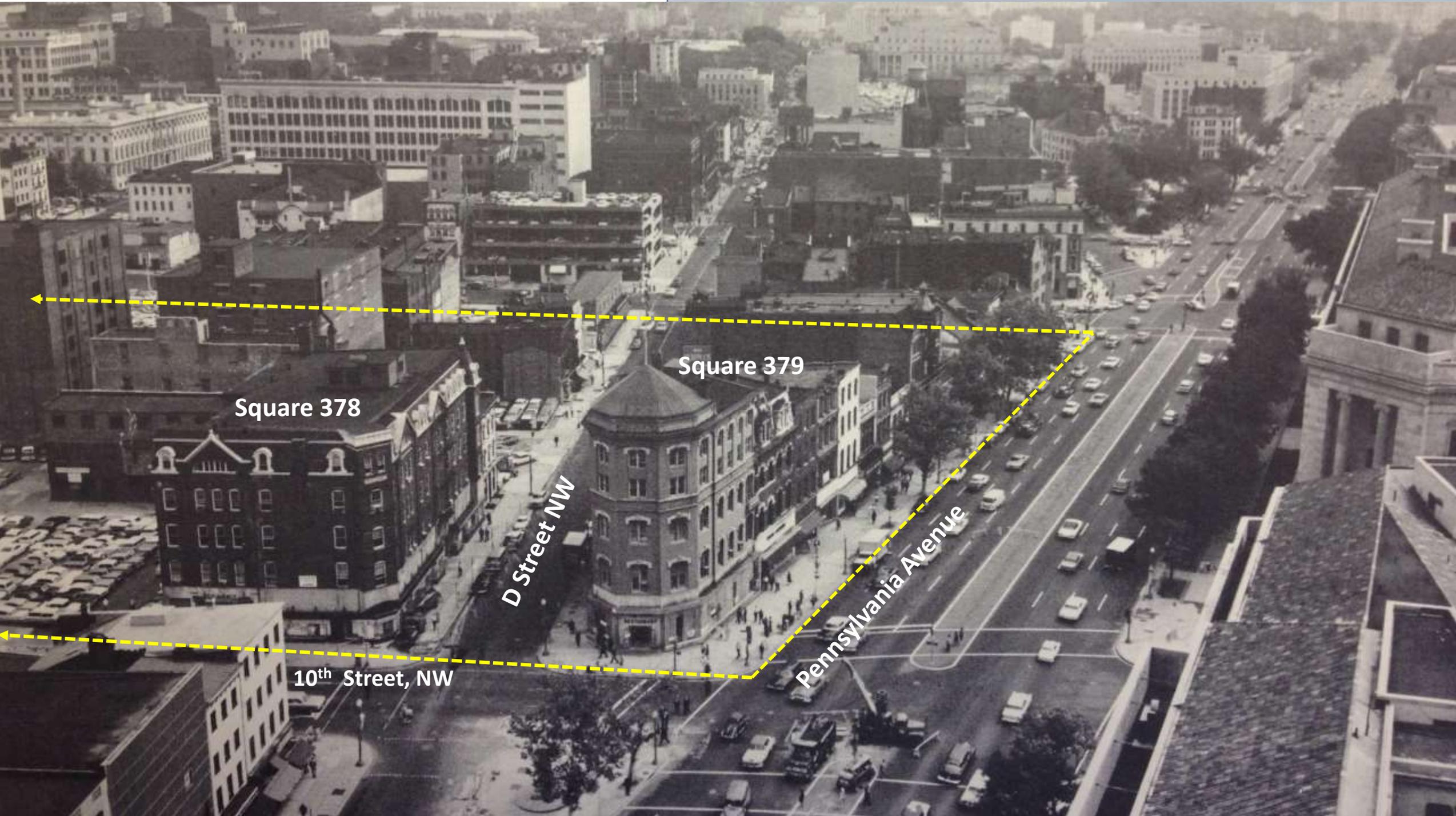


10th Street, NW

E Street, NW

D Street, NW

9th Street, NW



Square 378

Square 379

D Street NW

10th Street, NW

Pennsylvania Avenue



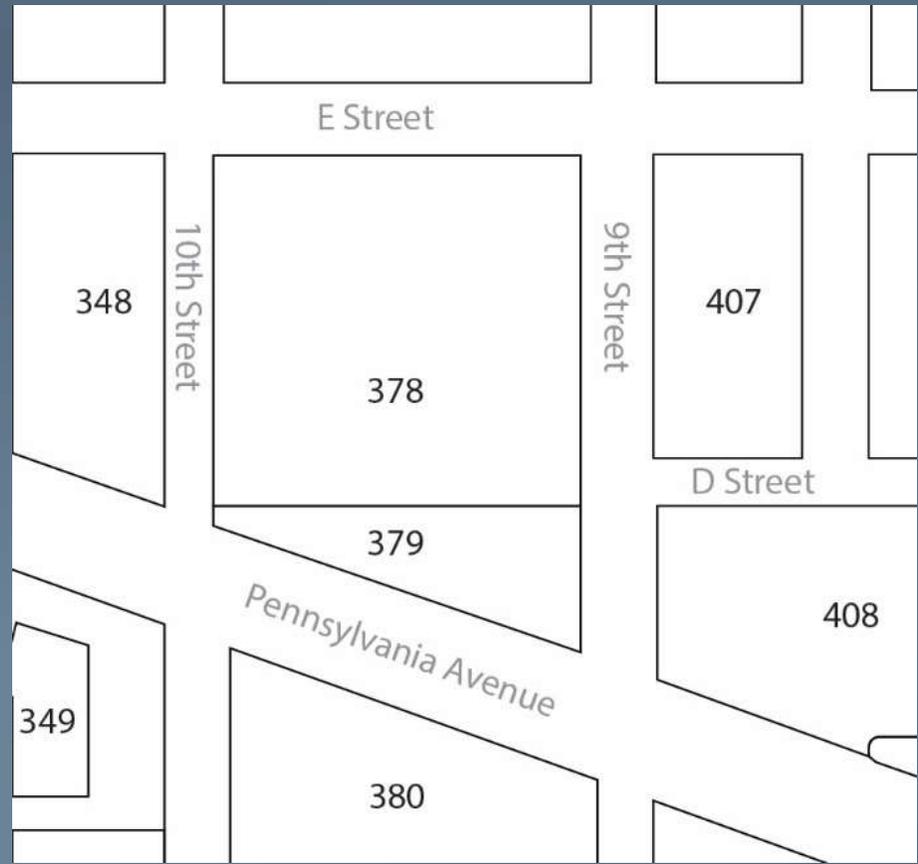
Standing on D Street at 8th looking west at FBI where the D St corridor would go through.

el

sip
sign
green-light

up
up
port water

D Street, NW: The spatial configuration of the D Street Right-of-way as designed in the L'Enfant Plan at 70' wide will be re-established if Squares 378 and 379 are redeveloped. The Square Guidelines may provide additional guidance regarding the function of this space later in the process.



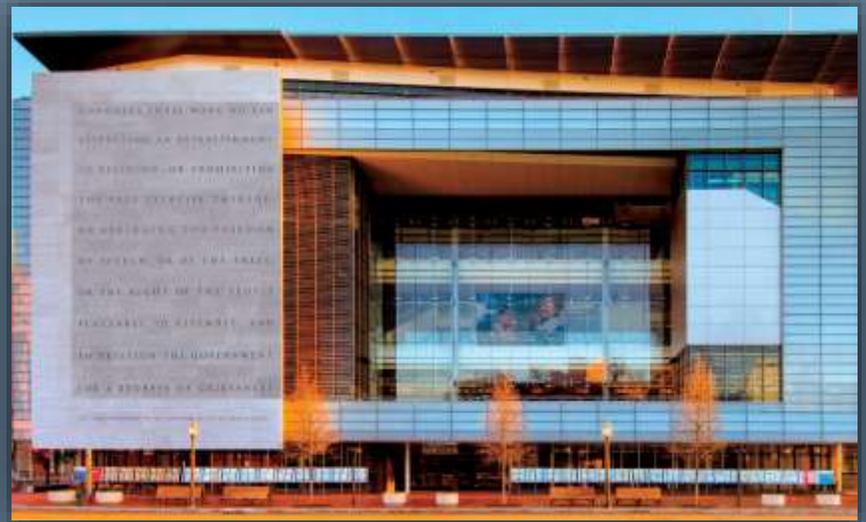
Existing Condition



Proposal

Special Design Guidelines

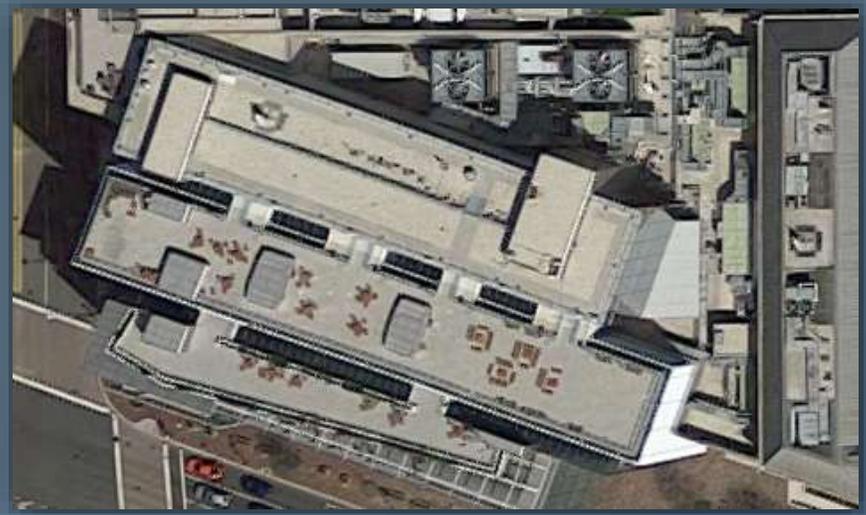
Plan Amendment:
Does not address
this level of detail.



Façade Design /Building Composition



Signage/Awnings



Location of Rooftop Structures



Parking and Loading

Public Realm Guidelines

Plan Amendment:
Does not address this
level of detail.



