

D.C. Zoning Commission Public Hearing
Case No. 11-03
Southwest Waterfront 1st Stage Planned Unit Development and Related Map Amendments

Testimony of Jo Chang, Southwest Neighborhood Assembly
July 18, 2011

Preface

The Southwest Neighborhood Assembly (Assembly) is Southwest's private, non-profit citizens' organization. Board members are elected by the community. The Assembly is the District of Columbia's (District) first integrated civic association; our mission is:

"To improve the quality of life for all residents; to open to every resident the wide cultural horizon of urban living; to help create rich and equal social, educational, and economic opportunities for residents of Southwest; to assist in providing the opportunity for gainful employment for all; and to promote development of the economic and aesthetic potential of Southwest. This mission shall be pursued without regard to the social, economic, and racial barriers that have divided cities in the past. "

The following conclusions were adopted by the 18-member Assembly board based on comments received directly in personal conversations or via email and the six community meetings we've organized since the release of the Hoffman-Madison Waterfront (HMW) plan. The most recent meeting was attended by over 350 residents.

We support the general framework of the plan. The HMW team in partnership with the the Deputy Mayor's Office for Economic Development has developed a captivating plan for reactivating the Southwest Waterfront (SWW). We believe the plan establishes a bold vision for redeveloping our waterfront, long suffering from incomplete development and inadequate maintenance. HMW has demonstrated commitment to Southwest by establishing interim uses and regularly meeting with community leaders and organizations.

However the plans require further refinement and modification. In the following we highlight a number of zoning & development, circulation, open space, sustainability, and public benefits shortcomings. In many respects, our concerns regard not what is written or depicted in the plans, but what isn't. Given the unprecedented size and complexity of the development this can be expected.

As a footnote for this project as well as future projects, a substantial amount of changes and new information regarding the plan have unfolded in the past month. Given today's technology and development complexity, we believe photo-simulations and view shed studies are a standard analytical tool, yet these were not provided until three weeks ago. Fundamental federal permits for modifications to maritime and building plans remain outstanding: it's unclear how this plan would be implemented without such permits. No public meetings have been held to inform the public about the final plan (June 28, 2011). It's our understanding that the only community members who were given the final plan were the individual Advisory Neighborhood Commissioners (ANC). The ANC graciously spent \$700 to make three copies available to the leaders of several community organizations, including the Assembly.

Zoning & Development

We recognize the importance of increased density for achieving District goals such as higher tax revenue and transit-oriented-development. As such, we aren't opposed to this new direction; however further refinement and standards are necessary. The HMW plan contemplates nearly twice as much density as what the community bought into as part of the District's 2003 SWW plan.

Southwest has arguably been the most stable diverse—both racially and economically—neighborhood in the city. It has one of the lowest crime rates and transiency. Housing prices have remained stable and affordable since the area's mid-20th century redevelopment.

The Mid-Century Modern design carefully integrates a variety of housing arrangements and open spaces, maintaining both privacy and civic identity in an urban area.ⁱ The architecture exemplifies an understated aesthetic that is oriented around civic structures and open spaces, a foundation of successful urban design. With the latest research in Europe finding common mental health disorders to be significantly higher in urbanites, we find these balanced design qualities integral to our safety and welfare.ⁱⁱ

Most of the SWW borders properties registered, nominated or eligible for National Register of Historic Places: including the Fish Market, Jefferson School, Arena Stage, Harbour Square, and Tiber Island. We believe the SWW plan should not be inconsistent with these properties and the surrounding community. Clearly it's possible. The recent Arena Stage and Waterfront Station developments have been well-received for their integration into Southwest's fabric.ⁱⁱⁱ

But successful integration, even by noted architecture firms is not a guarantee. Just this past month, the U.S. Commission of Fine Arts unanimously rejected a SmithGroup proposal for an infill building at L'Enfant Plaza. Determining that L'Enfant Plaza needed a "very light" building, in contrast to the surrounding brutalist architecture, SmithGroup proposed a design featuring a "rich combination of color" and wood detailing.^{iv} In the meeting, Commissioners Elizabeth Plater-Zyberk, who developed acclaim with her new-urbanist philosophy and noted urbanist professor and author Witold Rybczynski articulated the shortcomings of the SmithGroup plan as presented by lead architect Andrew Rollman.¹

¹ MR. ROLLMAN: We really felt that L'Enfant Plaza needed something very light and something that did contrast, not another solid-looking building. So the idea was to use a light material like glass. So we have come up with this facade that is this rich combination of color, very light in the tower, and then the introduction of wood which we thought was a very warm material.

