

**ZONING COMMISSION CASE NO. 06-110/06-120**

**CAMPUS PLAN AMENDMENT, FIRST-STAGE PUD MODIFICATION, SECOND-STAGE PUD AND MAP AMENDMENT FOR  
2100 PENNSYLVANIA AVENUE NW**

**SUPPLEMENTAL STATEMENT OF THE APPLICANT**

This statement details the Applicant's additional revisions and changes to the Project since the filing of the initial prehearing statement in July 2017 and summarizes the application's satisfaction of the relevant zoning standards.

**I. Building Design**

**A. *Materials / Design***

Since the filing of the Initial Pre-Hearing Submission, the Applicant's design team has continued to advance and refine the design of the Project. Attached as Exhibit F is a complete set of updated architectural plans that reflect the current design ("**Revised Plans**"). Overall, the Revised Plans reflect greater detail on the proposed material selection and articulation of the building design. The Revised Plans include detailed elevations and sections for the main building curtainwall façade as well as for the other retail and building facades. The Revised Plans also maintain the Applicant's commitment to use curved glass as shown on the drawings.

In addition, the Revised Plans reflect the following changes:

- Masonry spandrel material selection and design. The design team has selected a terracotta rain screen material for the masonry band that wraps around the building. The terracotta material will be extruded and textured with a vertical baguette pattern that will pick up and play off the curvature of the building façade. The material is able to be produced and installed in a manner that will parallel the graceful curves of the adjacent glass.
- Retail base design. The design team has further refined the design of the building at the lower levels to better activate and emphasize the retail space as well as distinguish it from the office use above. Among other changes, the Applicant has changed the material of the masonry band above the retail level to a darker terracotta material and raised the band to overlap and serve as the knee wall for the office level above. The Applicant also introduced a setback of the second story office space along the Pennsylvania Avenue frontage, similar to the setback along I Street. The net result of

these changes is the appearance of a greater two-story base and presence on all frontages of the Project.

### ***B. Building Projections***

Based on further discussion with the Office of Planning, the Applicant has revised the design of the building so that the projections along the Project's Pennsylvania Avenue and I Street facades comply with the 4-foot limitation on projection depth. The proposed projections on 21<sup>st</sup> Street continue to project 6 feet. As detailed in the Applicant's Initial Prehearing Submission, the depth of these projections is purely for architectural reasons, and it is necessary to convey the façade movement given the scale of the building and the adjacent open spaces created by Reservation 28 and the wide intersection of Pennsylvania Avenue, I Street, and 21<sup>st</sup> Street.

### ***C. Sustainability and Solar Panels***

The Project will seek Gold certification under the LEED Core and Shell v4 rating system. As described in the LEED narrative included in the Revised Plans, many of the targeted points are related to energy and water efficiency and reflect goals to significantly reduce stormwater runoff, reduce potable water usage, and reduce energy consumption through a high-performance building envelope and high-efficiency HVAC systems.

The Applicant also undertook a detailed study of the potential to incorporate a photovoltaic array into the Project with the design team as well as its green consultant, Sustainable Design Consultants, and a solar provider, New Columbia Solar. As a result of that detailed study, the Applicant commits to incorporate 1,000 square feet of solar arrays, to be located on the main roof of the building. The Applicant requests the flexibility regarding the roof plan as it relates to the configuration of the solar panels and the underlying green roof that is currently planned for this area, along with the pathways necessary to maintain such elements in order to efficiently integrate such elements into the Project. All solar panels and related guardrails will adhere to the 1:1 setback requirement as measured from the edge of the roof on which they are located.

The proposed solar commitment represents the best balancing of the desire to accommodate renewable energy with the Project's other design and sustainability commitments. The design and configuration of the Project incorporates multiple building setbacks, including in particular on the south part of the building along I Street, which minimizes the potential locations for solar panels. The Applicant also explored a denser solar array, but it would compromise the ability of the Project to achieve its stormwater management and GAR goals. However the solar array, when combined with the Applicant's commitment to achieve at least LEED Gold

certification, will delivery significant energy and water efficiency benefits features within the Project.

