

# Holland & Knight

2099 Pennsylvania Avenue, N.W., Suite 100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564  
Holland & Knight LLP | www.hklaw.com

Mary Carolyn Brown  
(202) 862-5990  
carolyn.brown@hklaw.com

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## Via Hand Delivery

Zoning Commission for the  
District of Columbia  
441 4th Street, N.W., Suite 210S  
Washington, D.C. 20001

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Re: Z.C. Case No. 11-03 – Southwest Waterfront Redevelopment  
20-Day Supplemental Submission

Dear Members of the Commission:

On behalf of the Applicant, Hoffman-Struever Waterfront, L.L.C. (doing business as Hoffman-Madison Waterfront (“HMW”)) we submit the following supplemental information, pursuant to section 3013.1 of the Zoning Regulations, in support of the planned unit development (“PUD”) and map amendment applications in the above-referenced case.

### **A. Revised Architectural Drawings**

Since the submission of its prehearing materials, the Applicant has further refined its plans for the project and has incorporated all the changes into one new set of drawings. This revised set of drawings, which is included with this letter, supersedes all previous drawings submitted to the Commission. A list of the precise changes to each sheet of the drawings is provided at Tab A. The key changes are as follows:

1. *Additional View Studies and Massing Diagrams*: The Applicant has prepared the following additional view studies and diagrams:

- An axonometric massing drawing for the project (see Sheet 2.11)
- A cross section showing the relationship of the Parcel 2 and the existing Banneker Overlook (see Sheet 4.9)
- Modifications to Parcel 1, Parcel 2, and Market Square to improve the visual relationship between Banneker Overlook and the project. These modifications

were the result of coordination with the National Capital Planning Commission (“NCPC”) and the U.S. Commission of Fine Arts (“CFA”).

- A cross-section showing the relationship of the proposed east end of the project at Parcels 10, 11 and Pier 4 to the existing residential buildings (See Sheet 5.7)
- Development View Studies (See Sheet 5.9 to Sheet 5.21)

2. *Building Height and Massing; Open Spaces.* Building height and massing of the project utilizes the principles of compact development to reduce lot coverage and maximize open space and view corridors. The number and quality of the public spaces reconstructed and/or created within the PUD is significant, consisting of more than 12 acres. Views of the public spaces of the Project are illustrated on Sheets 4.4 through 4.22 of the revised architectural drawings.

3. *Market Square and the Fish Market:* Sheets 4.6 – 4.8 of the attached architectural drawings provide additional information on the planned improvements to the Fish Market and how it relates to Market Square, particularly in light of the grade changes from the new development to the existing Fish Market elevation. The Fish Market and the Market Square are integral components of the Waterfront development. Although the Fish Market is not part of the current PUD application, the Applicant has worked with the Deputy Mayor for Planning and Economic Development (“DMPED”) on the completion of a Fish Market Master Plan, which contemplates the creation of a new market hall, landside improvements and iconic signage. The Applicant intends to lease the landside portions of the Fish Market to effectuate the Fish Market Master Plan. In conjunction with this master plan, and as one of the public benefits of the PUD, the Applicant will also undertake several site and utility improvements for the Fish Market, as described in Tab B.

4. *Parking:* Revised information on the proposed parking facilities is included in Sheet 5.2 of the updated architectural drawings. The range of parking has been narrowed to 2,100 to 2,650 spaces, with more specificity provided on the parking facilities for Phase I of the PUD. The parking range was derived from a shared parking analysis detailed in the Applicant’s Transportation study attached at Tab C. While the amount of parking provided complies with the chapter 2100 of the Zoning Regulations, it also responds to the requirements of the Land Disposition Agreement (“LDA”) and planning and transportation policies under the proposed re-write of the Zoning Regulations that promote multi-modal transit options and shared parking facilities. The parking plan supports a balanced mix of transit modes, utilizes shared parking methodology to ensure an adequate supply of off-street parking while preventing an over-supply of off-street parking, and provides for ample car-share parking spaces. The entrances to the below-grade parking garages are located on the mews streets and secondary thoroughfares, rather than Maine Avenue, Wharf Street or the primary public spaces of the project. The strategy will minimize negative impacts on urban design, the pedestrian environment and

public spaces, and will ensure that parking garage entrances are compatible with their surroundings. Parking may be provided in one or more garages per phase and will be located off the mews or secondary street entries in the mid-block locations identified on Sheet 5.2. Exact parking counts, location and number of garage ramps, and below-grade layout will be submitted with each Stage 2 PUD application.

