Executive Director's Recommendation

Commission Meeting: July 11, 2013

PROJECT
Old Post Office Building Redevelopment
Old Post Office
1100 Pennsylvania Avenue, NW
Washington, DC

SUBMITTED BY
United States General Services Administration

REVIEW AUTHORITY
Approval
per 40 U.S.C. § 8722(b)(1) and (d)

NCPC FILE NUMBER
7459

NCPC MAP FILE NUMBER
1.23(64.20)43811

APPLICANT'S REQUEST
Preliminary approval of site and building plans

PROPOSED ACTION
Approve as requested

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The U.S. General Services Administration (GSA) has submitted preliminary site and building plans for the redevelopment of the Old Post Office Building and Pavilion Annex located at 1100 Pennsylvania Avenue, NW in Washington, DC. In March 2011, GSA issued a Request for Proposals for the redevelopment of the Old Post Office building, land, and Pavilion Annex and in 2012, following an open competition, GSA made the announcement of the preferred selected developer, Trump Old Post Office LLC. As proposed, the project would convert the historic building and adjacent Annex from a combination of office and retail uses to a luxury hotel and conference facility. In addition to guest rooms and suites, the complex would include two or three restaurants, a spa, meeting and ballroom banquet facilities, retail establishments, and a newly dedicated Congress Bells Museum. The existing Clock Tower would continue to be open to the public with tours and interpretation provided by the National Park Service through an agreement with GSA.

KEY INFORMATION

- The Old Post Office Building is listed in the National Register of Historic Places and is also a contributing element to the Pennsylvania Avenue National Historic Site.
- The interior and exterior rehabilitation project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Redevelopment project includes the introduction of a curb cut in the former 11th Street right-of-way in order to establish a driveway for vehicular drop off/pick up.

RECOMMENDATION

The Commission:

Approves the preliminary site and building plans for the Old Post Office Building Redevelopment.

Adopts GSA's Finding of No Significant Impact for the Old Post Office Building Redevelopment Final Environmental Assessment; signed by GSA on May 16, 2013.

Requests GSA and the preferred selected developer continue to refine the designs for signage throughout the site to ensure that signage and canopies are appropriately scaled and oriented to the setting of the Old Post Office.

Requires that the transfer of jurisdiction to facilitate the introduction of a driveway in the former 11th Street right-of-way and to accommodate outdoor seating in front of the building, including the conditions for the transfer, be submitted to NCPC with or prior to the submission of the Old Post Office Building Redevelopment for final approval.

PROJECT REVIEW TIMELINE

Previous actions	**January 2013** – The Commission advised the Zoning Commission that the proposed zoning of the OPO site would not adversely affect the federal interest; that OPO would remain federally owned and under federal jurisdiction and therefore the property would be subject to NCPC's in-lieu of zoning authority.
Remaining actions (anticipated)	– Final Approval

Prepared by Jennifer Hirsch
July 1, 2013

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I. PROJECT DESCRIPTION

Site

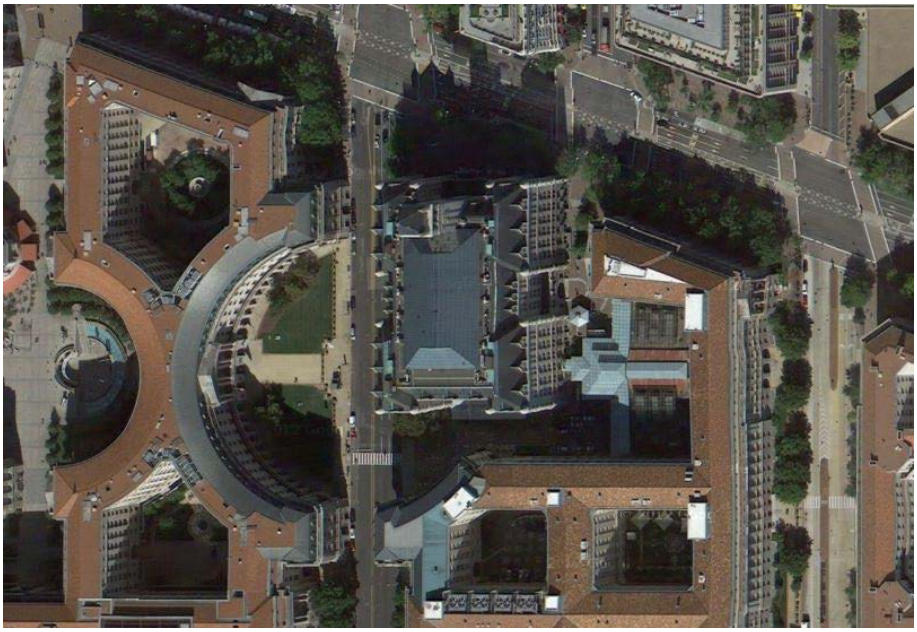


Figure 1: Aerial photo showing Old Post Office and Pavilion Annex

The Old Post Office and Pavilion Annex are located at 1100 Pennsylvania Avenue, NW, Washington, DC (Square 323 Lot 800 and Parcels 1, 2, and 3 of Squares 349 and 350). The site is located within Washington's Federal Triangle and is bound by Pennsylvania Avenue, NW to the north, 12th Street on the west, and the Internal Revenue Service Headquarters on the east and south. The Old Post Office and Pavilion Annex, and the underlying property, is owned by the United States Government with administrative jurisdiction held by the United States General Services Administration (GSA).

Background

Built from 1892 to 1899, the Old Post Office was built to house the U.S. Post Office Department Headquarters and the city's post office. However, the District of Columbia Mail Depot was moved to a larger building constructed next to Union Station in 1914, and although only 15 years old, the building at 12th Street and Pennsylvania Avenue was dubbed the "old" post office. In the 1920s, Treasury Secretary Andrew Mellon's building commission developed the surrounding Federal Triangle complex and actively sought the building's demolition. In 1943, the Postmaster General moved to a newly constructed office building directly across 12th Street, and the fate of the building appeared to be sealed. The only reason that the Old Post Office was not razed then was a lack of money due to the Great Depression. For the next 40 years the building served as overflow space for several government agencies. As no particular agency was made responsible for it, the building fell into decay.

In 1962, recognizing that the neighborhood around the Old Post Office was in need of improvement, President John F. Kennedy appointed a Pennsylvania Avenue Commission to study ways to improve the area. In 1964, the Commission proposed several recommendations, including demolition of the Old Post Office Building to allow completion of the Federal Triangle. In 1970 and 1971, demolition permits were issued and Congress appropriated the

money for the building's removal. However, local citizens who had grown to admire the building's architecture banded together and formed a group called "Don't Tear It Down," which later became the DC Preservation League, to save it. Nancy Hanks, the politically influential chairwoman of the National Endowment for the Arts, joined the effort and prevailed in convincing Congress to reverse its decision. In 1973 the Old Post Office was added to the National Register of Historic Places.

Redevelopment plans for the Pennsylvania Avenue corridor included preservation of the Old Post Office Building and renovation began in 1977. The renovation included a mix of retail spaces on the lower level, with Federal offices on the upper levels. The glass Pavilion Annex that is located to the east of the Old Post Office Building was constructed in the 1990s and contained a mix of retail and eating establishments, as well as a movie theater. Unfortunately, the Annex proved unsuccessful and was closed not long after it had opened. Currently, the Old Post Office contains the same mix of uses as was envisioned during the 1970s renovation. The lower levels contain a food court and a mix of small retailers. The upper floors are occupied by Federal agencies such as the Advisory Council on Historic Preservation and the National Endowment for the Arts. The Pavilion Annex remains vacant.

In 2008, Congress passed the Old Post Office Redevelopment Act which directed GSA to proceed with the redevelopment of the Old Post Office Building in accordance with existing authorities and consistent with a 2001 redevelopment plan that was approved by the Committee on Transportation and Infrastructure of the House and the Committees on Appropriations and Environment and Public Works of the Senate. In March 2011, GSA issued a Request for Proposals (RFP) for the redevelopment of the Old Post Office building, land, and Pavilion Annex (OPO). According to the RFP, the goals of the redevelopment are:

- To leverage the expertise of the real estate industry to reposition the Old Post Office as a viable asset;
- To preserve the historic integrity of this unique and important asset;
- To put the Old Post Office to its highest and best use;
- To provide a lucrative financial return to the Government;
- To provide for public access; and
- To contribute to the vitality of Pennsylvania Avenue and the Federal Triangle

In February 2012, GSA selected a private sector preferred developer, Trump Old Post Office LLC, and commenced with various planning and regulatory activities, including negotiating the terms of a long-term ground lease and complying with the requirements of National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA). Similar to the adaptive reuse of the Tariff Commission Building, now the Hotel Monaco at 700 F Street, NW, the structures and site will remain in Federal ownership under the jurisdiction of GSA with the Trump Organization operating the site under the terms of a long-term public-private ground lease with GSA, following the redevelopment of the Old Post Office Building and Pavilion Annex.

