



MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Jennifer Steingasser, Deputy Director 

DATE: November 19, 2012

SUBJECT: Hearing Report: Zoning Commission Case No. 08-34A for Second-Stage Approval of a Commercial Building in the South Block (Capitol Crossing)

I. SUMMARY RECOMMENDATION

Center Place Holdings LLC (the “Applicant”), on behalf of the District of Columbia through the Deputy Mayor for Planning and Economic Development, is requesting approval for a second-stage Planned Unit Development (“Second-Stage PUD”) for an office development with ground floor retail in the South Block of the Capitol Crossing project (hereinafter, the overall project will be referred to as “Capitol Crossing” or “Overall Project”).¹ The Zoning Commission (“Commission”) discussed the application at its regular public meeting on July 9, 2012 and set down the proposal for a public hearing.

The Office of Planning (OP) **recommends approval** of the Second-Stage PUD. The proposal also is not inconsistent with the first-stage PUD (“First-Stage PUD”) approval or the Comprehensive Plan.

II. SITE AND AREA DESCRIPTION

The site is located in the South Block of an ambitious proposal known as Capitol Crossing. In general, Capitol Crossing consists of three new blocks of development (North, Center, and South Blocks) which would occupy terra firma and the air rights above the sunken I-395 freeway.² The South Block (Lot 44) consists of 85,364 square feet of terra firma and air rights, and the proposed building would occupy most of the South Block.³ Lot 44 is bordered by the planned re-opening of F Street to the north, 2nd Street to the east, E Street to the south, and 3rd Street to the west. The west side of Lot 44 also arcs around an existing office building (501 3rd Street) which is not included in Capitol Crossing.

Existing development near the South Block consists largely of office and institutional uses. Across 3rd Street to the west is a 10-story office building. To the east, across 2nd Street, is the Georgetown Law Center campus. F Street between 2nd Street and 1st Street was closed pursuant to a 2001 easement and functions primarily as campus lawn with a security gate on the eastern end. There is an agreement that this portion of F Street would be re-opened when F Street is re-established across I-395. To the south, the freeway is covered in intervals by E Street, a pedestrian plaza adjacent to the United States Tax Court, D Street, and the United States Department of Labor.

III. BACKGROUND

Commission Case No. 08-34 (2011) approved a First-Stage PUD, a consolidated PUD (“Consolidated PUD”), and a related map amendment to C-4 zoning for a three block development site to be constructed above the Center Leg Freeway. The following elements were approved as part of the Consolidated PUD:

¹ The overall project previously was known as “Return to L’Enfant.”

² Capitol Crossing is generally bounded by Massachusetts Avenue N.W. to the north, 2nd Street N.W. to the east, E Street N.W. to the south, and 3rd Street N.W. to the west, and includes all lots except 43 in Square 568. It includes all lots except 43 in Square 568.

³ OP notes that there is a slight discrepancy with the site’s square footage between the official Lot 44 plat, which identifies the site as having 85,429 square feet, compared to the site size consistently used in the application of 85,364 square feet.



(1) construction of the entire platform and base infrastructure; (2) the mix of uses, the height and density of each block; (3) the North Block; (4) the construction of all below-grade parking, concourse, and service levels; and (5) the proposed landscaping and streetscape design for the Overall Project. Transportation management measures also were adopted.⁴

IV. PROPOSAL

The Applicant proposes to construct an office building with ground floor retail. The height, bulk, and use are generally consistent with Order No. 08-34 approval. Project details include:

