

August 1, 2017

VIA IZIS

Chairman Anthony Hood  
District of Columbia Zoning Commission  
441 4<sup>th</sup> Street NW, Suite 200S  
Washington, DC 20001

Re: Application to Amend the Campus Plan Approved in Z.C. Order No. 06-11/06-12

Dear Chairman Hood and Members of the Commission:

This letter and attached materials addresses the issues raised in the June 16, 2017 setdown report prepared by the Office of Planning and raised at the June 26, 2017 Zoning Commission public meeting regarding the above-referenced application.

**I. Campus Plan Amendment**

In its setdown report, OP requested that the University provide a relocation plan for the administrative uses currently within Rice Hall and for the academic / administrative / medical uses that would have otherwise been accommodated on this portion of Development Site 75B.

The University is in the process of evaluating the future space needs of the departments and units that currently occupy Rice Hall. The analysis is considering the various functions performed by these groups, their current and anticipated staffing levels, and appropriate adjacencies resulting from the interface of these groups with students and other on-campus functions. The University has engaged an architectural firm to support the architectural and programming analysis for this effort. Generally, the University intends to accommodate these uses either within other existing buildings on the Foggy Bottom campus or at other University campuses. Once the University has vetted the relocation plan with internal staff, it will share the plan with the Commission.

More broadly, the University continually re-evaluates its space needs for its administrative functions against the evolving nature of education delivery and the needs of

universities in urban areas as well as the dynamics of the broader real estate market. Space needs for such administrative functions are decreasing due to a number of factors, including but not limited to:

- Changes in space planning guidelines and metrics, such as the use of open space floor plans;
- Increase in telecommuting;
- Strategic use of GW campuses, such as the relocation of significant non-student facing uses to the Virginia campus; and
- Reduction in administrative overhead.

Based on all of these factors, the University has concluded that the amount of administrative space previously forecast for Site 75B is lower than what was initially contemplated. The University's existing and future demand originally anticipated for Site 75B can be accommodated within existing and already-approved Foggy Bottom campus development or on other University campuses. Accordingly, the redesignation of Site 75B1 for commercial/investment use is appropriate.

## II. Building Design

### A. Building Curves and Projections

At setdown, both OP and the Commission expressed a desire for the Applicant to further study additional wave projections and indentations in the façade. The Applicant has studied additional projections and concluded that they diminish, rather than enhance, the sense of movement in the façade. As shown on the drawings attached as Exhibit F, the central design concept is the dominant movement of the large curved embellishment at the corner of Pennsylvania Avenue and 21<sup>st</sup> Street, with smaller movements rippling “downstream” along the façades as they extend to the west and south. The architectural design team concluded that adding additional ripples, or increasing the size of the existing ripples, weakens this design concept, because the ripples take on the appearance of a form in themselves, rather than secondary movements extending outward across the otherwise “calm” façade.

OP also requested that the Applicant provide more information on the depth of the projections and support the need for 6-foot deep projection (rather than 4-foot projections allowed by code). Included in the drawings attached as Exhibit F are images that compare the building with 4-foot and 6-foot projections. The comparisons demonstrate that the 6-foot deep projections are necessary to convey the sense of movement and “rippling” from the main tower element at Pennsylvania Avenue and 21<sup>st</sup> Street across the remainder of the façade. The depth is

both necessary and appropriate because of the scale of the Property against its surrounding context, including in particular the openness of Reservation 28 (the triangular reservation across 21<sup>st</sup> Street from the Project), and the configuration of surrounding streets as they approach the Property.

Finally, OP requested that the Applicant commit to using curved glass where shown on the plans. The Applicant agrees to this request, and curved glass will be used for the highlighted areas as shown on the drawings included in Exhibit F.

B. Façade Articulation and Materials

At setdown, both OP and the Commission asked the Applicant to continue to develop the material details. The design team continues to study the development of the curtainwall system and related materials. More detailed perspectives of the curtain wall are included in the drawings attached as Exhibit F, and they reflect the ways in which a woven grid of mullions with varying depths will break down the glass façade. The design team continues to study the types of glass, metal, and stone that will be used for the façade. For example, the Applicant is studying whether a stone material or terracotta material is best used for the spandrel system, given that the spandrel needs to follow the curves of the façade. The Applicant is also selecting the glass type and coating that will best convey the façade movement.

C. Sustainability

At setdown, OP and the Commission request that the Applicant confirm whether it is committed to certification under the LEED system. The Applicant is committed to seeking certification for a Gold rating under the LEED v4 Core and Shell standard.

D. Public Realm Design

In its report, OP requested that the Applicant clarify the dimensions of the surrounding streetscape. Sections are included in the drawings attached as Exhibit F that demonstrate the width of the area between the building façade and tree box is nearly 20 feet, which provides ample room for both a 10-foot wide sidewalk and an area for sidewalk cafes and other street-activating uses.

