

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING



Office of the Director

SUPPLEMENTAL REPORT

DATE: June 26, 2006

TO: District of Columbia Zoning Commission

FROM:  Ellen McCarthy, Director OP

SUBJECT: Zoning Commission Review of an application by the District of Columbia Sport and Entertainment Commission for a Proposed New Major League Baseball Stadium, pursuant to DCMR 11 §1606.18.

LOCATION: Ballpark Site - Squares 702, 703, 704, 705, and 706 and Reservation 247, between South Capitol St. SE and 1st St. SE, and N St. SE and Potomac Ave. SE. Ward 6; Advisory Neighborhood Commission 6D.

ZONE: CG/CR

I. RECOMMENDATION

The Office of Planning (OP) continues to recommend approval of Option 1 in the original application submitted for the Ballpark, with the exception of the single-purpose, above-grade parking structure immediately north of the stadium. OP would also support the provision of additional (deeper) retail along the First Street SE corridor, provided that issues regarding pedestrian movement are adequately addressed.

This report provides a generally favorable recommendation for the Amendment submitted on June 23, 2006 for a mixed-use development, which provides some underground parking, and wraps the above-grade parking with residential, retail and hotel uses. OP has had additional, subsequent discussions with the applicant to note some detailed concerns, and has been advised that the applicant intends to further amend the drawings to address these concerns. OP strongly supports this proposal, particularly with the detailed changes to the plans that have been described to OP.

EXECUTIVE SUMMARY

In the OP report dated June 19, 2006, OP noted that aspects of the applicant's submission for Zoning Commission review of the Ballpark design were in flux, particularly related to parking and the form and nature of development on the north side of the stadium structure. OP further noted that amendments to the submission by the applicant were anticipated, and that a Supplemental Report from OP to discuss these issues would be provided.

The applicant submitted an amendment on Friday, June 23, 2006. In addition to formally amending the application to eliminate the "base" option and "option 2" from current consideration (as discussed in the previous OP report), the amendment addresses the north side of the ballpark site and changes to the plaza space on the south side of the stadium. The changes – particularly those on the north side of the stadium - are substantial, and significantly change the form of development on the site and the degree to

which the development conforms to the regulations and guidelines of the Capitol Gateway (CG) Overlay District and other planning efforts for the Ballpark area. In general, OP strongly supports the direction and intent of these changes, although some additional detail is needed, and is in the process of being compiled by the applicant, to fully assess the implications and impacts.

OP has had limited opportunity to review the Friday, June 23 submission by the applicant, but has had additional discussions. It has been shown further amendments to the drawing to address some initial detailed concerns with the proposal. As such, OP analysis remains somewhat cursory at this time, and is provided in Section V on page 6 of this report.

A more complete analysis of planning for the area as well as analysis of the stadium design against the regulations and guidelines of the CG Overlay are provided in the June 19, 2006 OP report.

II. PROPOSAL AS AMENDED

The original submission from the applicant included schematic building plans, a review of the proposed design against the relevant zoning regulations, and a detailed Transportation Management Plan, and included a number of options for consideration by the Commission. There are no significant changes to the form, character, or design of the stadium structure itself.

The current amendments to the proposal include:

- **Options:** The amendment, as anticipated, eliminated the Base Option and Option 2 from consideration, leaving Option 1. As noted in the earlier OP report, Option 1 is generally supported by OP, since it internalizes loading facilities and provides additional retail along 1st Street SE. Option 1 includes requests for relief for average depth of retail and floor to ceiling height of retail space. Although the applicant eliminated Option 2 from consideration, OP would also continue to support this option, which provides for more retail along First Street through the provision of deeper retail spaces extending out as far as the property line, provided that the remaining sidewalk width is adequate to accommodate pedestrians in a safe and comfortable manner.
- **North Side of the Ballpark Site:** The original application showed two large parking structures providing parking for over 1,100 cars. The structures included retail at the ground level, and were separated by a large plaza providing entry to the ballpark. Although the applicant has requested that the Commission continue to consider this proposal in the alternative, the amendments include a preferred option to replace the parking structures with two mixed use structures. The application notes that above grade connections, not clearly identifiable on the drawings, to the stadium allow the three buildings to be considered one, to allow height to be calculated from South Capitol Street. As such, the new towers would have a defined height of 130 feet measured from South Capitol Street, although the east building (at a lower grade) would have an actual height of over 140 feet. OP expressed some concern with regards to the nature of the connection, and the applicant is currently reviewing means to ensure that it is "meaningful". The applicant is also in the process of addressing OP concerns regarding the number and location of parking and loading entrances from First Street.