- The building would rise 130' in height and 12-stories. While Order No. 08-34 permitted up to 9.0 FAR for the South Block as a whole, the Applicant now proposes that the total FAR for the entire South Block, including the relocated Jewish Historical Society (JHS) Synagogue and new facilities, would total 8.7 FAR. The subject building would contain 689,352 square feet, which represents a 28,710 square foot decrease from the approved size in Order No. 08-34. More specifically, 670,251 square feet of gross floor area would be office use, with 13,954 square feet of that amount potentially reallocated to retail use. Dedicated retail use of 19,101 square feet is proposed.⁵ Order No. 08-34 requires a minimum retail amount for Capitol Crossing of 62,687 square feet, of which an estimated 20,000 square feet of the retail was allocated for the South Block.⁶ Should less square footage ultimately be located in the proposed building, the Applicant has indicated that additional retail must be relocated to future Capitol Crossing Second-Stage PUD projects.⁷
- The building's mass would be "organized into two parallel bars with a full-height glass atrium in the center."⁸ The bulk would be concentrated along 2nd and F Streets, with a step down to seven-stories on the building's west side. Massing stepbacks also would be incorporated into the southeast (11th and 12th floors) and northwest (12th floor) building corners to accommodate terraces. Entrances on E, F, and 2nd Streets would be recessed from the main street façade to further articulate the building frontages. The lot occupancy would be about 92%, which slightly exceeds the 90% lot occupancy limit approved in Order No. 08-34. The building would set back from the E Street Property line by 6'10", accommodating a width of 14' between the curb and ground floor façade.⁹
- Retail spaces would line the ground floor along adjacent streets. The Applicant has indicated to OP that retail ceiling heights would be a minimum of 12' in height and cannot be "increased further given the need to incorporate a minimum number of stories within the permitted height."¹⁰
- Upon the building's roof, a solar canopy would accentuate the building's corners and match the building's 130' height. The canopy would "consist of an open-grate brise soleil spanning between cantilevered structure members and will likely be fabricated out of aluminum or stainless steel rods."¹¹ The solar shades would connect to a vertical trellis extending down to second level pedestrian canopies, and the shade, trellis, and canopies would protrude no more than 4' from the building façade. A central atrium would rise no more than 18'6" in height above the roof. From the 2nd to 12th floors along the F, 2nd, and G Street facades, laminated glass fins would "project[]

⁴ See ZC Order No. 08-34, page 19.

⁵ The Applicant indicated that the amount of flex office/retail space has been reduced by 367 square feet due to the rearrangement of the elevator lobby and mechanical room.

⁶ This allocation was for the non-JHS portion of the South Block.

⁷ See the Applicant's November 8, 2012 submission, page 10.

⁸ See Applicant's June 4, 2012 submission, page 6.

⁹ The 14' setback represents a commitment made by the Applicant in original project approvals. See Order No. 08-34, page 8.

¹⁰ Applicant's November 8, 2012 submission, page 10.

¹¹ *Id.* at page 4. A "brise soleil" is a term for permanent sun-shading techniques.

from the face of the wall at various angles.”¹² An extensive green roof of varying depths would be provided, as well as paved pathways and seating on the rooftop.

- It is anticipated that the future development of the entire South Block, consisting of the proposed building and the JHS facilities, would be connected internally at or above the level of the main floor to form a single building with frontage on 3rd Street.¹³ The present application does not include the JHS component, but reserves the space for their future relocation and development.
- Centralized parking and loading features already were approved for the entire Capitol Crossing project in Order No. 08-34. The underground facility would be constructed contemporaneously with the platform and is part of the base infrastructure. To accommodate the full scope of the three block development, 1,146 vehicle parking spaces and a loading strategy of 1 berth @ 55', 8 berths @ 30', 1 platform @ 200', 8 platforms @ 100', and 4 service spaces @ 20' deep would be provided.¹⁴ Parking would be accessed from 3rd Street on the North and South Blocks, and the below-grade loading facility would be accessed from E Street. As part of the subject proposal, the proposal locates the loading entrance at the southwest corner of Lot 44 for “better coordination of the ramp with the below-grade facilities.”¹⁵
- As approved pursuant to Order No. 08-34, an eco-chimney location is shown on the application’s site plan.¹⁶ The function of the eco-chimneys is to “maximize filtration of air containing automotive exhaust from below-grade parking facilities and service corridor.”¹⁷ The chimney would be two stories and clad in glass panels. It would be located behind the eight-story portion of the building on F Street.¹⁸

V. MODIFICATIONS AND CLARIFICATIONS TO THE PROPOSAL SUBSEQUENT TO SETDOWN

- Canopy – Most significantly, the Applicant has lowered the height of the rooftop canopy. The Applicant’s original design had the solar canopy extending to 18'6" above the height of the building. In response to Commission feedback, the Applicant has lowered the overall height of the canopy to the maximum height of the building at 130'. The canopy would instead protrude over stepbacks incorporated into the northwest and southeast building corners, a design which is intended to maintain the original architectural design intent, to highlight the “separation between the building and the ‘canopy’ above...,” and to accommodate new terraces.¹⁹ In association with the revised canopy design, the easternmost penthouse would be split into two structures and re-located to either side of the atrium which would help to diminish their visibility. Additionally, as a result of the upper level stepbacks and minor setback changes to the ground floor entries, the size of the building was reduced by approximately 3,785 square feet.
- Atrium – The building’s signature central atrium would rise to a maximum height of 18'6" above the roof. The Applicant asserts that the design is consistent with the Zoning Regulations and the Height Act as applied to atrium coverings, and references several past precedents.²⁰ OP is not opposed to the atrium design which appears to be consistent with earlier interpretations.

