

**BEFORE THE DISTRICT OF COLUMBIA
ZONING COMMISSION**

**Application of D.C. Water and Sewer Authority
ANC 8C**

**APPLICATION FOR ZONING COMMISSION REVIEW OF THE DESIGN OF A
WATER TOWER ON ST. ELIZABETHS HOSPITAL – EAST CAMPUS**

I. NATURE OF RELIEF SOUGHT

This is an application to the Zoning Commission (the “**Commission**”) by D.C. Water and Sewer Authority (the “**Applicant**” or “**DC Water**”) pursuant to 11 DCMR § 2523.8A for approval of the modified design of the water tower on the East Campus of St. Elizabeths Hospital. DCMR § 2523.8A requires that any request by the Applicant to modify the designed approved by the Zoning Commission is subject to the same review criteria and approval process set forth in 11 DCMR § 2523. Certain changes in the design of the water tower approved in the Zoning Commission in Zoning Commission Order 10-06 dated May 10, 2010 (“**Z.C. Order 10-06**”) have been requested by the U.S. Commission of Fine Arts (“**CFA**”) and the Historic Preservation Review Board (“**HPRB**”). Therefore, the Applicant is requesting in this application Zoning Commission approval to modify the design approved by the Zoning Commission in Z.C. Order 10-06 to enable issuance of a building permit for the water tower based upon the design described in this Application.

Included in this application are site layout plans including utility layout and water tower schematics, past mitigation concepts, sample water tower exhibits, site photos and correspondence from the HPRB, CFA, and ANC 8C.

II. DESCRIPTION OF THE PROPERTY

A. History of St. Elizabeths Hospital

The property that is the subject of this application is a portion of the site known as the East Campus of St. Elizabeths Hospital. Saint Elizabeths is significant for its contributions both to the history of mental health care in the United States and as an excellent representation of the development of institutional architecture. Originally known as the Government Hospital for the Insane, Saint Elizabeths Hospital was founded in 1852 by Dorothea Lynde Dix and Charles W. Nichols as the first federal mental hospital in the United States. The facility was developed over the course of a century, starting with the West Campus in the mid- and late nineteenth century and moving to the East Campus in the late nineteenth and early twentieth centuries.

Early development on the East Campus consisted of informal groupings of agricultural structures and small-scale individual staff residences. During the early twentieth century, hospital development spread to the East Campus, and several large facilities were constructed and configured in formal complexes and quadrangles. The East Campus also has several other large hospital facilities constructed in the 1930s, as well as smaller buildings constructed in the 1950s and 1960s. Most of the development on the site has taken place on the west side of a deep ravine that runs north-south through the East Campus, leaving much of the east side of the East Campus undeveloped. Saint Elizabeths Hospital was intended to be a self-sustaining facility, and the development and character of the East and West Campuses has been shaped by the construction of various service buildings and structures that support operations, including fire engine houses, laundries, power plants, pumping

stations, and water distribution infrastructure. Part of the existing water infrastructure is an elevated steel water storage tower, which is located directly adjacent to a formal quadrangle of buildings on the East Campus. The tower was constructed in the 1930s, replacing a water tank from the early 20th century, during a period of rapid growth that rendered the existing water distribution system inadequate. Today, the tank is not fully operational and is unable to provide adequate water pressure to the hospital facility.

B. The Project Site and Zoning Requirements

As approved in Z.C. Order 10-06, the proposed water tower site will be located on a 3-acre piece of land northwest of the new St. Elizabeths Hospital (the "**Project Site**"), as shown on Exhibit 1 (*Updated Plan Illustrating the Project Site, Site Photos, and design Plans of the Proposed Water Tower*), and the Context Plan included in Applicant's Statement in Support of Application; Tab A (Plan illustrating the Project Site, site photographs, and architectural plans of the proposed water tower) attached to the Application in support of Z.C. Order 10-06. By text amendment approved by the Commission in Z.C. Order No. 09-10 the Commission authorized the construction of a water tower owned and operated by DC Water on unzoned property owned by the District of Columbia and located on the East Campus of Saint Elizabeths Hospital. See 11 DCMR § 2523.1. By Z.C. Order No 04-08B, dated May 10, 2010, and effective as of June 25, 2010, the Commission approved a minor modification of the PUD for the new St. Elizabeths Hospital site approved by Z.C. Order No. 02-45 (dated May 1, 2003, effective November 28, 2003) in order to remove 3.3 acres from the PUD site to permit the construction of a new water tower. The text amendment also required that any water tower that exceeds 90 feet in height be reviewed and approved by the

