



OFFICE OF THE CITY MANAGER

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January 21, 2009

Mr. John V. Cogbill, III, Chairman
National Capital Planning Commission (NCPC)
401 9th Street, NW
North Lobby, Suite 500
Washington D.C. 20004

Re: NCPC Submission
BRAC 133 Office Complex
Mark Center
Alexandria, Virginia

Dear Mr. Cogbill:

We have reviewed the referenced applications and materials submitted to the National Capital Park and Planning Commission (NCPC) for the BRAC 133 office building within the Mark Center of Alexandria and submit the following comments based on the conceptual approval and foundation permit requested. *Given the required NCPC deadline of January 21 for the submission of comments by the City, this letter contains preliminary comments and recommendations from the City of Alexandria and are subject to amendments based upon a planned community meeting on January 26 and a City Council meeting on January 27.* The City understands that the applicant will be required to submit a subsequent application for final design approval incorporating additional detail regarding materials, colors and design refinements for the building and site plan. We will provide additional comments at the final review process which we anticipate to be within the next three to four months.

As discussed later in this letter, we have concerns related to the details of the proposed Transportation Management Plan in that the Plan has not been worked out in detail, and is absolutely key to the achievement of the projects stated 40% non-single occupancy vehicle goal.

While the proposal is not subject to regulatory approval by the Alexandria Planning Commission and City Council, the City appreciates that the Department of Defense has indicated that it is their intent to substantially conform to the existing zoning. In addition to zoning conformance, due to the project's size, height and visibility, it is the City's strong opinion that the design and materials of the project be refined to ensure that the quality of design and construction is

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commensurate with its size and scale. The City recommends that if NCPC approves the concept design and foundation permit as requested by the applicant, it should be with the understanding that the applicant will address the design comments outlined in this letter and continue to work with the City regarding the final design, materials and colors and refinement to the site plan prior to the submission of the final NCPC review. Because of the BRAC-driven accelerated review schedule, the comments below are preliminary, and we feel it is important to obtain additional comments from the adjoining residents, communities and businesses to be reflected in the City's comments and testimony at the February NCPC hearing. It is also crucial that the applicant communicate and work with the adjoining communities throughout the review and construction process to minimize impacts to nearby property owners and residents.

A. Master Plan and Zoning

The City's Master Plan, composed of a series of Small Area Plans, and zoning districts are used to review development proposals in the City to ensure that they conform with the City's long range plan. The Mark Center property is a portion of land within the larger tract known as the Winkler Coordinated Development District (CDD) in the western portion of the City governed by the *Alexandria West Small Area Plan (SAP)*. The SAP envisioned this parcel to be a low density/high-rise office use due to its close proximity to Seminary Road and access to I-395. The previously City approved CDD acknowledges that higher density office use at this location is appropriate.

Because the property is owned by the Federal Government, the proposal is not subject to regulatory approval by the City's Planning Commission and City Council. The Department of Defense has indicated that while it is not required to comply with the City's existing zoning, it is their intent to substantially conform to the existing zoning.

The Coordinated Development District (CDD) zoning for the site permits a relatively high density and heights up to 250 feet. In 2004, this portion of the Mark Center development went through a development review process and received approval for a total of five buildings on the property with an approximate total floor area of 1,700,000 square feet of development and building heights up to 240 feet.

The applicant is proposing to develop two of the remaining three development blocks within Mark Center with approximately 1,400,000 square feet of office and associated uses. The applicant is proposing approximately 1,380,000 square feet within one building rather than the three previously approved. The current proposed building height of approximately 272 feet exceeds the previously approved building height (240 feet) and the maximum height (250 feet) permitted by the zoning ordinance. The mechanical penthouses are taller than permitted by the City's zoning.

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Additional aspects of the proposal, such as the site layout and floor area ratio, vary from the original 2004 proposal. For example, a portion of the proposed seven-level parking structure encroaches into the previously planned and approved central open space. Another variation from the original proposal is the incorporation of an 8,700 square foot transit center in the proposed parking structure.

B. Building and Site Design Comments

The City requires that all new buildings conform to a set of design principles as outlined in *Alexandria Design Principles*. A project of this size and type would be subject to the following applicable principles:

- Provide a base/middle/top building hierarchy.
- Incorporate multiple rhythms in the building façade.
- Provide a solid-void ratio appropriate to Alexandria.
- Create a skyline and articulated building tops.

The two building drawings in this letter reflect new drawings by the applicant's architect after receiving City comments, and as a result, have begun to reflect City staff design comments and concerns.

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The following comments are based on achieving compliance with these design principles and maintaining the high level of quality of buildings within the City.