¹² Applicant’s June 4, 2012 submission, page 7.

¹³ See Order No. 34, page 10.

¹⁴ Order No. 08-34 permitted one fewer 55' loading berth and one fewer 200 square foot platform than required under the zoning regulations.

¹⁵ Applicant’s June 4, 2012 submission, page 8.

¹⁶ See Applicant’s November 8, 2012 submission, drawing 1.2.

¹⁷ Order No. 08-34, page 8.

¹⁸ See Applicant’s November 8, 2012 submission, page 8.

¹⁹ See Applicant’s August 31, 2012 submission, page 3.

²⁰ See Applicant’s November 8, 2012 submission, pages 8 and 9.

- Connection to 3rd Street – As provided in Exhibit A of the Applicant’s August 31, 2012 submission, the site has been subdivided into a single record lot.²¹ Newly created Lot 44 borders on four streets, including 3rd Street. As such, the application asserts that the proposed building technically would front on 3rd Street, which would allow the building to achieve up to 130' in height under the Height Act because of 3rd Street’s 110' right of way. When a future JHS facility is built between the subject building and 3rd Street, the Applicant indicates that a “meaningful connection” between the buildings will be created. Building plans show a ground floor hallway which is intended to link with JHS in the future, and an excerpt of a 2012 agreement between the Applicant and JHS has been provided to show a mutual commitment to provide a meaningful connection.²²
- Western Façade – The Applicant provided more information concerning the proposed building’s western façade. The façade would include stucco on concrete block and would be painted in a neutral color. Project renderings show how the western façade would appear prior to being obscured by future JHS facilities.²³ The Applicant also addressed how the proposed at-risk windows along the western property line should not create a problematic condition.²⁴
- Affordable Housing – As approved in Order No. 08-34, a residential building constructed in the Center Block would include approximately 150 residential units. A minimum of 50 of the units would be affordable to individuals earning no more than 80% AMI and paying no more than 30% of the family’s household income for rent or housing ownership costs. The units would remain affordable for a 40 year term. The residential building would be reviewed and approved in a future second-stage application.

VI. ZONING

Order No. 08-34 approved a zoning related map amendment to C-4 for the entire Capitol Crossing proposal. A comparison between C-4 PUD standards, Order No. 08-34 approval, and the proposed project is shown below. Parking and loading features were already approved for the project as a whole.

SOUTH BLOCK	C-4 PUD	Approved per 08-34	Proposed
Height	130 ft. max.	130 ft.	130 ft.
FAR	11.0 max.	9.0 (768,276 sq. ft.)	8.66 (739,566 sq. ft.)
Lot Occupancy	100% max.	90%	92.4%
Uses	Office, retail allowed	Office, retail	Office, retail

VII. FLEXIBILITY

Pursuant to Order No. 08-34, the project already was granted flexibility as it relates to the loading required for a project located in a C-4 district. The overall project will provide 1 berth @ 55', 8 berths @ 30', 1 platform @ 200', 8 platforms @ 100', and 4 service spaces @ 20' deep, all within a centralized below-grade loading facility serving Capitol Crossing as a whole.²⁵ This represents one fewer 55' loading berth than required.

²¹ The subdivision was recorded at the Office of the Surveyor on July 12, 2012.

²² See the Applicant’s November 8, 2012 submission, pages 8 and 9 and illustrative plans page 5.1.

²³ See *id.* at page 7 and illustrative plans page 2.8.

²⁴ See *id.* at pages 7 and 8.

²⁵ Order No. 08-34, pages 16 & 29.

The Applicant requests the following additional relief from the Zoning Regulations²⁶:

- Multiple Roof Structures (§ 411.3)

The Applicant requests approval for multiple roof structures rather than a required single enclosure. The Applicant indicates that the roof structures must be separated as a result of the unique design of the central atrium bisecting the building. The Applicant indicates that the structures would be setback 1:1 as required at a uniform height of 18'6".

The Applicant has further requested relief related to the phasing and timing of construction of the proposed building. The Applicant requests that “upon approval of the Second-Stage PUD for the South Block, a building permit application must be submitted within two years of the completion of the construction of the platform and base infrastructure and the construction must commence within four years to that date.”²⁷ Such phasing would synchronize the timing with Condition No. 27 of the 08-34 Order for the North Block development. OP has no objection to this flexibility request.

In addition, the Applicant has requested flexibility in the areas of design, material, streetscape, and retail entrances as provided on page 13 of the application. OP has no objection to these typical flexibility requests.