Zoning Commission prior to the issuance of a building permit. See 11 DCMR § 2523.2. The Department of Consumer and Regulatory Affairs approved a waiver from the Height Act of 1910 to accommodate the new water tower. See **Exhibit 2**, *DCRA Height Act Waiver Letter dated January 27, 2010*.

III. PROJECT BACKGROUND: SITE SELECTION, DESIGN STUDIES, AND PROJECT DESIGN

DC Water operates the water distribution system that supplies water service to the District of Columbia. In 2000, DC Water published a Water System Facilities Plan (Facilities Plan) that evaluated the water system and outlined plans to improve water distribution. Based on the findings of the Facilities Plan, DC Water has proposed several needed improvements to its system, including the creation of a new service area east of the Anacostia River that will provide higher normal operating pressures to an area that currently receives insufficient service. For this new pressure zone, an elevated water storage tower must be constructed to provide the required pressure and fire protection. The proposed water storage tower will be the first elevated storage tower to be constructed by DC Water; it is also the first elevated storage tower sited in the District of Columbia since 1945.

The Applicant and its consultants have engaged in extensive efforts to determine the appropriate location and design for the proposed water tower. These efforts are described in detail in the Applicant's submissions in 2010 to the Commission. Since the issuance of Z.C. Order 10-06 and Z.C. Order No. 04-08B, the Applicant has continued to engage stakeholders, including HPRB and CFA, with respect to the design of the water tower, as further described in Section VI below.

A. Water Tower Site Selection

1. Selection of St Elizabeths Hospital East Campus.

In 2007, DC Water completed a "Water Tower Siting Study for the Proposed Anacostia Second High Pressure Zone," which investigated site alternatives to determine the most appropriate location for the proposed elevated water storage tower within the proposed new pressure zone. Alternative sites were considered based on elevation and were evaluated and ranked based on ownership, site availability, safety and security, compatibility with neighborhood uses, cost, and engineering considerations as well as impacts on view sheds, natural resources, and historic, cultural, and archeological resources. The study identified several advantages for the Saint Elizabeths site, including District of Columbia ownership, the required ground surface elevation, a sufficient distance from current and planned residential uses, and a central location within the proposed service area. Based on these criteria, the siting study concluded that the most favorable site for the proposed water tower would be on the East Campus of the Saint Elizabeths Hospital facility.

The Saint Elizabeths East Redevelopment Framework Plan approved by Council pursuant to PR17-0899 on December 16, 2008 and the Master Plan and Design Guidelines dated June 4, 2012 both depict a water tower being constructed on the Project Site.

The only disadvantage identified was the designation of the East Campus of the Saint Elizabeths Hospital as a National Historic Landmark and the required historic preservation reviews required pursuant covenants contained in Quitclaim Deed from the U.S. Department of Health and Human Services to the District of Columbia dated September 30, 1987 and recorded among the land records as Instrument No. 8700056986 (the "**District Deed**"), as interpreted by

the 1989 Memorandum of Agreement (MOA) among the United States, Department of Health and Human Services (USDHHS), the General Services Administration (GSA), the Advisory Council on Historic Preservation (ACHP) and the District of Columbia. As discussed further in Section IV below, the Applicant is working with the District officials, the District State Historic Preservation Officer (“DC SHPO”), HPRB, and the Advisory Council on Historic Preservation (“ACHP”) to complete the necessary reviews, and establish design measures to mitigate any negative impact on the Saint Elizabeths historic resources.