Proposal

As proposed, the project would convert the Old Post Office and Pavilion Annex from a combination of office and retail uses to a luxury hotel and conference facility. Along with guest rooms and suites, the complex would include multiple restaurants, a spa, meeting and banquet facilities, retail, a gift shop, and museum space. The facility would provide a total of 502,000 square feet, with approximately 267 hotel rooms and suites. Public landscaped gathering spaces would be provided on the north and south sides of the building. The rehabilitation and redevelopment of OPO is projected to be completed by December 2015, with the hotel opening in early 2016. The Clock Tower will remain open to the public with tours and interpretation provided by the National Park Service (NPS) through an agreement with GSA. The project, including interior and exterior alterations, will be completed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

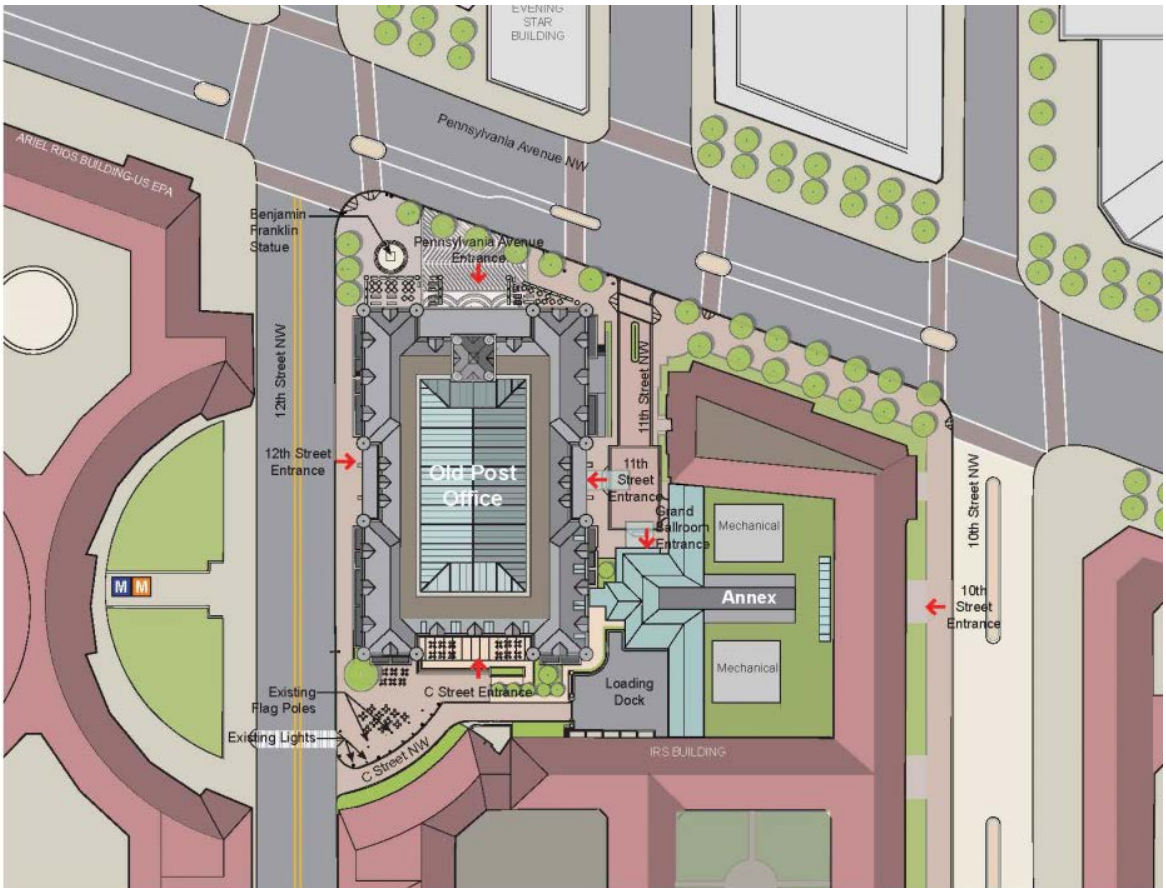


Figure 2: Proposed Site Plan

GSA and NPS are currently developing an agreement to transfer jurisdiction from NPS to GSA for portions of the public space along the south side of Pennsylvania Avenue (including the Benjamin Franklin Statue and a portion of the artwork pavers) to accommodate a curb cut at 11th

Street, and outdoor seating areas in front of OPO. The transfer of jurisdiction will be submitted to NCPC separately for review upon completion of the agreement documentation.

Pennsylvania Avenue

The Pennsylvania Avenue entrance would be reinstated as the primary pedestrian point of entry. The existing Pennsylvania Avenue plaza would remain as it was designed as part of the Pennsylvania Avenue Development Corporation (PADC) Pennsylvania Avenue Plan, with its sidewalk pavers, Artwork Pavers, and the statue of Benjamin Franklin. The multicolor granite and brick pavement that was designed by the artist Aleksandra Kasuba would be maintained. The area would remain available to the Presidential Inaugural Committee to use for inaugural activities. Temporary and non-fixed seating would be added at the front of the building to serve the retail establishments on the first floor of the OPO. The idea is that an outdoor café will bring a sense of vitality to the south side of Pennsylvania Avenue. The existing green awnings bearing the word "Pavilion" would be replaced with new awnings for the retail establishments. Signage for the "Trump International Hotel" would be placed inside the central arch and suspended from the structure.