VIII. PUD PURPOSE, STANDARDS, AND BENEFITS AND AMENITIES

The purpose and evaluation standards for PUDs are outlined in 11 DCMR, Chapter 24. The PUD process is “designed to encourage high quality developments that provide public benefits.” Through the flexibility of the PUD process, a development that provides amenity to the surrounding neighborhood can be achieved. The Applicant is requesting approval of a Second-Stage PUD. The PUD standards state that the “impact of the project on the surrounding area and upon the operations of city services and facilities shall not be unacceptable, but shall instead be found to be either favorable, capable of being mitigated, or acceptable given the quality of public benefits in the project.” (§ 2403.3).

Sections 2403.5 – 2403.13 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. In its review of a PUD application, § 2403.8 states that “the Commission shall judge, balance, and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case.” Sections 2403.9 and 2403.10 state that a project must be acceptable in all the listed proffer categories. To assist in the evaluation, the applicant is required to describe amenities and benefits, and to “show how the public benefits offered are superior in quality and quantity to typical development of the type proposed...” (§ 2403.12).

As provided in Conditions 79(a) – (i) in Order No. 08-34, benefits and amenities for the overall project already were proffered as part of the initial approval. Benefits included the construction of a platform and F and G Streets, environmentally friendly design, affordable housing, historic preservation for the historic JHS synagogue, re-construction of the Holy Rosary Church Annex and Rectory, space for technology incubators, the creation of new open spaces, transportation management measures, and employment and training opportunities, among others.²⁸ The Applicant does not propose any changes to the previously approved benefits and amenities package. The subject proposal furthers earlier approvals in areas such as those highlighted below:

1. *Environmental benefits* – The Applicant proposes a LEED Platinum certification for the core and shell of the building. The Applicant has submitted a LEED Scorecard with the application.²⁹ The project also

²⁶ See § 2405.7.

²⁷ Applicant’s June 4, 2012 submission, page 12.

²⁸ Order No. 08-34, pages 16-19 (conditions 79(a) – (i)).

²⁹ See Applicant’s June 4, 2012 submission, drawing 1.5.

includes sustainable features such as solar shading devices and an extensive green roof spanning an estimated 32,593 square feet.

2. *Employment and training opportunities* – As part of the initial project approval, the Applicant already has entered into a First Source Employment Agreement under which the Applicant will fill 51% of all new jobs resulting from the construction of the project with District residents, and will fill 67% of all new apprenticeship positions with District Residents. In addition, Certified Business Enterprises will represent 20% of the developer's equity and development participation in the project, and the Applicant will contract with Certified Business Enterprises for at least 35% of the contract dollar volume of the project.³⁰
3. *Transportation management measures* – The overall project will incorporate centralized below-grade loading and parking facilities with limited curb cuts to minimize impacts on pedestrians and vehicles. The Applicant will provide a Transportation Management Program for office tenants.³¹
4. *Urban Design, Landscaping and Creation of Open Spaces* – The proposal would further link neighborhoods in the District that historically have been separated by a vast freeway canyon. The project includes ground floor retail along existing and newly created streetscapes which could enliven the public realm. The building would be set-back from the F Street property line in order to create 14' of sidewalk width. The streetscape design for the overall development site was approved as part of the Consolidated PUD in Order No. 08-34, but the Applicant indicates that some additional planters have been added to F and E Street designs.

IX. COMPREHENSIVE PLAN

The Commission found during its review of the First-Stage PUD that the Capitol Crossing project is not inconsistent with the Comprehensive Plan ("Comp Plan"). OP finds that the Second-Stage PUD application is consistent with earlier approvals and does not detract from the project's relation to major tenets of the Comp Plan. The proposal would further a number of the Comp Plan's policies including:

Policy Central Washington (CW)-2.5.6: I-395 Air Rights Development

"Pursue development of the air rights over I-395 between E Street NW and Massachusetts Avenue NW, including the restoration of the streets rights-of-way along F and G Streets. Mixed land uses, including housing, offices, ground floor retail, and parkland, should be encouraged in this area. Air rights development should be sensitive to adjacent areas and should preserve important views."

Policy LU-1.1.1: Sustaining a Strong City Center

"Provide for the continued vitality of Central Washington as a thriving business, government, retail, financial, hospitality, cultural, and residential center. Promote continued reinvestment in central city buildings, infrastructure, and public spaces; continued preservation and restoration of historic resources; and continued efforts to create safe, attractive, and pedestrian-friendly environments."