In addition, the footprints of the new buildings are slightly larger than those of the original parking structures, in that the east tower is built out to the First Street SE property line (rather than providing a setback similar to that of the ballpark), and portions of both towers extend into the Half Street Plaza area at both ground level and to a greater degree above ground level. OP does not have concerns with the minor encroachment into the Half Street Plaza area, which remains very large, but has some concerns with the implications of not providing a similar setback along First Street as does

the Ballpark. OP has discussed amendments to the ground level plans which would minimize these concerns. The west tower provides the required 15 foot setback along South Capitol Street.

The new development on the north side of the ballpark would include, in the two towers:

- o 1 ½ levels of underground parking for residential, retail and hotel uses (approximately 700 spaces);
- o 26,000 sq.ft. of street level retail along N Street and baseball-oriented retail facing the ballpark entry plaza;
- o 4 levels of above grade parking generally wrapped on the north, west, and east sides with residential and retail uses, providing 925 parking spaces for ballpark patrons;
- o 8 levels of residential, with 600-700 residential units (63 affordable units) and (in the east building) 92,000 sq.ft., 180 room boutique hotel use facing 1st Street SE.

Although the information is somewhat conceptual, OP generally supports this amendment as being in keeping with the objectives and guidelines for the ballpark site and the surrounding ballpark area. Further, more detailed analysis is provided in Section VI of this report.

- **South Side of the Ballpark Site:** The amendment increases the number of underground parking spaces accessed from Potomac Avenue from 114 to 300. Due to grading issues, not all of the space would have sufficient head-space to be covered, resulting in the “day-lighting” of a portion of this area, exposing the parking below. As such, the lawn area shown on the original application would be eliminated. The applicant advises that this is a temporary solution, until such time as the site is ready for development with a new building. OP is concerned with this change, as public space has been eliminated in favor of partially exposed parking, which will be highly visible from the bridge, as well as for pedestrians along Potomac Avenue and the remaining plaza area on the ballpark site.

III. COMPREHENSIVE PLAN

The amendments to the proposal, to replace the parking structure option with two new mixed use (including above grade parking) structures would further a number of the major themes of the Comprehensive Plan, as outlined and detailed in Chapter 1 - General Provisions Element, including:

- (a) *Stabilizing and improving the District's neighborhoods*
- (b) *Increasing the quantity and quality of employment opportunities in the District*
- (e) *Respecting and improving the physical character of the District*
- (h) *Reaffirming and strengthening the District's role as the economic hub of the National Capital Region*
- (i) *Promoting enhanced public safety*

The amendment, which includes new retail, residential, and hotel facilities, would also further a number of Comprehensive Plan goals and objectives, particularly related to economic development, housing, transportation, urban design, and land use:

CHAPTER 2 ECONOMIC DEVELOPMENT ELEMENT

200 Declaration Of Major Policies

200.5 *The District's overall economic development goals are to generate a high-performance economy, create job opportunities for District residents, expand the revenue base through a strong, growing citizen-business-government partnership, and develop a program that moves from economic development planning through implementation and completion of projects.*

200.8 *The District places a high priority on expanding its role as a leading center for national and international tourism and international business.*

203 District Promotion

203.2 *... aggressively promote businesses that provide goods and services to the District's office and tourist-related sectors, including printing, publishing, hotels, restaurants, and retailing businesses;*

CHAPTER 3 COMPREHENSIVE PLAN: HOUSING ELEMENT

300 Declaration Of Major Policies

300.2 *A central theme of the Housing Element is that the District must stimulate a wider range of housing choices and strategies through ... the production of new units for a wide variety of household types.*

302 Housing: General

302.1 *The general objectives for housing are to stimulate production of new and rehabilitated housing to meet all levels of need and demand and to provide incentives for the types of housing needed at desired locations.*

302.2 (e) *Encourage housing on suitably located public or private properties that are vacant, surplus, underutilized, or unused...;*

CHAPTER 5 TRANSPORTATION ELEMENT

502 Transportation: General

502.2 (a) *Support land use arrangements that simplify and economize transportation services, including mixed-use zones that permit the co-development of residential and nonresidential uses to promote higher density residential development at strategic locations, particularly near appropriate Metrorail stations;*

