

## 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.

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

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

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

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

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

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

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

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

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

- Since 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 26<sup>th</sup> Meeting:**

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

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

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

1	- Ground floor uses on Penn Ave to encourage everyday use. Should also be articulated for E, 9 <sup>th</sup> and 10 <sup>th</sup> Streets in the square guidelines.
2	- Are there opportunities to change the land use for the site? - <i>The plan amendment identified a mixed use development. If something different is proposed, both the square guidelines and plan would have to be amended.</i>
3	- What about 9 <sup>th</sup> and 10 <sup>th</sup> Streets? You have those moats...are you also pushing out on those sides? - <i>We haven't gotten that far yet, but will be looking at what it means to be compatible with adjacent sites.</i>
4	- What about alignment to D Street? Is there the potential to have nothing on Square 379? We except Square 379 will be developed and that the D Street alignment will follow the original L'Enfant Plan alignment.
5	- You raised a question about continuous retail and the economics of it. This is so far ahead of when the project will be complete. Is it possible to build in some economic analysis in the interim? - <i>NCPC is working on a market study as part of the larger Penn Ave Initiative. It will be helpful in terms of exploring feasibility of different uses on the Avenue. Big pieces include residential feasibility and ground floor uses. It will be available this fall.</i>
6	- Does NCPC have the ability to require a higher level of residential uses in the square guidelines, or is that beyond the scope? - <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"> <li>- On-street parking: it's not anywhere along that (FBI) block. Will there be any more detail on this issue?</li> <li>- <i>There's the issue of the street parking, as well as loading and other circulation issues. There is no program for the site, so it's difficult to identify circulation and access. Parking availability has been reduced over time, but we will be looking at this issue and set some objectives.</i></li> </ul>
8	<ul style="list-style-type: none"> <li>- Walking along Penn Avenue for a long distance...what it's intended to do is one thing, but the feeling is much different. Trying to recreate a boulevard in Paris, but the street is too wide and the buildings too short. 75 foot sidewalks impairs activation. The volume of people needed and sustainability issues (impervious surface) are difficult to overcome. Also need to consider timespan of active café use. Promote shorter/narrower distances...50 feet feels like a good compromise as there is enough elbow room. The narrower existing sidewalks has a lot going on with building entrances, tree pits, and cars dropping people off. Same with 9<sup>th</sup> and 10<sup>th</sup> Streets – it's so vast.</li> </ul>
9	<ul style="list-style-type: none"> <li>- How does the public get to comment on the GSA developer selection process and championing a specific design proposal for the site?</li> <li>- <i>GSA will select the developer in accordance with their procurement procedures. CFA and HPRB will have public review processes, as well as a to-be-determined zoning process.</i></li> </ul>
10	<ul style="list-style-type: none"> <li>- Doing a good job of explaining physical issues, but it's also important to understand that there are a whole lot of answers that are possible. Goal is to get to a clear vision for the site, and there are a number of federal and local interests to balance, such as: setbacks, parade use, ground floor activation, retail types, and overall uses along the entire Avenue are all items to consider and be balanced.</li> </ul>
11	<ul style="list-style-type: none"> <li>- GSA has an incentive to maximize the value as part of the trade for the new headquarters. Has NCPC participated in setting any assumptions as to the value?</li> <li>- <i>The square guidelines will set the general building massing for the site (setback, height, etc.), which contributes to setting the value. The NCPC meeting in June gives potential developers the opportunity to hear from the Commission on items such as D Street, maximum allowable heights, etc.</i></li> </ul>
12	<ul style="list-style-type: none"> <li>- The option to develop the squares together and separately both on the table. Has the decision been made that it will be two squares?</li> <li>- <i>Only proposal is that the spatial configuration of D Street should be included. It could be pedestrian, car, or something else. We will develop guidelines for both squares concurrently. There will be no parcelization proposed at this time.</i></li> </ul>
13	<ul style="list-style-type: none"> <li>- Map shows D Street access coming out at the corner of the next building on the Avenue. Does that impact your massing projections? It looks intrusive.</li> <li>- <i>That's the original D Street location. When combined with the sidewalk setback, it does impact the space for development on a front parcel.</i></li> </ul>
14	<ul style="list-style-type: none"> <li>- Would a connection over D Street be entertained?</li> <li>- <i>Yes, it is possible and is one way to achieve height on buildings to the north of the site.</i></li> </ul>

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

These comments were typed from handwritten comment forms.