Ground Floor Design



Landscape



Outdoor Uses

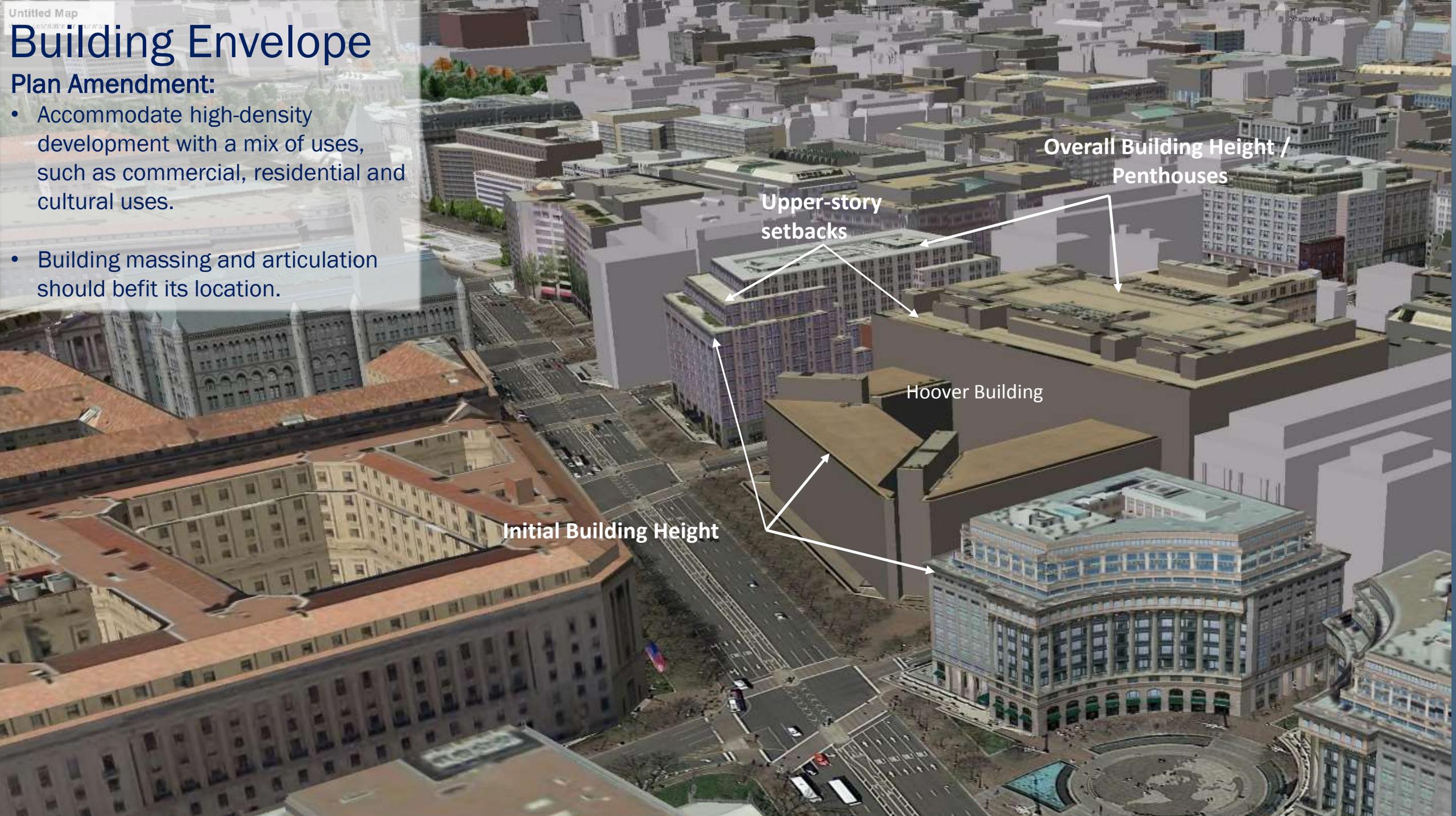


Character

Building Envelope

Plan Amendment:

- Accommodate high-density development with a mix of uses, such as commercial, residential and cultural uses.
- Building massing and articulation should befit its location.



Overall Building Height / Penthouses

Upper-story setbacks

Hoover Building

Initial Building Height



FBI

Department of Justice

156

140

102

137

105

110

127

315

108

156

135

114

96

117

122

160



Department of Justice

FBI

Market Square

160

137

114

135

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157

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122

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102

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140

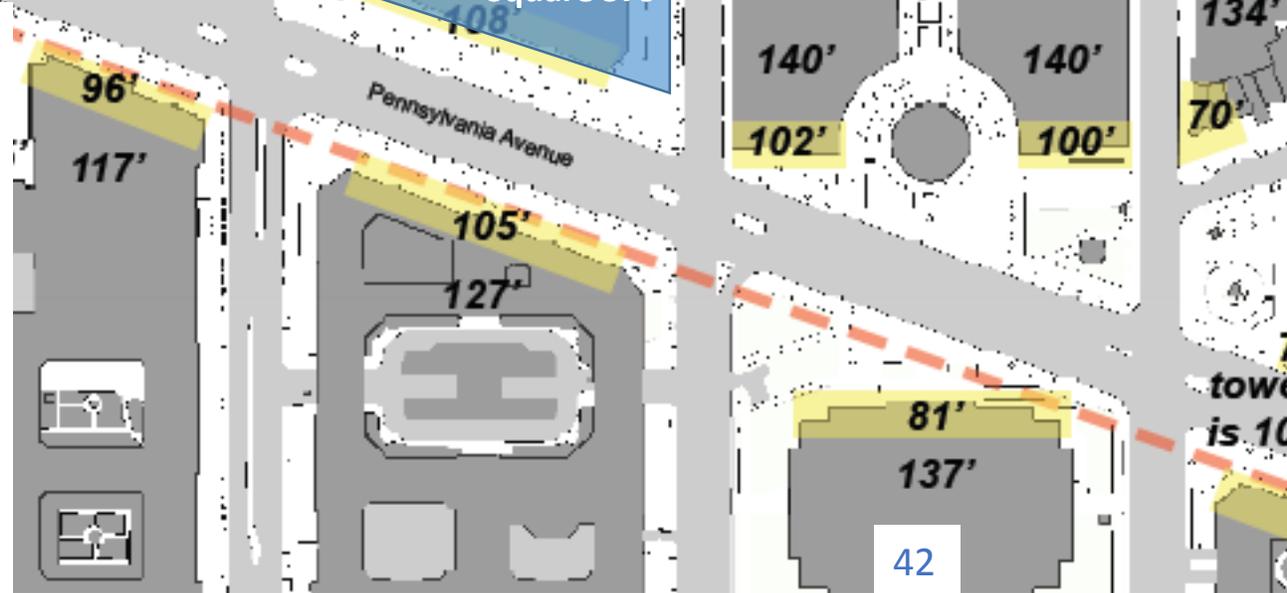
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137

81



- Allowable Height/Upper-Story Setbacks Square 378:** Under certain conditions, the 1910 Height Act allows buildings on Square 378 (north of the D Street Right-of-Way) to achieve 160'. The Square Guidelines support this allowable height but will include additional guidance regarding upper-story setbacks for D, 9th, 10th and E Street that are compatible with surrounding development (to be determined later in the Square Guideline process).



Build-to-lines

Plan Amendment:

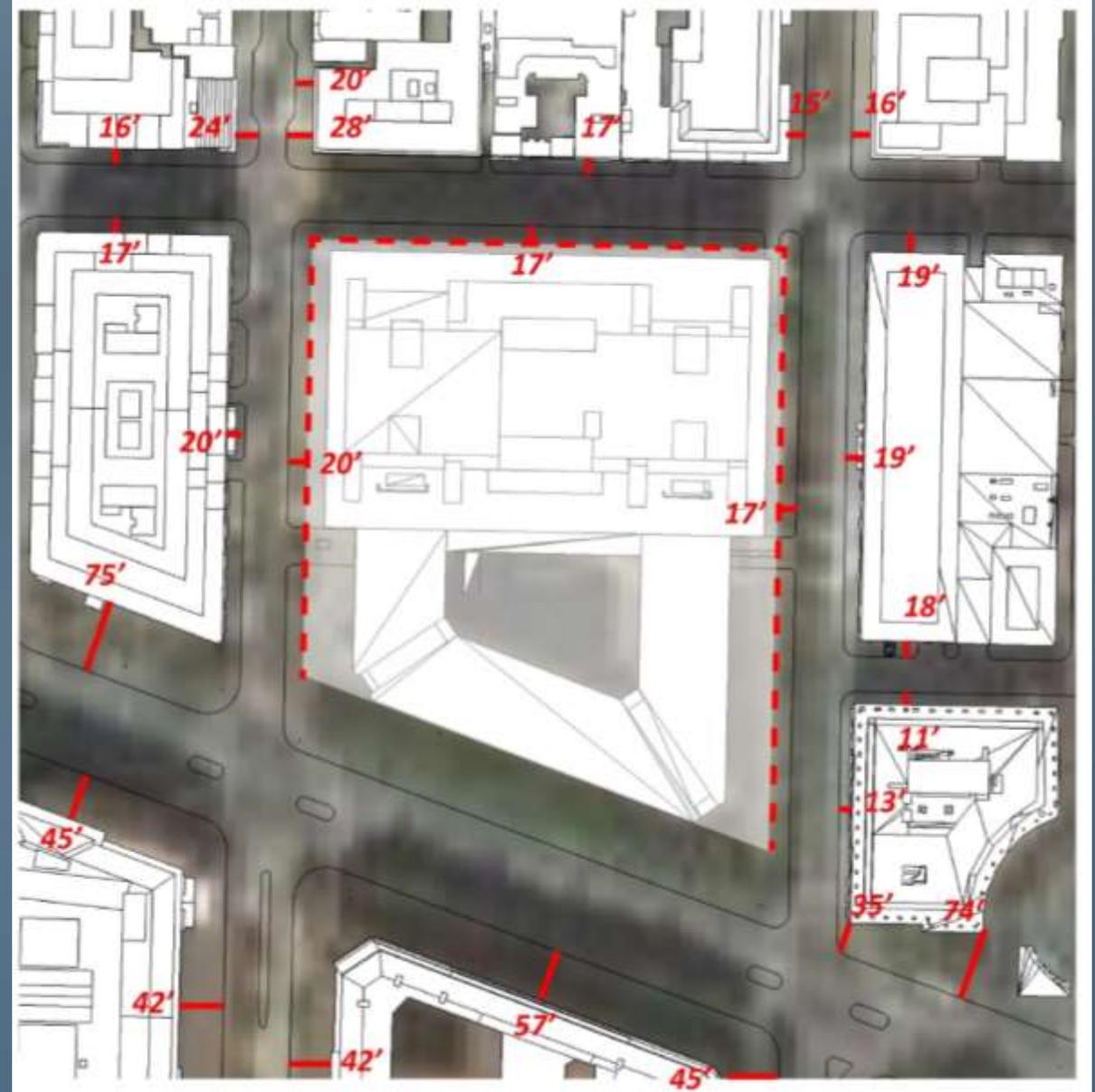
- Respect the principles of the L'Enfant Plan by restoring views.
- Provide and contribute to the Avenue's distinguished character.
- Strengthen the vista of the U.S. Capitol.



Current distance between building and curb is 79.5'.

Build-to-lines for 9th, 10th, D and E Streets, NW are as follows:

The build-to-line is the property line on 9th, 10th, E, and D Streets, NW. The property lines are consistent with the L'Enfant Plan right-of-way.