Policy LU-1.2.2: Mix of Uses on Large Sites

"Ensure that the mix of new uses on large redeveloped sites is compatible with adjacent uses and provides benefits to surrounding neighborhoods and to the city as a whole. The particular mix of uses on any given site should be generally indicated on the Comprehensive Plan Future Land Use Map and more fully described in the Comprehensive Plan Area Elements. Zoning on such sites should be compatible with adjacent uses."

Policy LU-1.4.1: Infill Development

³⁰ See Order No. 08-34, page 19 (Condition (i)).

³¹ The Transportation Management Program can be found in the Applicant's Supplement Report to the Transportation Impact Analysis (Tab 4) of the Supplemental Prehearing Submission (ZC Case No. 08-34).

“Encourage infill development on vacant land within the city, particularly in areas where there are vacant lots that create ‘gaps’ in the urban fabric and detract from the character of a commercial or residential street. Such development should complement the established character of the area and should not create sharp changes in the physical development pattern.”

Policy T-2.4.1: Pedestrian Network

“Develop, maintain, and improve pedestrian facilities. Improve the city’s sidewalk system to form a network that links residents across the city.”

Policy E-3.2.1: Support for Green Building

“Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities.”

Policy UD-1.1.2: Reinforcing the L’Enfant and McMillan Plans

“Respect and reinforce the L’Enfant and McMillan Plans to maintain the District’s unique, historic and grand character. This policy should be achieved through a variety of urban design measures, including appropriate building placement, view protection, enhancement of L’Enfant Plan reservations (green spaces), limits on street and alley closings (see Figure 9.3), and the siting of new monuments and memorials in locations of visual prominence. Restore as appropriate and where possible, previously closed streets and alleys, and obstructed vistas and viewsheds.”

X. AGENCY COMMENTS

Subsequent to setdown for a public hearing, the application was referred to the following District government agencies for review and comment:

- Department of the Environment (DDOE);
- Department of Transportation (DDOT);
- Department of Employment Services (DOES);
- Department of Parks and Recreation (DPR);
- Department of Public Works (DPW);
- Fire and Emergency Medical Services Department (FEMS);
- Metropolitan Police Department (MPD); and
- DC Water.

FEMS provided OP with the following comments: “I have looked over the preliminary information and have concerns previously expressed to DC DOT about the improvements that need to be made within the tunnel to accommodate such a proposed use...”³² In conversations with DDOT and the Applicant, it appears that the FEMS comments are directed toward the platform design, and DDOT will continue to work with the Applicant as the platform engineering progresses. DC Water’s comments are attached as Exhibit 3. OP has not received any other agency comments.

XI. COMMUNITY COMMENTS

OP has reviewed an October 15, 2012 submission from ANC 6C indicating a unanimous vote in support of the proposal. To date, OP has not received any other official submissions from the community.