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

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

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

*Are there additional topics NCPC should consider?*

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

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

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

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

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

*Do you have any additional comments?*

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

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

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

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

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

I don't think any are inappropriate.

*Are there additional topics NCPC should consider?*

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

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

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

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

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

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

*Do you have any additional comments?*

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

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

**Craig Vaughn—**

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

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

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

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

*Are there additional topics NCPD should consider?*

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

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

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

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

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

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

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

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

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

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

Yes.

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

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

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

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

**Annie V–**

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

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

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

Yes.

*Are there additional topics NCPC should consider?*

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

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

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

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

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

**Unidentified–**

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

No.

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

Yes.

*Are there additional topics NCPC should consider?*

I think everything is covered.

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

No.

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

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

*Do you have any additional comments?*

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

## 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.



June 2, 2016

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

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

Dear Chairman Bryant and Members of the Commission:

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

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

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

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

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

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1221 Connecticut Avenue NW, Suite 5A | Washington, DC 20036 | T: 202.783.5144 | F: 202.783.5596 | [www.dcpreservation.org](http://www.dcpreservation.org)

John Sandor, *President* | Scott P. DeMartino, Esq., *Vice President* | Howard S. Berger *Treasurer* | Kate M. Olson, Esq., *Secretary*  
Fay Armstrong | Sean C. Cahill | M. Jesse Carlson, Esq. | Melissa Cohen, AIA, LEED AP | John DeFerrari | Edward D. Dunson, AIA  
Hany Hassan, FAIA | Gerard Heiber, LEED AP | Rob McClennan, AIA | Donald Beekman Myer, FAIA  
D. Peter Sefton | Edwin Villegas | Chuck Wagner | Juliet Zucker



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

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

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

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

Sincerely,

A handwritten signature in black ink, which appears to read "Rebecca Miller". The signature is written in a cursive style.