#### ***D. Storefront and Signage Guidelines***

Attached as Exhibit E are a series of storefront and signage guidelines for the Project. The storefront guidelines articulate the parameters and limitations within which retail and other ground-floor tenants will be permitted to modify the exterior design of the building to convey their tenant identification and brand. The signage guidelines articulate the location, height, and type of signage that will be permitted within the Project for both retail users and building and tenant identification purposes.

### **II. Development Incentives and Flexibility**

The Applicant seeks the following development incentives, zoning flexibility, and design flexibility in order to implement the Project.

#### ***A. Rezoning***

The Applicant seeks a PUD-related rezoning of Lot 50 from the MU-9 to the MU-30 Zone District. The MU-30 Zone is wholly consistent with the Property's transit-oriented location and designation as High Density Commercial on the Comprehensive Plan's Future Land Use Map. (The portion of the Property known as Lot 51 will remain in the MU-9 Zone District.)

#### ***B. PUD Height and Density***

The Project as a whole will be constructed to a maximum height of 130 feet and a maximum density of approximately 8.92 FAR, which is within the matter-of-right limits for the MU-30 Zone District. The portion of the Project that is located within the MU-9 Zone District will, however, require use of the bonus height and density available to PUDs under Subtitle X of the Zoning Regulations.

#### ***C. Penthouse Setback***

The Project as a whole fully complies with the 1:1 setback requirements under the 1910 Height Act, which requires that penthouses be set back from all "exterior walls" (which has been interpreted to require setback from walls facing public streets. The Project also generally complies with the 1:1 setback requirements under the Zoning Regulations with one exception—the penthouse on the northern wing of the Project is not set back 1:1 from the western edge of the building roof. This is because the upper stories of the northern wing are set back from the

property line and adjacent under-construction building at 2112 Pennsylvania Avenue. As explained in detail in the initial application, limited available roof space due to the configuration of the building leaves limited area available for mechanical equipment with a larger footprint. The penthouse will have limited visibility from the street level, perceived for a small moment as one heads eastbound on Pennsylvania Avenue.

#### ***D. Architectural Embellishment***

One of the defining features of the Project is a large central atrium between its north and south wings; the atrium daylights the interior portions of the building and serves as the signature interior architectural feature and amenity of the Project. The atrium is created by a glass curtainwall on the Project's western alley-facing façade and a skylight over the atrium.

Since the filing of the initial application, the Applicant has refined the design of both the skylight and western curtainwall. The skylight projects above the roof of the building approximately 10 feet, which is permitted under both the Zoning Regulations (which exempts skylights from the penthouse regulations) and under the Height Act (which is interpreted to consider skylights as an architectural embellishment exempted from the height limit). The skylight and the western curtainwall are aesthetically and structurally integrated. At the point where they meet, the skylight merges into the western curtainwall and appears to be an extension of that curtainwall.

In reviewing the final skylight design, the Applicant has determined that the relationship of the skylight and western wall arguably constitutes a vertical architectural embellishment of the western curtainwall above the building height limit. Under the Height Act, such architectural embellishments are permitted above the height limit. The Zoning Regulations also permit architectural embellishments to extend above the height limit, provided that they do not create an appearance of raised building height for more than 30% of the wall on which the embellishment is located. Here, the architectural embellishment is 75 feet long, which represents 38% of the western building façade as measured from Pennsylvania Avenue to I Street. Accordingly, the Applicant requests flexibility from the Zoning Regulations to permit the proposed embellishment.

Relief from the embellishment limitation will not run contrary to the intent and purposes of the Zoning Regulations. The skylight is surrounded by the taller 20-foot penthouse on all three street-facing sides. The skylight / embellishment is located on the alley-facing, least-visible façade of the Project. Furthermore, the western curtainwall steps back approximately 30 feet from the property line and turns inward, which further minimizes the visibility of the embellishment. (See A-118.) And finally, the degree of relief is relatively minor, and the width of the embellishment is solely a function of the amount of open space between the northern and

southern wings of the Project. The skylight and western curtainwall are an integrated element that cannot be easily narrowed to meet the requirements of the Zoning Regulations. Narrowing the embellishment would require either widening the north and south office wings (which have been appropriately sized to meet market demand for office space) or narrowing the entire atrium (which would effectively pull the building façade back from the street and run contrary to established urban design policies and goals regarding streetwall design).