CHAPTER 7 URBAN DESIGN ELEMENT

708 Buildings

708.2 (a) *Design residential, commercial, and all other buildings to complement or enhance the physical character of the District; and*

(b) *Design buildings to include the use of appropriate arrangements of building materials, height, scale, massing, and buffering to complement the immediate region.*

712 Areas In Need Of New And Improved Character

712.1 *The areas in need of new and improved character objective is to encourage new development or renovation and rehabilitation of older structures in areas with vacant or underused land or buildings to secure a strong, positive physical identity.*

712.2 *The policies established in support of the areas in need of new and improved character objective are as follows:*

(a) *Encourage well-designed developments in areas that are vacant, underused, or deteriorated. These developments should have strong physical identities;*

(b) *Encourage in-fill development of attractive design quality in deteriorated areas to stabilize the physical fabric and to encourage renovation and redevelopment;*

CHAPTER 11 COMPREHENSIVE PLAN: LAND USE

1100 Declaration Of Major Policies

1100.2 (b) *The Land Use Element ... encourages a substantial amount of new housing, primarily in housing opportunity areas and near Metrorail stations, in order for the District to perform its critical role as the region's urban center providing the greatest density of jobs and housing. In fulfilling this role, the District relieves many of the transportation and related environmental problems of the region.*

CHAPTER 17 WARD 6 ELEMENT

1707 Ward 6 Actions To Implement The Plan: Housing

1707.1 (d) *Transient housing (inns, small hotels, etc.) should be designed in a manner compatible with the Ward's predominantly residential character;*

(h) *Improve the mix of subsidized and nonsubsidized dwelling units to enhance neighborhood stability;*

1734 Ward 6 Policies In Support Of Land Use Objectives

1734.1 (a) *Stabilize and improve residential and commercial areas throughout Ward 6;*

The proposal to replace the parking structures with new mixed use buildings, including new retail, hotel, and residential opportunities, would also further the goals and objectives of the Anacostia Waterfront Initiative and the Near Southeast Area Urban Design Framework Plan

IV. Zoning Regulations

The entire ballpark site, including the site for the new mixed use buildings, is zoned CG/CR (Capitol Gateway Overlay District / Commercial Residential District). The base CR District permits a medium to high density, mixed use form of development. By-right density is limited to 6.0 FAR, of which a maximum of 3.0 may be non-residential. Height is limited to 90 feet. However, the CG Overlay further provides that an FAR of 7.0 is permitted, provided the additional 1.0 FAR is devoted to residential use, and provides for additional height, to the maximum permitted under the Height Act of 1910, to accommodate the additional density. As such, the proposal appears to conform to the overall intent of the zoning regulations.

Information submitted in the application indicates that the entire site (Ballpark plus the two new towers) would have an FAR of 2.95 (about 2.5 million square feet). The application does not break out FAR for the towers from the Ballpark, as the applicant contends that they will all be parts of one building. With the information provided in the application, OP was not able to determine FAR for the towers separate from the Ballpark.

The application notes only two areas of relief required for these new structures:

- **Above grade parking:** The CG Overlay requires that all parking be located underground. The proposal includes underground parking for the residential and hotel uses, but also includes above grade parking (925 spaces) for ballpark patrons. The above grade parking is generally wrapped by other uses, such as retail and residential, along public streets.
- **Retail height:** The application notes a retail height of 12.5 feet minimum (14 feet minimum required), but does not indicate whether this would be for all, most or only some of the retail space. The application does not provide justification for this relief, but has noted to OP that the height of

retail will vary from 11 to 23 feet, and that about half meets the 14 foot minimum height requirement. Additional analysis of the this aspect of relief is provided in the next section.

The application and the drawings submitted do not clearly indicate whether other, more detailed forms of relief from specific zoning regulations will also be required. For example, some of the rooftop structure appears higher than the 18.5 feet permitted, although some of this may be considered architectural embellishment, permitted to exceed this height.

V. OFFICE OF PLANNING ANALYSIS

The analysis below is specifically for the major June 23, 2006 amendment to the proposal, to replace the parking structures with two mixed-use towers which encapsulate some above grade parking, but also provides updates based on subsequent discussions between OP and the applicant. Guidelines specific to the stadium itself have been omitted from this analysis as being not relevant to the discussion of the mixed use buildings. Analysis for the originally proposed parking structures, for which the applicant is also requesting approval, has also not been provided, as this is not the applicant's stated preferred option, and OP feels that these structures generally are not consistent with the intent of the CG Overlay goals and guidelines.