2. Selection of the Project

After determining that the East Campus of Saint Elizabeth Hospital was the most suitable location for the proposed water tower, four potential sites (A, B, C, and D) were selected within the boundaries of the East Campus. *See Exhibit 3, Presentation Regarding St. Elizabeths Water Tower, Creation of a Visual Landmark.* The potential sites were selected based on the existing topography of the East Campus, the locations of existing subterranean water distribution infrastructure, the precedent set by the existing water storage tower on the East Campus, and considerations of secondary functions of the tower within the context of the plan of the East Campus.

Each of the four potential sites was then assessed for its potential direct and indirect effects on historic resources and the qualities that make Saint Elizabeths National Historic Landmark. Assessment of the potential indirect effects focused on the effect of the water tower on views as well as on various planning and technical conditions. The assessment of indirect effects was informed by a balloon study¹ map studies, and planning studies.

¹ DC Water conducted a balloon study between August 24 and August 26, 2009, to assess the four proposed tower

The potential sites were assessed using the following criteria:

- Direct Effect on Historic Resources;
- Direct Effect on Archeological Resources;
- Direct Effect on Cultural/Landscape Resources;
- Effect on Natural Resources;
- Views within Primary Area of Potential Effect (APE) (East Campus);
- Views from Secondary APE (Neighborhood Vicinity);
- Views from Secondary APE (Distant);
- Compatibility with Framework Plan; and
- Preliminary Technical Considerations.

Based on a quantitative evaluation of the site assessment criteria, it was determined that Site "B", the site across the ravine adjacent to the John Howard pavilion, was the most suitable location that would have the least adverse effect and visual impact on the historic East Campus.

B. Water Tower Design Studies

1. Study of the Precedents of the Water Tower Form.

At the outset, the design approach started with a study of precedents for water towers to better understand the formal and cultural associations of these structures in rural, suburban and urban settings. The standard water tower form design is still developed from a simple principle of creating gravity fed water pressure via an elevated storage tank supported by a structural base (steel framework, concrete pillars or combination of the two.) Many of the well known

sites on East Campus of Saint Elizabeths Hospital. To conduct the study, a single balloon was anchored at each of the sites (A, B, C, and D). Each balloon was five feet in diameter and of a different color to allow for distinction of the four individual sites. Each balloon was raised 175 feet to represent the minimum required height of the proposed water storage tower. EHT Tracerics, Inc. and Cunningham Quill Architects took photographs from dozens of locations within the boundaries of the East Campus, from the West Campus of Saint Elizabeths Hospital, and from other historic districts and sites throughout Washington, D.C., Maryland, and Virginia that have unobstructed views of Saint Elizabeths Hospital. Views were assessed in three categories: from locations within the boundaries of the East Campus (Primary APE); from locations within the neighborhood vicinity of the Secondary APE; and from distant locations within the Secondary APE. Each of the potential tower sites was then scored based on whether its respective balloon could be seen from the various vantage points. The photographs taken during the balloon study were also used to create scaled representations of the proposed water tower to assess its full visual impact, which was used both in the assessment of the four sites and in efforts to minimize the visual impact of the tower through its architectural design

examples of 19th and early 20th century towers were smaller in scale and built with more embellishment because they had smaller tanks. The best examples were designed as architectural monuments to civic infrastructure that were integrated into urban settings. Compared to conventional towers of today, there was a greater degree of variation in the form, material and level of architectural design because of the relatively limited capacity of service and storage they were required to provide. Contemporary elevated tanks water towers in many suburban, regional or rural areas have become familiar industrial icons in the landscape that announce that region's commercial or cultural attractions. These structures are typically modified by painting or with minor decorative elements.

2. Design Strategies In Initial Design to Modifying the Standard Water Tower.

The next step in developing the design was to look at potential ways the standard water tower design could be modified and to look at examples of other large scaled structures that could serve as an inspiration. Given the technical criteria for the tank size (2 million gallons) and a minimum height of 175' (at a base elevation of 155' above sea level), the design team explored methods to mitigate the impact of the mass and scale of the tower. Several approaches were explored to understand the limitations and possibilities of modifying the appearance of the new Water Tower.