Rebecca Miller  
Executive Director

REVISED DRAFT 6/2/16

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

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

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

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

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

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

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

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

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

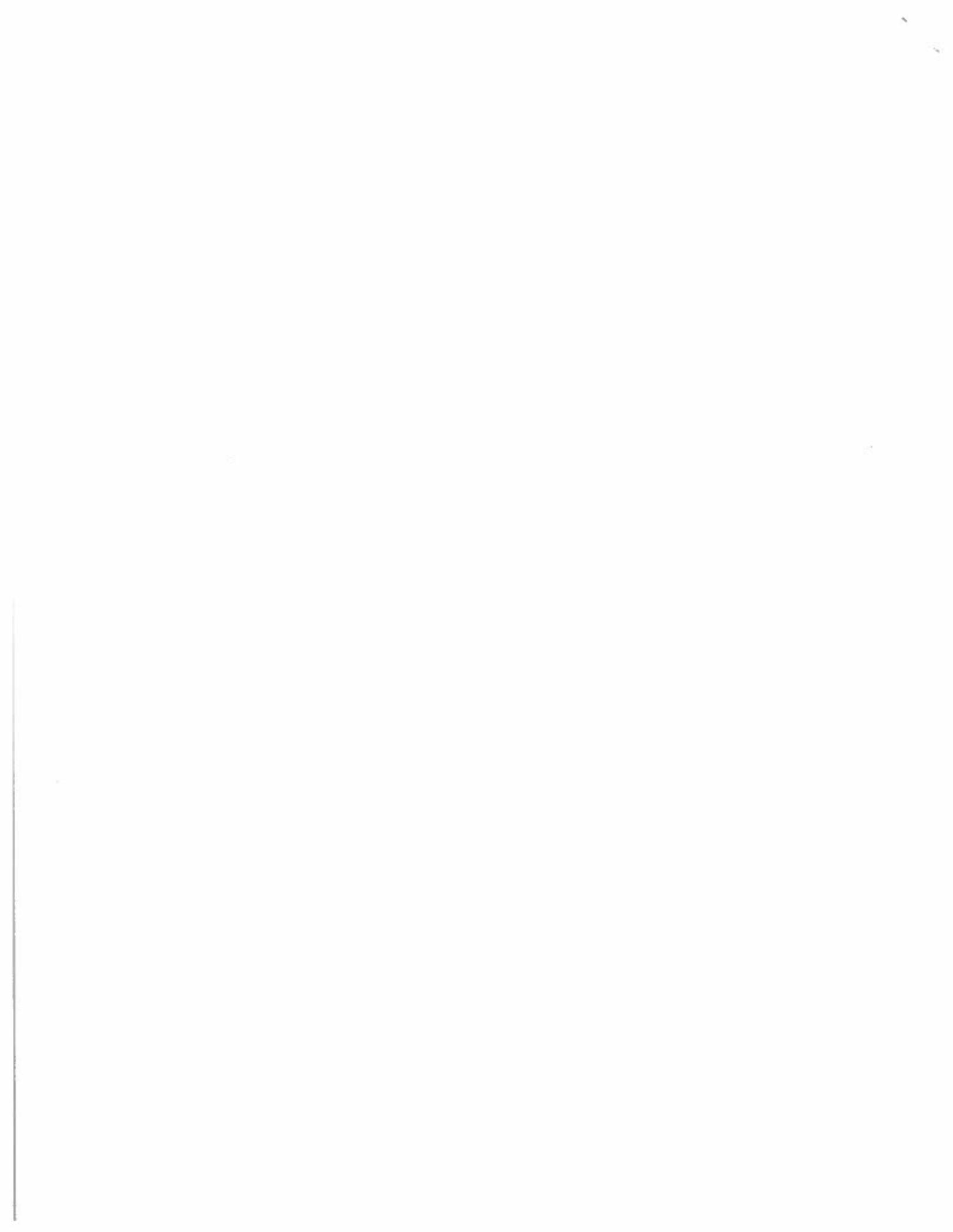
A robust and viable mixed use development will generate the desired activity on Pennsylvania Avenue, and we acknowledge the value in restoring D Street from both an urban design and historic preservation perspective. However, the L'Enfant Plan was realized with buildings built to the Pennsylvania Avenue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

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

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

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

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



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

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

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Gary Scott

AOI of DC

4425 Greenwich Pkwy,

NW, District of

Columbia

20007-2010

Tel: 202-342-1638

Luncheon RSVP's

202-342-1865

Web site:

[www.aoidc.org](http://www.aoidc.org)

E-mail:

[aioifdc@gmail.com](mailto:aioifdc@gmail.com)

May 29, 2016

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

Dear Chairman Bryant:

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

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

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

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

Sincerely,



William N. Brown, President

Cc: Thomas Leubke, Secretary, Commission on Fine Arts

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

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

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

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

the **1964 President's Council on**

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

Owings, with Frederick Gutheim, Daniel

Patrick Moynihan, Bill Walton, and Dan Kiley

among its members)

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

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

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

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

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

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

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

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

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

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

## **Second point**

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

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

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

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

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

when the Square Guidelines required retail and restaurants.

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

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

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

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Julia,

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

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

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

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

Thank you.

Lindsley

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

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

Dear Chairman Bryant:

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

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

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

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

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

Thank you for the opportunity to comment.

Sincerely yours,

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

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



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

May 13, 2016

**Mr. Marcel Acosta**

Executive Director

**National Capital Planning Commission**

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

Washington, DC 20004

Re: **Square Guidelines Public Meeting**

Square(s) 378 & 379

**Public Comment Submission**

**Dear Mr. Acosta:**

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

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

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

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

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

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

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

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

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

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

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

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

Mr. Marcel Acosta  
Square Guidelines Public Meeting, Square(s) 378 & 379  
May 13, 2016  
Page 4

