

Government of the District of Columbia

ZONING COMMISSION



ZONING COMMISSION ORDER NO. 310
CASE NO. 79-13
April 10, 1980

Pursuant to notice, public hearings of the District of Columbia Zoning Commission were held on November 15, 1979, December 17, 1979, January 7, 1980, and February 28, 1980. At these hearing sessions, the Zoning Commission considered an application from the International Monetary Fund (hereinafter - IMF), for approval of a consolidated Planned Unit Development and related Map change.

FINDINGS OF FACT

1. This application is for approval of a consolidated application for Planned Unit Development and related Map Amendment from R-5-C to C-3-B. This application was filed on July 17, 1979 and according to Paragraph 7501.32 of the present Regulations, will be considered under the Regulations in effect on that date.
2. The applicant proposes to construct an addition to the existing IMF headquarters building located on Lot 49 in Square 120, bounded by 19th, H, 20th and G Streets, N.W. Lot 49 is 98,295 square feet in area and comprises about eighty-six per cent of Square 120. The remainder of square 120 consists of Lot 826, the site of the Western Presbyterian Church, and a public alley adjacent to the Church.
3. The existing IMF headquarters building contains 609,593 square feet of gross floor area, is 130 feet in height and occupies 64,206 square feet, or about sixty-five per cent of Lot 49. The proposed addition will contain a floor area of 144,972 square feet, will be 130 feet in height and will occupy 12,405 square feet, or about thirteen per cent of Lot 49. Thus, the IMF building with the proposed addition will contain a gross floor area of 754,535 square feet, resulting in a floor area ratio of 7.676, and will occupy 76,611 square feet, or about seventy-eight per cent of Lot 49. On-site parking will be reduced by ninety spaces from 807 to 717 spaces.

4. Lot 49 is zoned C-3-B, except for the northeast part, formerly Lot 824, which is zoned R-5-C and consists of 6,751 square feet. The applicant requests that the C-3-B District be extended to include the northeast part of Lot 49. The existing IMF building is located on the major southern part of Lot 49. The northwest part of Lot 49 is improved with a surface parking lot used by IMF staff and having an approximately ninety car capacity, while the northeast part of Lot 49 is vacant and unimproved.

5. The IMF's international headquarters building on Square 120 was approved as a Planned Unit Development with an accompanying amendment to the Zoning Map by this Commission in Case No. 68-69 and 68-70. In that approval, the Commission contemplated that the IMF would eventually occupy the whole of Square 120 and would build to an F.A.R. of 7.0 over the entire square. It was recognized that development would proceed in stages, since in 1969 the IMF had not yet acquired Lot 826, the site of the Western Presbyterian Church, had not closed the alley adjacent to the Church, and, under an agreement with the George Washington University, had not razed the Adams Hall dormitory which occupied the northeast part of Lot 49. Thus, the existing IMF building, constructed on the major southern part of Lot 49, constitutes only an initial stage of the development of Square 120 approved in concept by this Commission in 1969. Recently, the Adams Hall dormitory on the northeast part of Lot 29 was razed. The IMF has also abandoned efforts to acquire Lot 826 from the Western Presbyterian Church and to close the adjacent alley as planned, because the Church plans to continue its ministry at its present location. Had the IMF been able to build to an F.A.R. of 7.0 over the entire square as contemplated in 1969, the IMF could have built 798,498 square feet. It is now proposing to build 754,535 square feet which is 43,763 square feet less than 798,498 square feet.

6. The existing IMF building was designed to accommodate 1600 people. From the time that the existing building was designed, there has been an increase in the IMF's membership from 115 countries to the present 140, most of which are developing countries. Over the same period there has been a significant expansion of the IMF's responsibilities and activities with respect to its membership. Presently, the building's capacity has been exceeded and the IMF now accommodates approximately 100 staff in rented office space several blocks away. Based on past experience, it is projected that over the next five to ten years, at least 200 additional staff will be needed. The proposed addition will provide office space for approximately 335 staff, and would thus meet both the IMF's immediate need for office space, and its projected needs over the next five to ten years. The addition will also provide needed meeting facilities.