XII. RECOMMENDATION

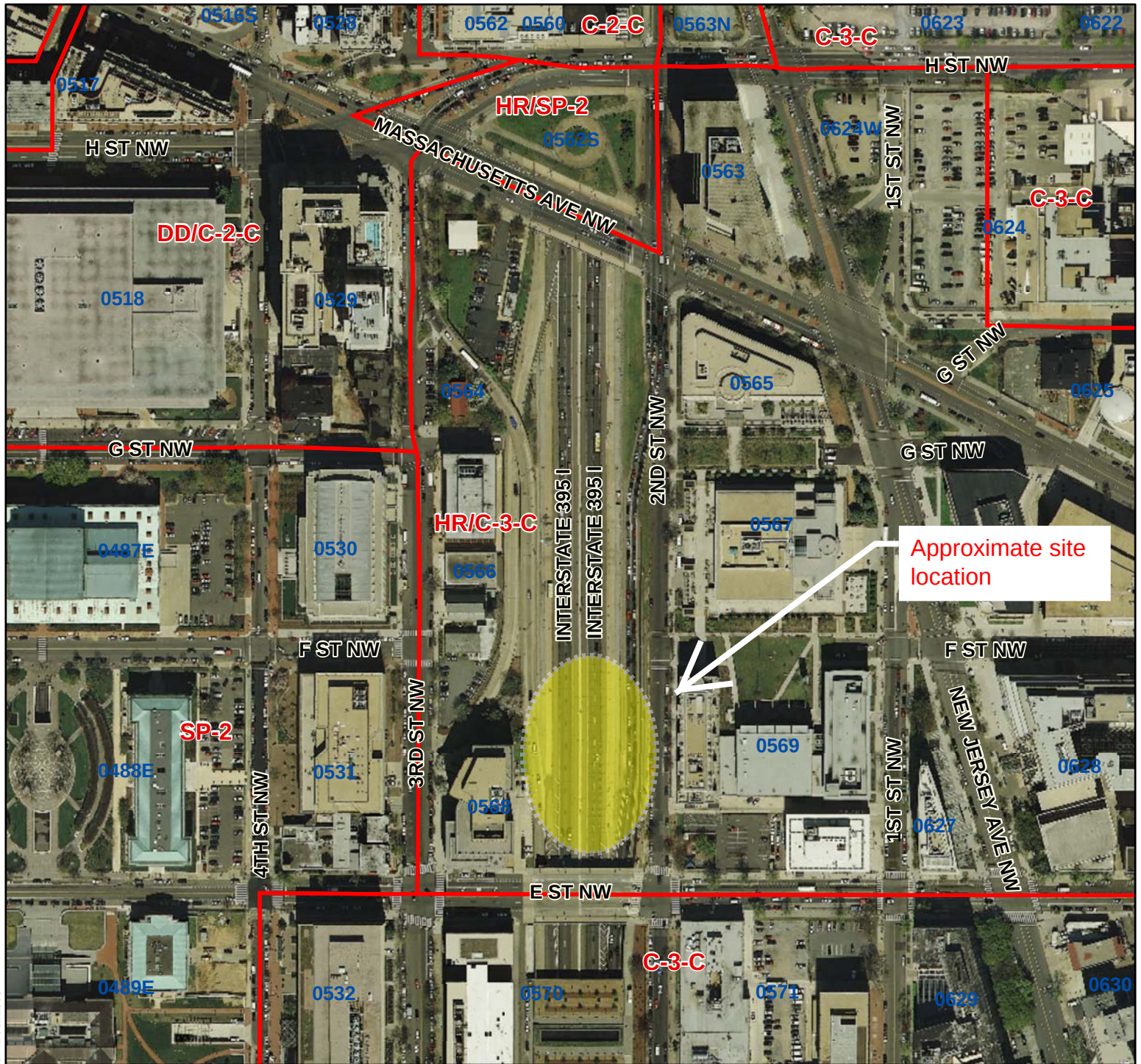
OP concludes that the proposal also is not inconsistent with the First-Stage PUD approval or the Comprehensive Plan. OP **recommends approval** of the Second-Stage PUD.

