LASALLE
ELEMENTARY SCHOOL
"A COMMUNITY OF LEARNERS"

December 9th, 2006

District of Columbia Zoning Commission
441 4th St. NW
Washington, DC 20001

Dear Commissioners,

This letter is to bring to your urgent attention certain issues concerning the proposed development in Case No.06-08, the Ft. Lincoln/Gateway Village LLC Consolidated PUD.

The Environmental Protection Agency's Stakeholder Manual for Watershed Protection impresses upon federal, state, and local agencies the need to support stakeholders' rights to be included in the dialogue where environmental issues meet urban and commercial development. As such, I am stepping up to this public forum as a matter of right and as a matter of responsibility.

As an affiliate of the District of Columbia Environmental Educators' Consortium (DCEEC) and with two graduate degrees in the Sciences, I not only have appropriate training and experience, but also the responsibility to act as an environmental advocate on behalf of the natural resources that will be so adversely affected by the construction and future development of this immediate site and more importantly *the cumulative impact* of all the planned and ongoing development in the Ft. Lincoln area: 23 acres here at Ft. Lincoln Gateway Village, 22 acres across the street at Dakota Crossing already in progress, and another 42 acres across the other street as the Washington Gateway "Big Box" development, all at less than a ½ mile from the Anacostia River within whose watershed the proposed developments all fall.

I also come as a teacher, environmental educator, and LID administrator (operating under grants from the USDA National Conservation Resource Service, and also from the District's DOE Watershed Protection Division) at LaSalle Elementary School located at 501 Riggs Rd., NE, a District of Columbia Public School, as the immediate and future effects of construction and development at this site will adversely affect the very sites where my students and I, in partnership with the Anacostia Watershed Society, have actively been restoring the health of the river and it's surrounding wetlands with river clean-up, wetland restoration, and watershed conservation projects, over the last four years. If not properly mitigated, any and all pollution from this site, whether through sediment and erosion, storm water runoff including trash and debris, settled airborne pollutants, or thermal pollution from the proposed acreage of impervious surface, will not only immediately affect our restoration efforts, it will adversely impact the health and safety of those students who work in the water itself and will undermine the education of hundreds of District students that has been directed to building within them the commitment required to bring about informed decisions, responsible behavior, and constructive actions concerning conservation and the environment.

children first
Their Future is NOW!

501 RIGGS ROAD NE • WASHINGTON, DC • 20011 • 202-576-6120 • 202-541-3859 (FAX)

ZONING COMMISSION
District of Columbia
CASE NO.06-08
EXHIBIT NO.30

If no mitigation strategies are applied, the detrimental consequences to the network of wetland habitats and their buffers, the local groundwater recharge capacity of the land, the consequential effect upon the Ft. Lincoln area and the entire Metropolitan area water quality, and the eventual cumulative contribution to the poor health of the Potomac into which it flows (and from where Ft. Lincoln residents, LaSalle students and their families, and myself obtain our residential water supply) and thence the Chesapeake Bay, and the eventual capital costs associated with water quality improvement, pollution abatement, and watershed restoration and conservation of all three waters will far outweigh the financial benefits accrued by the city by allowing residential development.

I wish to suggest to the Commission a compromise between non-development and the possible irresponsible and detrimental effect such a building project would cause if there is little or no intervention, and so I recommend to you that at a minimum, the Commission should prescribe four strategies to ensure environmental protection of the site:

1. Identify specific temporary erosion and sediment control measures prior to the start of construction of Ft. Lincoln Gateway Village, ensuring they are included in the construction documents, and that the MS4 operator has reviewed the site plan before ground is broken;

2. Identify specific post-construction runoff control measures and final storm water management design, including appropriate BMPs and LID strategies;

3. Appoint a Local Storm Water Management Panel to include representatives from the EPA, the Ft. Lincoln Gateway Village LLC, the Anacostia Watershed Society, and other local stakeholders; and

4. Recommend to the Government of the District of Columbia, that certain incentives be created to promote the use of LID strategies at this development, a strategy fully endorsed by Mayor-Elect Adrian Fenty. This is probably *the most important measure* that the Commission can prescribe to mitigate against the tremendous damage that will be done to the Anacostia River if outdated or ineffective techniques are used.