7. The objectives of the Planned Unit Development process are set forth in Paragraph 7501.11 of the Zoning Regulations. They are: sound project planning; efficient and economical land utilization; attractive urban design; the provision of desired public space and other amenities; compatibility with city-wide and neighborhood goals, plans and programs; environmental protection and energy conservation; historic preservation; improved circulation; and protection of the public health, safety, welfare and convenience.

8. The Commission finds that sound project planning is apparent in the design of the proposed addition and of the building as a whole. The addition has been carefully integrated with the design of the existing building, providing good interior circulation and a functional arrangement of new offices and meeting rooms, as well as a lounge area and snack bar as amenities for staff use. The first level below grade will be adapted for office use by providing a light well. The second, third and fourth levels below grade, which were originally proposed to be used for parking, will be used for support services.

9. The Commission finds that this project will make efficient and economical use of the subject site. The remaining undeveloped area of Lot 49 is divided into two parts, the northeast and northwest corners of the square, separated by Lot 826 which is occupied by the Church. The addition will be constructed on the northwest part of Lot 49, the larger of the two possible sites, and will utilize all of the remaining gross floor area allowable on Lot 49. Concentrating development in a single, 130 foot addition rather than two separate lower additions will create substantial public open space and attractive urban design. The intensive development of this site proposed by the applicant is an efficient and economical use of the City's scarce land resources. The supply of land in the City suitable for a major institutional use such as the IMF is severely limited.

10. The Commission finds that the attractive urban design of this project will enhance the city-scape. Along 20th Street, N.W., the facade of the completed building will be relieved by the meeting hall structure of the new addition. From 19th and H Streets, N.W., the uniform cornice line of the existing building and the new addition will provide a clean backdrop for the Church, while the Church will receive light and air over the park on the northeast corner of the square. The park which will be created on the northeast part of Lot 49 will also complement the existing, adjacent parks along Pennsylvania Avenue, N.W. and will enhance the vista from that important avenue. The applicant, by instruction from the Commission, redesigned the east facade of the new addition to enlarge the fenestration to match that on the north facade of the existing building. Also at the Commission's suggestion, the applicant redesigned the park to provide greater public access and more seating and to provide a clearer visual separation between the park and the neighboring churchyard. The applicant further agreed to refinish in stone the brick portion of the east

facade of the Church which has, since the Adams Hall dormitory was razed, become visible from 19th and H Streets, N.W. and from Pennsylvania Avenue, N.W., and to repair a part of the Churchyard wall.

11. The Commission finds that desired public space and other amenities will be provided by this project. There will be a total of 31,566 square feet of public amenity space, including 20,226 square feet on Lot 49 and 11,340 square feet in public space landscaped and maintained by the IMF. The park on the northeast corner of the square will contain an area of approximately 6,751 square feet on Lot 49 and 3,490 square feet in public space landscaped and maintained by the IMF. This is a substantial public park in this downtown location. In addition to the park, there will be a setback area around the IMF building containing approximately 8,825 square feet on Lot 49 and 7,850 square feet in public space landscaped and maintained by the IMF. The reading and exhibit room will be approximately 4,650 square feet in area and is therefore a significant public facility. In addition to the public space itself, the other public amenities which will result from this project will include the landscaping and maintenance of the open space, the quality of design and materials of the IMF building, including its limestone facade, and the quality of the urban design, including the harmonious relationship of the project to the Church, the adjacent parks along Pennsylvania Avenue and the surrounding structures. One of the most important public amenities will be the reading and exhibit room which will contain information relating to international organizations and economic affairs, reference books, and a wide range of international and financial periodicals. Also, a lecture area will be available for presentations about the IMF and there will be an exhibit area for exhibits on, for example, money and trade. The facility will permit the IMF to make some of its resources available to the public, without compromising the security of the headquarters building. For example, the IMF currently receives over 3,000 newspapers and periodicals, including many foreign language publications, which could be made available through the reading room. At the suggestion of the Commission, the applicant developed an outreach program to encourage use of the facility through distribution of information to school, college and public libraries and tourist information centers.

12. The Commission finds that this project is compatible with city-wide and neighborhood goals, plans and programs. With respect to city-wide goals, plans and programs, the Foreign Missions and International Agencies Element of the Comprehensive Plan prepared and adopted by the National Capital Planning Commission (The Foreign Missions Element) provides explicitly for the location of International Agencies within the City. The Foreign Missions Element, as amended on November 1, 1979, designates the subject Square 120 for international agency use, and the proposed project is totally in accord with this designation. This location is especially suitable because of its proximity to the World Bank, the Organization of American States, the Inter-American Development Bank, the State Department, the Treasury Department, the Executive Offices, and other related agencies and organizations.