The June 19, 2006 OP report provides full OP analysis of the "Option 1" proposal for the ballpark site against the Capitol Gateway (CG) Overlay regulations, guidelines, and objectives of §1606 of the Zoning Regulations, with the exception of analysis of development on the north side of the ballpark (the parking structures).

1600 PREAMBLE

1600.2 The purposes of the CG Overlay District are to:

- (a) *Assure development of the area with a mixture of residential and commercial uses, and a suitable height, bulk and design of buildings, as generally indicated in the Comprehensive Plan and recommended by planning studies of the area;*

The amendment significantly enhances conformance of the ballpark site development to this objective, through the provision of new residential, retail, and hotel development at this important location. The development furthers the objectives of the AWI and Near Southeast Plans. OP has some concerns that the east tower may be at an inappropriate height, since the applicant has measured its height from the somewhat higher South Capitol Street elevation, rather than the lower First or N Street elevations in front of this building. OP has discussed with the applicant ways to ensure that the connection between the buildings, which facilitates this, is "meaningful", as well as ways to potentially minimize the visual impact of the height along First Street.

- (b) *Encourage a variety of support and visitor-related uses, such as retail, service, entertainment, cultural and hotel or inn uses;*

The amendment provides a significant amount of street oriented retail, as well as new hotel space. In terms of type of retail use, retail facing the ballpark and the N Street ballpark entry plaza would be ballpark oriented; other retail fronting N and First Streets, would have a broader orientation in terms of use. In addition, the hotel would clearly meet the goals for hotel, inn and visitor-related uses.

- (c) *Allow for continuation of existing industrial uses, which are important economic assets to the city, during the extended period projected for redevelopment;*

Not applicable

- (d) *Provide for a reduced height and bulk of buildings along the Anacostia riverfront in the interest of ensuring views over and around waterfront buildings, and provide for continuous public open space along the waterfront with frequent public access points; and*

Not applicable to the June 23, 2006 amendments to the application.

- (e) *Require suitable ground-level retail and service uses and adequate sidewalk width along M Street, S.E., near the Navy Yard Metrorail station.*

While not located on M Street, the mixed use buildings would support retail and entertainment uses throughout the ballpark area, including along M Street.

- (f) *Provide for development of Squares 702-706 and Reservation 247 as a ballpark for major league sport and entertainment and associated uses.*

The proposal directly achieves this guideline.

1606 BALLPARK

1606.6 *In addition to the streetwall setbacks of §1606.15, any portion of the Ballpark that exceeds 110 feet in height shall provide an additional one-to-one (1:1) step back from the building line along South Capitol Street.*

Although the dimension is not provided on the submitted drawings for the west tower, they appear to show conformity to this requirement, as the 11th and 12th stories provide a setback from the stories below.

1606.7 *All parking spaces within the Ballpark Site shall be provided underground. At or above grade parking spaces shall be permitted if approved by the Zoning Commission pursuant to §1606.18; subject to the applicant demonstrating:*

- (a) *Practical difficulty with the provision of underground parking; and*
- (b) *Compliance with the provisions of §§ 1606.19 & .20.*

The amended proposal includes above grade parking (about 925 spaces) within the new towers, and the applicant continues to request relief from this requirement. The towers have been designed such that the parking areas are generally screened along public streets by other uses, including residential and retail. Where not screened by other uses, the applicant notes that the outer façade of the parking would be treated to minimize visual impact.

1606.8 *A maximum of 1,225 vehicular parking spaces shall be provided for the Ballpark use within the Ballpark Site, in addition to bus parking requirements of §1606.10. Of this number, a minimum of 125 shall be designated handicapped parking spaces. Any parking spaces in addition to the 1,225 amount shall be permitted if approved by the Zoning Commission pursuant to §1606.18; subject to the applicant demonstrating:*

- (a) *That the parking spaces are needed to satisfy parking demand generated by the Ballpark not met by existing or approved but not yet constructed parking facilities; and*
- (b) *Compliance with the provisions of §§ 1606.19 and .20.*

The amendment continues to note that 1,225 parking spaces will be provided within the ballpark site.

1606.9 *In considering whether to approve additional ballpark related at or above ground parking spaces under §1606.8, the Commission shall judge, balance, and reconcile the need for additional on-site parking against any adverse impacts the presence of the parking will have on traffic, and the aesthetics and development of the surrounding neighborhood.*

Such relief is not required and not requested.