Prior to the December 18th hearing on this case, I invite you to read the attached treatise which will include a closer look at the watershed issues of the immediate area, some analysis of the transcript of your June 12th hearing that indicates that certain information has either not been disclosed or purposely obscured in order to facilitate irresponsible development practice, a presentation of a fuller picture concerning the cumulative impact of the Gateway/Ft. Lincoln area and further information concerning LID (Low Impact Development) strategies that will play a crucial part in finding the necessary balance between the huge environmental impact and the need for residential/commercial development in this area.

Sincerely,

David Hilmy

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Encl.:

ENVIRONMENTAL CONCERNS Re. Square 4325, Parcel 173/145; Case No.06-08, the Ft. Lincoln/Gateway Village LLC Consolidated PUD; District of Columbia Zoning Commission Public Hearing, December 18th, 2006

CC.:

Council of the District of Columbia
Mayor-Elect Adrian Fenty, Kathleen Patterson, Marion Barry, Jim Graham, Carol Schwartz, Phil Mendelson, Vincent C. Gray, David Catania, Kwame R. Brown, Jack Evans, Linda W. Cropp, Sharon Ambrose, Vincent Orange

Elizabeth Berry, DC Department of Health; Alex Boado, DC Department of Health; Tim Karikari, DC Department of Health, Branch Chief, Watershed Protection Division; Hamid Karimi, DC Department of Health, Program Manager, Watershed Protection Division; Collin Burrell, DC Department of Health, Watershed Protection Division

Christopher Conner, US EPA, Director, Alliance for the Chesapeake Bay; Carl Bisland, US EPA; Rebecca Hanmer, US EPA, Chesapeake Bay Program ; Menchu Martinez, US EPA, Coordinator, Land, Growth and Stewardship; Terri A. White, US EPA, Urban River Restoration Pilot Program

John Dinne, USACE; Steven Pugh, USACE

Tom Brosnan, Branch Chief Mid-Atlantic, NOAA Assessment and Restoration Division

Ted Graham, Metropolitan Council of Governments, Chair, Land, Growth and Stewardship

Ana Swanson, Executive Director, Chesapeake Bay Commission

Christie Dunham, Chesapeake Research Consortium; Matthew Hubbard, Chesapeake Research Consortium

Robert E. Boone, President, Anacostia Watershed Society; James F. Connolly, Executive Director, Anacostia Watershed Society

Roy Hoagland, Chesapeake Bay Foundation, Chair, Citizens Advisory Commission; Lee Epstein, Chesapeake Bay Foundation; Doug Siglin, Chesapeake Bay Foundation

Richard Hammerschlag, US Geologic Survey; Scott Phillips, US Geologic Survey; Peter Clagget, US Geologic Survey

Stephen Syphax, National Park Service; Bob Campbell, National Park Service

Grace Manubay, Casey Trees, DC Environmental Educators Consortium

Leonard P. Massie, Jr., Principal, LaSalle Elementary School

Brian Van Wye, Anacostia Riverkeeper ECC

Jim Dougherty, Sierra Club

Norris McDonald, African American Environmentalist Association

David Paglin, Anacostia Watershed Citizens Advisory Commission
Jennifer Greiner, US Fish and Wildlife Service;

Carlton Haywood, Interstate Commission on the Potomac River Basin; Joe Hoffman, Interstate Commission on the Potomac River Basin

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Their Future is NOW!

501 RIGGS ROAD NE • WASHINGTON, DC • 20011 • 202-576-6120 • 202-541-3859 (FAX)

ENVIRONMENTAL CONCERNS
Re. Square 4325, Parcel 173/145

Case No.06-08, the Ft. Lincoln/Gateway Village LLC Consolidated PUD
District of Columbia Zoning Commission Public Hearing, December 18th, 2006

D.S.M. Hilmy, 2804 Shepherd St., Mount Rainier 20712

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The site itself comprises 23 acres of wet to dry meadow of various elevations and hydrology anchored by a network of several stream tributaries with active and visible stream flow on site flowing from West to East towards the Anacostia River itself. It serves as a sub-watershed and natural storm basin for the surrounding area which comprises approximately 70 acres bounded by upland buffer zones to the Northwest (adjacent to the DPR grounds) and the Northeast (adjacent to Ft. Lincoln cemetery) and by a narrow band of invasive callery pears along Ft. Lincoln Drive. Using standard Cowardin methodology[1], it's current state appears to have been formed after prior woodland clearing some years ago when it would have been an PFO (palustrine forested) wetland habitat; because of it's low elevation, the site has started to reestablish as a PSS (palustrine scrub-shrub) wetland (see Figures 1-3 below, and the U.S. Fish and Wildlife Service ArcGIS Wetland Delineation map of the Ft. Lincoln area in Appendix B).