13. The Commission finds that the IMF is one of the more prestigious and important international organizations and its functions bring dignitaries and others to the District. The IMF is a source of highly skilled jobs contributing to the overall variety of employment in the District and, with 1600 employees and an annual operating budget of \$62 million, is an important part of the local economy. It is also a very stable activity, not prone to fluctuations in response to business recessions. Use of public transit and improved air quality will be promoted by reducing off-street parking and concentrating employment on major transit lines. The reduction of automobile traffic will also reduce noise levels and conserve energy. With respect to neighborhood goals, plans and programs, the subject site is located on the southern edge of the Central Employment Area and along the major Pennsylvania Avenue corridor. The surrounding squares are developed with major institutional and commercial uses. Square 119 to the north is developed with the PEPCO building under a long term lease from the George Washington University, owner of the square. Square 141 to the east is developed with the World Bank building and Square 121 to the south was approved for development by the World Bank in Zoning Commission Case No. 78-19/76-14F. Square 102 to the west is part of the campus of the George Washington University. The IMF building is entirely compatible with these surrounding major institutional and commercial uses and structures. Although the University structures are lower in height and density than those of PEPCO and the World Bank, the level of intensity of activity on the campus is much greater than that generated by the IMF. The nearest residential concentration is located on F Street, N.W. between 20th and 21st Streets, N.W. and consists of high rise apartment buildings.

14. The architect for the applicant, Vincent Kling testified that the proposed building represented sound project planning and good urban design, continued the line of the existing building and the aesthetic movement along 20th Street, and provided a generous space between the Western Presbyterian Church and the new addition. Mr. Kling testified that the park would seat forty to forty - five people and that the library would provide foreign newspapers and manuscripts, a community outreach program, lectures, and exhibits explaining the function of the IMF. Mr. Kling testified that the project was compatible with city goals and policies because of the institutional character of area, the energy efficiency of the building and the addition of a park open to the public. In addition, Mr. Kling stated that the project provided a superior environment due to its quality materials and design and the provision of amenities such as landscaping, open space, the library and mini-park. The Commission so finds.

15. Arthur Fawcett, City Planner for the applicant testified that the PUD was within the area specified for international agencies by NCPC, compatible with city goals and policies, that the project would protect air and water quality, conserve energy and would provide a superior environment for IMF workers. The Commission so finds.

16. Robert Morris, Transportation Consultant for the applicant testified that the level of service at surrounding intersections was at acceptable levels. Mr. Morris stated that there would be better circulation with the proposed additional parking access and the elimination of the driveway to the existing parking lot. Mr. Morris also testified that the current ratio of employees per parking space was 1.98 and with the addition would be 2.70. The Commission so finds.

17. William B. Dale, Deputy Managing Director of the IMF testified that twenty-eight per cent of IMF employees are U.S. Citizens. The IMF must locate in the country which makes the largest financial contribution to the Fund. The IMF has 1800 employees in the Washington area, 1600 of which are employed by the IMF directly and 200 are contract employees. Mr. Dale also testified that the IMF has 100 people housed off-site and budgets \$62 million per year in payroll and operation expenditures.

18. The Office of Planning and Development by report dated November 9, 1979, and by testimony presented at the public hearings recommended conditional approval of the application. The OPD stated that it had no objection to the proposed map amendment based upon the appropriateness of the IMF's continuance at this location in light of District plans and policies for the area. The OPD also supported the concept presented by the IMF's Planned Unit Development but had specific reservations concerning the treatment of the "east" facade of the proposed addition, the design of the proposed park, the function of the proposed library/reading room, the provision of additional parking spaces in the addition and the density of the proposed development. As a result of the redesign of the "east" facade and the park, and the elimination of all additional parking spaces, OPD representatives acknowledged that the proposal, as modified, addressed those areas of previous concern. The OPD representatives testified that there was still concern over the potential development of those areas of Square 120 not included in the PUD. It was suggested that the IMF could attempt to gain rights of first refusal from Western Presbyterian Church for Lot 826.