### *E. Design Flexibility*

The PUD will be developed in accordance with the Revised Plans. Consistent with other PUDs, the Applicant requests minor flexibility to deviate from the Revised Plans in order to accommodate refinements to the final design of the Project as follows.

1. To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, mechanical rooms, elevators, and toilet rooms, provided that the variations do not change the exterior configuration or appearance of the structure.
2. To vary the final selection of the colors of exterior materials based on availability at the time of construction, provided such colors are within the color ranges proposed in the final plans.
3. To make minor refinements to exterior details and dimensions, including belt courses, sills, bases, courses, mullions, coping, railings, and trim, or any other changes to comply with Construction Codes or that are otherwise necessary to obtain a final building permit, or to address the structural, mechanical, or operational needs of the building uses or systems;
4. To vary the final landscaping materials of the Project based on availability and suitability at the time of construction, and to vary the location and type of green roof, solar panels, and paver areas to meet stormwater requirements and sustainability goals or otherwise satisfy any permitting requirements.
5. To vary the final streetscape design and materials in the public right-of-way in response to direction received from District public space permitting authorities.
6. To vary the final design of the retail storefront and signage, including the number, size, design, and location of retail windows and entrances, awnings, canopies, and similar features, to accommodate the needs of tenants and code requirements, in accordance with the Storefront and Signage Plan attached as Exhibit E.

7. To vary other building tenant and identification signage consistent with the Storefront and Signage Plan attached as Exhibit E.
8. To vary the location and number of terrace and penthouse access doors to meet tenant needs and code requirements.
9. To vary the final number of parking spaces plus or minus five percent.
10. To vary the final gross floor area of the project plus or minus two percent in order to accommodate interior modifications such as mezzanine spaces, atrium infill, and connection opportunities.

### **III. Community Outreach / Project Amenities and Public Benefits**

The Applicant has finalized its proposed project amenities and public benefits package for the Project, which includes significant and meaningful contribution to a number of local priorities that will improve the Foggy Bottom/West End neighborhoods. This benefits package was developed by the Applicant over the past nine months based on a detailed and thorough engagement with representatives of ANC 2A, FBA, WECA, District and federal agencies, and other stakeholders. The process began with discussions with ANC 2A, FBA, and WECA to help identify potential community interests and priorities, culminating in a discussion focused on community amenities at ANC 2A's April 19, 2017 public meeting. Two persistent themes emerged: a desire to improve the neighborhood's parks and open spaces, and transportation improvements.

Over the next few months, the Applicant then evaluated the potential amenities in detail to determine the scope and feasibility, with a focus on benefits that reflected defined, direct and continued request from interested stakeholders. This included extensive discussions with District and federal agencies and entities with "ownership" over potential amenity targets, including NPS, WMATA, the Golden Triangle BID, and Francis-Stevens School. The Applicant then developed a draft list of public benefits and followed up with representatives of ANC 2A, FBA, and WECA to confirm that the proposed benefits would meet the needs identified earlier in the planning process. Finally, the Applicant presented the benefits package to the community at both the September 12, 2017 Campus Plan Advisory Committee meeting and September 19, 2017 ANC 2A public meeting.

Based on this extensive study, the Applicant proposes the following improvements as public benefits of the PUD, along with brief comments on each proffer.

### ***A. Foggy Bottom Metro Station Improvements***

**Prior to the issuance of a certificate of occupancy for the Project, Boston Properties will contribute \$350,000 to fund accessibility/capacity improvements to the existing Foggy Bottom Metrorail Station entrance.**

Mass transit improvements are a specifically enumerated public benefit. 11-X DCMR § 305.5(p). As the Commission is aware, WECA has long advocated for improvements to the Foggy Bottom Metrorail Station and specifically for funding toward a second entrance to the existing station in order to improve access to the existing station. Early on in the process, the Applicant reached out to WMATA, who indicated that there were (still) no plans to move forward on a second entrance. WMATA did indicate, however, that it was planning to undertake a feasibility study to identify discrete improvements to improve access and capacity within the existing station. The study is intended to take place this fall. WMATA will then undertake an internal evaluation of the study and determine the type and timing of improvements identified in the study.