In reviewing the transcript of the June 12th hearing, this information was not disclosed, rather only the mention that the Office of Planning will "work with the applicant to protect any forest cover that remains on the site after construction"[2]. In fact, already very little forest cover remains because the site is *actually predominated by wetland habitat*. In addition, my recent enquiries to the U.S. Corps of Engineers indicate that no application has been made by the developer to seek the required permit under §404 of the Clean Water Act, a federal requirement.

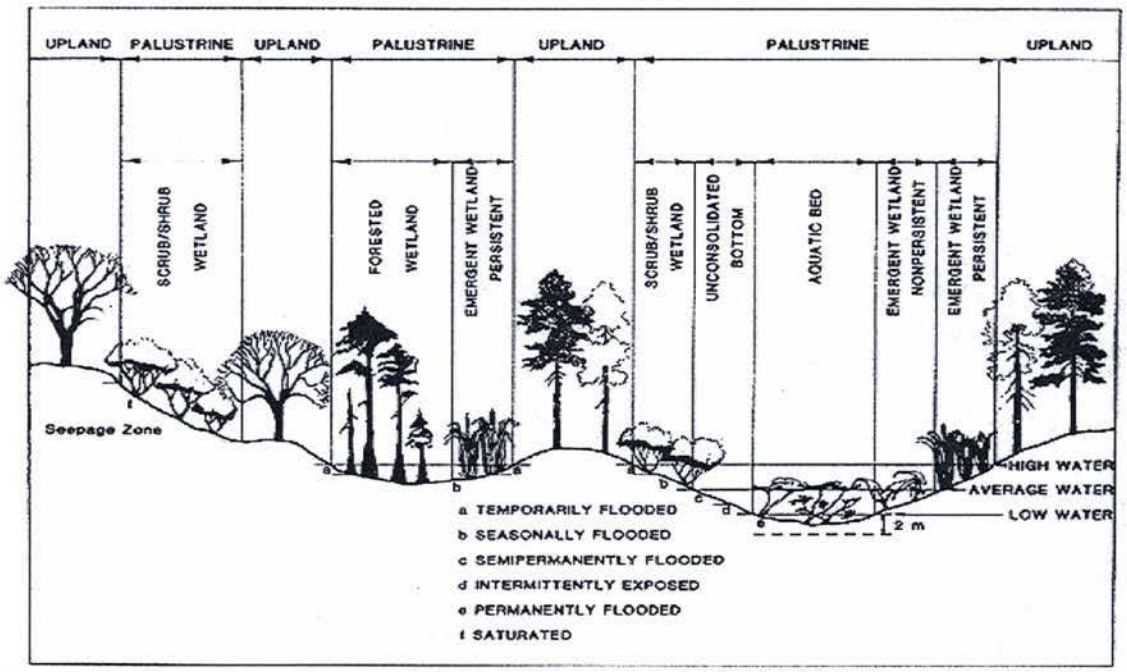

Figure. 1. Distinguishing features and examples of habitats in the Palustrine system.

[1] Cowardin, L. et al. Classification of Wetlands and Deepwater Habitats of the United States. Washington, DC. U.S. Department of the Interior, Fish and Wildlife Service; and Army Corps of Engineers Wetland Delineation Manual, 1997. Waterways Experiment Station, Vicksburg, MS. Technical Report Y-87-1.

[2] Transcript of DC Zoning Commission Public Hearing, June 12th, 2006: p.8, ll.1-3

Figure 2. View looking North (at 38°55'22.08"/76°57'11.38"). Note the elevating levels from wet meadow with *Juncus effusus* (Soft Rush) in foreground, through transitional level with *Andropogon virginicus* (Broom Sedge) and *Carex spp.* (wetlands sedges), to upper meadow with *Solidago spp*. (Goldenrod).

Figure 3. One of the stream tributaries (at 38°55'22.93"/76°57'17.51") showing vegetative wetland indicator species: *Juncus effusus* (FACW+) and *Carex folliculata* (OBL).[3]

[3] Obligate (OBL) and facultative wetland (FACW) plants are the best vegetative indicators of wetland: Tiner, R.W. (1988) Field Guide to Nontidal Wetland Identification. Maryland Department of Natural Resources and U.S. Fish and Wildlife Service.

