



RECEIVED
D C OFFICE OF ZONING
2007 JUL 16 AM 9 40

July 16, 2007

Ms Jerrily R Kress, Director
District of Columbia Office of Zoning
441 4th Street, NW
Suite 210 South
Washington, DC 20001

Dear Ms Kress,

Thank you for the opportunity to comment on the Setdown Report for ZC 06-30 for The Pollin Property. Comments from the staff of the Anacostia Waterfront Corporation are outlined below. Please feel free to contact us for more information on these issues.

Sustainable Development

With reference to Guiding Principle 34 of the Comprehensive Plan, we highly recommend that the Zoning Commission examine use of the recently adopted Anacostia Waterfront Corporation Environmental Standards (copy attached) as a guide for environmentally responsible development for projects along this vital river resource. The standards address several of the issues addressed in the Setdown Report, including stormwater management and protection of wetland resources. The standards also address green building and particularly compliance with the U.S. Green Building Council LEED program or—for low-rise affordable housing projects like this one—the Green Communities Standards developed by Enterprise and the Natural Resources Defense Council.

We understand that The Pollin Project is already coordinating with the Green Communities program, which we applaud. We encourage OP to work with the developer to look comprehensively at green building, stormwater control, and site planning to make this project a regional leader to demonstrate the viability and the considerable economic and human health benefits of sustainable development and green building.

Open Space and Wetlands

With respect to open space and wetlands preservation, we understand that the redefined PUD scope does not include the western sections of the previously defined subject site. We are aware of several characterizations that have identified wetland areas in the

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

western section of the subject site along the unnamed creek. While the PUD scope has been revised, we encourage actions to preserve and enhance the quality of this adjacent habitat area (perhaps in cooperation with the National Park Service). Enhancement of this area through invasive species removal and restoration activities could create vital habitat, protect existing resources, and improve the appearance of the green space adjacent to the proposed PUD and neighboring residences.

At a minimum, enhanced control of erosion and runoff must be put in place *during and after* construction to prevent damage to wetland areas directly downstream of the PUD site. The filling activities to meet floodplain requirements are of particular concern.

Stormwater Management

With respect to stormwater control, we are concerned about the proposal to waive quantity control requirements for the project and are pleased that OP has requested more information in this regard. We are not aware of the storm sewer configuration in the area or how the proposed "direct outfall" to the Anacostia would be accomplished. The site is several thousand feet from the river and the reference to direct outfall could mean outfall to the tributaries adjacent to the PUD. Any proposal to discharge to these tributaries would be of great concern as it would lead to stream and bank erosion and compound severe erosion and sedimentation problems.

Moreover, rather than seek a waiver from quantity controls, we strongly encourage OP and the developer to explore options to exceed existing quantity controls through on-site infiltration, storage and reuse options. Depending on site conditions, on-site infiltration may be a practical option to reduce stormwater runoff. Storage for irrigation or other uses may also be practical, particularly through decentralized use of rain barrels and other technologies. For water that is directly discharged to the Anacostia, the project should again exceed water quality treatment standards—we again refer you to the stormwater provisions of the AWC Environmental Standards for guidance. Systems designs can be modified to remove typical pollutants of concern including nutrients, oils, pesticides and herbicides, and bacteria. These systems typically take the form of landscape and streetscape elements such as rain gardens, biofilter strips, and filtering tree planters with underdrains. AWC is actively engaged in design and construction of similar systems and would be glad to provide input on their use.

Waterfront Area Elements

The PUD currently fulfills many objectives of the Waterfront Area Elements of the Comprehensive Plan including

- Policy UD-1.3.7 Neighborhood Connectivity – Improve the physical connections between neighborhoods and nearby waterfronts
- Policy FNS-2.6.2 Kenilworth Parkside Transit Oriented Development – Support mixed-use residential, retail, and office development on the remaining vacant

properties in the Kenilworth-Parkside neighborhood. Take advantage of this area's proximity to the Minnesota Avenue Metrorail station and its relative isolation from the low density single family neighborhoods to the east to accommodate medium to high density housing that is well connected to transit and the adjacent waterfront open space

- Policy FNS-2 6 3 Density Transitions at Parkside - Provide appropriate height and scale transitions between new higher density development at Kenilworth-Parkside neighborhood and the established moderate density townhomes and apartments in the vicinity. Buildings with greater heights should generally be sited along Kenilworth Avenue and Foote Street, and should step down in intensity moving west toward the river

Additionally, AWC strongly encourages the developer to effectively re-engage the adjacent communities, especially the current Parkside residents. AWC is aware that there is a new Advisory Neighborhood Commissioner (ANC 7D07) and new President of the Parkside Townhome Association, since the original Pollin plan was submitted in 2006. Additional outreach is recommended to engage both new and previously active stakeholders in the surrounding communities.

Sincerely,

Handwritten signature of Uwe Brandes in black ink, appearing as 'Uwe Brandes / EBS'.

Uwe Brandes

Vice President, Capital Projects and Planning



1100 New Jersey Avenue SE Suite 700 Washington DC 20003 (tel) 202 406 4040 (fax) 202 724 4481 www.anacostiawaterfront.net

FAX

To <u>Jeremy R Kress</u>	From <u>Brendan Shane</u>
Fax <u>202 727 6072</u>	Pages <u>4</u>
Phone	Date <u>July 16, 2007</u>
Re	cc
Comments	

RECEIVED
D C OFFICE OF ZONING
2007 JUL 16 AM 9 40