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NATURAL RESOURCES DEFENSE COUNCIL

August 12, 2003

Zoning Commissioners
DC Office of Zoning
441 4th Street, NW
Suite 210 South
Washington, DC 20001

2003 AUG 14 AM 9:06
D.C. OFFICE OF ZONING

RE: Case No. 03-06 (Southeast Federal Center (SEFC) - General Services Administration – Text and Map Amendments)

Dear Zoning Commissioners:

The Natural Resources Defense Council submits the following comments and recommendations pertaining to the Application to the Zoning Commission for Text and Map Amendments related to the Southeast Federal Center and the related Request For Proposals. We would like to be very supportive of GSA's general goals especially connecting the surrounding communities to the Anacostia Waterfront, creating significant amounts of open space along the Waterfront, and conforming to a high standard of environmental design.

The language in the Zoning Commission Application is promising and NRDC would like to encourage a strong commitment to specific practices to ensure that the goals of GSA are met. We would like the Zoning Commission to support this goal by requiring certain environmental remediation steps be implemented as part of its approval of GSA's requested Map and Text Amendments. The SEFC site is in an ideal setting for implementing low-impact development (LID) practices that will help mitigate contaminated stormwater flows and sewer overflows into the Anacostia River. The Zoning Commission should take this opportunity to display leadership in LID practices by ensuring that GSA uses specific LID practices such as drainage swales, rain gardens and other techniques to capture and infiltrate runoff wherever possible throughout the site. Additionally, the use of green roofs should be considered to further decrease impervious surface cover within the SEFC.

ZONING COMMISSION
District of Columbia
Case 03-06
Exhibit 34

As per our comments to GSA from December 17th, 2002 NRDC would like to reiterate its belief that SEFC should aim for high standards of energy efficiency, use of sustainably manufactured and recycled building material, indoor environmental quality, and water conservation. We urge the Zoning Commission to hold GSA to a standard "Leadership in Energy & Environmental Design" (LEED) in construction projects undertaken within SEFC.

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NRDC also has concerns and recommendation specific to the proposed Text and Map Amendments particularly pertaining to the W-O (Waterfront Open Space) Zone. NRDC acknowledges that development in this area and the creation of a Waterfront Park will increase pedestrian traffic and impervious surface cover near the waterfront. To mitigate this effect NRDC urges GSA to implement LID practices throughout this Zone, especially at structures within or abutting this zone that will increase the amount of impervious surfaces. NRDC also encourages the use of LID on lots subject to setback requirement as described in § 1805.10 of the proposed Text Amendment.

Thank you for the opportunity to comment on this important redevelopment project on the Anacostia Waterfront. We believe our recommendations are useful and constructive, and urge that you consider them in the continued development and refinement of the plan for redevelopment of the SEFC. Please feel free to contact NRDC with any further questions or clarification of our comments.

Sincerely,

Nancy Stoner
Director, Clean Water Project