**Measurements are based on GIS data and may have inaccuracies relative to field measurements*

Build-to-line on Pennsylvania Avenue (Square 379): Staff recommends a build-to-line in the range of 20-30 feet from the property line (46-56 feet between the curb and building face) similar to the south side of the Avenue which:

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



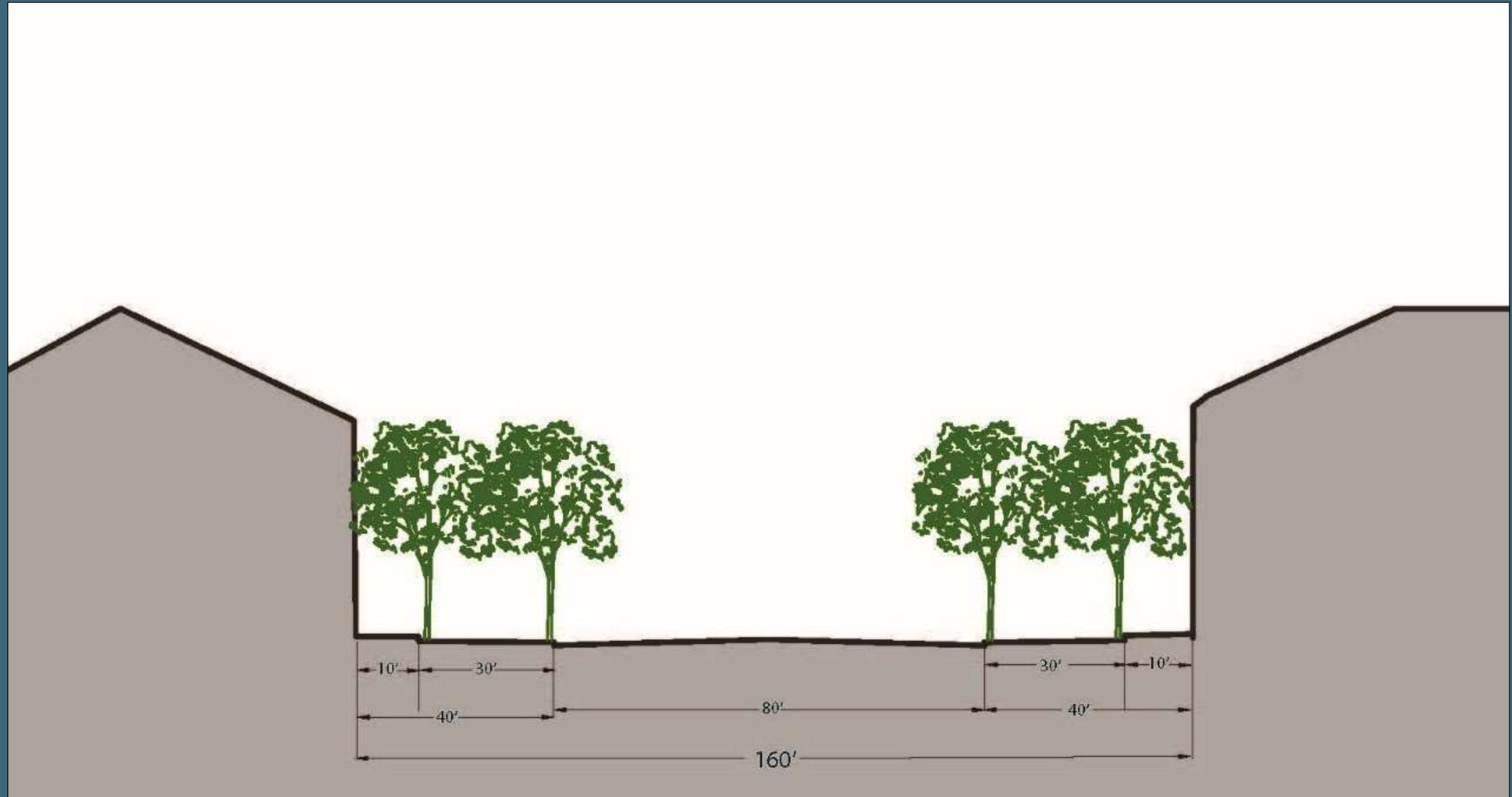
Example of the building face 26' from the curb