1606.10 *Any on-site bus parking shall be located internal to a building, with doors and entranceways designed to compliment the building façade, and shall permit safe and convenient vehicular and pedestrian movement.*

The amendment does not alter bus parking – the new structures would not include bus parking facilities.

1606.11 *The Zoning Commission may grant relief from the requirements of § 1606.10 pursuant to §1606.18 if necessary to the economic viability of the Ballpark and if consistent with the purposes of the CG Overlay as stated in §1600.2 and the provisions of §§ 1606.19 & .20.*

Relief is not required.

1606.12 *Loading platforms and berths for the Ballpark shall be located internal to a building, with doors and entranceways designed to complement the building façade, and shall permit safe and convenient vehicular and pedestrian movement.*

The amendment does not alter loading for the ballpark. Loading for the new buildings would be provided from First Street (east tower) and from N Street (west tower). As shown on the June 23, 2006 submission, loading and parking access take up over half of the First Street façade of the east tower, and a considerable amount of the west tower N Street façade. The applicant has since indicated that the drawings will be amended to reduce this amount significantly. OP has further discussed the option of moving some of the First Street loading or parking access to N Street, to ensure a more continuous retail frontage along First Street. The applicant indicated grading and programmatic issues associated with this, but agreed to investigate further, prior to the June 26 hearing.

1606.14 *Not less than twenty percent (20%) of the Ballpark building's exterior perimeter frontage, not including any detached accessory building, shall be devoted to retail, service, entertainment, or arts uses ("preferred uses") as permitted in §1807.2 of this Title, with the addition of "museum", in accordance with the following provisions:*

The application indicates that 57% of the exterior façade of the towers would be devoted to preferred use retail. Limiting the amount of parking access from First Street will further increase the amount of street fronting retail.

(a) *Preferred uses shall have a street orientation;*

(b) *Preferred uses shall provide direct exterior access at ground level;*

Preferred use retail would have street orientation and provide direct ground floor access to adjacent streets.

(c) *Not less than fifty percent (50%) of area devoted to preferred uses shall be devoted to display windows having clear or low-emissivity;*

The application notes that individual retailers would design the façade for individual retail stores, to provide façade variety and a more pedestrian rhythm to the façades. However, the applicant has committed to ensuring that each retail unit meets or exceeds this requirement.

(d) *The minimum floor to ceiling height of area devoted to preferred uses shall be 14 feet clear;*

At least some of the retail would have a height of 12.5 feet so would not conform to this requirement, and the applicant has requested relief. The project profile notes that retail space would have a height of 11 feet to 23 feet clear. The applicant has indicated to OP that about half of the retail would meet this requirement. OP does not object to a variety of retail heights, to encourage a broader range of retail uses, although clarification of the requested relief is required.

(e) The average depth from the exterior façade in towards the center of the building for space devoted to preferred retail shall be 50 feet minimum.

The application notes that the retail in the towers conforms to this requirement, with an average depth of 50.5 feet, ranging from 41 feet to 60 feet.

1606.15 The Zoning Commission may grant relief to a maximum of 50% of the amount of space required by § 1606.14 if necessary for the economic viability of the Ballpark and if consistent with the purposes of the CG Overlay as stated in §1600.2 and the provisions of §§1606.19 & .20.

Relief is not required or requested.

1606.16 Each building or structure located on the portion of South Capitol Street that lies within the Ballpark Site shall be set back for its entire height and frontage not less than 15 feet, provided that a minimum of 60% of the street-wall shall be constructed on the setback line

The west tower provides the required 15 foot setback.

1606.17 No private driveway may be constructed or used from South Capitol Street to any parking or loading berth areas in or adjacent to a building or structure constructed after {Effective Date of This Section}.

Although the illustrative site plan shows a slip ramp at the center of South Capitol Street providing access to underground parking, and Drawing A9-01 shows what is called an “alternate slip ramp”, the applicant has indicated to OP that there would be no access to parking from South Capitol Street, and drawings will be amended accordingly.

1606.18 The Ballpark and all other proposed buildings or structures within the Ballpark Site shall be subject to the approval of the Zoning Commission in accordance with the provisions of §§1606.19 & 1606.20.