Provide a Base/Middle/Top Building Hierarchy – Multiple Rhythms

We recommend the use of additional glass (some of which will not be vision glass because of the blast protection requirements) to reduce the perceived size of the building, provide additional visual variety and provide a more clearly defined base, middle and top to the building. We also recommend the use of contrasting darker and lighter colors of architectural precast panels to enhance vertical expression and multiple rhythms.



The principle of multiple rhythms in the City design standards is especially important in a large scale building such as this one to reduce the perceived height, length and to introduce human scale elements as part of the building.

Provide a solid-void ratio appropriate to Alexandria

One of the design challenges inherent in the proposal is the required blast resistant facade. This initially resulted in a predominantly solid faced expression with square windows, making the building appear larger and the windows smaller than required by the City's design guidelines. The smaller windows were atypical of most office buildings and made the building appear more monolithic. In response to the City's comments the windows in the revised design were enlarged for the entire building and darker spandrel panels were added, resulting in an overall less monolithic expression.

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As a way to better define the top of the building and to balance the solid to void ratio, the applicant has agreed to introduce a three story glass expression around the top of the building. The added glass feature creates a clearly defined frieze band and top expression and reduces the perceived mass of the building.

Skyline – Clearly articulated building top.

This building will be one of the most visible buildings in Alexandria and one of the most visible government office buildings in Northern Virginia. Therefore, it is essential that the building have a well-defined building top to provide a visually interesting addition to the skyline. The applicant has revised the top of the building to provide a more distinctive top expression as well as vertical brackets to integrate the top as an integral element of the building. The applicant has worked with the City to accentuate the top expression by increasing the spacing between the building and the roof-top wing. The applicant has added additional detail to the top to express the vertical construction of the wing and increased its “lightness.” As this project moves forward, it is essential that the applicant continue to work with the City to ensure that the final design, materials and lighting are appropriately designed for this visually prominent building.

C. Parking Structures

The proposal consists of two parking structures, one adjacent to I-395 and the other adjacent to Mark Center Drive. While the design of these parking structures is not part of the current application, we recommend that the applicant work with the City to integrate the design of these parking structures to be compatible in material and design with the proposed building and the remainder of the Mark Center campus and open space.

D. Green and Sustainable Building Practices

Ensuring that the building and new developments minimize impacts to resources, energy and are environmentally sustainable is an integral component of many City policies. This policy becomes even more essential for this proposal given its size and scale and potential impacts to city services and infrastructure. It is our understanding that the proposal will achieve silver LEED certification. While achieving silver LEED certification is consistent with the requirement for City facilities and the goals for private development, we are recommending that to the extent possible the elements as part of LEED certification focus on water use/reuse such as ultra low fixtures, stormwater and elements that will minimize impacts to climate and the resource protection area. While we have had some preliminary discussions with the applicant regarding the green and sustainable techniques to be used for the site and building, these are elements that need to be clearly defined and consistent with the City’s objectives and policies prior to final approval by NCPC.

E. Site Security

The applicant is proposing an anti-ram/anti-climb perimeter for the site. We recommend where possible that the required perimeter security (anti-ram/anti-climb) be better integrated with the landscape design and the remainder of the Mark Center campus through the use of elements such as berms, landscaping, decorative stone walls, planters, post and cable systems and water features.

Further, we recommend that the applicant relocate the remote inspection of trucks to support the WHS site at the Pentagon or another Remote Inspection Facility (RIF). Moving the RIF off-site would provide several advantages:

- The potential for an event (CBRNE) to occur at the Mark Center is significantly reduced; trucks would be pre-screened and cleared to the site and could enter the Remote Receiving Facility directly.
- The land area of the RIF could be used for a direct access road to the site for WHS personnel and mitigate traffic volumes on the Seminary/Beauregard arterials.
- Trucks could be scheduled to service the WHS site on off-peak traffic hours.

In addition, relocating the RIF would enable the retention of a wooded landscape buffer on Seminary Road, which would enable a more compatible use adjacent to the existing residential and office uses while providing a more secure campus by eliminating a wrap around security perimeter.

E. Transportation

The proposed BRAC 133 development will significantly impact the transportation systems surrounding and serving the development site. While the scope of the BRAC 133 proposal is generally consistent with prior City development approvals for this site in 2004, there are a number of related issues that need to be addressed.