According to the EPA Factsheet on Construction Runoff Control[4] "sediment runoff rates from construction sites are typically 10 to 20 times greater than those of agricultural lands, and 1,000 to 2,000 times greater than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting situation, and the contribution of other pollutants from construction sites, can cause severe physical, chemical, and biological harm to our nation's waters."

With construction and residential development, there will be immediate and long-term impact upon on the Anacostia River, with a cumulative effect upon the Potomac into which it flows, and thence the Chesapeake Bay itself. To preserve the water quality of any given watershed, no more than 10% of the land should be given over to impervious surface; we are already over 50% impervious area over the entire watershed for the Anacostia River and so every little parcel of land does indeed count! In the consolidated PUD application brought before this Commission on June 12th of this year, the developer requested relief to yard requirements and also relief to allow more than one structure on a single lot[5], and in addition, further relief for front yards[6]. The combined effect of these measures plus the proposed 357 homes and 896 parking spaces will exacerbate the overall negative impact of increased impervious surface and substantially decrease opportunities for on-lot infiltration, let alone other environmentally-friendly LID (Low Impact Development) strategies. The developer offers as an alternative, that the yard space be "concentrated... in the central green and pocket parks"[7] however, despite the assertion that "other goals of the Ft. Lincoln plan include... protecting the natural resources of the area"[8], of the 23 acres, or over 1,003,544 square feet, *only 180,486 square feet* have been designated as "greenspace". This represents *only 17%* of the original site preserved as a form of "natural" landscape; indeed, the greenspace, a "community park", is actually described as "more of an open lawn" which is "pretty sparse"[9].

This plan is certainly not protecting the natural resources of the area nor even properly mitigating the potentially disastrous effects of removing what is essentially a 100% effective natural storm water management system[10] and an important part of the chain of buffers between existing urban development and the river itself.

Washington Retail Gateway- the Whole Picture

More importantly, it is clear is that you are not being given the whole picture, rather elements are being presented to you in "piecemeal" fashion[11] or not at all. This has served to obscure or evade the complete nature of the Ft. Lincoln area development, the sum of which spells disaster for our natural resources and years and years of rescue efforts along the Anacostia. Literally across the

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[4] EPA Storm Water Phase II Final Rule, Fact Sheet 2.6 (Construction Site Runoff Control Minimum Control Measure), EPA 833-F-00-008 and EPA Storm Water Phase II Final Rule, Fact Sheet 3.0 (Small Construction Program Overview), EPA 833-F-00-013

[5] Transcript of DC Zoning Commission Public Hearing, June 12th, 2006: p 6, ll.5-6

[6] Ibid: p.8, ll.19-21

[7] Ibid: p.8, ll.24-25/p.9, l.1

[8] Ibid: p.7, ll.20-22

[9] Ibid: p.16, l.13-p.17, l.25

[10] Hammer, D.A. (Ed) 1989. Constructed Wetlands for Wastewater Treatment, Lewis Pub., Chelsea, MI; EPA Storm Water Technology Fact Sheet (Storm Water Wetlands), EPA 832-F-99-025

[11] Transcript of DC Zoning Commission Public Hearing, June 12th, 2006: p.12, ll.13-16 and p.13, ll. 17-18

street to the West (upper Ft. Lincoln Drive) construction has started on a 22-acre parcel where a further 209 homes are in the process of being built as Dakota Crossing and across the street immediately South (lower Ft. Lincoln Drive) there is planned the 42-acre "Big Box" development known as Washington Retail Gateway. The Washington Retail Gateway site is also predominated with wetland habitat including several streams, and at least six distinct PSS and PFO wetland habitats (see Wetland Delineation map as Appendix C). This particular piece of what is actually a 362-acre development puzzle by Ft. Lincoln New Town Corp. is apparently not even going to come before you[12] and as a result will slip by unaddressed and certainly will consolidate the cumulative negative impact to the entire area's hydrology, storm water flow, and *interdependent* network of wetland habitats. In effect, the "buffer" ends up being destroyed and the area that is supposed to be buffered becomes the next domino; it is entirely possible that as a result the proverbial domino effect will reach many miles upstream and even further downstream.

Figure 4. Satellite photograph showing all three development sites.