- a. **Modify the Form of the Standard Tower.** Research was conducted to understand the parameters of contemporary water tower form design. Contemporary water towers are made of two components: the storage tank and the structural support base; all contemporary water storage tanks are made of steel with a painted finish. While the size and diameter is determined by the storage capacity of the tank, the shape and height (known as head range) determines the effectiveness of the gravity system and has a very limited variation. Options for a tank shape include a half spherical tank ("goblet") or a cylinder with a shallow conical and angle bottom. While older water tower designs incorporated several variations for the

structural base of the tower, the only industry standard that is currently offered is a single concrete pedestal design (or metal pedestal design) because this method has been determined to be most cost effective to build and maintain. There is some variation to the color and texture of the concrete base, depending on the skill of the manufacturer.

- b. Water Tower as Building. In this approach, the standard tower form would be covered by materials that are similar in character to its surrounding context, to give it the appearance of a conventional building or be incorporated into a future building on the East Campus. However, it was determined that wrapping the tower in masonry would only increase the appearance of the mass of the tower. Security (access inside tower is to be restricted), timing (coordination with adjacent or future East Campus buildings), scale and cost led to the rejection of this approach.
- c. Multiple Towers. The project team considered creating a cluster of smaller tanks in order to reduce the mass of the single storage tank. However, in order for the tanks to properly function, the height of the towers would still remain the same and the size of the tanks would not substantially decrease. As a result, the cluster of towers would only increase the cost, visual impact and mass on the historic campus. For these reasons, this approach was rejected.
- d. Architectural Framework and Material. This approach involved research into structures, materials and forms that would enhance the industrial appearance of the tower in a sculptural manner while giving detail and scale to the monolithic mass of the standard composite tower design. Opportunities to give rhythm and appropriate ornamentation to the design with contemporary industrial materials and construction techniques were considered.
- e. Water Tower as a Landscape Feature. The design of the St. Elizabeths campus was founded on the principle that the landscape features and the self-sustainability of the campus were important therapeutic principles in the treatment of the patients. There was the belief that patients, in their everyday lives, were engaged in the environment through work or pleasure. The green spaces and surrounding densely wooded setting are significant historic elements of the East campus. The design team studied concepts that would demonstrate environmental sustainability and a strong relationship of water tower with its site.

C. Project Design

1. Initial Design Approved by Z.C. Order 10-06

Incorporating some of the design strategies discussed above, the DC Water project team, in consultation with other stakeholders, developed a design for the water tower, as shown on the plans “Presentation Regarding St. Elizabeths Water Tower, Creation of a Visual Landmark” attached as Exhibit 3 to this Application that would be compatible with the surrounding historic

environment by mitigating the impact of its mass and scale. First, the tower was located in a remote location from the contributing buildings of the campus and does not interfere with the character of the buildings or its open spaces. Second, the proposed tower's surrounding framework was thought to provide scale, rhythm, detail, and material variation to the standard tower. The structure was thought to provide a simple, yet more elegant silhouette than the standard tower. Third, the initial proposed design was thought to create a public destination for the base of the tower that demonstrates principles of environmental sustainability, water conservation and honors the landscape principles of the historic campus. Fourth and finally, the initial proposed design was thought to provide the most energy efficient systems to operate the tower, so that there is minimal energy use on the site. Rain water collected on-site would provide hydration for the rain gardens and site landscaping.

2. Comments to Design Approved in Zoning Z.C. Order 10-06.

Subsequent to the issuance of Z.C. Order 10-06, CFA and HPRB requested additional consideration of the exterior aesthetics, specifically the color, of the water tower design pursuant to the Section 106 review process.

Specifically, CFA has requested that the water tower design rely “primarily on color or simple form- rather than screening – to create meaningful icons of civic infrastructure” and that the “proposed spiral form of the screening may appear to be unfinished and may undermine the clear reading of the water tower as a landmark.” See Exhibit 4, *CFA Letter dated February 27, 2014*.