The BRAC 133 development proposal contemplates an aggressive 40 percent non-SOV (single-occupant vehicle) mode share for travel to and from the site. While believed to be an achievable goal, we feel strongly that it must be supported by an equally aggressive and well-managed transportation demand management (TDM) program. A detailed TDM program based on the following principles must be developed and adopted within the next six months:

1. The TDM program should be performance based. In consideration of the 40 percent non-SOV mode share assumed for the project transportation analysis, the City believes this is an appropriate performance standard for the TDM program. Specific program elements should be implemented and managed as necessary to meet this performance standard.
2. The TDM program should be adequately and continuously funded by the federal government as necessary to meet the facilities performance standard.
3. Program performance audits should be the basis for program management and its associated funding level. Such audits should be regularly conducted and the results publicly available.

While this development has committed to implementing all of the street improvements that were contemplated in previous 2004 site approvals, there remains opportunity for direct site access and egress from the I-395 interchange at Seminary Road. Such a direct connection to the I-395 corridor could materially reduce the impact of the proposed development on the surrounding street network. Working with the Virginia DOT, the Army, Duke Realty and the City have initiated efforts to secure the necessary approvals of this interchange access modification (i.e., creating a right-in and a right-out from the Winkler site on the I-395 southbound slip ramp) and the required traffic studies of this proposal by VDOT are underway. The applicant should be required by NCPC to continue to diligently pursue approval of this additional improvement and, if approved by FHWA, provide Defense Access Roads Program funding or other federal funding for construction.

Anticipating a significant level of transit service at the site, the proposed development includes construction of a transit center that will serve both the site and the surrounding community. Working cooperatively with the City and area transit providers, WMATA and DASH, the applicant has begun development of a comprehensive transit service plan for the site. Completion of this plan, including the integration of the public and agency-provided transit services (such as extensive WHS shuttles) and a funding plan to offset any increase in the cost of providing public transit service to the site, should be required by NCPC of the applicant within the next six months.

Also, as NCPC is probably aware, VDOT has been working with Fluor/Transurban to establish HOT lanes on I-395. They have indicated that they wish to have HOT access at Seminary Road. The City has not supported similar access in the past due to its potential negative impact on adjacent residential neighborhoods. However, with the HOT proposal, City staff are willing to analyze the situation again, and have asked VDOT and Fluor/Transurban to initiate a study of the impact of such a HOT Seminary Road interchange connection on adjacent residential

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neighborhoods. To date, VDOT and Fluor/Transurban have not agreed to undertake such a study. The City requests that NCPC endorse the City's study request.

F. Environmental Mitigation

The footprint of the proposed office building encompasses a recognized Resource Protection Area (RPA), and as a result, mitigation of this encroachment action needs to occur. The City, Duke Realty and the Army have been discussing and negotiating an appropriate dollar amount to be paid by the federal government to improve the Holmes Run Stream area in a to-be-determined location. NCPC should endorse the concept of appropriate RPA mitigation.

G. Open Space

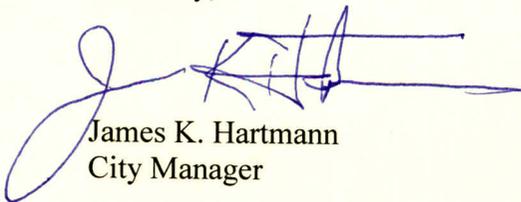
The proposed office building's footprint eliminates approximately 20,000 square feet of open space from the previously approved Winkler CDD. In order to mitigate this change in plans, the federal government should provide funding to purchase an equivalent amount of open space in the immediate area. NCPC should endorse the concept of appropriate open space mitigation.

H. Conclusion

This proposal is proceeding at a very aggressive schedule for review by the City, residents and remainder of the community. We feel it is essential that the residents and community be involved as part of the review process and, therefore, have assisted in the coordination of a January 26th community meeting. It also is essential that the applicant participate and facilitate community meetings as part of this review by NCPC as well as part of the ongoing construction of the proposal. Our comments are based on the conceptual review and foundation permit requested by the applicant with the understanding that the City's comments regarding traffic, the building, the site plan, security elements and green building elements will be adequately addressed prior to NCPC's review of the final proposal.

Please contact me if you have any additional questions or comments regarding this matter.

Sincerely,



James K. Hartmann
City Manager

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cc: The Honorable Mark Warner
The Honorable Jim Webb
The Honorable James P. Moran
The Honorable Mayor and Members of City Council
The Chairman and Members of Planning Commission
Mark Jinks, Deputy City Manager
Faroll Hamer, Director, Planning & Zoning
Jeffrey Farner, Deputy Director, Planning & Zoning
Tom Culpepper, Deputy Director, Transportation and Environmental Services
David Levy, Director, Urban Design and Plan Review, NCPC
Marcel Acosta, Executive Director, NCPC
Eugene Keller, Community Planner, NCPC