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

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

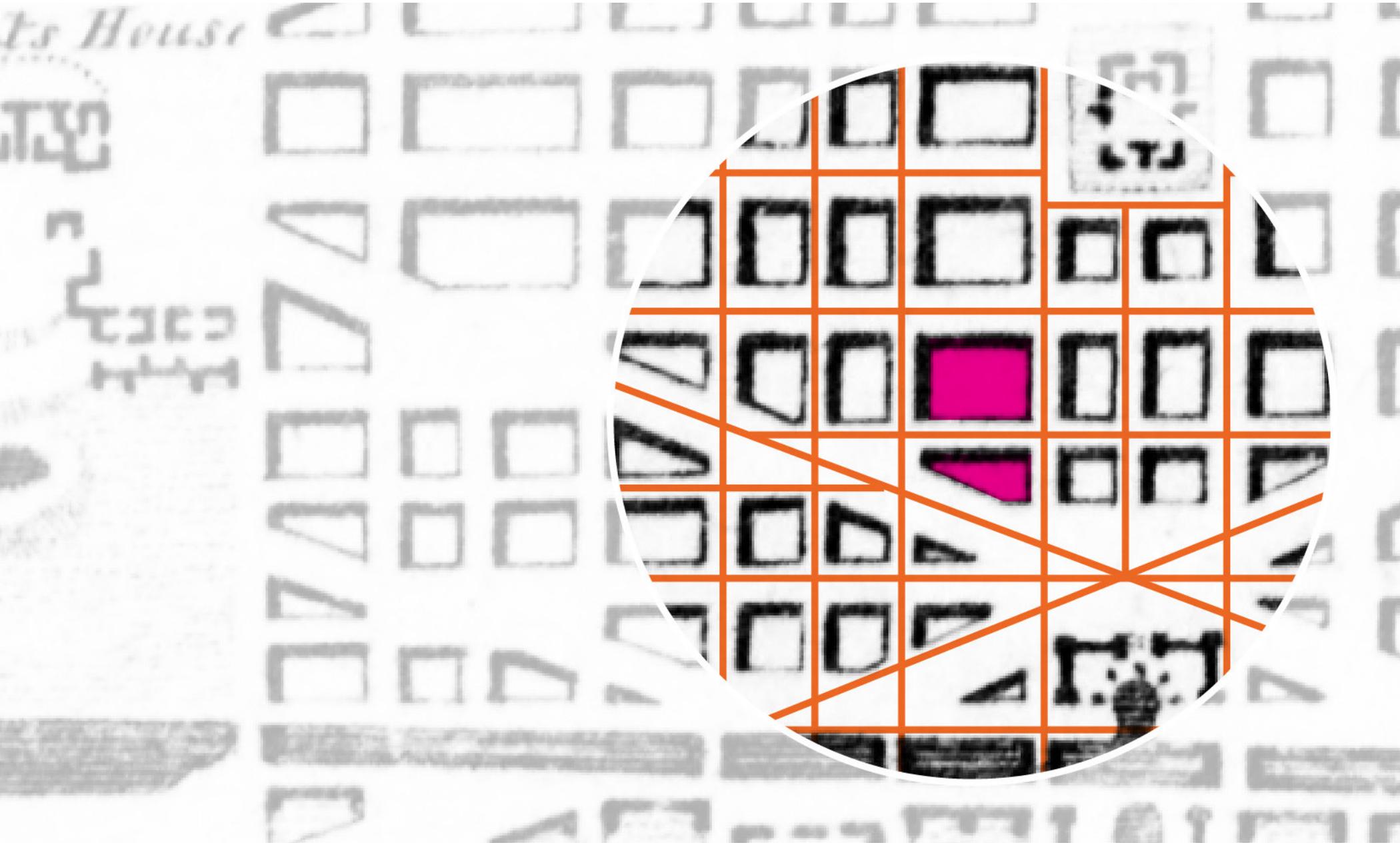