JS/pg

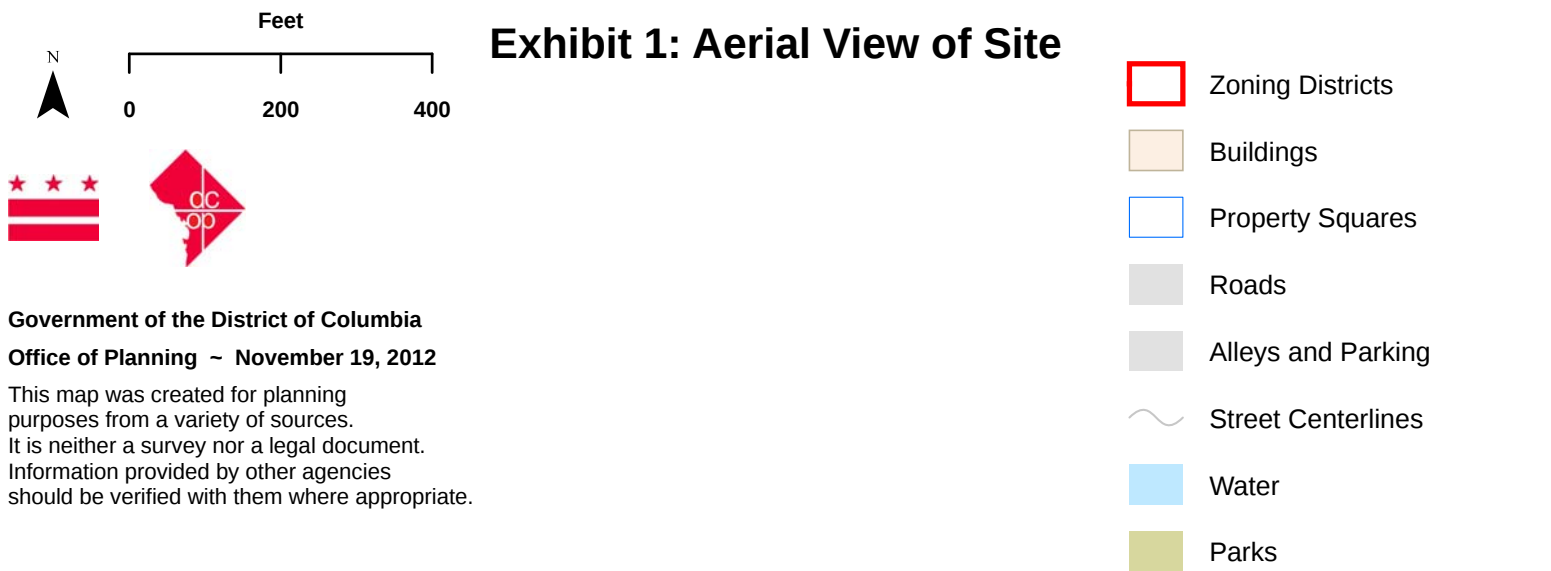
Case Manager: Paul Goldstein

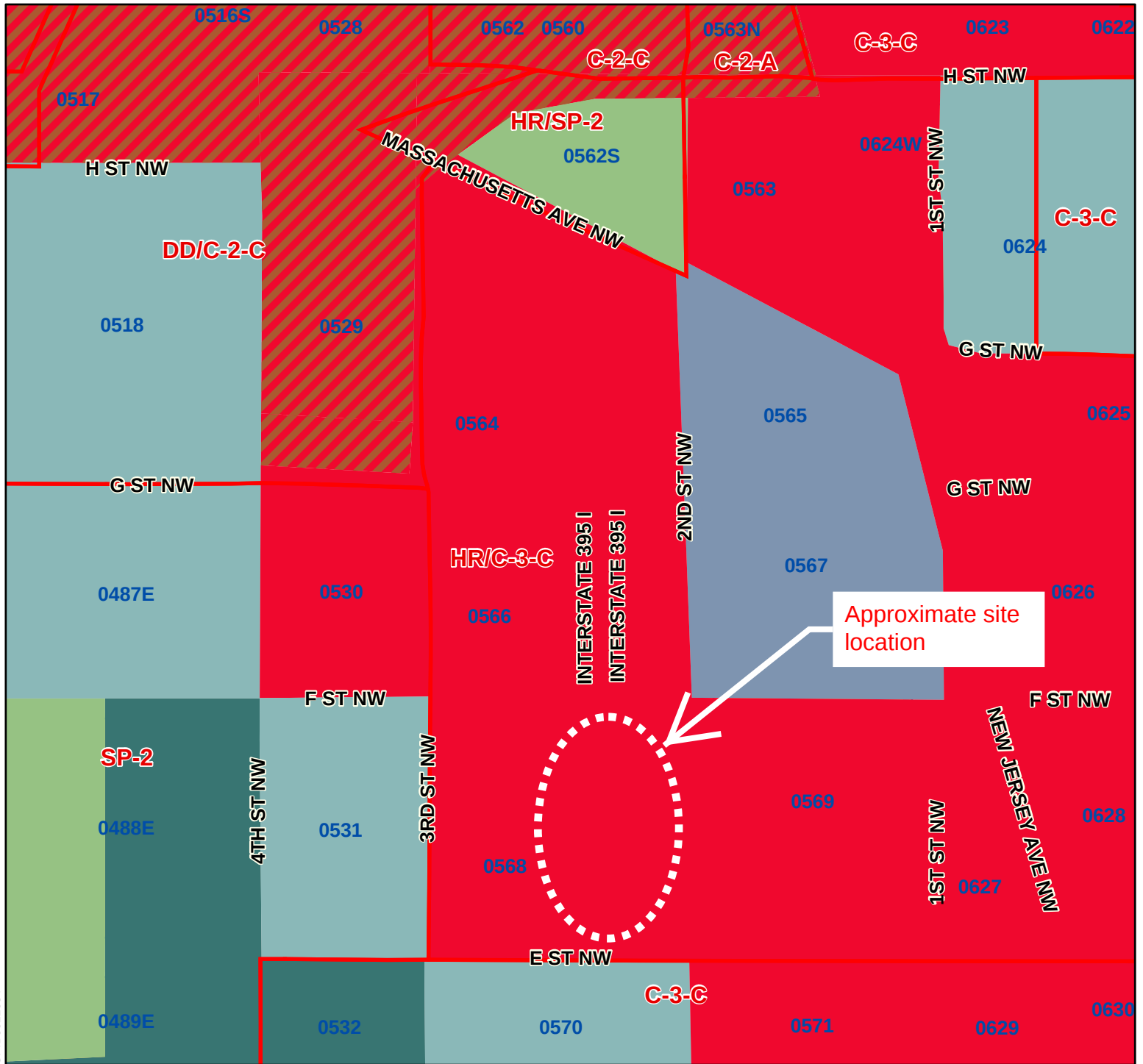
³² Email from Chief Bruce Faust to Paul Goldstein, dated November 13, 2012.