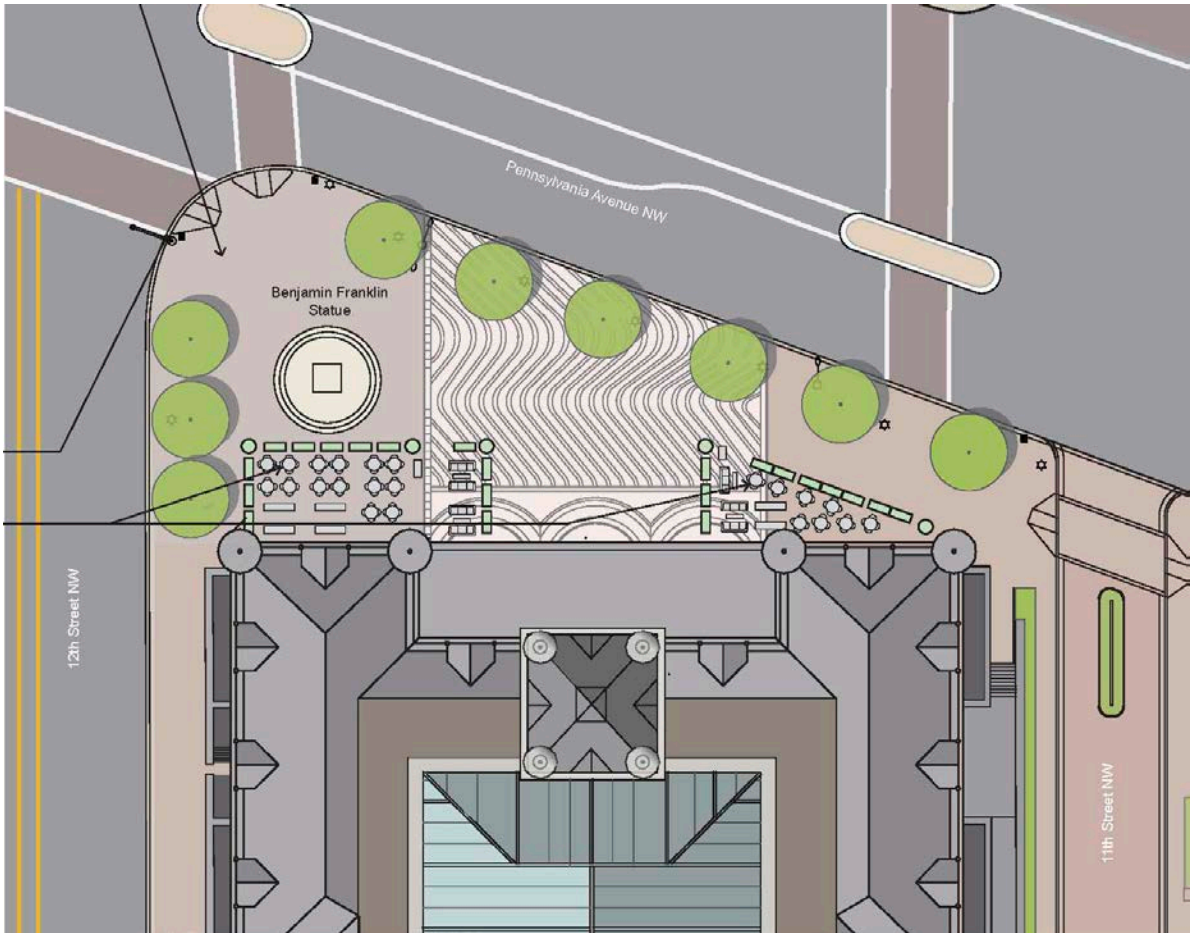


Figure 3: Pennsylvania Avenue Plaza

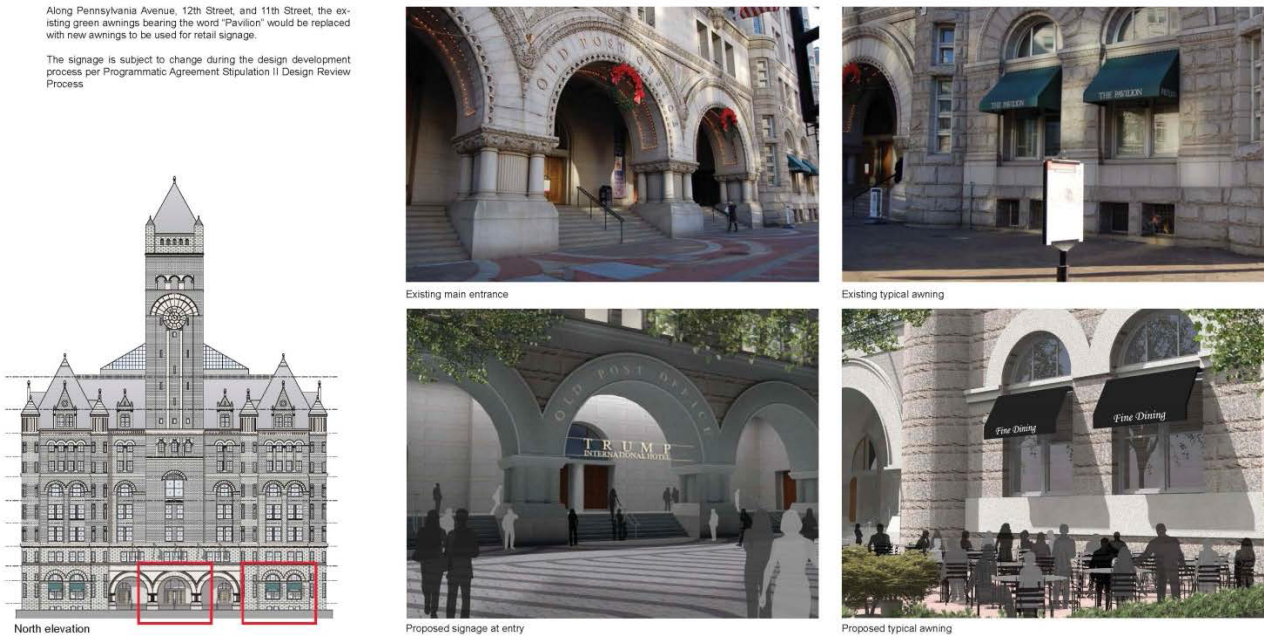


Figure 4: Signage at Pennsylvania Avenue entrance

12th Street

Similar to Pennsylvania Avenue, new awnings would replace the existing first floor awnings and new signage for the "Trump International Hotel" would be placed within the central arch and suspended from the structure at the 12th Street entrance. The 12th Street entrance would provide access to the restaurants and retail on the first floor as well as the renovated Cortile space.

C Street

On the south side of the OPO, the C Street entrance would serve as the primary pedestrian entrance from the National Mall and the Federal Triangle Metrorail station. This entrance would also serve as the primary entrance for the Clock Tower and also serve as an accessible entrance to the building.

The 1980s-era glass and metal enclosure on the south side of the building would be removed to reveal the original façade and the historic shed roof (trusses, beams, and ornamental cast iron) would be preserved in place.

To articulate and activate the C Street entrance, a public plaza would be created to provide seating and space for the ground level retail, as well as activities and events. The existing service drive and loading dock location would remain along with the existing flagpoles and lights.

New awnings would replace the existing awnings, and new signage for the "Trump International Hotel" would be placed on top of the shed structure. A new granite sign would be added near the southwest corner of the OPO along the curb at the intersection of C Street and 12th Street.