### **III. Retail and Other Ground Floor Uses**

In its report, OP requested that the Applicant further define the types of uses that will be located on the ground floor portions of the building. As shown on the drawings included in Exhibit F, the ground floor consists of three types of uses, represented by color:

- Blue. The blue spaces are spaces that will be dedicated to office use. This is generally the primary office lobby and related circulation space.
- Orange – I Street Space. The orange spaces are spaces that will be reserved for retail and related community-serving uses. The 2007 Campus Plan / PUD requires that at least 75% of the Project’s I Street frontage be reserved for the “neighborhood-serving” retail and service uses that were enumerated and listed under Sections 701.1, 701.4, 721.2 and 721.3 of the old 1958 Zoning Regulations. (Condition P-11 of the Campus Plan / PUD Order.) Under the new 2016 Zoning Regulations, these enumerated uses have been recategorized into uses in the “Retail”, “General Service”, “Financial Service”, “Eating and Drinking Establishments”, “Entertainment, Assembly, and Performing Arts”, and “Arts, Design, and Creation” categories that are permitted in MU-Use Group E. As shown on the proposed plans for the Project, approximately 85% of the Project’s I Street frontage is anticipated to be devoted to these uses, which satisfies the requirements of the Campus Plan / PUD.
- Orange – Pennsylvania Avenue and Below-Grade Space. The Project also includes orange “Retail” spaces along the ground level at Pennsylvania Avenue and 21<sup>st</sup> Street and within the below-grade portions of the building. The Applicant desires flexibility to use these spaces for any use in the above use groups as well as in the “Daytime Care” category that is permitted in MU-Use Group F, which corresponds with the Project’s existing MU-9 and proposed MU-30 zoning. As an example, the Applicant intends to use the retail space along Pennsylvania Avenue for a publicly-accessible daycare facility that will serve not only building tenants but also the surrounding neighborhood.
- Yellow. The yellow spaces are spaces that will initially be designed for use by the anticipated lead office tenant of the project. On the ground floor, they consist of a separate lobby entrance for clients and guests of the lead office tenant as well as a prefunction area for events and meetings. In the future, however, these areas could be converted to retail and similar community-serving uses, and the Applicant desires to

reserve the flexibility to convert the uses of these spaces as the building evolves over the life of the PUD.

#### **IV. Benefits and Amenities Update**

The Applicant has met with the ANC and neighborhood stakeholders, and received feedback on a preliminary list of community priorities for public benefits of the Project. The Applicant has been evaluating the feasibility of each benefit with governmental and regulatory stakeholders (including OP, DDOT, the National Park Service, the Golden Triangle Business Improvement District, and the Washington Metropolitan Area Transit Authority, among others) to ensure that any proffered benefits and amenities are consistent with agency priorities and capable of being implemented within the timeframe for delivery of the Project. The Applicant will continue to coordinate among community and governmental stakeholders to develop a robust amenities package commensurate with the development flexibility sought in this application.

#### **V. Public Hearing – Hearing Fee, Testimony, Witnesses, and Evidence**

Enclosed is a check for \$43,290.26, which represents the hearing fee, as determined pursuant to the Hearing Fee Calculation Form attached as Exhibit A. At the hearing, the Applicant will offer Rafael Pelli and Craig Copeland as experts in the field of architectural design and Jami Milanovich as an expert in the field of transportation planning and engineering. Resumes for the proffered experts are attached as Exhibit B. Mr. Pelli and Ms. Milanovich have been previously recognized as experts in their respective fields.

Outlines of the testimony of all of the Applicant's proposed witnesses is attached as Exhibit C. The Applicant intends to present testimony from Alicia Knight on behalf of the University and Jake Stroman on behalf of Boston Properties as well as from the two proffered experts.

A list of all publicly available maps, plans, and other documents supporting this application is attached as Exhibit D. A list with the names and addresses of each person having a lease with the Applicant for all or part of the buildings located on the Property is attached as Exhibit E.

The Applicant's Comprehensive Transportation Report was included in the initial application and submitted to DDOT at that time. The Applicant reviewed the CTR with DDOT and will submit an updated analysis to DDOT at least 45 days in advance of the public hearing.


**Exhibits**

The following documents are attached to this submission:

- Exhibit A      Hearing Fee Calculation Form
- Exhibit B      Expert Witness Resumes
- Exhibit C      Outlines of Witness Testimony
- Exhibit D      List of Publicly Available Documents
- Exhibit E      List of Names and Addresses of all Tenants of the Property
- Exhibit F      Revised and Updated Plans

**Conclusion**

The Applicant has satisfied the requirements for consideration of the application and respectfully requests that the Commission schedule a public hearing on the matter.