Attachments: Exhibit 1: Aerial view of the site
Exhibit 2: Comp Plan Future Land Use Map
Exhibit 3: DC Water comments



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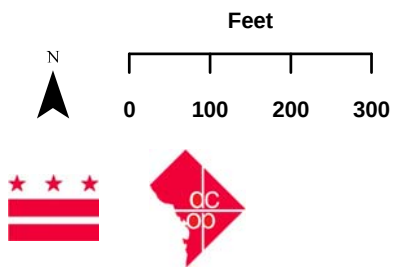


Exhibit 2: Comp Plan Future Land Use Map

Government of the District of Columbia
Office of Planning ~ November 19, 2012

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

Goldstein, Paul (OP)

From: Christopher Sandt <Christopher.Sandt@dcwater.com>
Sent: Friday, November 16, 2012 4:40 PM
To: Goldstein, Paul (OP)
Cc: Callie Schaper
Subject: RE: Zoning Commission Case No. 08-34A: Request for Comments

Hi Paul,

Please submit the following language as preliminary feedback from DC Water on Zoning Commission Case No. 08-34A.

This information is specific only to the existing water and sewer utilities adjacent to the proposed South Block within the overall Capitol Crossing project:

DC Water is aware of this proposed development and has considered the potential impacts to the water and sewer infrastructure. Overall, there is adequate water supply and wastewater treatment plant capacity to support this project and local infrastructure is available for connections. It will be incumbent upon the applicant to extend the water and sewer infrastructure to service the site and provide local upgrades as may be necessary. It is anticipated that the project will develop public rights-of-way for streets and utilities. If not, easements will be required by DC Water in order to assume ownership and maintenance of public water and sewer infrastructure.

With regard to water infrastructure, there is an existing 8-inch cast iron water main (constructed in 1939) in 3rd Street NW, an existing 8-inch ductile iron water main (constructed in 1969) in 2nd Street NW, and an existing 12-inch cast iron water main in E Street NW. These water mains are available for new connections. Subsequent to water distribution system testing, analysis of flow demand for the proposed development, and analysis of the age, break history, water quality and capacity of the surrounding water system, large connections (3-inch diameter and larger) may require replacement or upsizing (i.e., replacement with larger water main) of portions of the 8-inch and/or 12-inch water mains adjacent to this project site. The applicant is advised that new water infrastructure will be required to complete the public grid in F Street NW and G Street NW where rights-of-way or easements are established across I-395.

With regard to sewer infrastructure, the project site is located in an area with a combined sewer network along 3rd Street NW, 2nd Street NW and E Street NW. All proposed sanitary and storm sewer services must be connected to the combined sewer mains. There is an existing 24-inch combined sewer main (constructed in 1938, unknown pipe material) in 3rd Street NW and an existing 12" combined sewer main (constructed in 1910, unknown pipe material) in 2nd Street NW. These combined sewer mains are available for new sanitary sewer and storm service connections. There is also an existing 96" combined sewer main (unknown material and construction date) along the lot frontage for Lot 43 in E Street NW. The 96" combined sewer main transitions to a 144" combined sewer main as it crosses the Interstate 395 corridor. The structural integrity of this existing, large-diameter sewer should be verified and monitored before, during, and after project construction. Pile driving in the vicinity of the 96" or 144" combined sewer mains may be problematic. The applicant is advised that new sewer infrastructure may be required to capture roadway stormwater runoff in F Street NW and G Street NW where rights-of-way or easements are established across I-395.

The information above describes the existing infrastructure in the vicinity of the project. A final determination of the ability of those lines to service this project can only be made after site development plans and supporting application documentation has been submitted to and reviewed by DC Water. If as a result of that review DC Water finds the existing water and sewer systems to be unsuitable for the proposed connections, the plans will not be approved. The

applicant is advised that, under DC Water's infrastructure renewal program, priority is given to replacement of infrastructure that serves the most critical needs of our customers, as determined by DC Water. Any upgrades to the water and sewer systems that may be needed to accommodate this project are unlikely to be included in DC Water's renewal program in the immediate future. The applicant may at their option elect to replace or extend water and sewer, at their expense, to meet their project needs.

Feel free to call or e-mail me if you have any questions/comments.

Regards,

Chris



Christopher Sandt, P.E. | Engineer III | DC Water-Permit Operations
1100 4th Street SW, Suite 310 | Washington, DC 20024 | (202) 646-8600
(Direct) 202-646-8623 | (E-Mail) christopher.sandt@dcwater.com
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