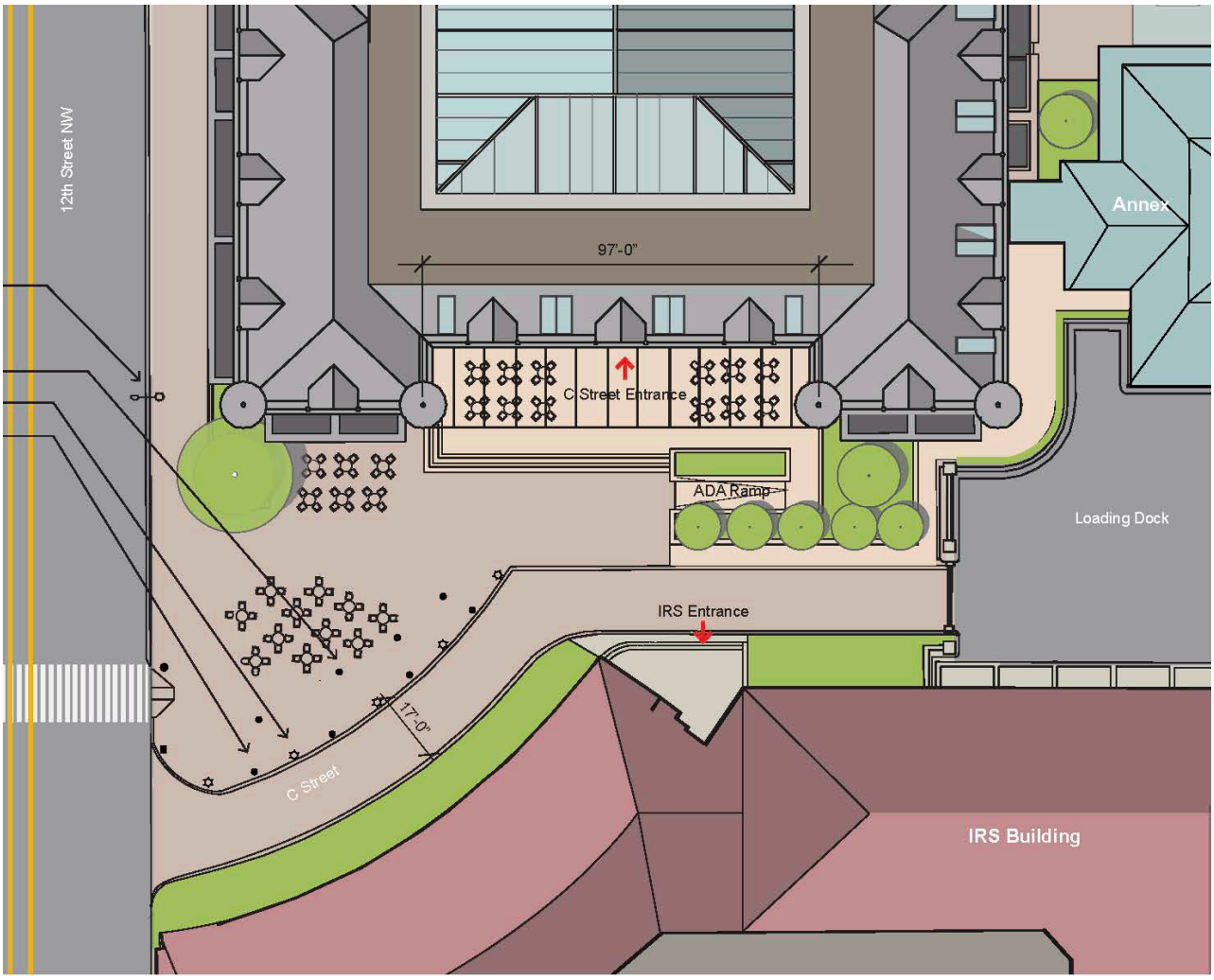


Figure 5: C Street Plaza



Figure 6: C Street Plaza – view towards the northeast

11th Street

On the east side of OPO in the closed historic L'Enfant Plan right-of-way of 11th Street, an access drive would be established that would serve as the primary vehicular access for guest pick-up/drop-off. The establishment of this driveway would require a curb cut on the south side of Pennsylvania Avenue after the NPS transfers jurisdiction of this area to GSA. The area would remain available to the Presidential Inaugural Committee for inaugural activities. The driveway would provide controlled drop-off for taxis and other vehicles, as well as provide access to the valet parking in the basement of the Annex. Sidewalks on either side of the driveway would provide pedestrian access to the 11th Street entrance of OPO and Annex entrance. In addition, a new granite plinth sign will be installed in the 11th Street driveway at the Pennsylvania sidewalk for the "Trump International Hotel". New awnings will replace the existing green awnings on the first floor of the OPO and a new steel and glass canopy will be added at the 11th Street entrance. A steel and glass canopy will also be added to the Annex entrance.

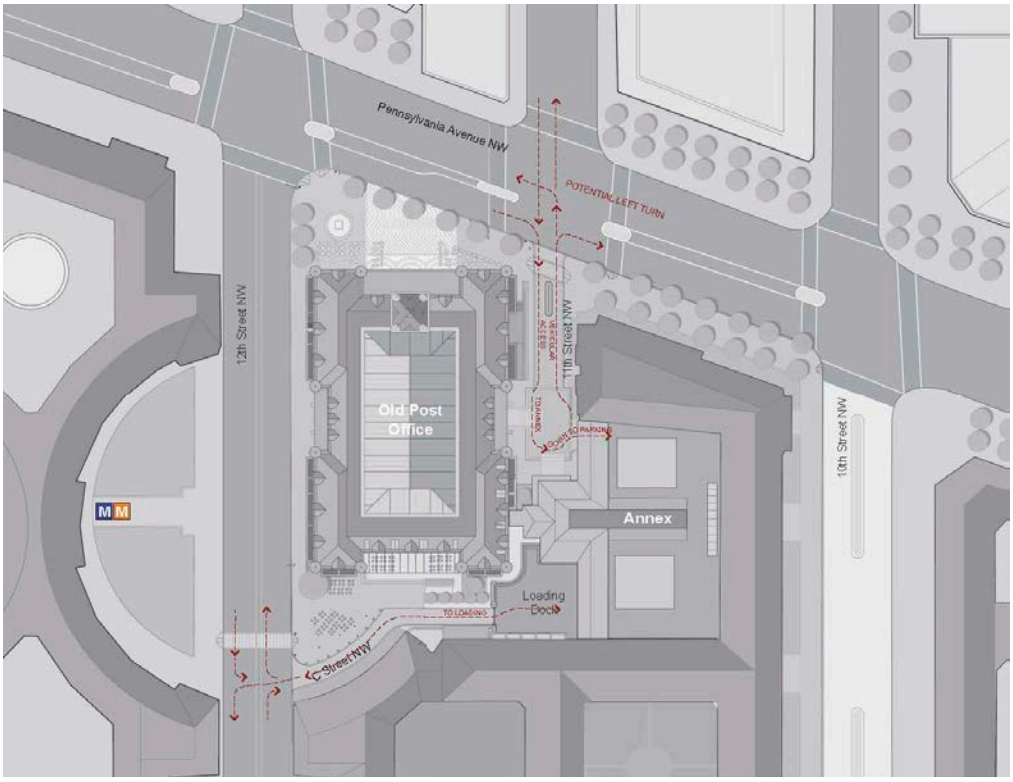


Figure 7: Proposed traffic flow



Figure 8: Renovation of Annex and 11th Street driveway

Annex

In the 1990s, the Annex was constructed directly to the east of the OPO in the courtyard space of the IRS building. The structure is primarily glass and steel with tiered skylights and a central open court. Public access to the Annex was provided in three locations: 1) through the OPO via a slender walkway bridge which fit within an existing window opening on the historic building's first story; 2) 11th Street plaza; and 3) 10th Street, through the IRS entrance arcade.

The existing walkway bridge between the OPO and Annex would remain and be repaired and upgraded. This walkway will continue to be the primary guess and service corridor between the two buildings. The proposed design converts the Annex into the hotel's conference center and Grand Ballroom. The main entrance to the Annex would be provided from the 11th Street driveway, with a secondary entrance and egress during special events at the 10th Street IRS arcade. The tiered roof of the Annex would be lowered and a green roof would be added to allow for stormwater management and control. The main body of the Annex would be re-designed and a new façade and canopy would be added at the entrance that will serve as the terminus of the 11th Street driveway. Two options for the entrance at the terminus of 11th Street are proposed – one with stone cladding and the other with glass cladding.



Figure 9: Proposals for entrance to grand ballroom

The Annex would contain 86,000 square feet with approximately 34,400 gross square feet in the basement level, which would be used for parking (up to 150 valet parking spaces) and mechanical systems. The new Grand Ballroom and back-of-house space for the hotel which comprise approximately 31,600 square feet will be located on the ground floor. The remaining space on the upper floor, approximately 21,000 square feet, would be used for additional conference spaces.

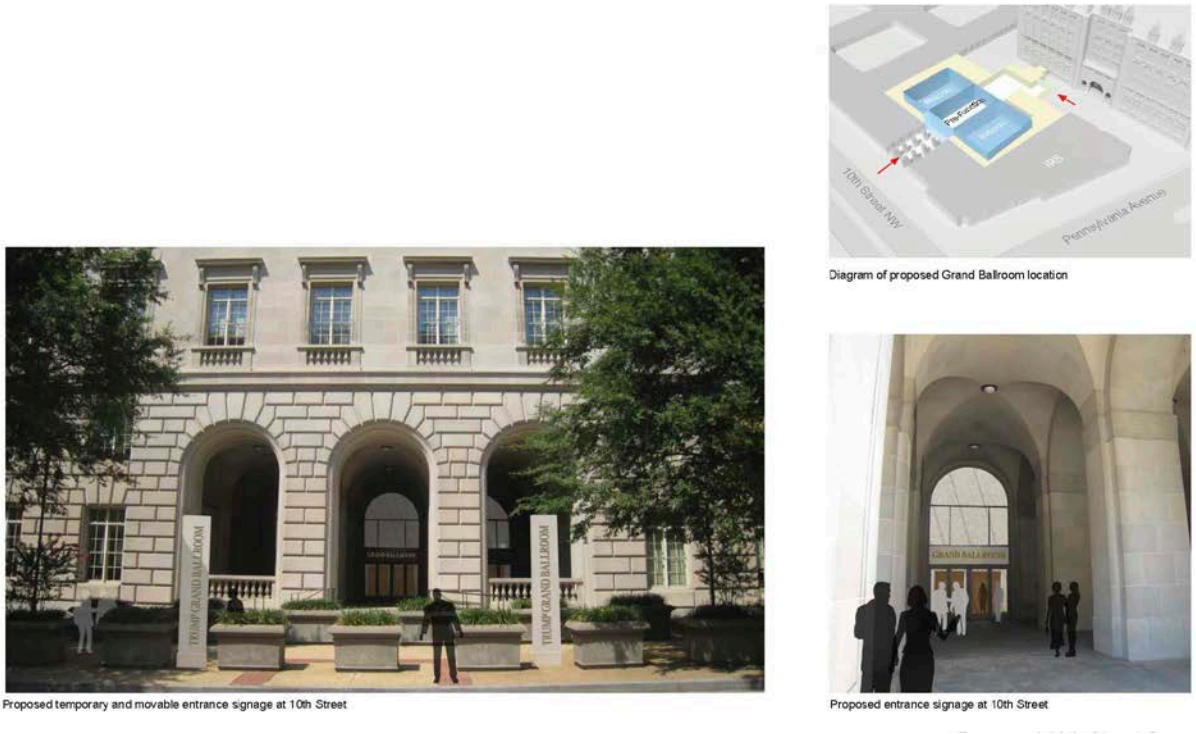


Figure 10: Entrance at 10th Street during special events

Windows

As part of the redevelopment project, the original exterior windows' sashes, frames, and hardware would be repaired and repainted. The glass panes would also be reglazed. The interior storm windows, installed during the previous rehabilitation project of the building, would be replaced with more energy-efficient interior storm windows.