19. The Office of Business and Economic Development by memorandum dated November 1, 1979 recommended approval of the Planned Unit Development. The OBED believed that centralization of the IMF's facilities at this location would reinforce the area's image as an international headquarters and financial center. The Office stated that the proposed extension will generate increased opportunities for District businesses which provide supplies and services to the IMF. In addition, OBED believed that expansion of the IMF's facilities on this site will be in the District's interests by not taking more property off the city's tax roles.

20. By memorandum dated November 23, 1979 the Fire Chief stated that the Fire Department had no objections concerning the proposed addition to the International Monetary Fund Building. The Department stated that it will be necessary for the developer to maintain close coordination with the Fire Marshall to assure that all of the features necessary for fire safe structures are provided.

21. The Department of Environmental Services by memorandum dated October 26, 1979 stated that the existing water distribution system serving the area is adequate to accommodate the proposed development. The Department recommended that on-site storm water management be included in order to provide maximum protection of the property and to reduce the general overload on the combined sewers serving the area. The Department stated that the proposed development should have no long-term negative impact on air and noise quality in the surrounding area nor will the development have significant impact on the Department's solid waste and disposal activities.

22. The Department of Transportation via report of the OPD dated February 11, 1980 noted that the Farragut West Metrorail station is approximately 1600 feet from the site. The Foggy Bottom-George Washington University station is approximately 2000 feet from the site. The site is also well served by Metrobus. Seventy percent of the regional work force will be able to reach the site by transit within forty-five minutes when the Metro system is completed. The Department also noted that the proposed addition will have no measurable detrimental impact on the surrounding street system. Elimination of the proposed ninety parking spaces should slightly decrease the automobile usage of IMF employees. The signalized intersections at 19th and G Streets, and at 20th and G Streets now operated at level of service C during both peak periods. The Department stated that the ninety spaces proposed by the applicant should not be included. DOT noted that the existing 717 spaces exceed the minimum requirements of C-3-B zoning and that the Department's own calculations resulted in a demand for 280 spaces for the entire complex.

23. The George Washington University, the U.S. Treasury Department the U.S. Department of State and Martha Sauve, representing the Western Presbyterian Church, expressed strong support for the application.

24. Harold Davitt and Steven Levy, testified at the hearing on behalf of ANC-2A in opposition to the application. Mr. Davitt stated that the unusually large building did not offer benefits to the city and there were no commercial services which would benefit residents or workers in the neighborhood. The ANC listed the following points as the basis for its opposition:

- a. the change from residential to commercial zoning;
- b. the application is not a proper PUD nor a Phase II since the IMF is asking for all zoning benefits as if they had purchased the church property without actually doing so;
- c. the project uses the bonus authority of the Zoning Commission "cheaply"
- d. the award of FAR to a building after the fact is inappropriate;
- e. The IMF could build a facility under the existing zoning;
- f. The proposal does not offer significant benefits to the neighborhood.

Mr. Levy testified that it is inappropriate to award additional FAR to an existing building. Mr. Levy stated that the IMF could build a seven story building and that a 130 foot building was not in harmony with adjacent campus buildings. Mr. Levy testified that the IMF proposal results in a building with an FAR of thirteen on the unbuilt site and that substantial FAR is requested in return for a postage stamp park and reading room. Mr. Levy stated that most of the proposed amenities cannot be used by citizens such as they could with the World Bank and the Lafayette Center proposals.

25. Katherine Wood, Chairperson of the Foggy-Bottom Association testified in opposition to the application and supported the position of ANC 2A as stated by resolution dated November 16, 1979. Ms. Wood also stated that she is opposed to preferential treatment for the tax-exempt IMF and is opposed to the reduction in residentially zoned land for the creation of offices. It was also stated that the project is not in accord with the city's "Goals and Policies" element because the scale of the building is incompatible with low buildings to the south and west, the project will not contribute to the vitality of the area, does not preserve or enhance the neighborhood and does not contribute to the provision of sound, affordable housing. Ms. Wood also testified that she did not believe that area residents would use the library.