Based on this information, the Applicant proposed making a contribution to WMATA to help fund access and capacity improvements identified in the study, with a particular focus on funding improvements that could be delivered in an early phase of the anticipated changes to the station. WMATA expressed interest in the proposal and indicated that the feasibility study could be tailored to specifically evaluate what improvements could be funded in the near term based on the proposed contribution.

Boston Properties has also agreed to help facilitate discussions between WECA and other stakeholders and WMATA regarding community input on proposed improvements at the appropriate time within WMATA's established process. The final improvements will be selected by WMATA.

Prior to the issuance of a certificate of occupancy for the Project, the Applicant will complete its contribution to WMATA for the improvements, provided that WMATA has identified the improvements within its established 6-year Capital Improvements Plan. This satisfies the requirements of 11-X DCMR § 305.3(d), which permits monetary contributions so long as the Applicant can provide proof that the benefits are being provided.

### ***B. Park Improvements***

**Prior to the issuance of a certificate of occupancy for the Project, Boston Properties will make the following improvements and contributions:**

**26<sup>th</sup> Street Park: design and construct improvements to sidewalks, crosswalks, and ramps to improve access to park, landscaping, and public fountain/spigot.**

Improvements to parks and streetscape are specifically enumerated public benefits. 11-X DCMR § 305.5(l), (n). The 26<sup>th</sup> Street Park is a neighborhood park with a playground, dog run area, and linear plaza located along the west side of the 900 block of 26<sup>th</sup> Street NW, on the western edge of the Foggy Bottom neighborhood. Conceptual drawings shown on plans attached as Exhibit A reflect the Applicant's proposed improvements, which are coordinated with and support other planned improvements to the park itself. Final design and construction plans will be subject to review and approval by District agencies during the permitting process. The estimated value of this amenity is \$150,000, though the Applicant's commitment is to install the improvements outlined above and on the concept drawing.

**Reservation 28: design and construct improvements to the existing triangular park, including new landscape, hardscape, and furnishings, and maintain such improvements for the life of the Project.**

The creation of open spaces is a specifically enumerated public benefit. 11-X DCMR § 305.5(b). Reservation 28 is the triangular reservation bounded by Pennsylvania Avenue, 21<sup>st</sup> Street, and I Street, across the street from the proposed PUD. A concept design shown on the plan attached as Exhibit B reflects the Applicant's design intent for renovations to this park that have been developed by the Project's design team. The Applicant's vision is to create a more urban public plaza on the western edge of the reservation and maintain the green space on the eastern side of the reservation, mirroring the programming of sister triangular reservation (James Monroe Park) across Pennsylvania Avenue. The urban plaza would serve as a placemaking terminus for the eastern end of the I Street retail corridor, which is bookended by the widened sidewalk associated with the Square 54 PUD and the Foggy Bottom Metro station plaza at the other end. In supporting the retail corridor, the improvements to Reservation 28 would also serve as a use of special value to the Foggy Bottom/West End neighborhood. 11-X DCMR § 305.5(q).

Because the reservation is maintained by the National Park Service, the Applicant has and will continue to coordinate with NPS regarding the design and implementation of the amenity. The Applicant has successfully partnered with NPS on renovations and maintenance of other reservations in the District located near Mount Vernon Square. The final design of the improvements will be subject to review and approval by relevant federal agencies, including the Commission of Fine Arts.

The Applicant's estimated minimum commitment to the design improvements is \$150,000; however, the final value will depend on the design approved by stakeholders (the concept design advanced by the Applicant represents well over \$500,000 work of work). This value does not include the cost of ongoing maintenance, which the Applicant has also agreed to undertake for the life of the PUD.

**Duke Ellington Park: contribution of \$30,000 to artwork to be installed with the park at Reservation 140.**

Public artwork is a specifically enumerated public benefit. 11-X DCMR § 305.5(d). Reservation 140 is the triangular park located at the intersection of 21<sup>st</sup> Street, M Street and New Hampshire Avenue NW; it is known as Duke Ellington Park. The Applicant proposes to contribute \$30,000 to fund artwork to be installed within the Park, which will complement other improvements proposed for the park by the Golden Triangle BID and also complements efforts by the BID to integrate public artwork into other parks and public spaces. (The Golden Triangle BID assists NPS in maintaining parks within the boundaries of the BID.) The artwork will be selected by the BID, with input from community stakeholders, and installed by the Golden Triangle BID.