Roof Windows

The rehabilitation project would reintroduce skylights to the central and eastern portions of the roof off of C Street and the southern portion of the roof off of 11th Street to create usable guest rooms on the 9th floor. The original design drawings for the OPO and historic photographs show skylights on the steeply pitched southern roof, presumably to allow light to the workrooms on the 9th floor. These skylights were obscured in subsequent rehabilitation and remain concealed today. The new roof windows would not be visible from the vistas of Pennsylvania Avenue or 11th Street; they would be minimally visible from 12th Street and C Street.

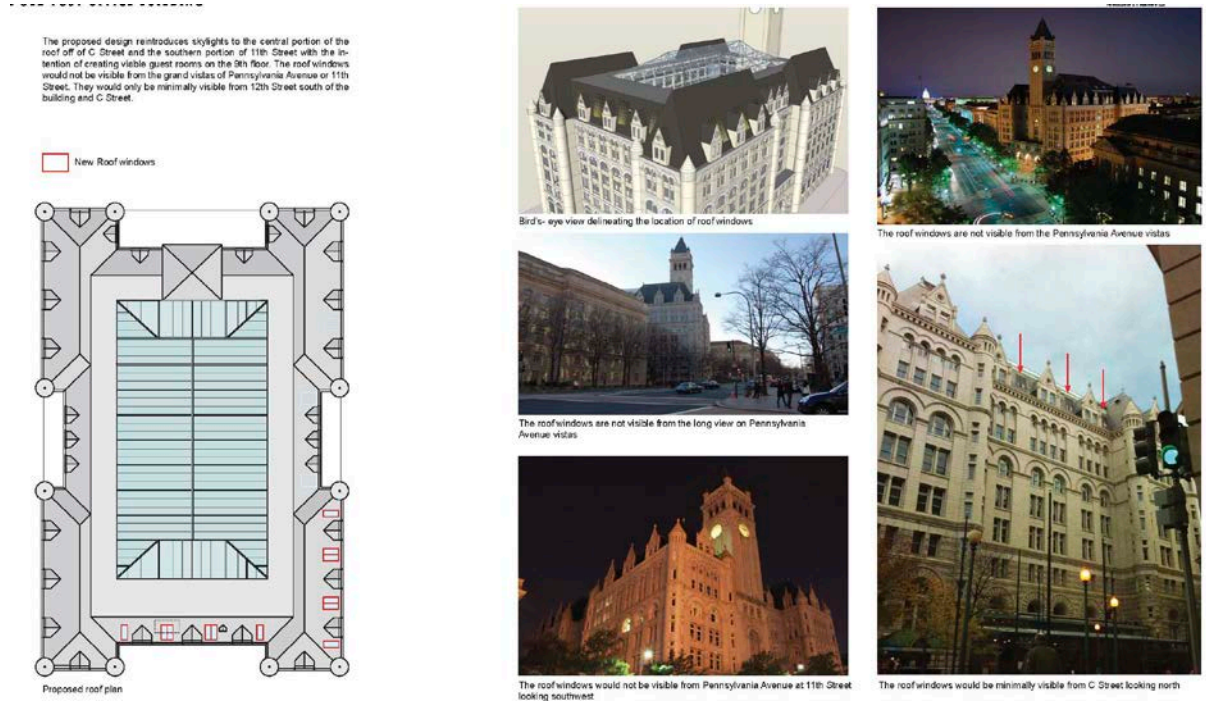


Figure 11: Roof windows

Skylight
The glass in the Cortile skylight, which dates to the 1980s, would be replaced with new glass.

Interior Renovation
The redevelopment of the OPO would transform the interior of the Old Post Office Building from a combination of retail and office space to a mixed-use luxury hotel. The interior improvements would conform to the Secretary of Interior's Standards for Historic Preservation. The interior space is organized around the central atrium of the building, historically called the Cortile. The Cortile is visually defined by the steel trusses (formerly provided a roof structure for the original post office workroom) and the upper skylight that allows visibility to the Clock Tower. In the 1980s, several modifications were made to the interior of the building including: 1) the introduction of a scalloped, curvilinear opening in the first floor slab and a new staircase that connected the main level to the ground floor; 2) a new mezzanine at the south end of the Cortile with an open staircase that connected it with the first and lower levels; 3) the introduction of retail tenants on the first and ground floors, which resulted in the addition of food kiosks and food court stalls; 4) the extension of the south end of the building, creating a bike shed; and 5) the commission and installation of Robert Irwin's "48 Shadow Planes" in the Cortile.

With the proposed redevelopment, the first floor would be in-filled where previously removed, to allow for one continuous space beneath the historic steel trusses. The staircase connecting the first floor to the ground floor would remain to provide public access to the spa, fitness center, and meeting rooms to be located on the ground floor. The Old Post Office and Congress Bells Museum would also be located on the ground floor.

The first floor of the OPO would be organized around the Cortile with the main guest entrance located off of the new 11th Street plaza. The Cortile's multi-story open space, characterized by the original metal trusses, would be maintained. The historic Stamp Counter on the east side of the Cortile would be used as the hotel registration desk. Other uses on the first floor would include the hotel's concierge, retail spaces, a bar/lounge in the Cortile, seating areas, restaurants or retail in the northeast and northwest corners of the building, as well as a restaurant in the Cortile space, and a limited number of hotel guest rooms. The mezzanine, one level above, would include additional space for first floor restaurants or retail and additional hotel rooms.

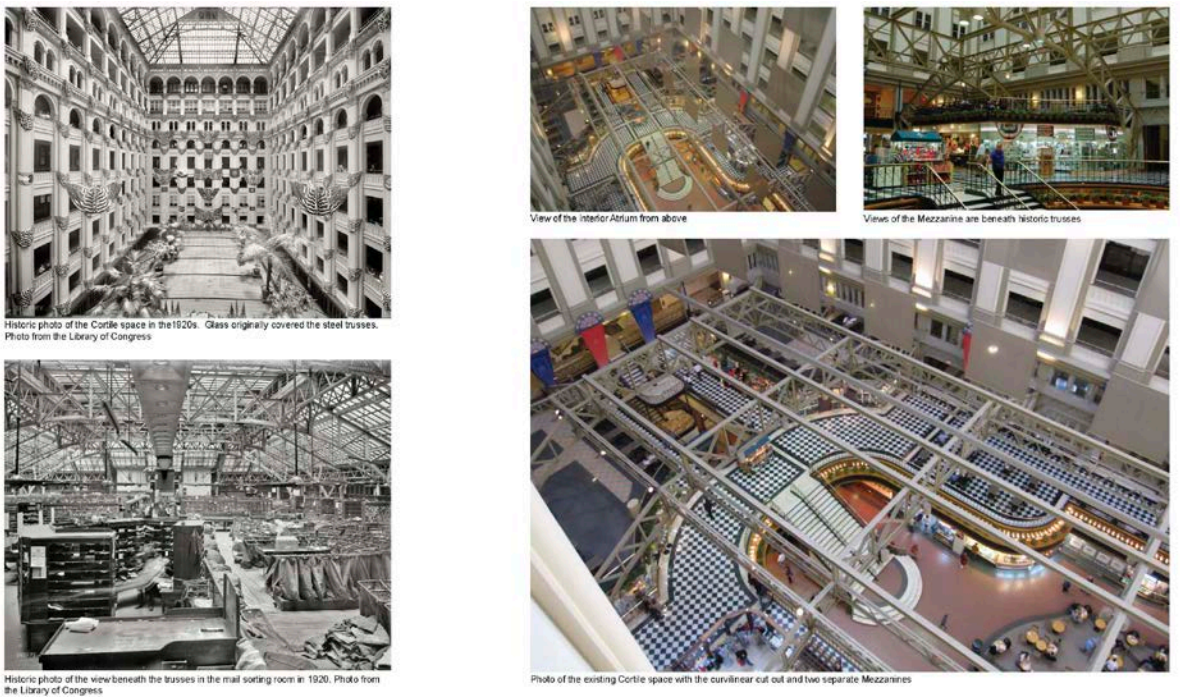


Figure 12: Historic and existing condition of Cortile

The balance of the hotel rooms and suites would be located on floors two through nine. The majority of the rooms would be located to the outside of the hallway circulating around the Cortile.