Example of the building face 52' from the curb 25

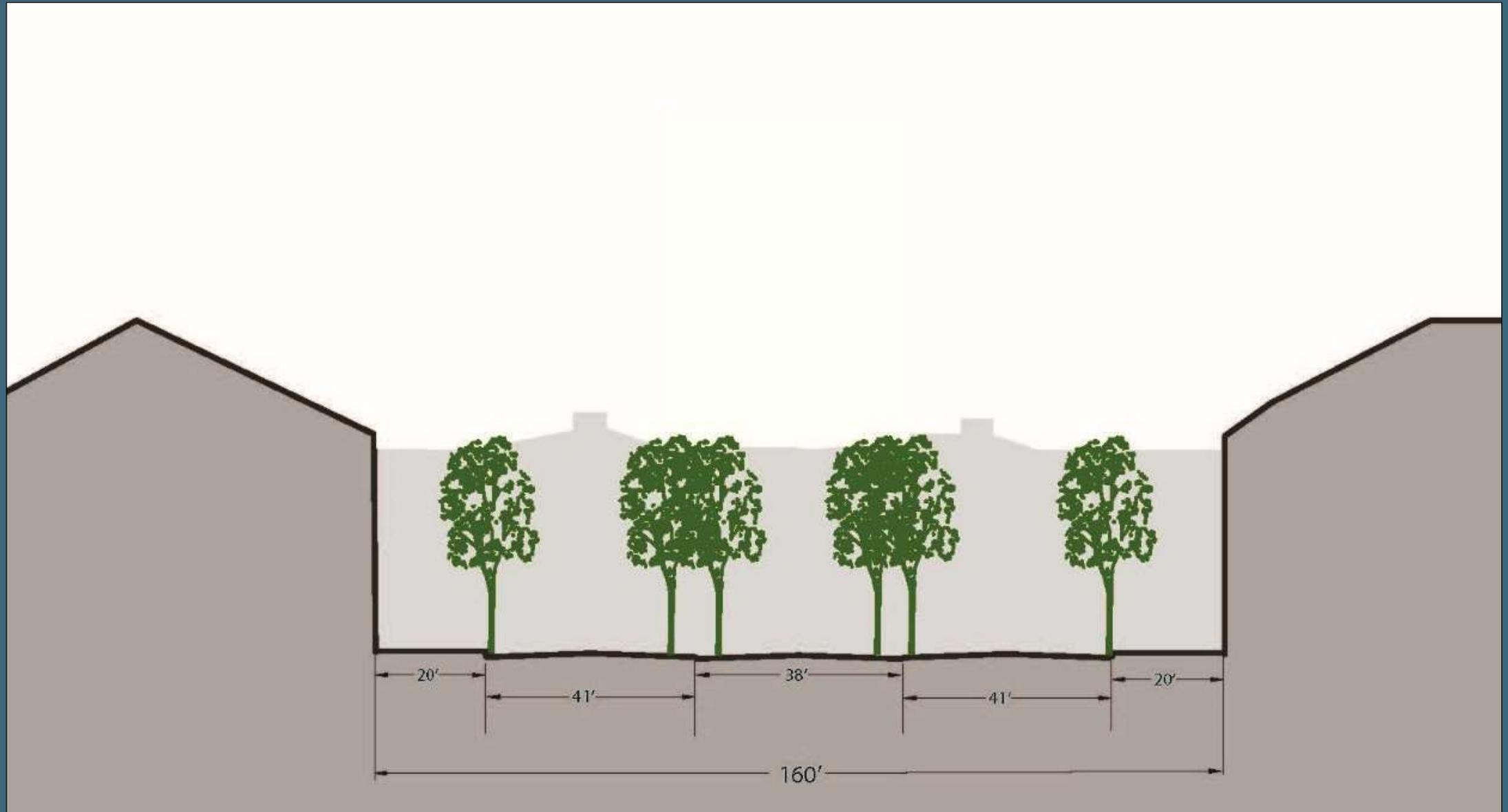
L'Enfant Plan | Proposed Avenue Layout

1791



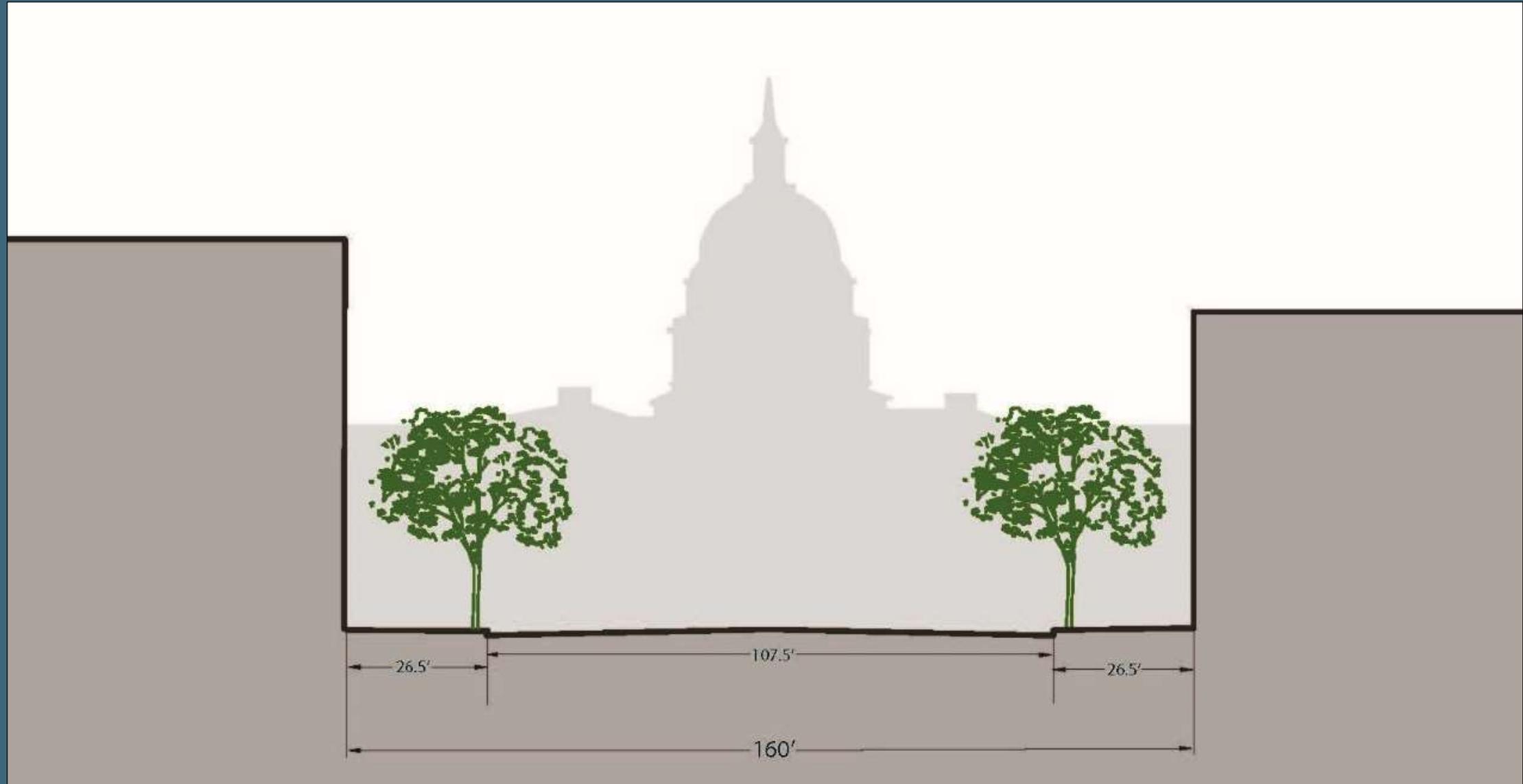
Jefferson Improvements

1803



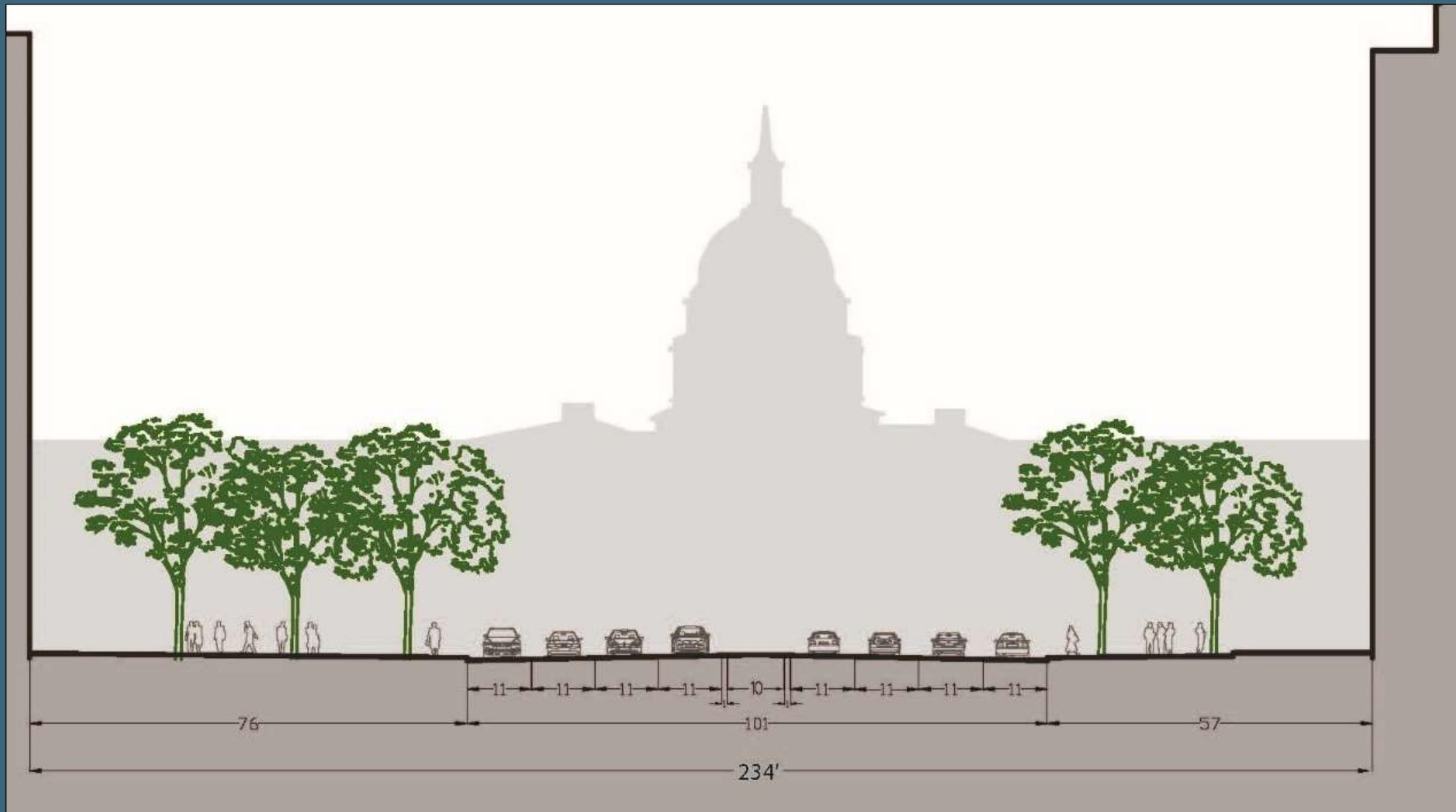
The McMillan Plan

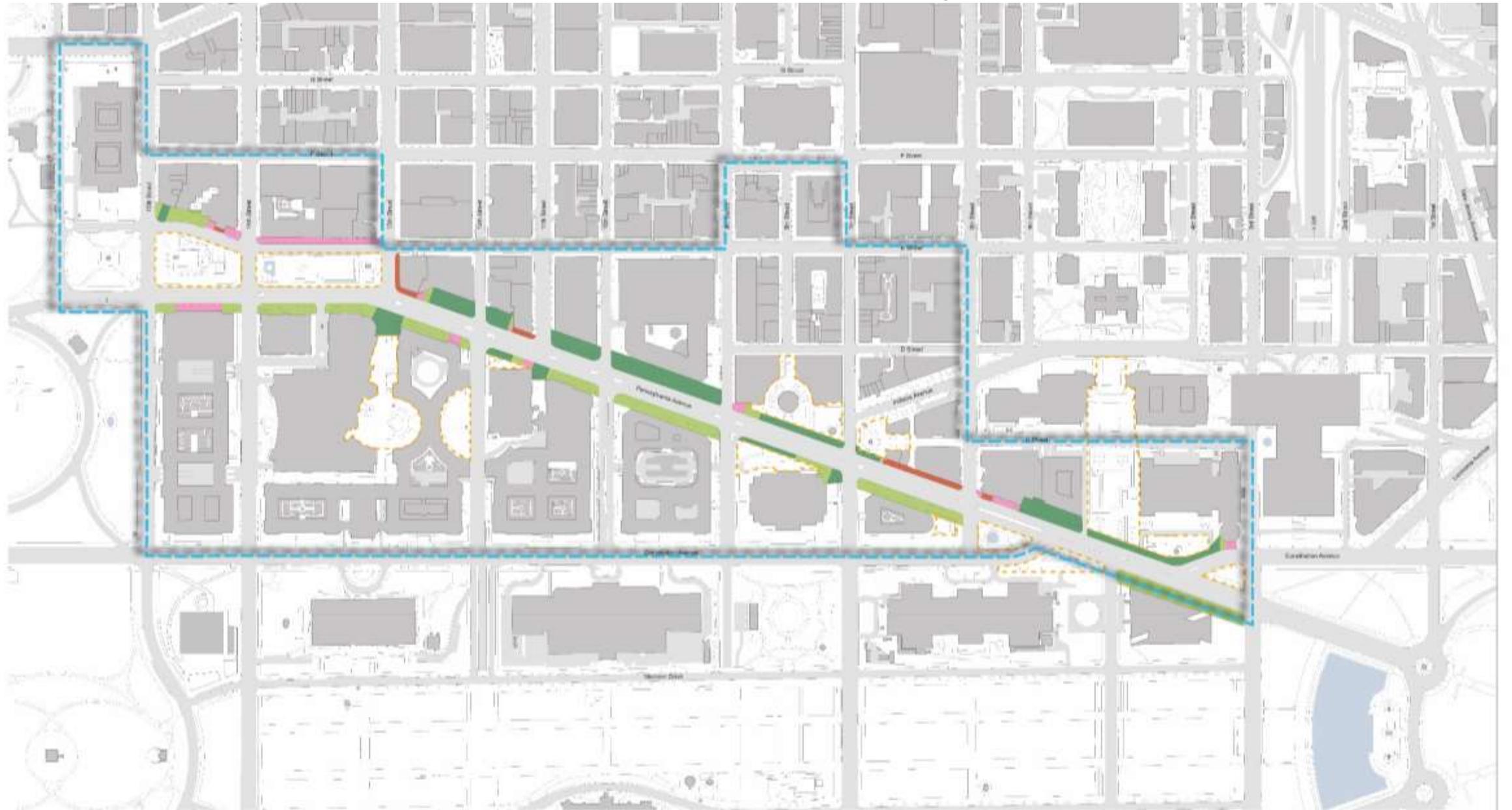
1901



The PADC Plan

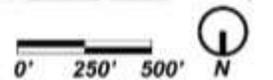
1974



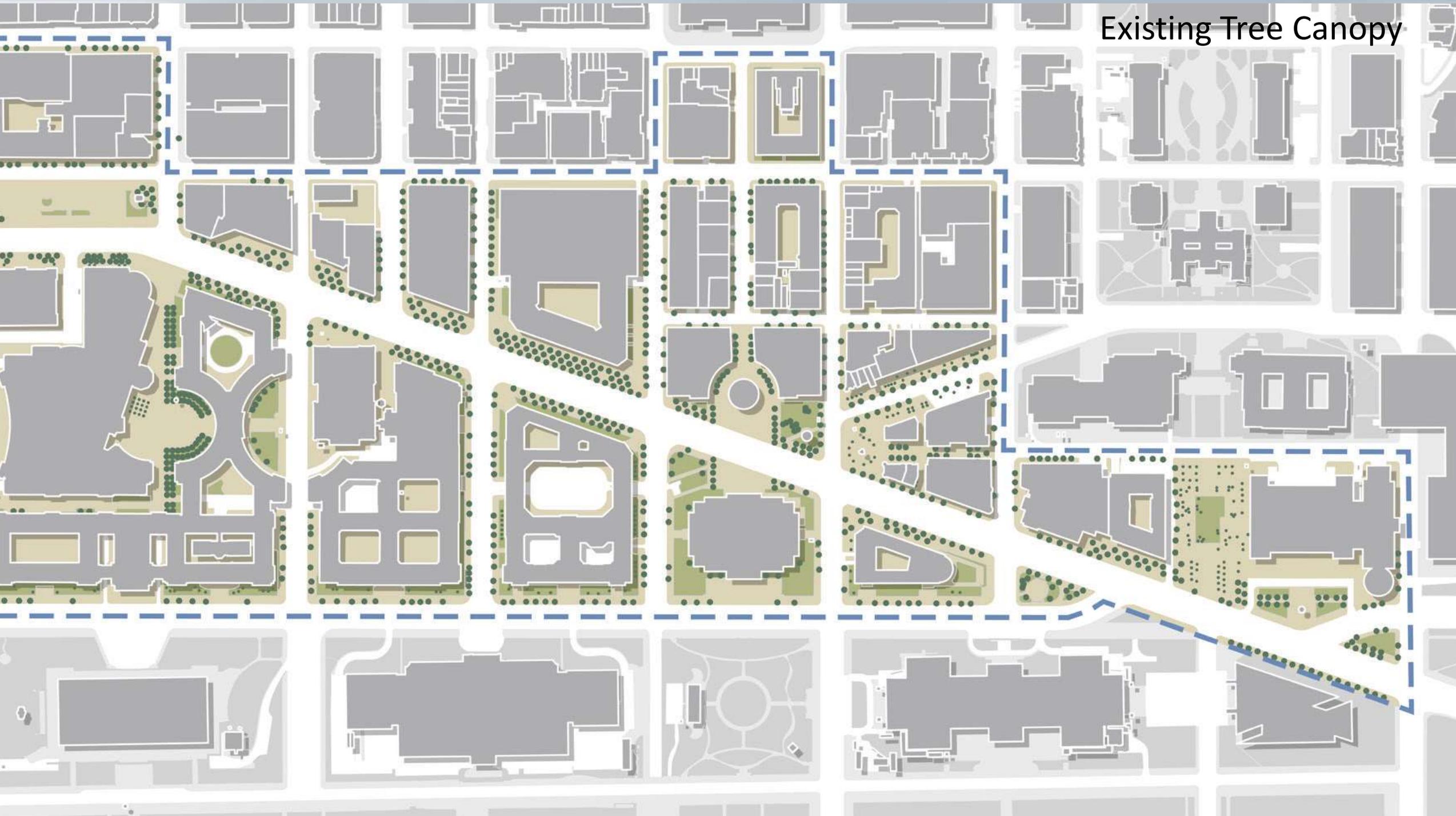


LEGEND

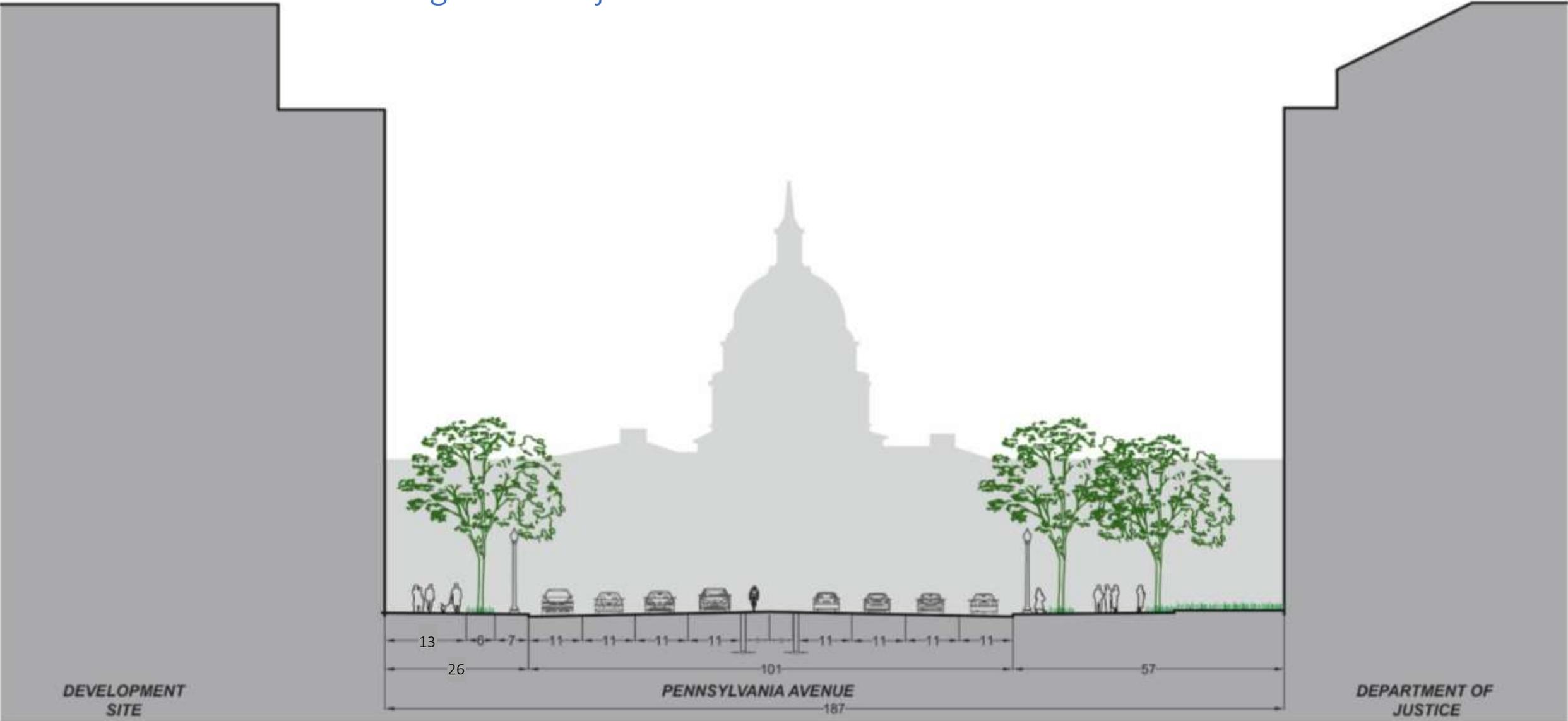
- PROPOSED INVENTORY AREA
- 75' or more
- 26' - 44'
- PLAZA / PARK
- Approximately 50'
- 25' or less



Existing Tree Canopy



Sidewalk = 26'
Trees Align with Adjacent Blocks





North Side of Pennsylvania Ave between 10th & 11th Streets