At its June 26, 2014 meeting, HPRB recommend that:

The Board found the project to be sufficiently consistent with that approved by the order and decision of the Mayor’s Agent in 2010. The Board approved the concept of the plain tower and recommended

clearance of a permit for its construction, with further review delegated to staff. The Board did not receive any comments from the community, but asked that D.C. Water consult further with the surrounding community on the subject of mitigation with the National Historic Landmark district. The Board requested that there be some agreement, at least on the process for resolving the issue of mitigation, within six months. As for the character of the mitigation, the Board emphasized preservation work on the campus, but is also open to other design work on the tower itself or its environs that would ameliorate its impacts, or to other amenities. Regarding landscape around the tower, the Board recommended that it be designed so that is not distinct and isolated, but knits together with the adjacent portions of the campus. The Board also expressed an interest in the finishes on the tower that are low-maintenance and have low reflectivity. Vote: 6-0 (Casarella recused). See Exhibit 5, *HPRB Actions, June 26, 2014 Meeting*.

The National Capitol Planning Commission (NCPC) also indicated that they do not support the inclusion of a screen structure surrounding the water tower. See Exhibit 6, *NCPC letter dated February 17, 2010*.

The CFA, HPRB and NCPC requests to remove the screen element of the design created a conflict with the design approved by the Zoning Commission in Z.C. Order 10-06, which required:

The water tower shall be consistent with the plans for either Option A or Option B as included in the Applicant's initial filing; provided, that the Applicant shall have the flexibility to modify the design to provide any illumination, lighting, or markings required by the Federal Aviation Administration or for other safety or security purposes.

Option A and Option B each included specifications for a basic 2,000,000 gallon and 175 foot water tower, but provided for variations of the aesthetic screening for the exterior of the basic water tower. Specifically, Option A provided for a "Space Frame" and Option B provided for a "Bowstring" concept with "Tensile Fabric Infill" or "Curved Steel Tubes." See Tab C2 of Applicant's Statement in Support of Application (Presentation Regarding Site Section and Water

Tower Design). The Applicants initial filings also included a landscaping plan for the area surrounding the water tower.

3. Updated Proposed Design.

The Applicant still plans to construct the basic water tower in the location and at height of no more than the 175 feet that was approved by Z.C. Order No. 10-06, and depicted on **Exhibit 1, Plan Illustrating the Project Site, Site Photos, and Architectural Plans of the Proposed Water Tower.** The Applicant is requesting the removal of the design requirement for an aesthetic screen element to the design of the water tower and a deferral to the HPRB, in consultation with CFA, with respect to the exterior aesthetic design of the water tower and historic mitigation measures, including potential changes in the landscape design of area surrounding the water tower.

IV. JURISDICTION OF THE ZONING COMMISSION

The Zoning Commission has jurisdiction to review the design of the water tower pursuant to 11 DCMR § 2523, and must find that the tower meets the standards of 11 DCMR § 3104 and is not inconsistent with the Comprehensive Plan; small area plan; the Saint Elizabeths East Redevelopment Framework Plan approved by Council pursuant to PR17-0899 on December 16, 2008; the Master Plan and Design Guidelines dated June 4, 2012; and other adopted planning studies that pertain to the site. *See* 11 DCMR § 2523.2. Any modification to the design approved by Z.C. Order 10-06 is subject to the same review criteria and approval process set forth in 11 DCMR § 2523.

V. WATER TOWER DESIGN REVIEW

The Applicant seeks Zoning Commission approval of the design of the proposed water tower. The tower must be in accordance with the general 11 DCMR § 3104.1 of the Regulations as well as not inconsistent with the Comprehensive Plan and other applicable planning studies. As demonstrated herein, the Applicant fully complies with these requirements. The proposed water tower is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and will not tend to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Maps. The water tower is also not inconsistent with the Comprehensive Plan; St. Elizabeths Hospital East Campus Small Area Plan; the Saint Elizabeths East Redevelopment Framework Plan approved by Council pursuant to PR17-0899 on December 16, 2008 and the Master Plan and Design Guidelines dated June 4, 2012.