The existing Clock Tower would continue to be open to the public after the rehabilitation with tours and interpretation provided by NPS. The hanging sculpture by Robert Irwin, "48 Shadow Planes", would be removed from the Cortile temporarily for conservation, but would be returned to its original location.



Figure 13: Cortile rehabilitation

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

Overall the redevelopment of OPO is consistent with the Federal Elements of the Comprehensive Plan of the National Capital. The project would help achieve visions in the Monumental Core Framework Plan to reconnect downtown Washington, DC with the National Mall through the Federal Triangle. In addition, the proposed redevelopment would promote sustainability, economic development, and activate Pennsylvania Avenue with a mix of uses.

Analysis

Staff recommends **the Commission approve the preliminary site and building plans for the OPO redevelopment**. The project will preserve an important historic resource while also achieving the goals of the 2008 Old Post Office Redevelopment Act including a lucrative financial return to the Federal government. In addition, public amenities in the form of outdoor plazas, dining options, and museum space will be provided through the redevelopment project. The project will help to revitalize and activate the Pennsylvania Avenue corridor through a mix

of uses and is consistent with several federal and local plans and polices including the Federal and District Elements of the Comprehensive Plan, the Monumental Core Framework Plan, and the Pennsylvania Avenue Plan.

The OPO redevelopment would discontinue the existing office use of the site and would repurpose the space as a hotel with approximately 267 guest rooms, retail and restaurant space, meeting rooms, and a conference facility in the Annex. The first three levels of OPO with existing retail and restaurant space would maintain these uses, but the space would be reconfigured and the tenant mix would be altered to accommodate a spa, back of the house spaces, new meeting rooms, and fine dining restaurants. Current federal tenants would be relocated to existing office space within the Washington, DC area, in accordance with the programmatic needs of each agency. Though there would be a change in uses on the site, the new uses are consistent with existing land uses in the vicinity of OPO. The land use changes as a result of the proposed action would not alter the management of NPS parks and historic sites in the vicinity. The Clock Tower and Pennsylvania Avenue National Historic Site along with the National Mall would continue to be operated by NPS for the benefit of the public.

Pennsylvania Avenue
Through the redevelopment of OPO, modifications will be made to sidewalks along Pennsylvania Avenue. The perimeter security planters located along the sidewalk on Pennsylvania Avenue in front of OPO would be removed which would improve the public space and pedestrian circulation in front of the building. Planters located in front of the IRS Building would remain, but would be repositioned. In addition, Sidewalk cafes are proposed along the sidewalk of Pennsylvania Avenue in the area proposed for transfer from NPS to GSA. Temporary and non-fixed seating and furniture would be placed in these outdoor café areas. Prior to the transfer of jurisdiction, GSA and NPS would agree on covenants to ensure appropriate accommodation for bleachers for the Presidential Inaugural Committee. The Artwork Pavers and Benjamin Franklin statue located along Pennsylvania Avenue in front of OPO would remain unchanged. The introduction of the outdoor cafes and removal of the perimeter security elements would help activate the streetscape along Pennsylvania Avenue and therefore staff is supportive of these modifications.

12th Street
As a result of the redevelopment the 12th Street entrance of OPO would be open to the public and existing security screening facilities would be removed. This entrance is currently only open to government employees. It is anticipated that this entrance would be used by Metrorail riders arriving from the Federal Triangle station. With the redevelopment project, public access to the OPO would improve as another entrance to the building would be opened.

C Street
Improvements along the C Street plaza include the addition of moveable, non-fixed seating within public space. The placement of tables and chairs would be adjusted seasonally, including their removal during the winter months. These changes would reduce the space available in the expanded sidewalk area and plaza, and may constrict pedestrian movement, but the seating will also serve to activate the space and provide an engaging pedestrian environment. In addition, the

removal of the non-historic glass and steel bike shed (located in the C Street right-of-way), and restoration of the historic shed roof (trusses, beams, and ornamental cast iron) will contribute to the preservation of the OPO. (Elimination of the bike shed will require the relocation of the bike tour business that currently occupies that space. The business owners are aware of this and are looking for a new location.) The existing low walls south of the building will remain in place as they help define the service entrance. The C Street plaza would be redesigned to step down to the C Street entrance and would also include an ADA accessible ramp. It is anticipated that the C Street entrance will be the most direct access for visitors to the Clock Tower.

As noted above, most of the improvements to the C Street plaza would utilize public space and, pending formal closure of C Street, would require a public space permit. GSA is in the process of completing the closure of a portion of C Street, which was initiated in 1986. NCPC recommended favorably to the Council of the District of Columbia regarding the closure of this portion of C Street in July 1985. Following NCPC's recommendation, the Council of the District of Columbia passed D.C. Law 6-88 (Act No. 6-116) indicating that this portion of C Street was no longer needed for street purposes and closure was contingent on the filing of a covenant between the District of Columbia and GSA to incorporate a fire protection lane request by the District of Columbia Fire Department. The closure was to take effect after a 30-day Congressional review period which occurred in January 1986. However, because the covenant was not filed, the street was not officially closed. Therefore, GSA is working to file the covenant to fulfill the terms of D.C. Law 6-88. Pending formal closure of C Street, the preferred selected developer would be required to obtain a public space permit for activities in the portion of C Street under the District of Columbia Department of Transportation's jurisdiction.

As part of the redevelopment project, signage is proposed for the C Street plaza above the restored shed roof as well as near the intersection of 12th and C Street. Staff notes that the signage proposed at the intersection of 12th and C Street appears to be large in scale and because of its l-shaped configuration, it may block views of landscaping and the building. Therefore, staff recommends that **the Commission request GSA and the preferred selected developer continue to refine the designs for signage throughout the site to ensure that signage and canopies are appropriately scaled and oriented to the setting of the Old Post Office.**

11th Street

The proposed action calls for the introduction of a driveway at the former 11th Street right-of-way in order to provide vehicular access to the site. Though the driveway will introduce a curb cut and cause some interruptions for pedestrians along Pennsylvania Avenue, it will reestablish the physical configuration of a L'Enfant Plan street by providing the fourth leg of what is currently a three-way intersection. In addition, by inserting the driveway, the historic block configuration would be reestablished as what is currently one long block along Pennsylvania Avenue would be divided into two distinct blocks. The proposed driveway would not be a mid-block intrusion across the sidewalk as it would be signalized with a crosswalk clearly marked to minimize any conflicts between pedestrian and vehicles. The introduction of the driveway will be facilitated by a transfer of jurisdiction subject to the Commission's review and therefore staff recommends **the Commission require that the transfer of jurisdiction to facilitate the introduction of a driveway in the former 11th Street right-of-way and to accommodate**

outdoor seating in front of the building, be submitted to NCPC with or prior to the submission of the Old Post Office Building Redevelopment for final approval.

Alternatives to the 11th Street driveway were considered, but dismissed for a variety of reasons. A lay-by-lane along Pennsylvania Avenue was considered, but this would involve a semi-circular driveway in front of the main entrance of OPO and would therefore require two curb cuts mid-block along Pennsylvania Avenue. This option may also require amending the Pennsylvania Avenue Plan and negotiating agency agreements. NPS, the District of Columbia Department of Transportation (DDOT), U.S. Commission of Fine Arts, and larger historic preservation community were not supportive of this option. A lay-by-lane along 12th Street was also considered, but there was the potential to impact 12th Street traffic and DDOT was not supportive of this option. In addition, this would not eliminate the need for a drive at 11th Street as an entrance would be required to gain access to the parking in the Annex. GSA considered using C Street as a driveway, but this would eliminate the proposed public plaza and would increase traffic on 12th Street. Using C Street as the main vehicle entrance would also draw activity off of Pennsylvania Avenue and this was not considered to be desirable. GSA considered restricting the proposed 11th Street driveway to right-in, right-out turn movements. However, the results of the transportation study indicated that pedestrian safety would not noticeably improve by limiting traffic in this way. Finally, an option was no on-site parking was considered, but in consultation with DDOT, GSA determined that relying upon valet service to other existing parking garages would generate more traffic in the surrounding area by increasing the number of trips to and from the project site. In addition, because there is no viable alternative for a lay-by-lane, valet service at the curb would block traffic and cause impacts on surrounding traffic operations.