26. In response to the issues and concerns of ANC 2A and the Foggy-Bottom Association, the Commission finds that the applicant has met its burden to demonstrate the public benefits and other meritorious aspects which will result from approval of the additional floor area requested for this project. The project will accommodate an important public service organization in keeping with the role of the City as the National Capital and the obligations of the United States as the host country under the Articles of Agreement of the IMF. This will contribute to the economy of the City and enhance its image as an international Center. The IMF will be accommodated in a location determined to

be appropriate for international agency use and the project will make efficient and economical use of the subject site, will create an attractive urban design and will compliment the surrounding structures and uses. Desired public space and other amenities, including a public park and a public reading and exhibit room will be provided. Parking will be reduced and traffic conditions in the area will be improved. Both the Office of Planning and Development and the Office of Business and Economic Development recommended that these public benefits merit approval of this project, subject to appropriate conditions.

27. As to the change of zoning, the Commission finds that the zoning of adjacent property to the north and south is already C-3-B, with C-4 located directly across the street to the east. With the exception of the Western Presbyterian Church, all of the property in Square 120 would be zoned C-3-B. The Commission further finds that the proposed use, height and bulk permitted under the proposed zoning would be entirely compatible with existing uses and structures in the area.

28. As to the design of the proposed building, the Commission held a further hearing on February 28, 1980, to consider alternative design solutions which reduced the bulk of the building. The Commission considered a number of alternatives presented by the applicant, and one submitted by the ANC. The Commission finds that the most appropriate design solution is the one presented in the application, that best continues the mass and design of the existing building, and best compliments the existing building and completes an urban design statement for the block.

29. At the public hearing held on November 15, 1979, Steven Levy, on behalf of ANC 2A, moved that the existing building be excluded from consideration in the PUD application. The Commission took the motion under advisement and requested advice from the Corporation Counsel.

30. By memorandum dated December 18, 1979, the Office of the Corporation Counsel advised the Commission that nothing in paragraph 7501.21 of the Zoning Regulations rendered it significant that a portion of the PUD site had been developed pursuant to a previous PUD case and that the subject project met the minimum area requirements of 7501.21.

31. The proposed action was referred to the National Capital Planning Commission under the terms of the District of Columbia Self-Government and Governmental Reorganization Act and the National Capital Planning Commission reported that the PUD with the guidelines, standards and conditions as proposed by the Zoning Commission will not have an adverse impact on the interests or functions of the Federal Establishment within the National Capital Region and is not inconsistent with the Comprehensive Plan for the National Capital. The Commission further reported that the development should contain additional public amenities, including mixed uses at the ground floor level and should be more responsive, in terms of its bulk, mass and scale to surrounding land uses and development.

32. As to the third and fourth recommendation of the NCPC, the Commission finds that these issues are essentially local issues not affecting the Federal interest and that the Commission has fully addressed all the relevant local issues in this order. The comments of the NCPC in this regard go beyond the scope of issues to which the NCPC should address itself.

CONCLUSIONS OF LAW

1. The proposed Planned Unit Development meets the minimum area requirements of Sub-section 7501.2 of the Zoning Regulations.
2. The Planned Unit Development process is an appropriate means of controlling development of the subject site.
3. Approval of this consolidated PUD application is appropriate, because the application is generally consistent with the present character of the area and because it would encourage stability of the area.
4. The Commission takes notes of the position of Advisory Neighborhood Commission 2A, and in its decision has accorded to the ANC the "great weight" to which it is entitled.
5. The approval of the application would promote orderly development in conformity with the entirety of the District of Columbia zone plan as embodied in the Zoning Regulations and Map of the District of Columbia.
6. The proposed application can be approved with conditions which would insure that development would not have an adverse effect on the surrounding area.

DECISION

In consideration of the Findings of Fact and Conclusions of Law herein the Commission hereby orders that the Motion to Dismiss filed by ANC 2A is hereby denied. Further, the Commission hereby orders approval of the consolidated application for a Planned Unit Development and a change of zone from R-5-C to C-3-B for that part of lot 49 formerly known as lot 824 located in square 120, subject to the following guidelines, conditions, and standards:

1. The planned unit development shall be developed in accordance with plans filed with the Zoning Commission, dated January 7, 1980, prepared by the Kling Partnership and marked as Exhibit No. 60, except as modified to conform to the conditions of this Order.
2. The use of buildings included in the planned unit development shall be limited to office, meeting and other accessory uses of the International Monetary Fund.