A. Special Exception Requirements

The water tower is in harmony with the general purpose and intent of the Zoning Regulations and Zoning Maps and tends not to affect adversely the use of neighboring property in accordance with the Zoning Regulations and Maps.

1. The Requested Relief is in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps.

The general purpose and intent of the zoning regulations and zoning maps is to promote the public health, safety, morals, convenience, order, prosperity, and general welfare. 11 DCMR § 101.1. Specifically, the requested relief must take into consideration the character of the respective districts as well as the suitability of each district for the uses permitted; and must be designed to encourage the stability of districts and of land values. 11 DCMR § 101.2. The proposed water tower is in harmony with the general purpose and intent of the Regulations.

Under 11 DCMR § 2510, all structures must comply with the 1910 Height Act. Pursuant to the Height Act, DC Water secured approval for the height of the proposed water tower from the Department of Consumer and Regulatory Affairs in January 2010. See **Exhibit 2**.

2. The Requested Relief Will Not Adversely Affect the Use of Neighboring Property

The proposed water tower will not adversely affect the use of neighboring property. As discussed in detail above, the location of the water tower was deliberately selected based on extensive site studies that demonstrated the Project Site was the best location for the water tower within the East Campus because of District of Columbia ownership, the required ground surface elevation, a sufficient distance from current and planned residential uses, a central location within the proposed service area, and a minimal adverse effect on the historic features of the East Campus.

B. Comprehensive Plan and other Planning Studies.

The Comprehensive Plan specifically acknowledges the need for a new water tower and identifies the campus of St Elizabeths as the appropriate location:

IN-1.1 Modernizing Water Infrastructure

In conjunction with WASA, the District must consider the impacts of new development and ensure that water infrastructure will be able to meet future demand. Planned improvements to the water system involve normal maintenance to replace aging water distribution mains and small diameter pipes, and upgrades to keep pace with population growth and new development. This may also include the addition of new water storage facilities, increasing the capacity of certain water mains, and upgrading pump stations. WASA's Capital Improvement Program has identified the need for several new storage facilities to support growth projections. These facilities will provide additional water pressure to certain areas of the District as well as emergency back up service. Two million gallons of elevated storage is needed in the *so l l them half [?]* of the Anacostia First High service area. **WASA has worked with the District and reached an agreement to site this water storage tank on the East Campus of St. Elizabeths Hospital.** Currently, necessary approvals and permits are being pursued, including historic preservation approvals that will ensure no historic structures on the campus are negatively impacted. Another two million gallon elevated storage tank will be needed in the fourth high service area in the Upper Northwest. The Washington Aqueduct CIP also calls for storage improvements at the Georgetown Reservoir and for additional dewatering facilities at the Dalecarlia water treatment/reservoir site. (Emphasis added.)

Other portions of the Infrastructure Element also support the construction of the water tower as described herein. Policy IN -1.1.1 calls for the provision of an adequate water supply through cooperation with DC Water. Policy IN-1.2.1 calls for modernization and rehabilitation of the water supply system and recommends consultation with ANCs and community organizations on the proposed location of new facilities. As this Commission is aware, the plan for the water tower was adopted only after exhaustive community involvement and outreach by DC Water, and the community supports the new tower. This is one of the most significant public initiatives in Ward 8 in decades that will address a critical need.

Policy IN-1.2.2 specifically addresses the water tower:

Policy IN-1.2.2: Ensuring Adequate Water Pressure

Work proactively with W ASA to provide land for new storage tanks and other necessary operations so that adequate water supply and pressure can be provided to all areas of the District. The siting and design of water storage tanks and similar facilities should be consistent with the policies of the Urban Design and Environmental Protection Elements, and should minimize visual impacts and "skylining" effects on ridges or hills.

The water tower is also not inconsistent with the Area Element for Far Southwest I Southeast or planning studies for the East Campus. Policy FSS-2.2.1 calls for redevelopment on the East Campus including, among other uses, civic uses and local public facilities such as the water tower.