Respectfully,

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

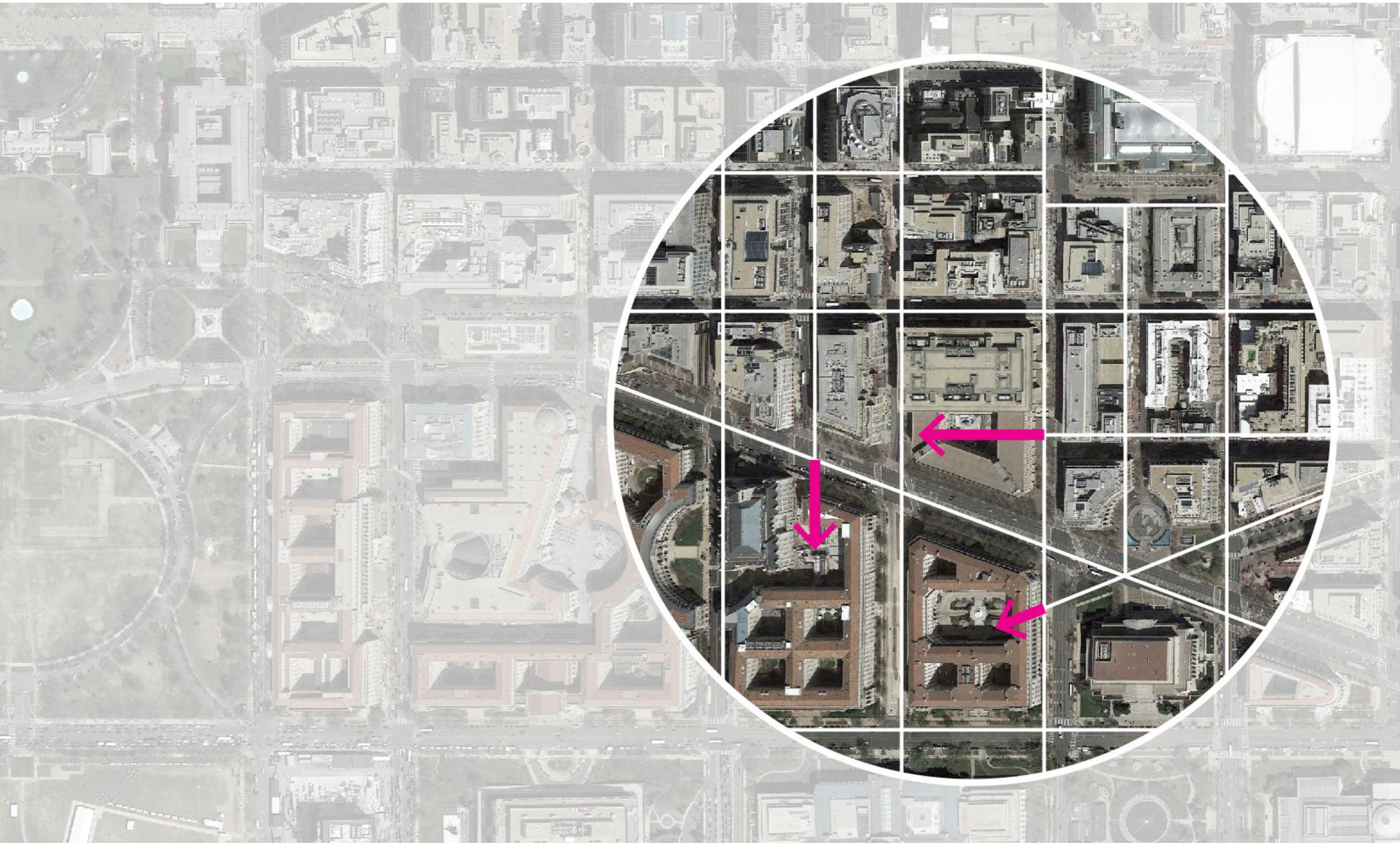
Serge Demerjian, AIA  
Vice President – Development