5. Loading. Revised information on the proposed project service and loading is included in Sheet 5.1 of the updated architectural drawings. The loading is consistent with the intent of the District's new proposed General Loading Regulations, DCMR 11 - Chapter 17. The PUD project will provide shared loading bays to be utilized by different use categories within the same building, as contemplated under proposed Section 1703, "Rules of Measurement and Interpretation." The PUD's loading and service facilities will be designed and located so as not to create conflicts with the pedestrian environment or vehicular and bicycle traffic, in conformance with the intent of Section 1704 "Location Restrictions" of the proposed regulations. Loading and service entrances are located on the mews streets and secondary streets, rather than Maine Avenue, Wharf Street, and the main public spaces of the project, which is also consistent with the intent of proposed Section 1704. Exact number, location, and sizes of loading and service areas will be submitted with each Stage 2 PUD application.

6. Bicycle Parking: Revised information on the proposed PUD bicycle facilities is included on Sheet 3.6 of the updated architectural drawings. Under section 2119.2 of the Zoning Regulations, the Applicant is required to provide a minimum number of bicycle spaces equal to five percent of the number of automobile spaces required, or in this instance, approximately 105-133 spaces. The number of bicycle parking spaces provided on site will range between 1,500-2,200. The bicycle parking plan will be refined in conjunction with the LEED-ND requirements for Smart Location and Linkage Credit 4 "Bicycle Network and Storage" and will be consistent with the intent with the District's new proposed bicycle parking regulations under proposed Chapter 16 of the of the Zoning Regulations. Consistent with the intent of proposed section 1605, "Short-Term Bicycle Parking Space Requirements," the project will include short-term public bicycle spaces on streets, near building entrances, public spaces, and parks. Additionally, the project will provide some provisions for covered short-term bicycle parking spaces throughout the project in order to promote all-weather and all-season bicycle access. Similarly, as discussed under proposed section 1606, "Long-Term Bicycle Parking Space Requirements," the project will include secured long-term bicycle parking and changing facilities for project employees, residents, and other building occupants within each building or parking garage. In addition, Capital Bikeshare stations, or stations for a similar DDOT supported system, will be placed at two or more locations on site in conjunction with DDOT. Exact bicycle parking counts, location and number will be submitted with each Stage 2 PUD application.

7. Transportation Infrastructure: The updated architectural drawings provide information on the infrastructure for the transportation features of the project, including reconstruction of Maine Avenue, features associated with Arena Stage and the streetcar system. The applicant intends to provide significant transportation and mobility improvements to the site as part of the development. These improvements include:

- Reconfiguring the existing Maine Avenue right-of-way to allow for three additional signalized intersections
- A traffic feature at the intersection of Maine Avenue and M Street indicating the terminus of M Street, S.W., and the entrance to the Wharf. The operation of the traffic feature is designed to allow streetcar operations and minimize the impacts on traffic flow while providing for safe pedestrian crossings.
- Ten improved signalized pedestrian crossings across Maine Avenue and 12 pedestrian access points through the site
- Provision of streetcar tracks along the Southeast bound lanes of Maine Avenue between the Market Square and the traffic feature, and along Wharf Street.
- Pedestrian connection from Banneker Circle to Market Square by means of a temporary stair and surface crossing at Maine Avenue.
- A dedicated two-directional bicycle lane facility of not less than 10 feet on Maine Avenue created by setting buildings back approximately 12 feet on private property
- Six new streets to improve access from Maine Avenue and to create a network of blocks and streets
- The improvements to Maine Avenue improvements are listed in Tab B.

8. Project Uses: The Applicant has refined the project uses for each parcel, as shown on Sheets 2.6, 2.7, 2.8, and 2.9 of the updated architectural drawings. As described below, Phase I currently includes Parcels 2, 3, 4, and 5, for which greater specificity of uses has been provided on Sheets 2.6 and 2.7. The second phase detailed on Sheets 2.8 and 2.9 retains some flexibility between residential and commercial office uses, based upon market demand and availability of financing prior to submission of Stage 2 PUD applications for Phase II. In all cases, the maximum square footage of gross floor area for each segment of the PUD will not exceed the maximums indicated.