As a result of a recent meeting with the developers of that site, Peterson Companies and Ft. Lincoln Properties, the Anacostia Watershed Society reported in a letter to Mayor-Elect Adrian Fenty "it was revealed that there was a very weak understanding of stormwater control, and no plans to implement Low Impact Development into this project" but that the developers were instead going to rely upon outdated, and by modern standards, relatively ineffective measures that would be "extremely irresponsible and damaging" to the Anacostia River[13]. With no less than 80% of the Ft. Lincoln Gateway Village development planned to be impervious surface,

[12] Ibid: p.18, ll.6-21
[13] See letter attached as Appendix A.

combined with the impervious surface under construction at Dakota Crossing, and with what appears to be almost 100% impervious surface over the 42-acre Washington Retail Gateway project (including 2,100 parking spaces), without LID techniques, an *integrated* storm water management plan, or a concerted effort to preserve a wetland/forest buffer along the river, the impact to the Anacostia will be disastrous; if one looks at the runoff acreage, land status, and runoff distance of the larger 362-acre plan it could be catastrophic, and will certainly be a severe setback to the ongoing Urban Rivers Restoration Pilot project.

Policy Recommendations for Development

One could however argue that developing small parcels of land within the District is a better alternative to carving out residential space from virgin woodland areas on the outskirts of the Metro area, and so I wish to suggest to the Commission a compromise between non-development and the possible irresponsible and detrimental effect such a building project would cause if there is little or no intervention, recommending to you that at a minimum, the Commission should prescribe four strategies to ensure environmental protection of the site:

1. Identify specific temporary erosion and sediment control measures prior to the start of construction of Ft. Lincoln Gateway Village, ensuring they are included in the construction documents[14], and that the MS4 operator has reviewed the site plan before ground is broken;

2. Identify specific post-construction runoff control measures[15] and final storm water management design to include appropriate BMPs[16] and LID strategies (including preserving wetland habitat on site) as a part of the SWPPP (Storm Water Pollution Prevention Plan)[17], and where necessary amend local ordinances in support;

3. Appoint a Local Storm Water Management Panel to include representatives from the EPA, the Ft. Lincoln Gateway Village LLC, the Anacostia Watershed Society, and other local stakeholders[18]; and

4. Recommend to the appropriate authorities within the Government of the District of Columbia, that certain incentives be created to promote the use of LID strategies at this development[19], a strategy fully endorsed by Mayor-Elect Adrian Fenty.[20] This is probably *the most important measure* that the Commission can prescribe to mitigate against the tremendous damage that will be done to the Anacostia River if outdated or ineffective techniques are used.

---

[14] Temporary control measures should include, but are not limited to: silt fences, storm inlet protections, entry/exit stabilization, as well as site stabilization procedures for exposed soils. The Commission should charge the contractor to implement these measures and to inspect weekly, or after each rain event, for control effectiveness from the start of construction until final stabilization.

[15] See EPA Storm Water Phase II Final Rule, Fact Sheet 2.7 (Post Construction Runoff), EPA 833-F-00-009.

[16] See the Metropolitan Council's Urban Small Sites Best Management Practice Manual: (www.metrocouncil.org/environment/watershed/bmp/manual.htm)

[17] Stormwater Management for Construction Activities: Developing Pollution Prevention Plans and Best Management Practices, EPA 832-R-92-005

[18] EPA Storm Water Phase II Final Rule, Fact Sheet 2.4 (Public Participation/Involvement Minimum Control Measure), EPA 833-F-00-0006

[19] Perhaps as wetland mitigation credit through the USACE, tax incentives, or reductions in stormwater fees.

[20] Adrian Fenty. A Healthier Environment for a Healthier City. p. 4.

Low Impact Development

The use of LID was pioneered by Prince George's County Department of Environmental Resources, beginning with the use of bioretention cells containing a highly porous soil mixture and populated with vegetation capable of tolerating temporary saturation as well as a high concentration of runoff pollutants. Numerous municipalities have followed suit, as have the Navy and the Department of Defense, incorporating a myriad of LID strategies into their urban resource protection plans.[21]

LID aims to preserve open space and minimize land disturbance, and protect natural systems and processes. It proposes alternative site infrastructure (streets, curbs, sidewalks) and incorporates natural site elements (stream corridors, etc.) as design elements[22], and it decentralizes and micromanages storm water at it's source including but not limited to: BMPs in series or storm water "treatment trains", on-lot infiltration[23] and other bioretention strategies[24], vegetated swales[25], filter strips, permeable pavement surfaces for sidewalks and parking spaces[26], rain gardens, tree box filters, reduced street widths and altered cul-de-sac design, and vegetated roof covers (green rooftops). This is supported by Mayor-elect Adrian Fenty, who writes: "I endorse the installation of green roofs as a strategy for increasing our City's green spaces, reducing storm water runoff, and reducing the urban heat island effect"[27].

