United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Parks–East
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:

L30 (NCR-NACE)

February 15, 2000

Ms. Sheila Cross Reid
Chairperson
District of Columbia Board of Zoning Adjustment
441 4th Street, N.W.
Second Floor
Washington, D.C. 20001

Re: BZA Case No. 16457, Good Hope Road, S.E.
"The Homes at Woodmont"

Dear Ms. Reid:

We are in receipt of the February 14, 2000 memorandum from the District of Columbia Office of Planning on the subject application. Because of the many community issues involved in this case that are beyond our institutional purview, we will neither support nor oppose this project. In the event this application is approved, we wholeheartedly endorse the final sentence in the Office of Planning memorandum: "We would note the importance of the Board's making the many commitments by the applicant to the community and to the National Park Service a part of its order in this case and for the applicant to continue working with all parties, particularly the Fairlawn community, to ensure a development that lives up to all of its promise and is a true asset to that part of the city."

We have met several times with the applicant and his consultants since the initial May 1999 BZA hearing. The applicant has offered a number of accommodations to address National Park Service concerns about potential impacts of this project. We believe the applicant has made a good faith effort to understand our concerns, and to provide some level of response to them.

However, we remain concerned that, given the unique nature of Fort Stanton Park's resources, significant adverse impacts could still easily result from this development. Fort Stanton Park is listed on the National Register of Historic Places; it was a critical link in the Civil War Defenses of Washington. Further, it contains significant sensitive natural habitat, provides important local recreational opportunities, and is an important element of the larger cityscape of our nation's capital. Therefore, the utmost care must be exercised in any adjoining development.

BZA
Case No. 16457
Exhibit No. 104

Board of Zoning Adjustment
District of Columbia
CASE NO.16457
EXHIBIT NO.104

The applicant's eastern parcel contains massive amounts of fill material; consequently, the garden apartments will be artificially elevated significantly above the natural tree line of Fort Stanton Park and the contiguous Fort Circle Parks. The Fort Circle Parks provide the signature "topographic bowl", the forested ridgeline that is a critical element of the larger landscape of our nation's capital. It is inevitable that some visual intrusion into this historic landscape will result from this construction. Since intrusive structures already exist nearby, it is most important that extensive mitigative landscaping be provided to (1) visually separate the development from adjoining structures, and (2) soften or "break up" the architectural lines of the buildings as viewed from the many historical areas which may be affected. Critical viewsheds include, but are not limited to, Anacostia Park, the Pennsylvania Avenue corridor, the 11th Street bridge, Lincoln and Stanton Parks on Capitol Hill, and the Mall. The applicant has provided cross-section analysis of the 11th Street Bridge vista. Other vistas have not been analyzed. The reviewing authority for the site landscaping should give critical emphasis to the rapid and permanent mitigation of long-range viewshed impacts when reviewing the applicant's detailed plans. Likewise, final approval of architectural details, building materials, colors, etc. should be primarily based on the cumulative mitigative effect they will provide.

Similarly, views from the adjacent Fort Circle Trail inevitably will be impacted by this development. In reviewing the applicant's detailed plans for augmentative plantings along the eastern parcel's property line, the reviewing authority should emphasize (1) providing conditions (particularly soil depth and composition) that will support long-term reforestation, and (2) immediate screening of the most highly impacted views from the trail. Because the east parcel contains fill material of dubious quality, it is critically important that all necessary soil improvements are made to insure that landscape and reforestation plantings will reach full mature height. All plantings should be permanently protected by a forest conservation easement, so that no future owner might remove them.

In developing a detailed landscaping and reforestation plan for this project, the applicant should be directed to continue to consult closely with the National Park Service. We have provided the applicant with NPS reforestation specifications. "Whip" plantings at a density of 1,700 plants per acre, with a 10% component of two-inch caliper stock, is required for historic landscape reforestation. All landscape plans should be subject to the review and concurrence of the National Park Service.

It is hoped that the ongoing long-term storm water, erosion, and sedimentation problems from the fill site will be corrected in the execution of development plans. The applicant has offered to remove accumulated sediments from park land and to provide minor restoration work to the Fort Circle Trail; we consider this an appropriate direct mitigation for past impacts from the fill site. An eroded gully on or adjoining the southern boundary of the east parcel is also in need of rehabilitation during the construction phase.

Adjoining the single-family homes parcel, several important wetland "seeps" exist in Fort Stanton Park. These are homes to sensitive plant communities, as well as rare microfauna. The applicant has agreed to work with us to protect these areas from immediate construction impacts, as well as from secondary impacts such as the spread of invasive plants. We will also coordinate with staff from the D.C. Department of Health, Division of Health & Environment in this regard.

Thank you for the opportunity to comment on this matter, and for the evident concern the BZA continues to show for the important public resources that we manage in our nation's capital city.

Sincerely,

John Hale
Superintendent
National Capital Parks-East