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Advisory Neighborhood Commission 6D
400 Eye Street SW • Washington, DC 20024

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February 5th 2003

Chairperson Carol J. Mitten
DC Zoning Commission
441 4th Street, NW • Suite 210 South
Washington, DC 20001

Re: Case No. 02-38
Southwest Waterfront PUD Application

Dear Chairperson Mitten:

At a duly noticed meeting on January 13, 2003, Advisory Neighborhood Commission 6D, representing the areas in near Southwest and near Southeast that would be the most impacted by the proposed PUD, voted 6-1 to oppose the application of the RLA Revitalization Corporation in case 02-38, the Southwest Waterfront PUD. The ANC has seven Commissioners, and four Commissioners comprise a quorum.

The Commission (ANC 6D) specifically opposes the Developers' application for an amendment to the Zoning Map that would rezone the site from C-3-B to C-3-C, as well as the PUD in its present form.

Please note that the Commission is in support of a redeveloped Waterside Mall (a/k/a Waterfront) because it has the potential to provide greater and more vibrant retail and commercial presence in Southwest. However, as it is proposed, the project offers little benefit to **residents** and raises some serious concerns among many stakeholders. Those concerns are as follows:

- **Project Height**: The requested zoning change would permit construction of buildings up to 130 feet tall, a height that dwarfs neighboring structures, significantly blocking light, vistas, and open space.

- **Size and Density**: The proposal to double the amount of office space from the existing 1,117,500 to 2,051,500 will significantly impact the residential character of the neighborhood and have an adverse effect on the community. In addition, the proposal, which includes plans for an additional 1,000,000 square feet of office space, makes no provisions for additional parking.

- **Proximity to M Street SW**: The proposed towers are sited too close to the sidewalk line at M Street eliminating the green space that currently provides a graceful amenity to the community. Furthermore, the tower proposed for the southwest corner of the site will block the line of sight view from the Metro station to the Washington Channel west along M Street, eliminating the "broad boulevard" envisioned and promoted by the Office of Planning in its Anacostia Waterfront Initiative plan for the Southwest Waterfront.

- **The Re-opening of 4th Street SW**: There are insufficient mitigating measures to minimize the conflicts between vehicles and pedestrians, and critical information from the most recent DDOT traffic study has not been incorporated in the PUD.

ZONING COMMISSION
District of Columbia
Case 02-38
Exhibit 30

ZONING COMMISSION
District of Columbia
CASE NO.02-38
EXHIBIT NO.30

- **Public Amenities**: The 100 by 200 foot public plaza adjacent to the Metro entrance is inadequate open space relative to a project of this size, and does little to contribute to the developer's concept of a "Town Center" model. The proposed sidewalks along 4th Street are too narrow to accommodate free pedestrian passage, open air/café dining opportunities, and appropriate landscaping and green space as presented in public meetings by the developer.

- **Timetables and conditions**: Critical components, such as the development of residential space and retail stores, are contingent upon the developers' ability to lease office space. In addition, the proposed timeline for construction, which the developer's state may span 20 years, will create a retail void that the community cannot endure, significantly impacting the quality of life in a geographically isolated community of more than 12,000 people.

- **Residential vs. commercial construction**: We feel that the community and the city would be better served by broadening the tax base through increasing the residential component of this complex.

- **Community involvement and jobs**: No provisions have been established in the PUD for the employment of Southwest and near Southeast residents, on-going dialogue with members of the community, or the location of community facilities, such as meeting space, within the development.

It is the intention of ANC 6D to present more detailed testimony at the BZA hearing on February 13th. The ANC's response will be presented by ANC Chairman Ahmed Assalaam.

In an email dated January 27, 2003 sent to past ANC 6D Chairman Andy Litsky from Cynthia Giordano of Arnold & Porter, the attorneys for Waterside, she wrote, "I understand that the ANC will be convening again to review its written submission and that the ANC will not be able to submit its written report as required 7 days prior to the hearing. We have no objection to a late filing, but we would appreciate it if you could email or fax the report to us on completion." Although the ANC is **not** filing late, we do request that the Zoning Commission leave the record open to permit the ANC to submit a revised report at a later date.

Finally, please note that even though the PUD refers to "ANC 2D", as a result of redistricting, the area formerly encompassed by ANC 2D is now in Ward 6, and the name and jurisdiction of the Commission has therefore been changed from ANC 2D to ANC 6D, effective January 2003.

Sincerely,

Ahmed Assalaam

Ahmed Assalaam
Chairman, Advisory Neighborhood Commission 6D

cc: Councilmember Sharon Ambrose, Ward 6 (by fax)
cc: Director Jerrily R. Kress, DC Office of Zoning (by fax)
cc: Director Andrew Altman, DC Office of Planning (by fax)