Annex
Modifications to the Annex include the installation of a green roof and alterations to the main body of the façade. Two options for the wall cladding of the Annex have been proposed – one option proposes the use of stone and the other glass. While staff is supportive of both options, the articulation of the entry and the use of stone appears to be more compatible with the historic fabric of the OPO. Staff recognizes that the U.S. Commission of Fine Arts (CFA) recommended the entrance of the grand ballroom be designed as a "small glassy pavilion". As the design for the Annex is developed in response to CFA's recommendation, GSA and the preferred selected developer should continue to retain options that respect the scale and materials of the OPO.

Stormwater Management
The OPO site is located within the Potomac River watershed in an urbanized setting and site where drainage has been altered from its natural patterns. The OPO site is primarily made up of impervious surfaces that do not allow stormwater to infiltrate into the ground, including the paved plazas, sidewalks, and driveways surrounding the building, as well as the roofs of the OPO Building and the Annex. On the north, east, and west sides of the OPO, the landscape is comprised almost entirely of impervious surfaces. On the south side of the OPO and at the Annex, 95% of the landscape is impervious.

As a result of the Energy Independence and Security Act of 2007 (EISA), federal projects of 5,000 square feet or more must maintain or return to pre-development hydrological conditions. The District of Columbia governing body for stormwater management is the Stormwater Management Section of the District of Columbia Department of the Environment (DDOE). DDOE requires more stringent provisions to ensure stormwater quantity control is implemented to pre-development levels at the site, regardless of the extent of existing impervious conditions.

Per DDOE standards, the total disturbed area outside of the buildings, including the disturbed area within the right of way, contributes to the project's stormwater obligation. The redevelopment of the OPO would disturb approximately 15,000 square feet, which requires the project to provide stormwater management measures. The amount of stormwater treatment volume is determined by choosing the higher value of either quantity control volume or the quality control volume. For the OPO redevelopment, the quantity control volume is the controlling number at 630 cubic feet.

The OPO redevelopment project would decrease the amount of impervious surfaces on the site and add pervious surfaces and vegetation. In addition to the existing vegetated surface, approximately 10,000 square feet of green roof technology would be added to the roof of the Annex. This green rooftop terrace would increase the vegetative cover at the site and allow for greater stormwater management practices. Initial calculations indicate that the proposed 10,000 square feet of green roof area would provide about double the minimum requirement of 630 cubic feet. By providing green roof technology, the overall amount of site impervious area would be decreased when compared to the existing site condition. Therefore, the post-developed construction flow rates and runoff volumes would not exceed the pre-developed condition. In addition, a detailed stormwater management plan would be prepared for the project. The intent of the stormwater management plan would be to meet the stormwater runoff requirements under Section 438 of EISA.

Comprehensive Plan for the National Capital

Overall, the project is consistent with policies in the Federal Elements of the Comprehensive Plan for the National Capital, and in particular those contained in the Preservation and Historic Features Element, Environment Element, and the Visitors Element. These policies encourage the federal government to preserve and adaptively reuse historic properties; practice environmental stewardship; and accommodate visitors while highlighting American culture and democracy. The proposed redevelopment project will satisfy each of these areas.

The rehabilitation of the OPO would be consistent with the Environment Element of the Comprehensive Plan for the National Capital by ensuring that the rehabilitation and reuse of the OPO would use sustainable design principles established in the Leadership in Energy and Environmental Design for New Construction and Major Renovation Projects (LEED-NC) standard. The energy efficiency of the building would improve, and the preferred selected developer would explore the purchase of energy derived from alternative sources to reduce consumption of non-renewable energy resources. Environmental policies that the project is consistent with include:

- Minimize power generation requirements, such as by utilizing best available "green" building systems and technologies.
- Encourage the development and use of alternative energy sources to reduce the reliance on fossil fuels.
- Promote indoor air quality by using environmentally friendly ("green") building materials, construction methods, and building designs.
- Promote the use of new water-saving technologies that conserve and monitor water consumption.
- Encourage the use of innovative and environmentally friendly "Best Management Practices" in site and building design and construction practice, such as green roofs, rain gardens, and permeable surface.
- Enhance the environmental quality of the national capital by replacing street trees where they have died or where they have been removed due to development.
- Encourage the use of native plant species, where appropriate.

Redevelopment of the OPO is consistent with the following policies in the Preservation and Historic Features Element:

- Protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image.
- Promote continuity in the historic design framework of the nation's capital by protecting and enhancing the elements, views, and principles of the L'Enfant Plan.
- Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.
- Use historic properties for an adaptive use that is appropriate for the context and consistent with the significance and character of the property.
- Plan for federal historic properties to serve as catalyst for local economic development and tourism.

Redevelopment of the OPO is also consistent with policies in the Visitors Element. The main entrances to the building would no longer require security screening, improving public access to the building. The Clock Tower will continue to be open to the public along with museum space and therefore, the project will provide visitor attractions on federal property.

Monumental Core Framework Plan

The Monumental Core Framework Plan (Framework Plan), published in 2009, offers a comprehensive approach to easing demand for construction on the National Mall while creating lively urban spaces throughout the city. The Framework Plan identifies four major precincts surrounding the National Mall that are targeted for revitalization as new cultural centers and destinations that exude special civic qualities. The four precincts are: Northwest Rectangle, Federal Triangle, Southwest Rectangle, and East Potomac Park. The Framework Plan examines opportunities to enhance these precincts in new ways to meet the future needs of the federal government, while also protecting the city's open space and public realm. The *Framework Plan* specifically states that

the Federal Triangle should: "exhibit the purpose of the federal government, America's diverse national heritage, and the best of American art, architecture, landscape architecture, and urban design. It should have lovely and animated city streets and public spaces; welcoming public buildings; flexible and convenient public transit service; sustainable and accessible streets and buildings; and federal, local, and private development." Strategies to achieve this goal included the following:

- Establish new destinations on Pennsylvania Avenue by concentrating a mix of office, culture and hospitality uses on Pennsylvania Avenue between 9th and 12th Streets, NW;

- Enhance the public realm by establishing a welcoming, interconnected system of lively and beautiful streets, introducing sustainable public spaces, and improving the pedestrian experience and symbolic importance of Pennsylvania Avenue and the Federal Triangle.

The redevelopment of the OPO is generally consistent with the strategies in the Framework Plan. The redevelopment project would help fulfill the vision in the plan for the OPO as well as the Federal Triangle by establishing the building as a premier destination on Pennsylvania Avenue that introduces a mix of uses. The propose rehabilitation will introduce public plazas and outdoor restaurant seating along Pennsylvania Avenue and complement the nearby museums on the National Mall. In addition, the proposed entrance to the grand ballroom along 10th Street will improve pedestrian circulation in the Federal Triangle.

The Framework Plan highlighted the need to improve pedestrian connections throughout the Federal Triangle and a vision included in the plan involved a potential north-south pedestrian connection from Pennsylvania Avenue to C Street through the OPO site if the Annex were demolished. While GSA and Trump Old Post Office LLC explored the possibility of creating this connection, with the retention of the Annex it is very difficult to create a connection that would be a benefit to the pedestrian experience. Ultimately, GSA recommended against creating this connection for the following reasons: 1) the level of the water table in relation to the foundation and building piles; 2) the potential for intrusions into the historic building fabric either at the east façade or inside the building could endanger the structural integrity of OPO; and 3) the poor quality of the pedestrian experience that would result if the narrow passage were created. Though this pedestrian connection cannot be established, the project will achieve other goals of the Framework Plan by establishing a destination on Pennsylvania Avenue and enhancing the public realm with outdoor public plazas.