North Side of Pennsylvania Avenue at 6th St looking west.



North Side of Pennsylvania Avenue
at 7th St looking east.



← Old Post Office & Tower
→ Visitor Information Ctr
→ The National Mall
← National Theatre

→ Federal Triangle
← Metro Center

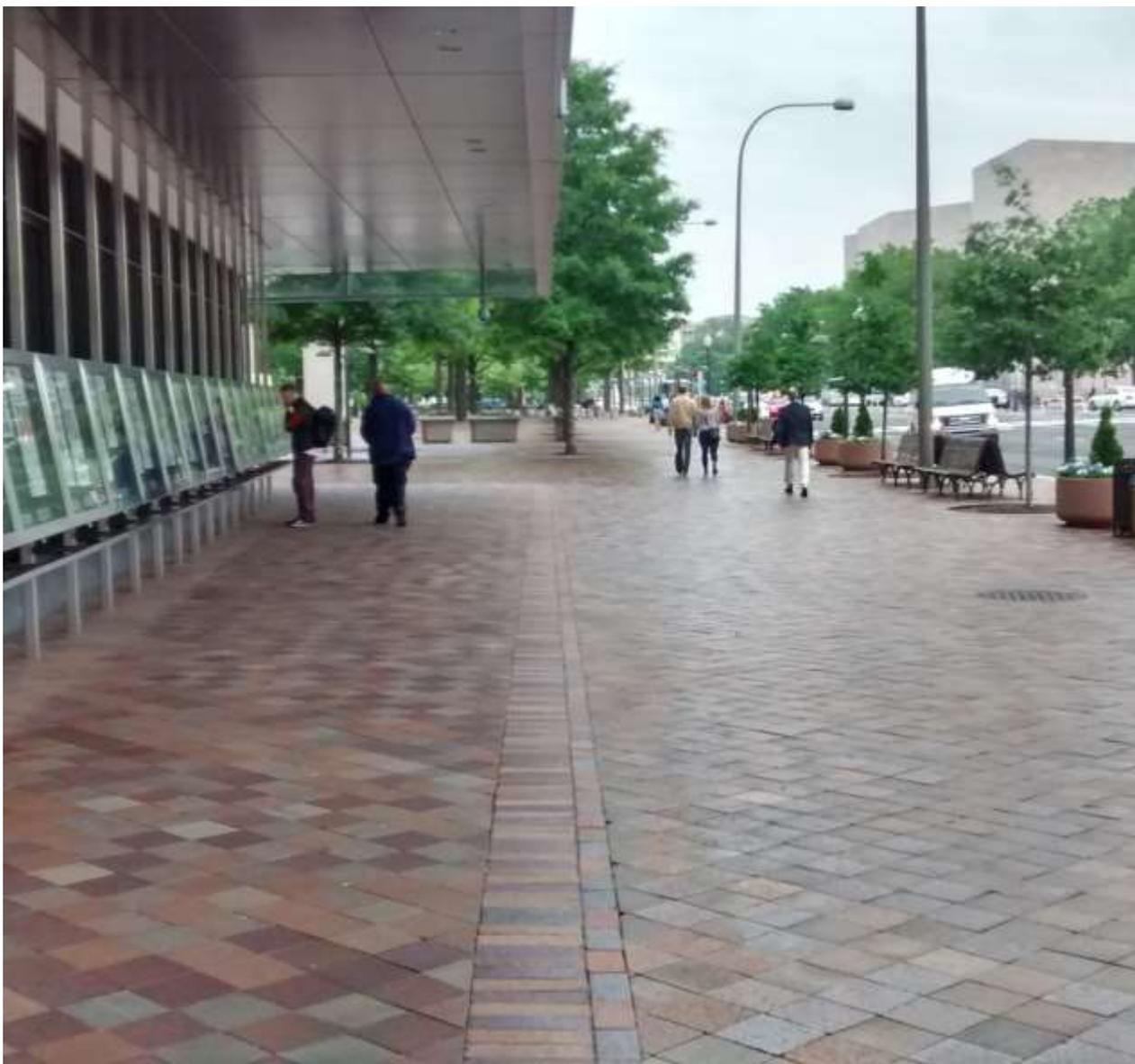
North Side of Pennsylvania Avenue
at 13th St looking east.



North Side of Pennsylvania Avenue
between 6th and 7th.

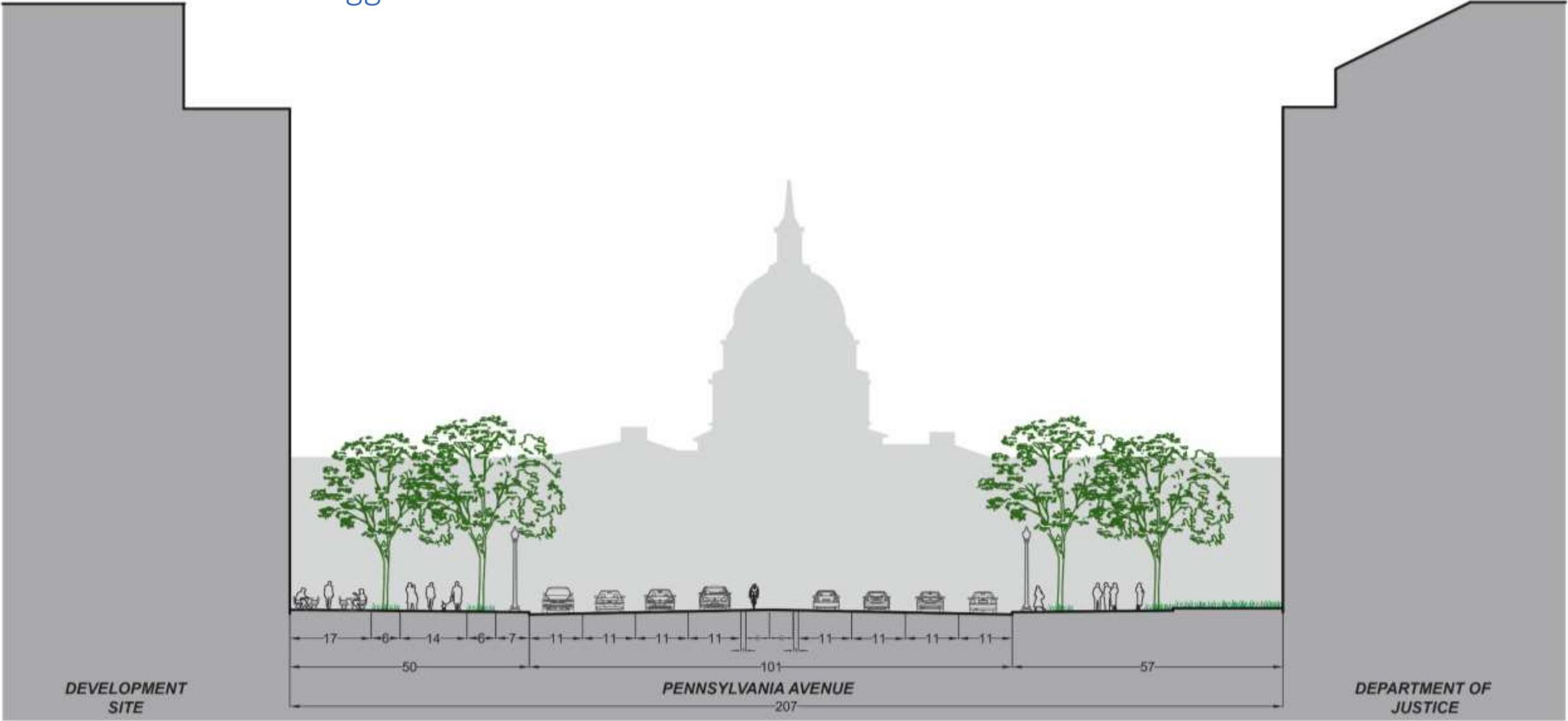


North Side of Pennsylvania Avenue
between 6th and 4th.



North Side of Pennsylvania Avenue
between 6th and 7th.

Sidewalk = 50'
Staggered Double Row of Trees





South side of Pennsylvania Avenue at 7th St looking east.



South side of Pennsylvania Avenue at 7th St looking west.

