

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS
OFFICE OF THE ZONING ADMINISTRATOR**



February 15, 2013

Maureen E. Dwyer
Goulston & Storrs, PC
1999 K Street, NW- Suite 500
Washington, DC 20006

RE: GSA West Heating Plant – 1051 29th Street, N.W (Square 1193)

Dear Ms. Dwyer:

This is to confirm the substance of our discussion on October 5, 2012, concerning the potential redevelopment of the above-referenced property, the GSA West Heating Plant (“WHP”). The property is located south of the C&O Canal between 29th Street, K Street, and Rock Creek Parkway. The property is currently owned by the U.S. General Services Administration and is therefore not presently subject to the D.C. Zoning Regulations. GSA plans to dispose of the property through a public auction and any development would require a zoning map amendment before the District of Columbia Zoning Commission.

The existing building has a height of approximately 110 feet. The existing zoning to the west and north is W-2 and the maximum permitted height in a W-2 District is 60 feet. Therefore, if the Zoning Commission determined to place the property in the W-2 zone classification, the existing building would be nonconforming as to height. The issue we discussed is the extent to which the building could be demolished in order to permit adaptive reuse to the same height and bulk as the existing structure.

Your engineer has described the structural challenges associated with the proposed adaptive re-use of the WHP building and the need to partially demolish and reconstruct the building. Specifically, the exterior wall has extensive cracking throughout and the installation of any additional fenestration will destabilize the wall beyond a repairable/serviceable condition and require significant alteration/demolition of the wall. Cross bracing exists behind every masonry wall, so new openings cannot be made without the demolition of the bracing and associated reinforcing of the steel framing. As these elements are either fully or partially integral to the masonry construction, each frame modification adds risk of damage or the creation of new instabilities in the structure. Since redevelopment for any adaptive re-use, particularly residential or hotel use, would require additional fenestration and the addition of floors, partial demolition and reconstruction of the building are essential.

As I discussed when we met, if the redevelopment of the building were to preserve a minimum of four (4) feet of the enclosing exterior walls, subject to openings for access, then the structure could be reconstructed to its original height and bulk and preserve its nonconforming status. Your architect indicated that the plans would comply with this requirement and, in addition, that the entire 29th Street façade would be preserved. The result is that 31.6% of the building will be preserved, including a minimum of 4 feet of the enclosing exterior walls. As we also discussed, any redevelopment will be subject to extensive review by the Old Georgetown Board, Commission of Fine Arts, and the Zoning Commission with full opportunity for community input and participation.

Based on the structural information you presented as well as the drawings presented by the architect, and assuming that the building complies with the requirement that a minimum of 4 feet of the closing exterior walls is preserved, subject to openings for access, then the structure could be reconstructed to its original height and bulk and preserve its nonconforming status in the W-2 zone.

As we also discussed when we met, and based on my review of the attached plat, I find that Square 1193 can use the width of the Whitehurst Freeway for purposes of measuring the maximum building height which permits a height of at least 110 feet, which is the approximate height of the existing building.

Please feel free to contact me if there are any questions.

Sincerely, 
Matthew Le Grant
Zoning Administrator

Attachment: Diagram

File: Det Let re 1051 29th St NW to Dwyer 2-15-2013