There are plenty of successful projects where LID has benefited both the environment, the developer, and the homeowner[28] including the Somerset community in PG County, an 80-acre development with 199 homes on 10,000 foot lots- the developer saved $300,000 by eliminating the need for retention ponds by incorporating bioretention techniques, gained an additional six lots (and associated revenues), and reduced the finished cost by over $4,000 per lot[29]. Similarly, the 1997 New York City Watershed Agreement demonstrated the crucial importance of natural resource management as a capital investment where the city invested between 1 and 1 ½ billion dollars in natural capital, concentrating on restoring and protecting the watershed, in order to produce *savings of $8 billion plus annual running costs of $300 million*[30].

---

[21] "We must promote strategies to reduce stormwater runoff from new buildings... New development can and should be informed by smart environmental design." Ibid: pp. 4-5

[22] Excellent resources available for LID include: the Municipal Guide to Low Impact Development (www.lowimpactdevelopment.org/lid%20articles/Municipal_LID.pdf); Low-impact design strategies: an integrated design approach. 2000, PGDER (www.epa.gov/owow/nps/lidnatl.pdf) ; and with important construction recommendations and photographic and design "before and after" examples, the Department of Defense LID Manual (www.lowimpactdevelopment.org/lid%20articles/ufc_3_210_10.pdf), a copy of which (105 pages) I can make available to the Commission and to the Office of Planning/development team at the December 18th hearing.

[23] EPA Storm Water Technology Fact Sheet (Infiltration), EPA 832-F-99-019

[24] EPA Storm Water Technology Fact Sheet (Bioretention), EPA 832-F-99-012

[25] EPA Storm Water Technology Fact Sheet (Vegetated Swales), EPA 832-F-99-006

[26] EPA Storm Water Technology Fact Sheet (Porous Pavement), EPA 832-F-99-023

[27] Adrian Fenty. A Healthier Environment for a Healthier City. p.6.

[28] For homeowners, LID techniques can increase property value, reduce heating and cooling energy consumption and costs, lower stormwater utility fees, and can earn them energy tax credits, grants, or subsidies.

[29] Sustainable Stormwater Storage Alternatives for Army Installations, Technical Bulletin 200-1-36, 2005: p. 42

[30] Chichinsky, G. and Heal, G. 1998. Economic Returns from the Biosphere. Nature, February 269, 30; Economist 2005. Are You Being Served? April 23, 76-79; and Pagiola, S., von Ritter, K., and Bishop, J. 2004. Assessing the Economic Value of Ecosystem Conservation. Environment Paper 101, Washington DC, World Bank.

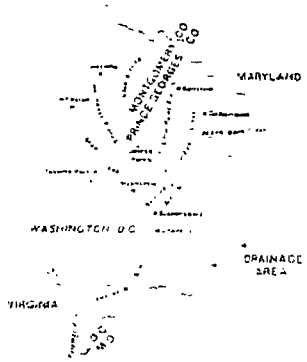
Commissioners, I urge you to hear this case with an understanding that we can achieve a balance between the need to provide high-density residential housing and ensuring that the environmental impact of all the development is mitigated against, so that our own natural resources, natural capital if you will, are adequately protected.

There is a win-win solution here if it can be impressed upon the developers of this site and those of future sites that they must apply a series of Best Management Practices and Low Impact Development strategies.

Appendix A
Letter dated November 17th 2006 from the Anacostia Watershed Society to Mayor-Elect Adrian Fenty

Anacostia Watershed Society

(301) 699-6204 Fax (301) 699-3317
Email: robert@anacostiaws.org
http://www.anacostiaws.org



November 17, 2006

Hon. Adrian Fenty, Mayor-Elect
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Dear Mayor-Elect Fenty,

This letter comes as a comment and policy recommendation on the 42 acre Washington Gateway development project, located off of New York Avenue at Fort Lincoln Drive, NE, adjacent to the Anacostia River. As part of Washington, DC's urban renewal initiative, a great opportunity presents itself with this project for the implementation of innovative stormwater management practices at this site. However, current plans are not focused in this direction. It would be a tremendous loss if steps were not taken to alter the course of this project in a direction which would benefit the Anacostia River and the city.