1606.19 An applicant requesting approval under this section must prove that the proposed building or structure, including the siting, architectural design, site plan, landscaping, sidewalk treatment, and operation, will minimize potential impacts to the neighborhood and the United States Capitol by:

(a) Minimizing associated noise, particularly into adjacent residential neighborhoods;

The proposed mixed use towers should not significantly impact noise levels in the area. As submitted, the larger retail areas (which could, conceivably, support more active and potentially noise producing uses such as a sports bar) are located well away from South Capitol Street and any existing residential area. Encapsulating the parking in other uses may minimize any noise associated with parking structures, although OP notes that parking areas above grade along South Capitol Street area not entirely encapsulated in other uses.

(b) Minimizing light spill, particularly into adjacent residential neighborhoods;

The proposed mixed use towers should not significantly impact light levels in the area. The other uses which wrap the parking and the façade screening where provided should minimize the minor impacts associated with car headlights and other lighting for the above grade parking.

(c) Minimizing parking and traffic conflict between Ballpark patrons and neighborhood residents;

Access to parking for ballpark patrons (the above grade portions of the parking) would be provided from First Street SE and from N Street SE. Access to the 300 underground spaces at the south end of the site would be mid-way along Potomac Avenue SE. At these locations, the parking access should minimize potential conflicts with neighborhood residents, but OP has not had an opportunity to discuss the proposed plans with the District Department of Transportation (DDOT).

Of concern is how cars will be prevented from exiting the ballpark on N Street and attempting to cross South Capitol Street into the residential area to the west, possibly to avoid traffic on M Street and South Capitol Street. Adequate control measures will be required. Also of concern is that the location of the parking garage entrance may result in cars cueing along South Capitol Street.

The applicant's supplemental submission included a preliminary Transportation Operations Plan (TOP). In the time available, OP has not had an opportunity to review these documents in any detail, or to discuss them with DDOT. It is our understanding that DDOT will provide input for the public hearing.

- (d) Encouraging the use of bicycles through the provision of safe, secure and convenient bike storage, as well as other forms of alternative transportation to the site;*

Providing denser forms of residential and retail use in proximity to a Metro station is supported. However, the proposal does not detail specific initiatives to encourage modes of transportation to the mixed use development other than metro and the private vehicle – additional information is needed. Connections to the waterfront bike path and other area bike paths should be explored in more detail. It is assumed that the proposed hotel use would generate a minimum of private vehicle traffic, but the application does not detail how taxis and shuttle buses will be handled.

- (e) Minimizing conflict between vehicles and pedestrians;*

As noted above, OP discussed with the applicant concerns regarding the number of parking access / egress ways and loading berths located on First Street SE, the prime pedestrian connection between the ballpark and the waterfront, as shown on the June 23 submission. While loading can be restricted during game days (to lessen impacts on arriving or departing ballpark patrons), this design solution could result in conflicts on non-game days. The applicant has since noted to OP amendments to the drawings to minimize this concern by consolidating the parking access. OP continues to encourage some or all of these functions to be relocated to N Street SE.

- (f) Encouraging the design and development of properties in a manner that is sensitive to the establishment of South Capitol Street as a monumental civic boulevard while recognizing the proximate residential neighborhood use and context;*

The proposed design would not seem to be contrary to this objective, although detailed elevations and site plans have not been provided to fully assess this. In particular, it is not noted whether the sidewalk treatment along South Capitol Street will be consistent with (or an improvement on) that of the adjacent Ballpark.

- (g) Being in context with the surrounding neighborhood and street patterns;*

The proposed development and the proposed massing are generally in keeping with the anticipated, evolving context and street pattern. The new towers appear able to adequately address the streets they front, and enhance the Half Street Plaza area. The height of the east tower would be inconsistently higher than that of the Ballpark and other future development along First Street SE.

- (h) Providing view analysis which assesses openness of views and vistas around the Ballpark, including views toward the Capitol Dome, other federal monumental buildings, and the waterfront, from the surrounding neighborhood and neighborhoods east of the Anacostia River, South Capitol Street, the Frederick Douglas Bridge, and the waterfront;*

View analysis, other than that provided as part of the original application, has not been provided. In particular, additional and more detailed views along South Capitol Street and down Half Street

(into and out of the Ballpark) are needed. Following discussions with OP, the applicant has indicated changes to the First Street façade at ground level which would improve the relationship between the mixed use building and the ballpark entrance directly to its south.