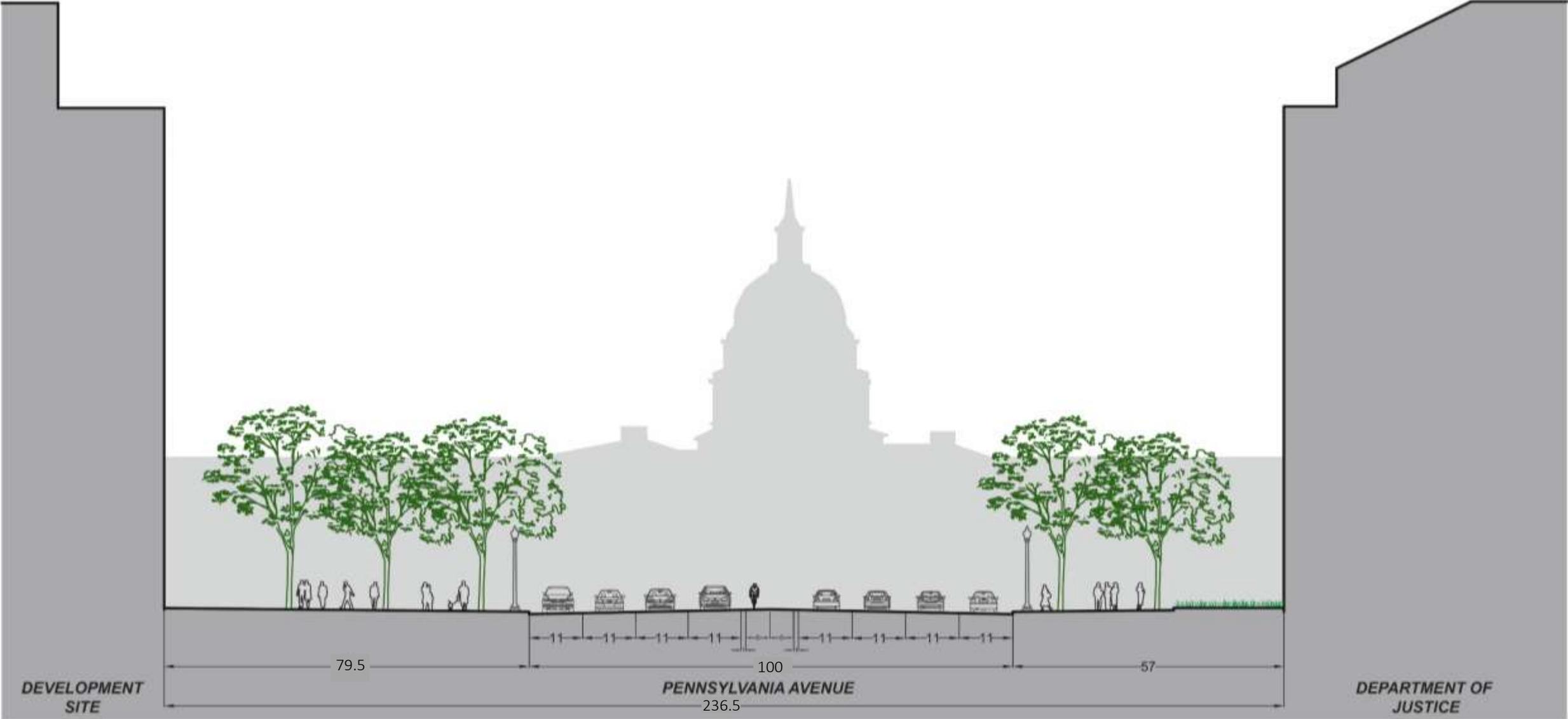


North side of Pennsylvania Avenue at 14th St looking east.



South side of Pennsylvania Avenue at 12th St looking west.

Existing Sidewalk = 79.5'
Staggered Triple Row of Trees





North side Pennsylvania Ave between 9th & 10th Streets



North side Pennsylvania Ave between 10th & 11th Streets



FBI
↓

Looking East towards the Capitol

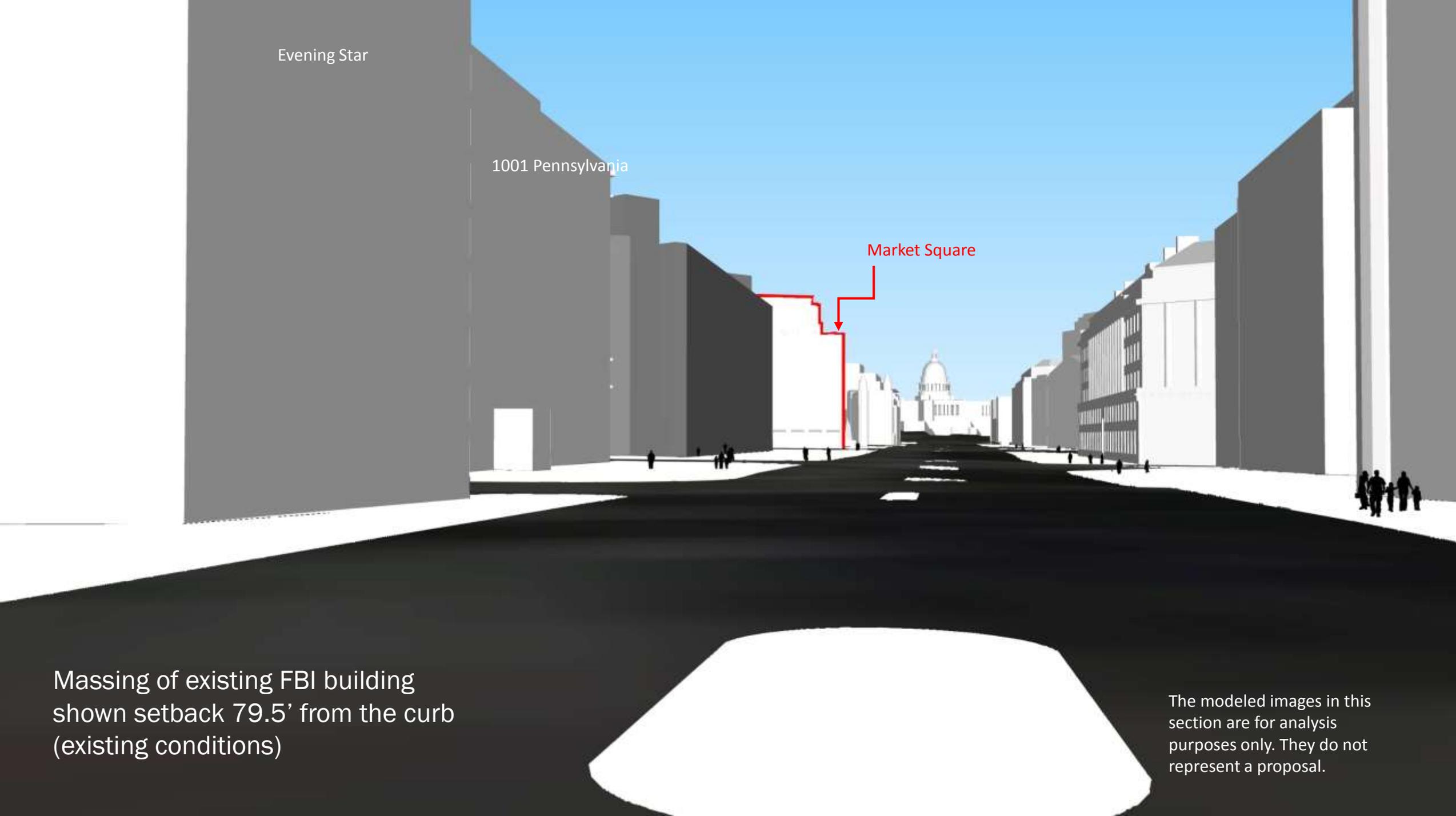
Evening Star

1001 Pennsylvania

Market Square

Massing of existing FBI building shown setback 79.5' from the curb (existing conditions)