The Anacostia River

It is well documented and publicized that the Anacostia River suffers from inputs of urban pollution which severely impair its health. The primary source of this pollution comes from stormwater runoff which rolls across parking lots, roadways and rooftops bringing with it trash, toxics, metals, fertilizers, pesticides, bacteria and sediment into the nearest storm drain pipe. These pipes are designed to drain directly into the nearest stream, and there are no controls present in these pipes to clean the water or slow it down. All of the pollutants are carried directly through to the river.

Low Impact Development

Many advances have been made in the scientific understanding of how to solve this problem. Following the excellent lead of Mother Nature, where rainwater falls onto a forest floor and slowly soaks down through the soil to recharge the groundwater which feeds the streams, some innovative engineers have begun to mimic this dynamic. By designing parking lots, roadways and rooftops which allow rainwater to soak into the soil as close to the area where it falls as possible, impacts to the Anacostia River and its streams can be greatly reduced. These building techniques, known as Low Impact Development (LID) are being used all over the country with great success, including in the District of Columbia, as well as in Prince George's and Montgomery Counties. Instead of focusing the stormwater problem into large, concentrated facilities, such as regional stormwater ponds, or instead of not treating it at all and piping it into the nearest stream, LID serves to dilute the problem by localizing the stormwater and letting the living soil work to purify and detain it. Rain gardens, infiltration trenches in parking lots, pervious pavers, and green roofs are a few of the LID techniques which can be used, and which have proven successful.

Washington Gateway

The Washington Gateway development project calls for a 42-acre shopping center development, with two major big box retail stores (excellent green roof potential), a large grocery store and a

number of smaller retail operations, all of which is surrounded by many acres of impervious parking lot surface (bio-retention potential). At a recent meeting with the development team, (consisting of the Peterson Companies and Fort Lincoln Properties) it was revealed that there was a very weak understanding of stormwater control, and no plans to implement Low Impact Development into this project. When presented with the question as to why they would not undertake this opportunity, the Peterson Company representative responded that the monetary costs for LID implementation prohibited them from using these technologies, and that the District government had already approved the stormwater ponds years ago. Many advances in stormwater technologies have been made over the past decade since this was approved, and a much greater understanding about the dire need to control urban stormwater runoff into our waters has also been achieved in our collective thinking. While LID technologies might cost slightly more upfront, the costs of environmental cleanup and restoration of our polluted waterways are far greater if we continue to perpetuate the 1950's-era engineering concepts that this project offers. Large parking lots and expansive department store rooftops are extremely harmful to the Anacostia River due to the tremendous volume of polluted stormwater that they 'shed' into the river. Allowing the Washington Gateway project to add 42-more acres of impervious surface into the river's watershed without requiring complete stormwater control through Low Impact Development Best Practices would be extremely irresponsible and damaging.

Policy Recommendation

We are writing to recommend that the developers of this project be required to complete a thorough stormwater management plan, and that incentives be created to promote the incorporation of Low Impact Development technologies on site to treat the first one inch of stormwater as a standard. As a major gateway site into the District which sits adjacent to the Anacostia River, this project should serve as an example of the highest level of stormwater control and river protection in the city. Further development at this site is expected in future years, and the bar needs to be set high in terms of acceptable stormwater practices. The cumulative effect of the entire Fort Lincoln development on the Anacostia River will be severe if aggressive stormwater management is not put into place. If incentives are not available, then the developers should be required to find ways to manifest LID on this site. The Anacostia River cannot withstand more of the same damaging stormwater impacts that have caused its decline over the past decades. The river, and the citizens of this region, deserve better.