**School Without Walls @ Francis-Stevens—Urban Farm: fund urban farm for the “FRESHFARM FoodPrints” program at the School Without Walls @ Francis Stevens school consistent with concept plan shown on Exhibit C.**

Gardens and food production are specifically enumerated public benefits. 11-X DCMR § 305.5(k)(3). FRESHFARM FoodPrints is an educational program that integrates gardening, cooking, and nutrition education into the curriculum of District of Columbia schools. The FoodPrints program at the School Without Walls @ Francis-Stevens school, located at 2425 N Street NW at the northern end of the West End neighborhood, has developed a small garden that is part of this curriculum. FoodPrints seeks to significantly expand its educational program with a larger and more robust urban farm to be located on open land west of the school, and they have developed a design for the proposed farm through a local urban agricultural construction firm, which is estimated to cost \$20,000. FoodPrints has also been working with District and federal representatives to confirm permits and approvals required for the construction of the new farm. The final design and location of the farm will be determined and permitted by FoodPrints and School Without Walls@ Francis-Stevens in conjunction with the appropriate governmental agencies. As a project that benefits a public school’s educational curriculum, the urban farm also constitutes a use of special value to the neighborhood and the District as a whole. 11-X DCMR § 305.5(q).

***C. Superior Urban Design and Site Planning***

**The Project will deliver a signature office building with active ground-floor retail uses at a key intersection on Pennsylvania Avenue.**

As shown on the plans, the Project exhibits many characteristics of exemplary urban design and planning, ranging from the use of high-quality materials and details (such as the commitment to curved glass) and context-specific design features (such as the building atrium

and associated skylight) to the creation of street-activating ground-floor uses on all three building frontages on a challenging, sloping site. Exemplary design and planning are enumerated public benefits. 11-X DCMR § 305.5(a),(c).

***D. Day Care***

**The Applicant will reserve space within the Project for a day care that will serve not only the Project's tenants but also the general public.**

Providing a day care that is open to the public is a specifically enumerated public benefit. 11-X DCMR § 305.5(i).

***E. Sustainable Design***

**The Applicant shall secure certification that the Project has been designed to a minimum of a Gold rating under the LEED Core and Shell v4 standard.**

Achieving LEED Gold certification is an enumerated public benefit. 11-X DCMR § 305.5(k)(5).

***F. Streetscape Improvements***

**The Applicant will complete the streetscape improvements shown on the Revised Plans.**

Streetscape improvements are enumerated public benefits. 11-X DCMR § 305.5(l).

***G. Retail Uses***

**The Project will reserve a minimum of 30,000 square feet of total floor area devoted to uses in the following categories: arts, design and creation; daytime care; eating and drinking establishments; entertainment, assembly, and performing arts; retail; and general or financial service use (provided, however, that financial service uses shall not be located along the Project's I Street ground floor frontage).**

Providing such retail use will enhance and strengthen the I Street retail corridor and it is a use of special value to the Foggy Bottom / West End neighborhood. 11-X DCMR § 305.5(q).

***H. Satisfaction of PUD Standards for Public Benefits***

All of the public benefits proffered above are superior features of the Project that will benefit the surrounding Foggy Bottom and West End neighborhoods to a significantly greater

extent than would a matter-of-right development of the Property. The benefits are tangible, quantifiable, and measurable, and all may be arranged for or delivered prior to the issuance of a certificate of occupancy for the Project, as required by 11-X DCMR § 305.3. Furthermore, all of the benefits relate to ANC 2A, in satisfaction of 11-X DCMR § 305.4. And all of the parks and the Metro station are located within ANC 2A, as required by 11-X DCMR § 305.7. School Without Walls @ Francis-Stevens is located immediately adjacent to ANC 2A approximately a half-mile from the Property, but the school serves as the in-boundary pre-kindergarten through eighth grade school for the Foggy Bottom/West End neighborhood and the benefit therefore directly accrues to the residents of ANC 2A.