The construction of the water on tower on the East Campus is consistent with the Saint Elizabeths East – Redevelopment Framework Plan approved by Council December 16, 2008 (R 17-0899) provides:

Water is supplied to the East campus from a 14” main that extends from the existing water tower. The West Campus is supplied from a 20” main extends beneath Martin Luther King, Jr. Boulevard. The 20” main has been replaced in one section south of the campus, and plans to replace the portions northward and parallel to the campuses are pending. A second 24” main traverses Alabama

Avenue. A pumping station for the domestic water system on the East Campus is located in building 120, the Dix building. Studies by the District of Columbia Water and Sewer Authority have identified the need for several new storage facilities to support population growth and development, to provide additional water pressure to certain areas of the District, and to provide emergency backup service. The most immediate need is for two million gallons of elevated storage in the southern portion of the Anacostia first high service area. Ultimately the water tower will connect to the 20" main beneath Martin Luther King Avenue and the 24" main on Alabama Avenue. DCWASA has proposed a new water tower on the East Campus to address significant water pressure issues in Ward 8. For maximum efficiency, the 2,000,000 gallon tank would be placed on a high point of the site; however, the exact location of the water tower requires further planning and consultation. It is believed that the existing network of water supply piping is in a deteriorated state and development plans should consider include provisions for new service connecting to the new supply tank, scheduled for completion in 2013. (emphasis added).

A two million gallon water tower of approximately 170 feet in height on the Project Site is also contemplated in the Saint Elizabeths East Master Plan and Design Guidelines, Government of the District of Columbia adopted on June 4, 2012.

For the reasons discussed above, both the location and design of the water tower have been sensitively selected in order to minimize its visual impact yet permit the water tower to accomplish its goals for improved water pressure.

VII. OTHER REVIEW PROCESSES

The water tower has been the subject of an extraordinarily high level of review due to both the federal Section 106 process and local historic preservation review process pursuant to the District of Columbia Historic District and Historic Landmark Protection Act (the "Act"). The Section 106 process has involved numerous consulting meetings that have involved as many as 75 participants representing 35 agencies. These review processes have entailed significant community outreach over many months. The community has strongly advocated for the need for increased water pressure; therefore, there is a broad base of

support for the project. In addition there has been interest in the various design options as well as general acceptance of the need for the required structure at this location.

St. Elizabeths Hospital is designated as historic district, and the design of the water tower is currently being reviewed pursuant to the Act. ANC 8C has issued a letter in support of design and the construction of the basic water tower proceeding. See **Exhibit 7**, ANC 8C Letter dated June 18, 2014. The Applicant is working with the affected ANCs, the Historic Preservation Office, HPRB, CFA and NCPC to refine the exterior aesthetic design and to create mitigation measures to address any adverse impacts to the historic resources on the East Campus of Saint Elizabeths.

IV. EXHIBITS

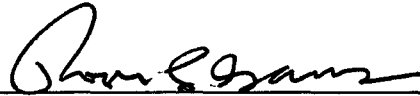
In support of this application, the following exhibits are attached to this document:

<u>Exhibit 1</u>	Updated Plan Illustrating the Project Site, Site Photos, and Architectural Plans of the Proposed Water Tower
<u>Exhibit 2</u>	DCRA Height Act Waiver Letter dated January 27, 2010
<u>Exhibit 3</u>	St. Elizabeths East Campus, 2MG Elevated Water Tower, Washington, DC, Zoning Commission Submission October 2014
<u>Exhibit 4</u>	CFA Letter dated February 27, 2014
<u>Exhibit 5</u>	HPRB Actions, June 26, 2014 Meeting
<u>Exhibit 6</u>	NCPC letter dated February 17, 2010
<u>Exhibit 7</u>	ANC 8C Letter dated June 18, 2014

IX. CONCLUSION

For all of the above reasons, the Applicant asks that the Zoning Commission approve the design of the proposed water tower as described in this Application.

D.C. WATER AND SEWER AUTHORITY

A handwritten signature in black ink, appearing to read "Roger L. Gans", is written over a horizontal line.

Roger L. Gans, PE
Manager, Design
Department of Engineering and Technical Services

Dated: October 7, 2014