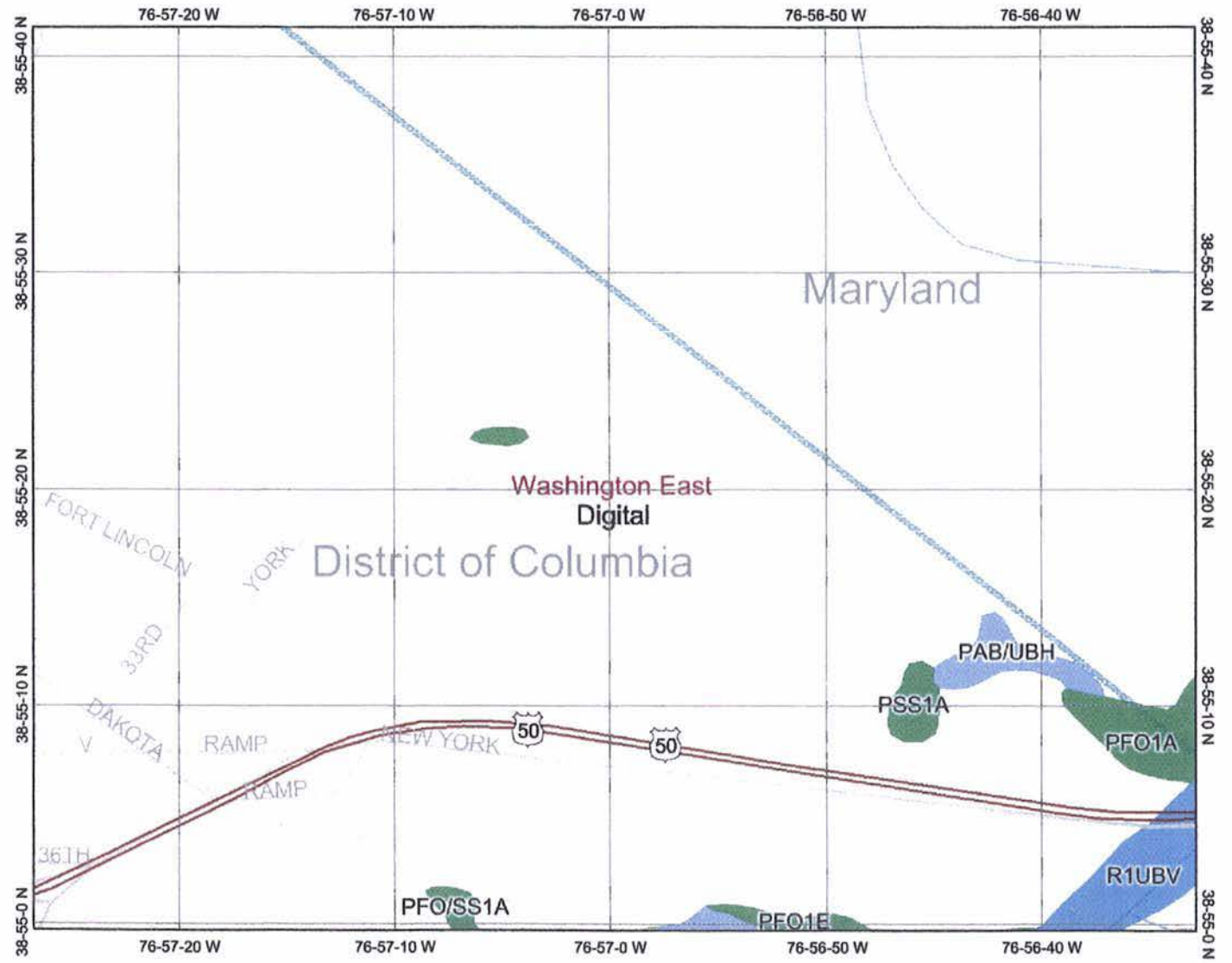
Sincerely,

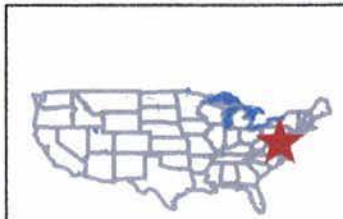
Robert E. Boone
President

James F. Connolly
Executive Director

Appendix B
U.S. Fish and Wildlife Servi reGIS Wetland Delineation map of Ft. Linco ea indicating Ft. Lincoln
Gateway Village site locate SS1A wetland

Ft. Lincoln Area





Legend

- Interstate
- Major Roads
- Other Road
- Interstate
- State highway
- US highway
- Roads
- Cities
- USGS Quad Index 24K
- Lower 48 Wetland Polygons
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine
- Lower 48 Available Wetland Data
- Non-Digital
- Digital
- No Data
- Scan
- NHD Streams
- Counties 100K
- Urban Areas 300K
- States 100K
- South America
- North America

N

Scale: 1:12,000

Map center: 38° 55' 20" N, 76° 57' 0" W

This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

Notes: note PSS1A wetland delineated on Ft. Lincoln Gateway Village site (square 4325, lot 173/145)

Appendix C
Washington [Retail] way Wetland Delineation map indicating str and PSS/PFO wetlands