### *I. Housing Linkage*

**The Project will provide \$8.5 million as a contribution to the Housing Production Trust Fund, tied to both the PUD and the habitable penthouse space.**

Contributions to affordable housing are a requirement of PUDs that gain an increase in office space through the PUD process as well as for penthouse habitable space devoted to nonresidential uses. The contribution associated with the PUD is approximately \$8,030,550; this payment is based on the increase in permitted gross floor area for office use, which is calculated based on the increase over the total of the office density permitted as a matter of right on Lot 50 and the existing office density on Lot 51, using the assessed value for Lot 50. The contribution associated with the penthouse space is approximately \$553,169; again using the assessed value for Lot 50. Although these amounts are requirements of the Zoning Regulations, they nevertheless represent sizeable and significant public benefits of the PUD. The housing linkage and penthouse linkage calculations are attached as Exhibit D.

### **IV. Agency Review / Project Impacts and Mitigation**

Over the past nine months, the Applicant has met extensively with representatives of multiple District agencies, including OP, DDOT, and DOEE, to review and address the impacts of the Project. In June 2017, the Applicant received concept approval for the Project's driveway, which involved extensive review and discussion with District public space officials at OP and DDOT. And on September 7, 2017, the Applicant participated in a coordinated interagency review of the Project, which was attended by representatives of OP, DDOT, DOEE, and DHCD. The PUD has been revised to reflect input received in these discussions.

## ***A. Transportation Analysis and Impacts***

### **1. Site Access**

As is shown on the Revised Plans, the Project's parking is accessed from a driveway on I Street, while its loading is accessed from the public alley. Through the Public Space Committee concept review process, the Applicant undertook a rigorous analysis of potential site access alternatives. This analysis concluded that parking access from the alley would be infeasible because of the unique configuration of the alley system, conflicts created by trucks using the alley, and anticipated vehicular volumes in the alley associated with the adjacent building at 2112 Pennsylvania Avenue. Based on this analysis, the Public Space Committee granted concept approval for the driveway, subject to the following conditions:

- (1) The driveway be narrowed to 20 feet in width;
- (2) The Applicant integrate a secondary entrance to the office component of the Project on I Street, west of the driveway;
- (3) The Applicant agrees to employ a flag person to manage vehicular / pedestrian traffic at the driveway during the PM peak hour.

The Applicant agreed to all conditions, and the Revised Plans reflect these changes.

### **2. Traffic and Parking Impacts**

The Applicant prepared and submitted its Comprehensive Transportation Report in April 2017 and submitted an updated report in August 2017. The CTR concludes that the proposed redevelopment will generate a relatively low net new number of trips (35 AM peak hour trips and 46 net new PM peak hour trips). The Applicant proposes to mitigate the impacts of these additional trips through the following mitigation measures:

- (1) A new traffic signal at the intersection of 21<sup>st</sup> and I Streets NW;
- (2) Signal timing adjustments to the existing signal at the intersection of 22<sup>nd</sup> and I Streets NW; and
- (3) Implementation of a Transportation Demand Management Plan and a Loading Management Plan to encourage non-auto modes of transportation and manage delivery and service traffic to the Project.

The Transportation Demand Management plan is detailed on pages 50-51 of the revised CTR; the Loading Management Plan is detailed on pages 44-45 of the revised CTR.

### **3. Public Space**

Through the PSC concept review process and in the CTR, the Applicant also analyzed and addressed the impact of the Project on certain facilities in public space. Specifically:

- (1) Utility vaults are proposed to be located in covered, conditioned vaults located on the Project's Pennsylvania Avenue frontage, near its northwest corner.
- (2) The existing bus shelter on Pennsylvania Avenue near the northeast corner of the Project will be relocated or replaced and will comply with WMATA's requirements for accessibility.
- (3) The existing Capital Bikeshare station located on I Street near the property's southeast corner will be relocated, either to an on-site location along 21<sup>st</sup> Street or to an alternative off-site location near the Project. Potential alternative locations include space within Reservation 28 or in the public space along I Street to the immediate south of Reservation 28.

The final location and design of all improvements in public space will be subject to approval by District public space authorities.