Enclosure – D Street Diagrams

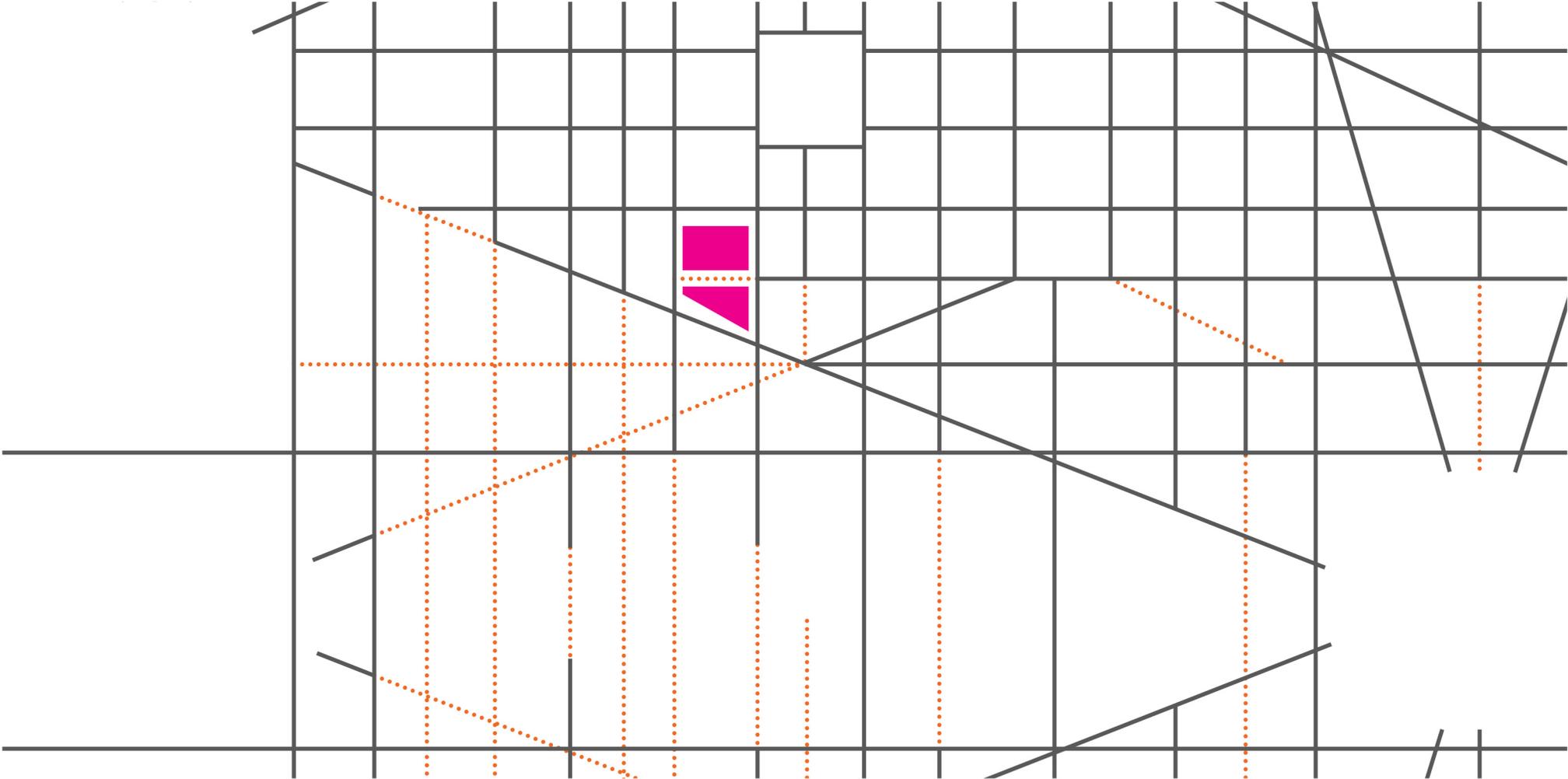
L'ENFANT STREET STUDY



L'ENFANT STREET STUDY



L'ENFANT STREET STUDY  
EXTANT STREETS AND REMOVED SEGMENTS

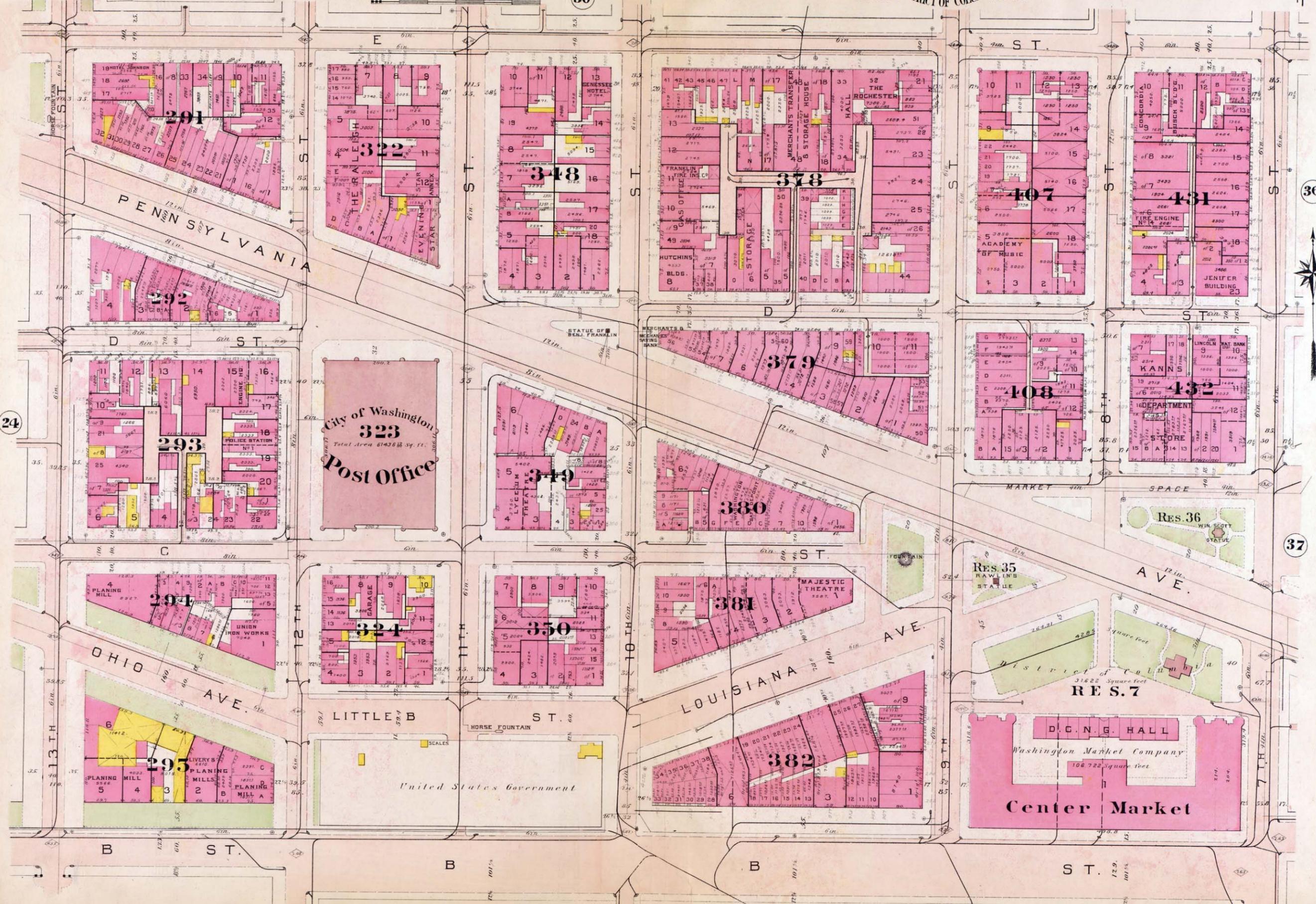


**EXPLANATIONS**

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

Scale 80 feet to the Inch

30



36

37

City of Washington  
**323**  
 Total Area 61435 Sq. Ft.  
 Post Office

Res. 35  
 RAWLINS  
 STATUE

District of Columbia  
**RES. 7**  
 31625 Square feet

D.C.N.G. HALL  
 Washington Market Company  
 106,722 Square feet  
**Center Market**

United States Government

MAJESTIC THEATRE

19 HOTEL  
**291**

GENESSEE HOTEL  
**322**

**348**

FRANKLIN FIRE INS. CO.  
**378**

ACADEMY OF MUSIC  
**407**

JENIFER BUILDING  
**431**

**292**

ENGINE HD.  
**293**

LYCEUM THEATRE  
**349**

**379**

**408**

KANON  
**432**

PLANNING MILL  
**294**

GARAGE  
**324**

**350**

**381**

PLANNING MILL  
**295**

United States Government

**382**

Res. 36  
 WIN. SCOTT  
 STATUE

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

ADDED to  
Public Comment  
Table -  
updated in  
electronic  
Files

TO: NCPC

RE: Public Comments for FBI Building Square Guidelines

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

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

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

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

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

Thank you,

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

202-745-0994