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



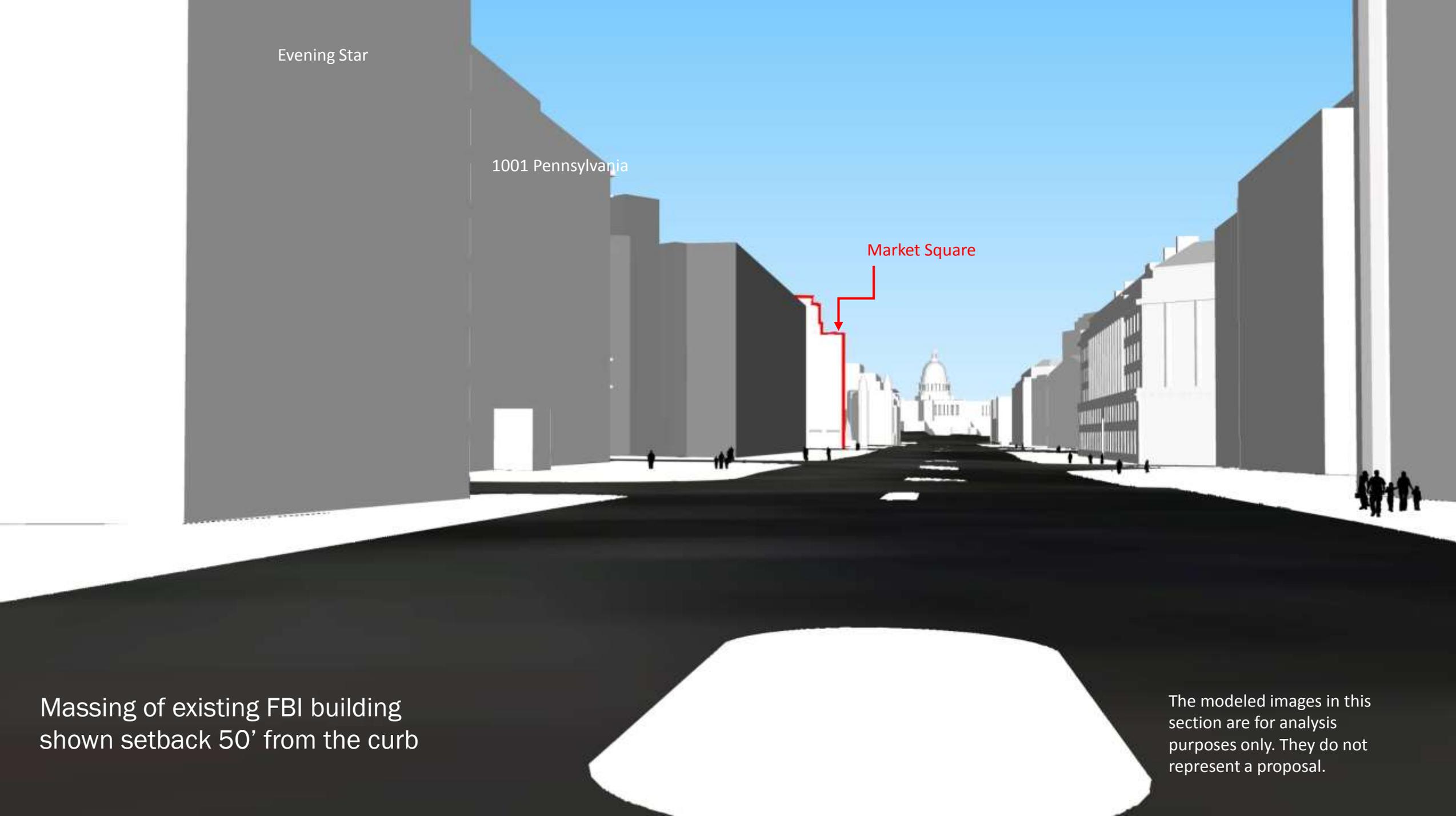
Evening Star

1001 Pennsylvania

Market Square

Massing of existing FBI building
shown setback 50' from the curb

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



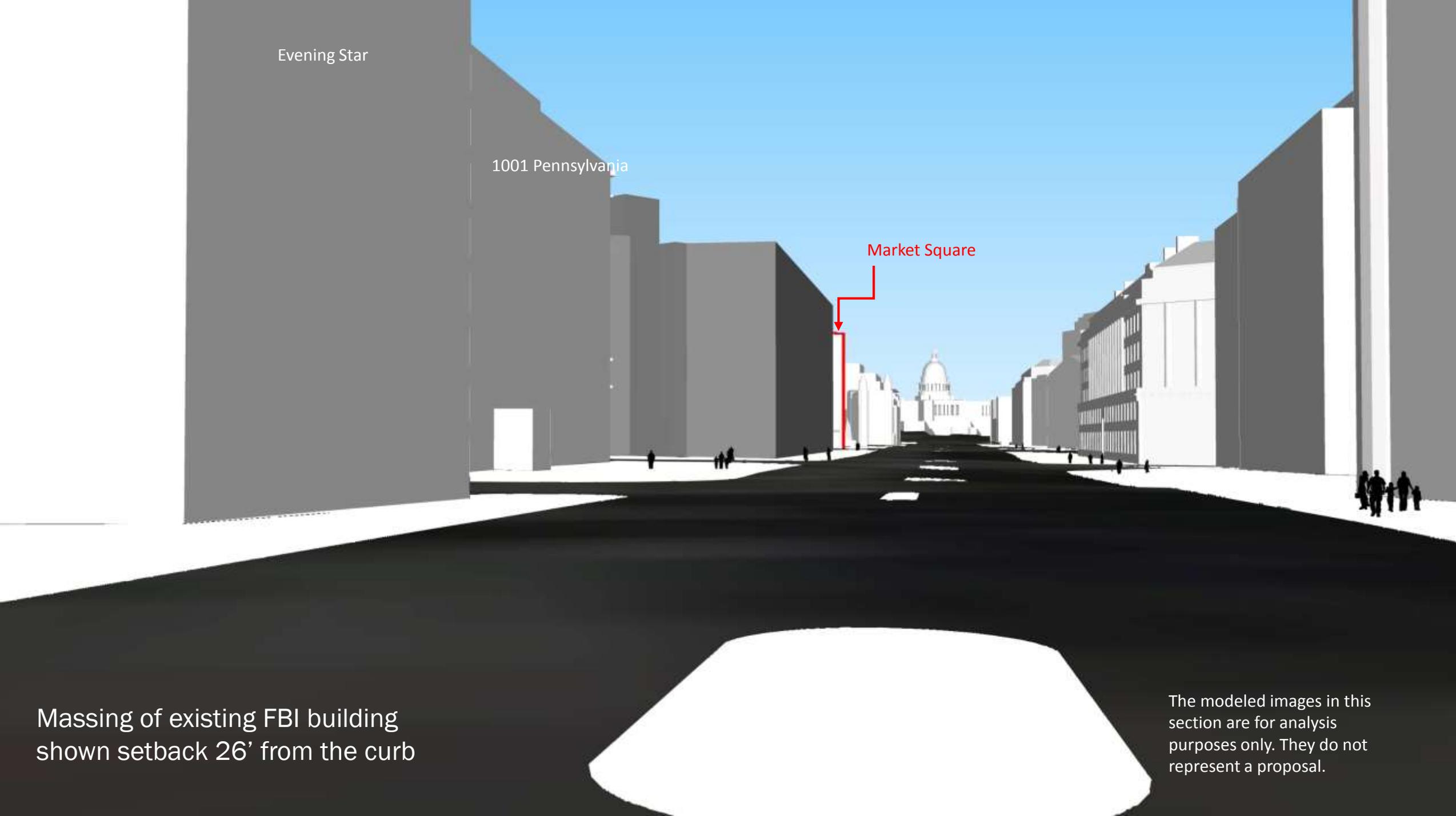
Evening Star

1001 Pennsylvania

Market Square

Massing of existing FBI building
shown setback 26' from the curb

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

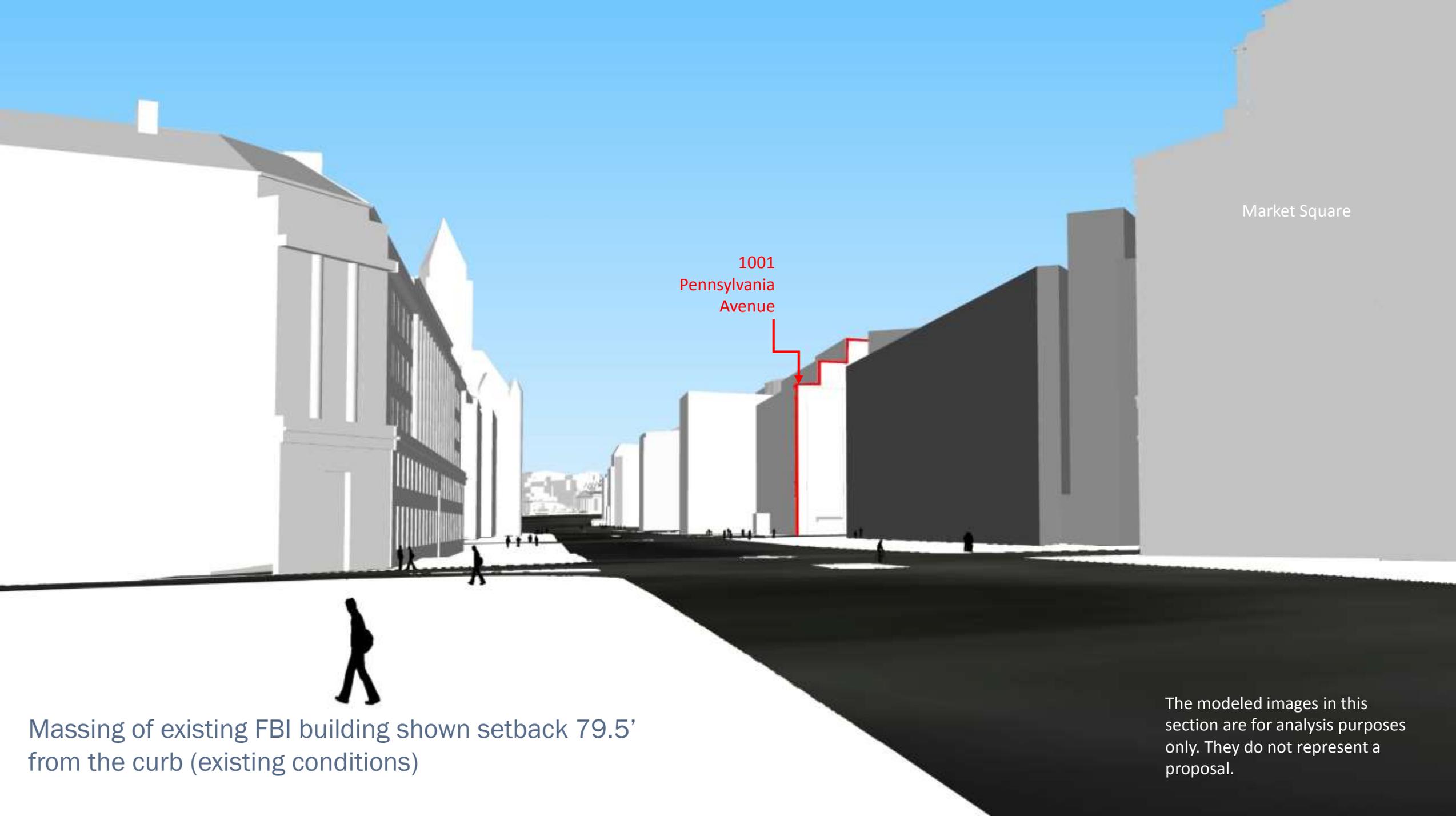




FBI



Looking West towards Freedom Plaza

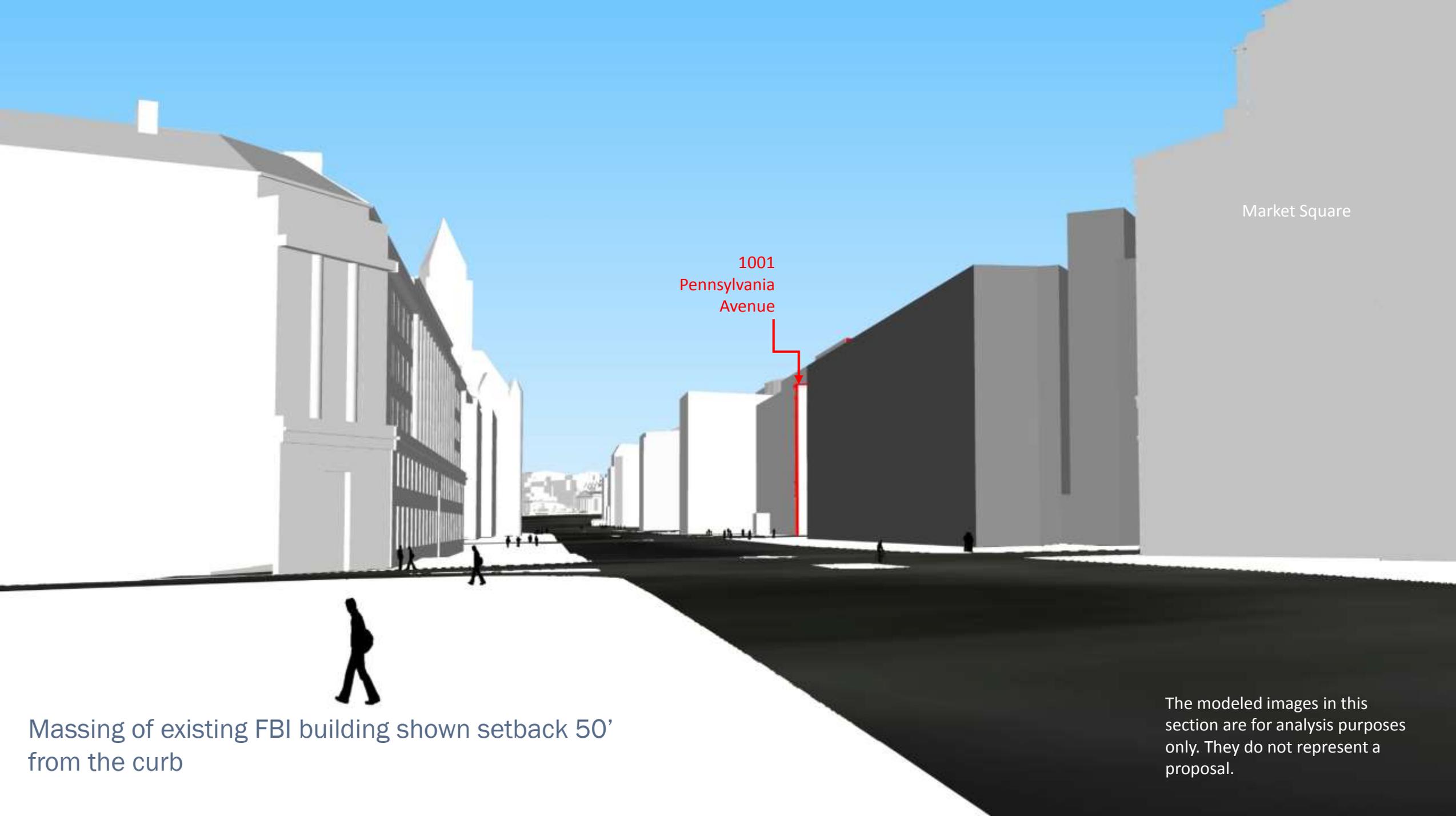


Market Square

1001
Pennsylvania
Avenue

Massing of existing FBI building shown setback 79.5' from the curb (existing conditions)

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



Market Square

1001
Pennsylvania
Avenue

Massing of existing FBI building shown setback 50' from the curb

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



Market Square

Massing of existing FBI building shown setback 26' from the curb

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

Attachment 2
NCPC FILE No. P7713

Pennsylvania Avenue Development Corporation Plan Square 378 and 379

Existing PADC text (enlarged from page 37 of the Plan):

“These blocks are occupied by the new FBI Building, which has been built in conformance with the new Pennsylvania Avenue building line. The structure is now planned to be used solely for FBI offices. However, the corporation will encourage the FBI to permit retail businesses along Pennsylvania Avenue frontage so that there can be continuous retail activity along the Avenue instead of a one-block hiatus at this critical location. Ground level shops and restaurants would do much to alleviate the building’s monumental appearance, while providing services for large numbers of tourist who will visit the building, as well as for FBI employees and the general population.”