### ***B. Utilities***

As set forth in Exhibit F of the initial PUD filing, the average daily water and sewer demands for the Project can be met by the existing District of Columbia water system. Similarly, electrical services can be accommodated through the existing power grid. Solid waste services will be handled through a private trash collector.

### ***C. Environmental Impacts***

As discussed above, the Project will contribute positively to the District's environmental, energy conservation, and stormwater management goals through its commitment to LEED Gold certification and the design and operational features that will be required to meet that high threshold. The Project will also meet or exceed current stormwater management and Green Area Ratio requirements, resulting in a new positive impact on the management of stormwater runoff compared to the existing impervious surfaces on the Property.

### ***D. Visual Impacts***

As discussed in the initial application and as shown on the Revised Plans, the Applicant has incorporated a series of setbacks, particularly along I Street, to reduce the apparent height and scale of the Project as it transitions from the commercial corridor along Pennsylvania Avenue to the historic campus and residential context along I Street.

## **V. Planning Impacts**

### ***A. Comprehensive Plan***

As set forth in the initial application, the Project is not inconsistent with the District of Columbia Comprehensive Plan, including the site's designation in the High Density Commercial and Institutional land use categories, citywide policies and goals in the Land Use, Economic Development, Education, Transportation, Urban Design, and Environmental Protection elements, and policies and goals in the Near Northwest Area Element.

### ***B. Foggy Bottom Campus Plan / Campus Plan Amendment***

As set forth in the initial application, the Project is generally consistent with the goals and policies of the 2007 Foggy Bottom Campus Plan, will not generate objectionable impacts on surrounding residentially-zoned properties, and furthers many of the public benefits in the related First-Stage PUD, including in particular the creation of the I Street retail corridor.

The Project requires an amendment to the Campus Plan to re-designate the portion of Development Site 75B known as Rice Hall or Lot 51 from academic / administrative / medical to commercial / investment use. The project will also require the relocation of existing university uses in Rice Hall to other locations. In the Initial Prehearing Submission, the Applicant detailed the process by which it was evaluating future space needs for the uses that currently occupy Rice Hall and developing a plan for the relocation of those uses. The University has completed its initial space studies and continues to engage with departments regarding these relocations and planning for vacating Rice Hall by December 2018.

As a part of this project, the University will be relocating current administrative uses within Rice Hall to space on all three of its campuses – Foggy Bottom, Mount Vernon and the Virginia Science and Technology campus. For uses remaining on the Foggy Bottom campus, some uses will be co-located and incorporated into existing compatible uses on the campus, and will not displace existing uses. Other relocated uses will displace existing uses. For example, the Offices of the President and Provost will relocate to 1918 F Street (currently named “Alumni House @ 1918 F Street”), and other administrative functions will be relocated primarily to 1922 F Street (currently named “Old Main”). Existing uses in both 1918 F Street and much of 1922 F Street will then be relocated to alternate space.

All relocations within the Foggy Bottom campus will occur within the context of the use designations of the Foggy Bottom Campus Plan. Moreover, no relocations will repurpose spaces that are devoted to student uses (such as the student organization spaces on the 4<sup>th</sup> floor of the Marvin Center) for academic or administrative uses. Relocations to space on the Mount Vernon

Campus will be done in a manner consistent with all relevant aspects of the 2010 Mount Vernon Campus Plan. Some functions will also relocate to the Virginia Science and Technology Campus. Additional information will be available for presentation at the Hearing.

The Initial Prehearing Submission also articulated why the amount of administrative space previously forecast for Site 75B is lower than what was initially contemplated in the Campus Plan / PUD. Similar factors as above, including changes in space planning guidelines and metrics, an increase in telecommuting, reduction in administrative overhead, and strategic use of other University campuses, have led to a decrease in space needs for administrative uses. Therefore, the University concludes that the existing and future demand originally anticipated for Site 75B can be accommodated elsewhere within existing and already-approved Foggy Bottom campus development or on other University campuses. Accordingly, the redesignation of the Rice Hall property (Site 75B1) for commercial/investment use is appropriate and will not create objectionable impacts in the residential neighborhoods surrounding the Foggy Bottom campus due to noise, traffic, number of students or other objectionable conditions.