3. The overall FAR of the project shall be limited to 7.676 which shall include the existing IMF building and the additions proposed under this planned unit development, exclusive of roof structures.
4. The gross floor area of the project shall not exceed 754,535 square feet, exclusive of roof structures.
5. The height of the proposed building shall not exceed 130 feet, provided, however, that the roof structure for the proposed building shall match the height and setback of the roof structure on the existing building.
6. The roof structure of the proposed building shall be constructed in accordance with Drawings Z-10-A, Z-12-A, Z-13 and Z-14 of Exhibit No. 60. The gross floor area of the roof structure shall not exceed 7,631 square feet. The proposed roof structure shall house mechanical equipment and shall be enclosed with materials to match the roof structure of the existing building.
7. The architectural finish materials of the proposed addition shall be as described in Exhibit No. 60 and elsewhere in the record of this case, to match the finishes of the existing IMF building on Lot 49.
8. The total number of parking spaces allowed under the PUD shall be limited to a maximum of 717 spaces, the number which is now located in the existing IMF building. No parking spaces shall be provided in the proposed addition, however, parking access and parking ramps shall be provided as shown on Drawings Z-1-A, Z-3-A, Z-4 and Z-5 of Exhibit No. 60.
9. Three loading berths shall be provided, two of which are now provided in the existing building and one of which shall be provided in the proposed addition as shown on Drawing Z-5 of Exhibit No. 60. All loading berths and platforms shall conform to the requirements of loading berths and platforms located in the C-3-B District.
10. Landscaping, paving and other exterior site treatments including those to be located in public space, shall be as shown on Drawings Z-16-A and Z-21 of Exhibit 60.
11. Subject to acceptance and agreement by the Western Presbyterian Church, the brick portion of the east facade of Western Presbyterian Church shall be refinished in stone to match the existing Church facade and a portion of the brick wall enclosing the church yard shall be repaired. The cost of such repairs and modifications shall be borne by the IMF as a condition of approval for the planned unit development.

12. The proposed mini-park located on the northeast corner of Lot 49 shall be constructed and landscaped as shown on Drawing Z-21 of Exhibit No. 60.
13. The proposed library, reading room shall be constructed as shown on Drawing Z-18 and Z-19 of Exhibit No. 60. Such library/reading room shall include an "outreach program" as outlined in the record of this case to encourage its use by the neighborhood and the Washington Community. Access to the library/reading room by the public shall be allowed during normal working hours of the IMF and at other selected times.
14. Storm water management and erosion control features shall be included in the PUD as shown on drawings Z-10-A and Z-16-A of Exhibit No. 60. Such features shall conform to the requirements of the D.C. Department of Environmental Services at the time of construction.
15. If and when the International Monetary Fund shall purchase lease or otherwise gain effective control over the use of Lot 826 in Square 120 now owned by the Western Presbyterian Church, no use of the property by the IMF shall be established without prior approval of the Zoning Commission.
16. The change in zoning requested by the applicant from R-5-C to C-3-B shall be effective upon recordation of a covenant as required by Section 7501.8 of the Zoning Regulations.
17. No building permit shall be issued for this planned unit development until the applicant has recorded a covenant in the land records of the District of Columbia, between the owner and the District of Columbia, and satisfactory to the office of the Corporation Counsel and the Zoning Regulations Division, which covenant shall bind the applicant and all successors in title to construct on and use this property in accordance with this Order or amendments thereof by the Zoning Commission.

Vote of the Commission taken at the public meeting of March 13, 1980: 3-2 (Commissioners Theodore F. Mariani, Ruby B. McZier and George M. White to adopt, Commissioners Walter B. Lewis and John G. Parsons to deny).


THEODORE F. MARIANI
Chairman
Zoning Commission


STEVEN E. SHER
Executive Director
Zoning Secretariat

This order was adopted by the Zoning Commission at its public meeting held on April 10, 1980 by a vote of 3-2 (Ruby B. McZier, George M. White and Theodore F. Mariani to adopt, John G. Parsons opposed, Walter B. Lewis opposed by absentee ballot).

In accordance with Section 2.61 of the Rules of Practice and Procedure before the Zoning Commission of the District of Columbia (18 D.C. Register 891, Supp. no. 3, July 6, 1972), this order is final and effective on 16 APR 1980 and the amendment to the Zoning Map is effective on _____.