9. Neighborhood Compatibility: The Applicant has spent considerable effort to design Parcels 10, 11, and Pier 4 in such a way that they lessen the visual impact on residents of the adjacent Tiber Island and Harbor Square developments. The Applicant has agreed to R-5-B zoning on Parcel 11 and W-1 zoning Parcel 10 and Pier 4. This will result in maximum heights of 45 feet on Parcel 11 and 60 feet on Parcel 10 and Pier 4.

**B. Project Phasing**

The Applicant currently anticipates construction of the project to occur in three phases. The preliminary phasing plan is included on Sheet 1.6 of the drawings. Exact project phasing remains contingent on project financing and will be refined during the Stage 2 PUD process. Phase I currently includes parcels 2, 3, 4, and 5 for which greater specificity of uses has been provided. Future phases retain greater flexibility of uses to allow Phase I success and lessons learned to be measured alongside market demand and availability of financing prior to submission of Stage 2 PUD applications for Phase II and commencement of Phase II construction. Given the size and breadth of the project, the Applicant anticipates submitting multiple Stage 2 applications over the next ten years.

**C. Marine Relocation, Continuity and Utility Phasing**

In consultation with its construction managers, the Applicant has developed a plan clarifying how construction phasing would be handled during development of the waterside to ensure coordinated relocation of the boats and piers. That information is included in Sheet 6.5 of the drawings. Provisions will be made for maintaining both the existing Capital Yacht Club (CYC) and Gangplank marina facilities during and after construction. The Project will require reconstructing most of the bulkhead and promenade as well as replacing all of the marina slips. The creation of the larger public marina and public piers at the west end of the project in Phase I will require a reconfiguration of both the Capital Yacht Club and Gangplank marinas.

The Applicant will provide for a live-aboard community at the redeveloped Gangplank Marina on the Southwest Waterfront for approximately the same number of live-aboard slips as exist as of June, 2011 (94 slips) with provisions for retention of existing live-aboard slip holders. The new marina will be constructed as part of Phase III. During the construction of Phase I, most slipholders will either be relocated to temporary locations along the waterfront to allow construction of Phase I and the Phase I marina. These locations include vacant slips within the marina on Piers J, A, B, C, and D, temporary docks outside of Phase I construction but at the Southwest Waterfront. The Gangplank marina facilities will remain in their current location or, if required, will be moved to a conveniently located temporary facility.

The Applicant has completed a transition plan that it has shared with the Gangplank Marina Slipholders Association (“GPSA”) Development Advisory Group. The plan provides for reasonable continuity of existing services (including water, electric, trash, pump-outs, security, showers/restrooms, US mail and package receipt, and vehicle access) and amenities (including parking, laundry, and Cable/Internet), and accommodates the current Gangplank Marina slipholders in the Washington Channel during the redevelopment, consulting with GPSA to prioritize vessel moves.

**D. Amenities Package**

The Applicant has updated its public benefits and project amenities to incorporate several elements from the LDA with the city. It also includes a more detailed description of the Workforce Intermediary Program, efforts to link residents with training opportunities and apprenticeships, the duration of local business opportunities, the distribution and mix of the affordable housing units. The amenities package is described in the information included under Tab B.

**E. Affordable Housing**

The proposed PUD will create new housing and home ownership opportunities consistent with the goals of the Zoning Regulations and the Comprehensive Plan. The housing will be offered for rent and for sale at a mix of price points, including low income housing (30 percent of the Area Median Income (“AMI”) or lower), moderate income housing (60 percent of AMI or lower), workforce housing and market rate housing. The project will provide at a minimum 160,000 square feet of low and moderate income housing, which represents approximately eight to ten percent of the housing component of the project. Additionally, the Applicant will set aside as workforce housing 20 percent of the units built over and above a threshold of 500 units.

As an example of the affordability explained in the pre-hearing statement, the area identified as Phase I (Parcels 2, 3, 4, and 5) on Sheet 1.6 would have an approximate unit mix as shown in the chart below. The units would be located in the three mixed-income residential buildings on Parcels 2 and 4 (which exclude one all-market-rate condominium building per the Land Disposition Agreement (“LDA”) on Parcel 4).