Sincerely,  
  
/s/ David M. Avitabile  
David M. Avitabile

  
/s/ Cary R. Kadlecck /DMA  
Cary R. Kadlecck

**CERTIFICATE OF SERVICE**

On August 1, 2017, I caused a copy of the foregoing letter and enclosure to be delivered by hand or electronic mail to the following:

Joel Lawson  
D.C. Office of Planning  
1100 4<sup>th</sup> Street, SW, Suite E650  
Washington, DC 20024

Anna Chamberlin / Haley Peckett  
District Department of Transportation  
55 M Street SE, 5<sup>th</sup> Floor  
Washington, DC 20003

Advisory Neighborhood Commission 2A  
P.O. Box 293  
2020 Pennsylvania Avenue, NW  
Washington, DC 20006

President, Foggy Bottom Association  
c/o Marina Streznewski  
904 New Hampshire Avenue NW  
Washington, DC 20037

West End Citizens Association  
c/o Barbara Kahlow  
800 25<sup>th</sup> Street, NW #704  
Washington, DC 20037

  
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David Avitabile

**CERTIFICATION OF COMPLIANCE WITH SUBTITLE Z, SECTION 401 OF THE  
ZONING REGULATIONS**

The George Washington University and Boston Properties, Inc. (“Applicant”) hereby certifies that this pre-hearing submission, which has been filed with the Zoning Commission on August 1, 2017, complies with the provisions of Subtitle Z, Section 401 of the Zoning Regulations as set forth below, that the application is complete, and that no further changes are expected to be submitted prior to the public hearing on this application, other than the changes discussed in detail below.

At its June 26, 2017 Public Meeting, the Commission voted to set down the application for a public hearing. In response to comments made by members of the Commission during the public meeting and in the Office of Planning Setdown Report dated June 16, 2017, the Applicant has provided additional information regarding the proposed PUD project. The additional information requested includes:

- 1. Campus Plan Amendment. OP requested that the University provide a relocation plan for the administrative uses currently within Rice Hall and for the academic / administrative / medical uses that would have otherwise been accommodated on this portion of Development Site 75B.*

The information requested by OP is provided herein, and additional information regarding the details of the relocation plan will be provided in a supplemental submission.

- 2. Building Design. OP and the Commission expressed a desire for the Applicant to further study additional wave projections and indentations in the façade. OP also requested that the Applicant provide more information on the depth of the projections and support the need for 6-foot deep projection (rather than 4-foot projections allowed by code). Finally, OP requested that the Applicant commit to using curved glass where shown on the plans.*

As discussed herein and shown on Exhibit F, the Applicant has further studied the building design, including the projections and the use of curved glass.

- 3. Façade Articulation and Building Materials. OP and the Commission asked the Applicant to continue to develop the material details.*

As discussed herein and shown on Exhibit F, the Applicant has further developed the façade articulation and building materials for the Project. Additional details will be provided in a supplemental submission.



4. *LEED Commitment. OP and the Commission request that the Applicant confirm whether it is committed to certification under the LEED system.*

As discussed herein, the Applicant is committed to seeking certification for a Gold rating under the LEED v4 Core and Shell standard.

5. *Streetscape Dimensions. OP requested that the Applicant clarify the dimensions of the surrounding streetscape.*

As discussed herein, sections are included in Exhibit F that demonstrate the width of the area between the building façade and tree box is nearly 20 feet, which provides ample room for both a 10-foot wide sidewalk and an area for sidewalk cafes and other street-activating uses.

6. *Ground Floor Retail Uses. OP requested that the Applicant further define the types of uses that will be located on the ground floor portions of the building.*

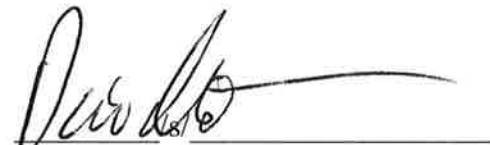
As discussed herein, the Applicant further defined the types of uses that will occupy the various portions of the street-level portions of the Project.

In all other respects, the project is the same as filed on April 13, 2017.

<b><u>Subsection (Subtitle Z)</u></b>	<b><u>Page</u></b>
401.1(a) Information Requested by the Commission; Updated Materials Reflecting Changes Requested by the Commission	Pre-Hearing Submission
401.1(b) Witnesses	Pre-Hearing Submission
401.1(c) Summary of Testimony of Applicant’s Witnesses	Exhibit C
Resumes of Expert Witnesses	Exhibit B
401.1(d) Additional Information, Reports or Other Materials Which the Applicant Wishes to Introduce	Pre-Hearing Submission
401.1(e) Reduced Plans	Application (Exhibit P); Pre-Hearing Submission (Exhibit E)

<u>Subsection (Subtitle Z)</u>	<u>Page</u>
401.1(f) List of Publicly Available Maps, Plans, and Other Documents	Pre-Hearing Submission (Exhibit D)
401.1(g) Estimated Time Required for Presentation of Applicant's Case	1 Hour
401.2 Memoranda of Understanding with Agencies and Entities regarding Public Benefits	Status addressed in Pre-Hearing Submission; decisions pending discussions with ANC and stakeholders
401.3 List of Names and Addresses of All Property Owners within 200 Feet of the Subject Property	Application (Exhibit D)
List of Names and Addresses of All Tenants within 200 Feet of the Subject Property	Pre-Hearing Submission (Exhibit E)

Respectfully submitted,

  
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 David Avitabile