Proposed Existing Conditions text:

The blocks are currently occupied by the J. Edgar Hoover Building, the headquarters for the Federal Bureau of Investigation (FBI). The Brutalist concrete building, dedicated in 1975, is approximately 2.8 million square feet in size and houses federal employees. The building was designed and constructed prior to the adoption of the 1974 Pennsylvania Avenue Plan (the Plan), taking its cues from earlier temporary presidential commission recommendations that were later incorporated into the Plan.

The building is set back 50 feet from the Pennsylvania Avenue property line, which is located approximately 25 feet from the curb. The Hoover Building is eight stories tall at 107 feet in height on Pennsylvania Avenue—an initial building height similar to the Federal Triangle buildings to the south with a significant upper-story step-back—before reaching eleven stories tall at 160 feet in height on the northern portion of the site.

The D Street right-of-way between 9th and 10th Streets, NW was closed to facilitate the construction of the building. The building has an interior courtyard surrounded by a monumental mezzanine that overlooks Pennsylvania Avenue. Access to the courtyard is limited, and the first floor bay openings were enclosed to improve security with no ground-floor retail at the site provided. A wide areaway surrounds the 9th, 10th, and E Street facades of the building. The Pennsylvania Avenue sidewalk features street furnishings designed for the avenue and a double allee of willow oaks. A single-row of street trees line the perimeter of the building along 9th and 10th Streets, NW.

Proposed Development text (Plan Amendment text)

The blocks would be available for private use as well as continued federal use. If the blocks were to be redeveloped, they would accommodate high-density development with a mix of uses, such as commercial, residential and cultural uses.

The development would complement and enhance all of the surrounding downtown blocks and reinforce the importance of Pennsylvania Avenue as a ceremonial and lively downtown corridor—a place where people live, work, visit and play. The development would be defined by distinctive, high-quality urban design and architecture, including massing and articulation, befitting to its location. The development would respect the principles of the L’Enfant Plan by restoring views and circulation patterns; providing and contributing to the avenue’s distinguished character; and strengthening the vista of the U.S. Capitol. The development’s design and its ground floor uses would accommodate and encourage everyday activities, opportunities for commerce and public use, as well as national and local civic events that take place in the public realm. The development would achieve high environmental performance.

If the existing building were to be retained for private use, the identical goals for high-density mixed use, active ground-floor spaces, support for public-space activities, and robust pedestrian circulation would apply. If the building were retained for federal use, active ground-floor spaces and public access to and through the courtyard would be strongly encouraged.

Attachment 3

Summary Comments of Public Comments

The following section is a general summary of the entire document, including information taken from the hand written comments.

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

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

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

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

Most everyone agreed on the need to enhance and activate pedestrian experience along the avenue by improving uses, public space, and design. For example, add a variety of active retail uses, especially restaurants with sidewalk cafes, special landscaping, retail kiosks and art works.

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

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

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

Circulation - North south circulation north of D Street should be considered to bring more light into northern parcel.

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

Penthouses and Roof top uses – Penthouses should be kept within the 160’ height limit and roof tops should include provisions for recreational areas, green roofs, gardens, and restaurants.

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

Compiled Email Comments

The following comments were received online or by email.

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

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

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

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

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

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

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

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

So my proposal is allow setback from curb to move to 50' which will allow room for commercial space and sidewalk cafe on ground level at penn but to cap height to 108-110, not 160, as a compromise for more usable space on the avenue Allow easier restrictions behind Pennsylvania avenue, to '30 Feet or less on new D Street frontage and up to 160' to E Street, 9th to 11th Street parcel. Alternatively, the parcel that is defined by Penn Ave to new D Street pass-through becomes a ground level park and location for Penn Quarter farmers market, Which I would argue fits within the historical character of the neighborhood that was displaced when Central Market was razed to create the National Archives.

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

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

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

Robert Harpring, Washington, DC - The main problem with the existing building is with light. It casts a looming shadow, and the facade is not varied enough in texture to provide a free feeling on surrounding

sidewalks. Does the existing building need to be demolished? I think adding green walls to the facade, modifying the glazing, and opening up the inner courtyard to foot traffic, with retail and outdoor patios, would go a long way. I don't think D St should be extended, unless it is for a pedestrian only walkway or delivery access. Adding a street there is probably going to be worse for traffic due to the proximity to the existing intersection with Pennsylvania and left turns off of D St. I think the intent of the City Center Development is a good benchmark, but I don't think the architectural style of City Center will mesh well with the other structures along the Pennsylvania Avenue corridor. Newseum does a good job of not contrasting too sharply with the museums and monuments. The building facade should create the line along Pennsylvania, but I think a heavily landscaped inner walkway with good light (in place of a vehicle traffic D Street), should be the main focus of any new Development. The size and height of the actual construction should be less than the existing FBI building. A final comment would be that DC could use an avant-garde structure, the new African American History museum is somewhat bold, but I think a grouping of smaller buildings with an unorthodox shaped centerpiece would be a dream come true in this location. A sloping park on the lower part of any structure (to provide an easy stroll to a great vista right off the sidewalk-maybe 50 feet total elevation on a 20-30-degree slope), and a small water feature (something like the SW duck pond), would also be ideal if money was no object.

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

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

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

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

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

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

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

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

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

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

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

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

- Since NCPC does not plan on submitting their opinion on the Guidelines until early June, how does NCPC expect the developer teams to react given the fact that the RFP was released on January and is due in late June, in other words, teams have spent months working on assumptions for the redevelopment, what if NCPC runs counter to these assumptions?
NCPC will consider these topics in developing Square Guidelines: Land Use, Building Massing, Build-to-lines, Building Height, Upper-story Setbacks, Penthouses, D Street, Ground Floor Use, General Design Guidelines, Public Realm, Sustainability, Circulation/Access/Loading:
- The buildings that are located on either side of the squares on Pennsylvania Avenue each follow a different set of design guidelines; this should mean that the Hoover site should follow what's best for the redevelopment, not so much trying to follow an insistent set of guidelines or taking queues from neighboring sites that inconsistent with each other.
- The current sidewalk at this location is extremely wide, creating a zone of little to no activity, especially given the lack of ground floor retail, this would be a more successful mixed use destination if the façade was brought much closer to the curb and the sidewalk was not as deep as it currently is. 30 feet seems appropriate.
- There was mention in the NCPC presentation about the rows of trees (are one, two or three appropriate) – it seems that just adding width to the sidewalk to accommodate trees is not the ideal use of prime urban space. If the building can have the maximum allowable high and is pulled close to the sidewalk the street will be well shaded with just one row of trees, while still maintaining a street line on PA Ave that is consistent with other blocks nearby.
- For years the neighborhoods around the Hoover Site have become livelier, live work and play neighborhoods, but the area immediately surrounding Hoover has been left behind because the block is a super-block with no ground floor activity and an almost ominous design presence at the ground level. Because of this the neighborhoods remain separate by the “Berlin Wall” that is the Hoover Site. The redevelopment from the monolithic version of the site to a lively, high density, mixed use site that connects the federal triangle and the Penn Quarter in a way that does not exist today.
- The goal of the redevelopment of the Hoover site should be to create a true place, the best example being the new City Center neighborhood. There was concern during the NCPC public meeting that a developer can't be “forced” to create a lively mixed use neighborhood with ground floor activity, however, it is in the best interest of a developer to create a successful urban environment – with this in mind the Square Guidelines should allow the maximum flexibility for the redevelopment.
- The best scenario for D Street would be to restore it as a pedestrian only street that creates a welcoming space for walkers to move from the Penn Quarter and the Federal Triangle area that is also interesting and safe. A pedestrian only street would make sense to align with the existing

D Street that terminates at the building while also avoiding an awkward intersection at 10th street if it was to be a vehicular street.

- While Pennsylvania Ave is an important ceremonial and historic street we should remember that older photos show a very live, busy street scape that is currently not there, the goal of these guidelines should ensure that the redevelopment brings life back to the block and those immediately surrounding it (both on and off PA Ave).
- While we understand that the inaugural parade runs by this site every four years, it does not seem prudent to design an entire block around a once in 4 years, for a few hours, event. The Avenue is so wide at this point, and with security on lookers are already kept at a great distance from the parade, forcing very wide sidewalks will not create a better space for the parade.
Are these the right topics to include on the guidelines?
- Given the fact that this is going from government use (tax free) to private (taxable land) there should be consideration to how these site guidelines might affect the future taxable value of the land. Yes, we need to pay attention to history and urban design but we can't totally ignore value.

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

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

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

Are these the right comments to include in the guidelines?

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

Are there additional topics NCPC should consider?

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

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

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

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

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

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

The improved design and animation of the Pennsylvania Avenue frontage of the future building complex is of key concern. In part, this relates to the Avenue originally having been outlined in the L'Enfant Plan and the continuing design and animation of the Avenue (and sometimes lack of animation) over many years. We note another feature that is being discussed is the reopening of the section of D Street between 9th and 10th Streets based on its inclusion in the L'Enfant Plan and it being closed for the development of the FBI Building. As you know, the Committee of 100 is a strong supporter of the L'Enfant Plan and of maintaining its street patterns. Nevertheless, we agree that opening that section of D Street for vehicular traffic would not be desirable since it would create an awkward intersection at 10th Street, D Street and Pennsylvania Avenue. We would support reopening D Street to provide a path for pedestrian circulation. However, we believe that the Pennsylvania Avenue frontage is very important and should take priority in considering design and uses. Perhaps it might be possible to continue D Street west from 9th Street as an attractive pedestrian arcade.

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

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

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

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

Do you have any additional comments?

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

April 26 and April 28, 2016 Public Meeting Comments

These comments were transcribed from the audio recordings.

April 26th Meeting:

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

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

April 28th Meeting:

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

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

April 26 and April 28, 2016 Public Meeting Comment Forms

These comments were typed from handwritten comment forms.

Jessica Rosenberg, Washington, DC 20004 –

Are these the right topics to include in the guidelines?

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

Are there additional topics NCPC should consider?

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

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

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

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

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

Do you have any additional comments?

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

David Rosenberg, Washington, DC 20004 –

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

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

Are these the right topics to include in the guidelines?

I don't think any are inappropriate.

Are there additional topics NCPC should consider?

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

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

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

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

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

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

Do you have any additional comments?

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

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

Craig Vaughn—

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

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

Are these the right topics to include in the guidelines?

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

Are there additional topics NCPD should consider?

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

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

Are these the right topics to include in the guidelines?

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

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

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

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

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

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

Are these the right topics to include in the guidelines?

Yes.

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

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

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

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

Annie V–

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

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

Are these the right topics to include in the guidelines?

Yes.

Are there additional topics NCPC should consider?

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

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

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

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

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

Unidentified–

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

No.

Are these the right topics to include in the guidelines?

Yes.

Are there additional topics NCPC should consider?

I think everything is covered.

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

No.

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

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

Do you have any additional comments?

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

Notes from Penn Quarter Meeting – May 11, 2016

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

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

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

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

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

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

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

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

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

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

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

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

Comment 13 (M)

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

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

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