- (i) *Providing for safe and convenient movement to and through the site, including to public transit and to the Anacostia River;*

The mixed use towers appear to generally provide for pedestrian movement through the area, to the waterfront and to the ballpark. While the mixed use buildings slightly narrow the Half Street plaza above grade level (via overhangs), this should not impede pedestrian traffic movement, while the proposed retail uses should help to animate this space on both game and non-game days.

- (j) *Ensuring that signage on the exterior of building or internal to the ballpark structure but visible from the outside, including the scoreboard, will not have such intensity or brilliance as to cause glare or impair the vision of any driver, or otherwise interfere with the driver's operation of a motor vehicle; adversely impact an owner's enjoyment of residential property located proximate to the ballpark; or impact the character and integrity of the ballpark site.*

Although this guideline is not directly applicable to the mixed use towers, OP notes that there is not yet detail provided regarding the form and character of any retail signage – it is assumed that this would be resolved as part of the individual designs for façades of the retail establishment.

1606.20 *In addition to the required provisions of 1606.19, an applicant requesting approval under this section shall also demonstrate that the proposed building or structure, including the siting, architectural design, site plan, landscaping, sidewalk treatment, and operation will:*

- (a) *Help achieve the objectives of the CG Overlay District as set forth in §1600.2;*

Analysis of the proposal against the objectives of the CG Overlay is provided above.

- (b) *Be of a superior quality;*

OP is supportive of the overall design intent for the new towers, as they appear to be providing an interesting and varied massing and form. OP is also supportive of the mix of uses, and the façade materials) noted in the application (glazed aluminum curtain walls with glass and painted finishes), as being appropriate to this location. However, the application does not provide sufficient detail at this time to fully address this guideline.

- (c) *Encourage safe and active streetscapes through building articulation, landscaping, and the provision of active ground level uses including retail, entertainment, cultural, and pedestrian concourse space;*

Again, a detailed site plan is required to adequately address this guideline. However, the provision of a significant amount of retail and the placement of residential and hotel entrances are supported as encouraging an active and safe streetscape. The amount of façade space devoted to parking and loading access, however, is a concern.

- (d) *Minimize unarticulated blank walls adjacent to public spaces through facade articulation; and*

The proposal appears to generally further this guideline, particularly directly at street level. The drawings show above grade parking (intended to be attractively screened) along South Capitol Street at street level; and facing First Street and the Half Street plaza but only above street level. OP would encourage further efforts by the applicant to reduce the number of garage doors for parking and loading along First Street.

- (e) Promote the use of best practice environmental design, including minimizing potential impacts on the Anacostia River through stormwater management and recycling practices.*

The application indicates that there will be some green roof design, but does not further elaborate on best practice environmental design initiatives in the June 23 submission. The applicant has since indicated to OP that it is their intention to provide a LEED certifiable design, which OP supports. Additional detail is required.

VI. CONCLUSION AND RECOMMENDATION

With regards to the amended proposal:

- OP supports the elimination of the Base option, as being contrary to the intent of zoning regulations. OP generally supports the proposed Option 1, with the exception of the single-purpose above-grade parking structures immediately north of the stadium. OP also supports, in concept, Option 2.
- OP has concerns with the proposal to eliminate the lawn area and instead daylight portions of the underground parking at the south end of the site. Even though this is intended as an interim measure (until such time as the site is redeveloped), OP would encourage a solution which provides the parking underground and provides some form of public amenity at grade.
- OP strongly supports the proposal to replace the two parking structures with two mixed use buildings (including wrapped parking for ballpark patrons and underground parking for residents), and generally supports the somewhat conceptual design submitted in the amendment to the application, particularly with the changes to the design described to OP by the applicant. OP notes that the following additional information or further clarification is required:
 - Additional and more detailed architectural drawings, including a detailed site plan, elevations of all facades, sections, etc.
 - A more detailed zoning analysis of the towers against all zoning regulations and the guidelines of the CG Overlay. OP further notes that the Project Profile, provided as part of Attachment A to the June 23, 2006 submission, is, in places, not entirely consistent with the text of the submission.
 - Detailed height calculations, and description of any connections between the two towers and the ballpark.
 - Relationship between the east tower and the ballpark along First Street SE.
 - Submission of changes to the numbers and locations of loading and parking accesses along First Street.
 - Screening for the above grade parking, where not screened by other uses.
 - Nature of the proposed affordable housing.
 - Best practice environmental design elements, with LEED certification recommended.