Pennsylvania Avenue Plan

The Pennsylvania Avenue Development Corporation (PADC) was established by Congress through Public Law 92-578, 86 Stat. 1266, § 2, (Oct. 27, 1972). Congress determined that it was in the national interest for the area adjacent to Pennsylvania Avenue between the Capitol and the White House to be developed and used in a manner suitable to its ceremonial, physical, and historic relationship to the legislative and executive branches of the Federal Government. PADC was commissioned to improve the area along Pennsylvania Avenue, which was in poor condition. The OPO Building is not located within the PADC boundary and thus not subject to

PADC guidelines; however the area to be transferred by NPS to GSA is within PADC boundary and is subject to the PADC's Pennsylvania Avenue Plan and the applicable laws, regulations, and policies. The NPS acquired this area when Congress sunsetted PADC through PL 104-134, April 26, 1996. GSA, NPS, and NCPC, as the successor agencies to the PADC and pursuant to a Memorandum of Agreement signed in 1996, are required to review proposed alterations within PADC boundaries for consistency with the Plan, and seek an amendment if the proposed action is deemed not consistent.

Building on previous planning efforts, the PADC developed the Pennsylvania Avenue Plan in 1974. It has since been amended. The Pennsylvania Avenue Plan and Guidelines (the Pennsylvania Avenue Plan) called for altering the original 160 foot width of the Pennsylvania Avenue in order to accommodate wider sidewalks, although this would not be undertaken where existing buildings with historic and architectural value were to be preserved. The plans identified widening the south sidewalk of Pennsylvania Avenue by trimming up to 7.5 feet from the roadway while adding a double row of trees. This was intended to make the Avenue's broad expanse less of a physical and visual barrier. PADC designed and revitalized the Pennsylvania Avenue corridor through the development of a landscape plan that includes pavers, plantings, public plazas, and public art.

The 11th Street right-of-way was closed when planning and construction of the Federal Triangle began in the 1920s; however, the cartway continued to be used by vehicles after the Internal Revenue Service Building was constructed and occupied. During the implementation of the Pennsylvania Avenue Plan, the Pennsylvania Avenue sidewalk was redesigned with a new sidewalk across the closed 11th Street right-of-way, creating a two-block-long sidewalk, which is the current condition.

The current space between the Old Post Office and the IRS Building is the result of two eras of planning history in Washington: 1) the incomplete implementation in the 1930s of the Federal Triangle buildings and designed open spaces to replace the nineteenth-century development of downtown blocks in the L'Enfant Plan; and, 2) the decision in the 1970s to preserve and rehabilitate the Old Post Office rather than demolish it to complete the Federal Triangle. The result, underscored by the 1992 construction of the Annex, created a condition whereby two buildings of different eras, originally built on different blocks separated by 11th Street, NW, are joined by a two-block-long segment of the Pennsylvania Avenue sidewalk, spanning a plaza between the two buildings.

With the OPO redevelopment, a driveway would be constructed in the L'Enfant Plan historic 11th Street right-of-way, reestablishing the intersection of Pennsylvania Avenue and 11th Streets, NW. This proposed action is not inconsistent with the Pennsylvania Avenue Plan and General Guidelines (36 CFR Part 910). While the Pennsylvania Avenue Plan and General Guidelines prohibit mid-block curb cuts in development parcels on the north side of Pennsylvania Avenue, there is no such restriction on the south side of Pennsylvania Avenue in front of OPO. The proposed driveway would reestablish the physical configuration of the L'Enfant Plan street by providing the fourth leg of what is currently a three-way intersection. In addition, by inserting the driveway, the historic block configuration would be reestablished as what is currently one

long block along Pennsylvania Avenue would be divided into two distinct blocks. The proposed driveway would not be a mid-block intrusion across the sidewalk as it would reintroduce the historic block configuration. There would be clear visual cues that would be easily understood by pedestrians walking along the avenue.

National Environmental Policy Act (NEPA)

NCPC and GSA each have an independent responsibility to comply with the National Environmental Policy Act (NEPA); NCPC's responsibility stems from its approval authority over the project. In accordance with the Council on Environmental Quality's rules for implementing NEPA, and the Commission's Environmental and Historic Preservation Policies and Procedures, GSA prepared an Environmental Assessment (EA) for the project, to which NCPC was a cooperating agency. The EA analyzed a no action alternative and one action alternative; the preferred alternative was identified as the "Action Alternative." Topics analyzed in the EA include: land use, planning policies, public space, archaeological resources, historic resources, visual resources, socioeconomics, vegetation, stormwater management, floodplains, air quality, vehicular circulation, parking, public transportation, pedestrian circulation, utilities, energy use and sustainability. GSA issued a Finding of No Significant Impact (FONSI) for the Action Alternative on May 16, 2013.

NCPC staff has reviewed the EA and GSA's FONSI and determined that the information and analysis provided meets the standards for an adequate EA as set forth in NCPC's Environmental and Historic Preservation Policies and Procedures and that a FONSI is warranted based on the information contained in the EA. Staff recommends **the Commission adopt GSA's Finding of No Significant Impact for the Old Post Office Building Redevelopment Final Environmental Assessment; signed by GSA on May 16, 2013.**

National Historic Preservation Act (NHPA)

NCPC and GSA each have an independent responsibility to comply with the National Historic Preservation Act (NHPA); NCPC's responsibility stems from its approval authority over the project. GSA initiated consultation with the District of Columbia State Historic Preservation Officer (SHPO) in 2005, but did not continue the consultation at that time as the redevelopment project did not move forward. After Congress passed the Old Post Office Redevelopment Act in 2008, GSA re-initiated consultation in 2009, and again the consultation was put on hold until 2011. Following the selection of the preferred selected developer in early 2012, Section 106 consultation continued and 7 consultation meetings were held between May 2012 and February 2013. The OPO is individually listed in the National Register of Historic Places, is a contributing element of the National Register-listed Pennsylvania Avenue National Historic Site and is listed individually in the District of Columbia Inventory of Historic Sites.

Pursuant to the implementing regulations of Section 106, GSA consulted with the DC SHPO, the Advisory Council on Historic Preservation (ACHP), NCPC, NPS, Trump Old Post Office LLC, and other Consulting Parties regarding the effects of the redevelopment project. GSA elected to fulfill its Section 106 responsibilities through a Programmatic Agreement (PA) for the leasing,

rehabilitation, ongoing maintenance and stewardship of the OPO and Annex as well as the associated transportation improvements. NCPC designated GSA lead agency to fulfill its Section 106 responsibilities in January 2013. Signatories on the PA included GSA, NCPC, NPS, DC SHPO, ACHP, and Trump Old Post Office LLC. The PA stipulates a design review process for the redevelopment project as well as on-going consultation for the duration of the long term lease. Based on the 35% level the design, GSA, with the concurrence of the DC SHPO and PA Signatories determined the project will have no adverse effect on historic properties. The redevelopment project is intended to be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties and GSA along with Trump Old Post Office LLC will ensure that the measures outline in the PA are carried out to avoid adverse effects.

III. CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its June 19, 2013 meeting. The Committee forwarded the proposed preliminary site and building plans 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 State Historic Preservation Office; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts

The U.S. Commission of Fine Art (CFA) reviewed and approved the concept plan for the redevelopment of OPO at its April 18, 2013 meeting. In approving the concept, CFA commended GSA for undertaking the redevelopment of the historic OPO for private use while urging GSA to ensure that this redevelopment maintains the history and character of the property as a public building. CFA was generally supportive of the proposed design including the rehabilitation of the Cortile and historic building envelope. While CFA was supportive of the overall project, they suggested that some elements of the landscape design be reconsidered to strengthen the hotel's contribution to public space on one of Washington's most prominent avenues. CFA focused their comments on the C Street plaza and recommended that this space be treated as a tree-shaded public space and that the use of planters and flags be reconsidered. In addition, CFA noted that the signs and canopies proposed for the building and site were overly prominent and they recommended that they be reduced in both size and number in order to appear subordinate to the historic OPO. CFA also noted that the design of the Annex exterior was visually disruptive and reminiscent of a portal and they recommended that the ballroom entrance be treated as a small glassy pavilion.

Coordination with local agencies

GSA and Trump Old Post Office LLC will be required to coordinate with the DDOT regarding the design of the curb-cut for the 11th Street driveway as well as the associated traffic control devices.