	<b>Apartments</b>
Market Rate Units	471 units (68%)
Low Income Units	66 units (10%)
Moderate Income Units	66 units (10%)
Workforce Units	87 units (12%)
<b>TOTAL</b>	<b>690 units</b>

The anticipated number of units in Phase I with low- and moderate-income affordability is approximately 2.5 times more than what is required by Inclusionary Zoning (“IZ”), with all low- and moderate-income units being at a greater level of affordability than the 80 percent of AMI that is required by IZ. While the precise unit mix and size for Phase I would be adjusted based on market considerations, the affordability levels would nevertheless be in excess of the IZ requirements and in conformance with the requirements of the LDA and the Southwest Waterfront Redevelopment Clarification Act of 2010. Additionally, the Project will include units designated as Workforce Housing units, which addresses an affordability level not captured

under IZ. Phase II and III affordability will be determined by the ultimate mix of residential and commercial office approved during subsequent Stage 2 PUD applications and will include a mix of all income-level housing for rent and for sale.

**F. Status of Federal Legislation Navigable Waters**

Two pieces of federal legislation have been introduced in the U.S. House of Representatives by Congresswoman Eleanor Holmes Norton (D-DC) to facilitate the full redevelopment of the Southwest Waterfront, as described below. The language contained in the bills was requested as part of Mayor Vincent Gray's FY 2012 Budget Request Act of 2011 (B19-202), which the Council approved on May 25, 2011. The two matters addressed by the legislation are as follows:

1. Narrowing the Navigational Width of Washington Channel. Congresswoman Norton introduced bill H.R. 723 on February 15, 2010, which will reduce a portion of the federal navigation channel located within the Washington Channel from an existing width of 400 feet to 200 feet to allow for the expansion of a more dynamic marina within the PUD boundaries. The legislation was initially passed by the full House of Representatives on July 20, 2010, as H.R. 5545, but the bill was not enacted prior to the close of the 111th legislative session. A copy of the new bill is attached as part of Tab D.

2. Promoting Development of Southwest Waterfront. On June 22, 2011, Congresswoman Norton introduced a second piece of legislation, H.R. 2297, to assist with the redevelopment of the Southwest Waterfront. The discussion draft of this legislation is attached as part of Tab D. This legislation includes the following provisions:

- a. allow the District to transfer the property by "one or more quitclaim deeds";
- b. update the site description to be transferred to include all areas within the approved project site (including areas between the 1940's and 1960's bulkheads)
- c. update the D.C. Code to remove reference to the urban renewal plan, which has expired, and inserting the phrase "master plan" in its place;
- d. allow for the sale of condominiums on the site in air rights above the ground lease parcels;
- e. correct language referencing the District of Columbia Redevelopment Land Agency and changes all references to the Agency to "the District of Columbia, as successor in interest to the District of Columbia Redevelopment Land Agency"; and
- f. broaden the definition of market uses for the Fish Market to include other food and beverages, produce, flowers, etc to be consistent with the lease between Hoffman-Madison and the District of Columbia.

**G. Update on Coordinated NCPC and CFA Review**

The Applicant had met several times with the National Capital Planning Commission ("NCPC") and the U.S. Commission of Fine Arts ("CFA") to discuss the interface between Banneker Overlook and Parcels 1 and 2 of the PUD. The revised drawings on Sheets 1.5 and 2.5 reflect a design solution for this area of the plan that resolves the outstanding concerns. An 80-foot viewshed has been provided above Parcel 2 along the 10<sup>th</sup> Street axis to provide views from the future museum or monument that may occupy the overlook. Additionally, the design of the low roof of Parcel 2 may include a terminated axial element such as a trellis or outdoor feature. The rotated view from the current Benjamin Banneker Park and overlook towards the Fish Market, the future East Potomac Park Canal alignment, and the Jefferson Memorial have been enhanced by setting back Parcel 1 and the Fish Market headhouse to provide a view of approximately 100 feet through site. A small pavilion was added to the Market Square to provide continuity of the experience without inhibiting the views. The connection from Banneker Park to the Fish Market is further enhanced by the temporary stair connection and the new signalized intersection across Maine Avenue, as illustrated on Sheet 4.7. A letter of support from CFA dated November 10, 2010 is attached in Tab E.

**H. U.S. Army Corps of Engineers**

The PUD requires close coordination with and permits from the U.S. Army Corps of Engineers ("USACE"). The application for seawall, piers, marinas, and pier structures (NAB 2011-00766 Southwest Waterfront Development, D.C. ) was submitted to the USACE on March 15, 2011. The application was issued for public notice by PN 11-50 on June 13, 2011. Currently the Applicant is working with affected agencies to address specific concerns. It is anticipated the USACE permit will be issued by the end of 2011.

**I. Transportation Analysis**

The Applicant's transportation consultant, Gorove/Slade, prepared an assessment of the traffic impacts of the proposed PUD. The report concludes that the project will not have any adverse impacts on the local transportation network and that it conforms to District's Department of Transportation policies of promoting non-automobile modes of travel and sustainability. A copy of the report is attached at Tab C.

**I. Community Outreach**

The Applicant has continued to meet regularly with the community to provide updates on the PUD and solicit input for residents. A list of the community outreach meetings is included at Tab F. A compilation of support letters is included at Tab G.



**J. Witness List and Outlines of Testimony**

The Applicant proposes to call the following witnesses to testify in support of its application:

1. Monty Hoffman, Hoffman-Struever Waterfront, L.L.C.
2. Stanton Eckstut, Perkins Eastman Architects
3. Representative of Gorove/Slade, traffic consultant
4. Steven E. Sher, Holland & Knight LLP, urban planner
5. Rob Sloop, Moffat & Nichol, marine engineer

Outlines of witness testimony, as well as resumes of witnesses to be qualified as experts, are attached at Tab H.

**K. Estimated Time for Hearing Presentation**

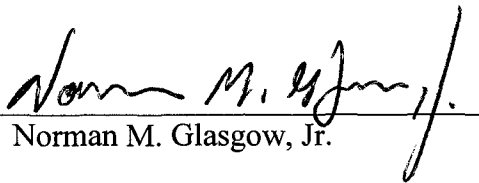
Given the size and breadth of the project, the Applicant anticipates it will need 90 minutes in which to present its case in chief.

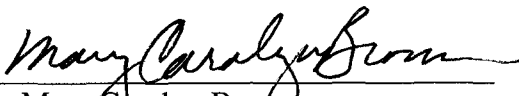
**L. Conclusion**

Because the requested map amendment and Stage 1 PUD are consistent with the Comprehensive Plan, the Property's designation on the Future Land Use Map, and the purposes of the Zoning Regulations and Zoning Map as set forth in D.C. Code § 6-641.02, the Applicant respectfully requests that the Commission approve the application.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By:   
Norman M. Glasgow, Jr.

By:   
Mary Carolyn Brown

Attachments

cc: Susan Longstreet, DMPED/OAG (w/attach. via overnight mail)  
Matt Troy, DMPED (w/attach. via overnight mail)  
Harriet Tregoning, Office of Planning (w/attach. via overnight mail)  
Jennifer Steingasser, Office of Planning (w/attach. via overnight mail)  
Joel Lawson, Office of Planning (w/attach. via overnight mail)  
Matt Jesick, Office of Planning (w/attach. via overnight mail)  
Andy Litsky, ANC 6D04 (w/attach. via overnight mail)  
Bob Craycraft, ANC 6D01 (w/attach. via overnight mail)  
Ron McBee, Chair, ANC 6D (w/attach. via overnight mail)  
David Garber, ANC 6D (w/attach. via overnight mail)  
Cara Shockley, ANC 6D (w/attach. via overnight mail)  
Roger Moffat, ANC 6D (w/attach. via overnight mail)  
Rhonda Hamilton, ANC 6D (w/attach. via overnight mail)  
Betsy Karmin, DLA Piper (w/attach. via overnight mail)  
Jacques DePuy, Greenstein, DeLorme & Luchs (w/attach. via overnight mail)  
Kwasi Holman, St. Augustine's Church (w/attach. via overnight mail)  
Cornish Hitchcock, Esq. (w/attach. via overnight mail)