MS. PLATER-ZYBERK: So you don't want to look like the old buildings.

MR. ROLLMAN: Correct.

MS. PLATER-ZYBERK: ...if there is not a way to acknowledge a context and be part of it and actually make it clear...to the person who is going to be walking in this area...to make the connections visible and not the separations and at the same time to not just despise the surrounding buildings.

And that may be difficult because of their character but I believe that [the buildings] have an integrity and character that is related to their time. [The buildings] are going to be there for a long time and I don't think you can just turn your back on them. [...digression about underground entrances]

So, if this is to be reconnecting or a connecting for the first time...it is a kind of retrofitting and place-making that, like it or not, I think, has to acknowledge them [i.e. the 1960s buildings] in some way within the new building.

MR. ROLLMAN: ...So we were trying to do that in an abstracted way.

MS. PLATER-ZYBERK: I appreciate the intent but I don't think you are getting there and I always worry when new buildings come in and just say, that was then and this is now and we are better and, you know, we don't want to have anything to do with what is there.

As depicted in the HMW Plan, we find the height, bulk, and design of the buildings inconsistent with Southwest's fabric.

The surrounding SWW context is largely zoned R-3 and R-5-D and features low-rise buildings interspersed with mid-rise buildings. The mid-rise buildings top out at about 90 feet, with rooftop appurtenances consisting of little more than elevator over-runs. Buildings are setback between 20-50 feet from the street. Much of the bulk of the townhouses is set even further back from the street. The mid-rise buildings are elevated on delicate pilotis, creating an open feeling at street level. Viewed from a distance, the surrounding area features a healthy tree canopy peppered with towers.

In contrast, the HMW plan largely adopts the city's densest commercial zone and proposes that most buildings rise to 130 feet. Buildings are topped with 18 foot penthouse structures spanning their entire length, short of the required 1:1 setback. The only low-rise building is Parcel 11 which tops out at 45 feet. Proposed buildings are almost uniformly ten feet from the street and rise at least thirty feet without any setback. Viewed as a whole from a distance, the arrangement bears an uncanny resemblance to K Street NW, downtown.

While Stage 1 PUD is focused on the basic development profile, it is also an important juncture to clarify urban design directions. Conceptual depictions serve as a point of reference for future planning. This is the last opportunity to evaluate the project as a whole. The HMW plan is set up to facilitate development of separate parcels by independent developers. Successful waterfront projects like Battery Park City in New York City and the Presidio in San Francisco are founded on design guidelines.

Beyond the basic arrangement of spaces and buildings, Southwest Washington's urban design is characterized by subtle, but clearly articulated building exteriors. Cladding is dominated by earthen tones and materials. Signage is very discrete. The rare architectural embellishment is thoroughly integrated within building architecture and at ground level.

Development models cited by HMW—European cities, Seattle, and Baltimore—are problematic for Southwest. The European waterfront communities were more or less developed in tandem with the surrounding areas over a hundred years ago. The Seattle and Baltimore developments did not border pre-existing residential communities. Preliminary renderings for the SWW submitted by HMW are equally troubling. Upper floors appear as glass boxes reminiscent of downtown office buildings. Lower floor design is reminiscent of generic new-urbanist developments in suburbia.

The illustrations in the final plan depicted a highway-size billboard and other architectural embellishments wholly inconsistent with the surrounding passive parkland and the District's design vocabulary, not to mention, the existing Southwest community. The billboard proposed at the

MR. RYBCZYNSKI: Just to put it another way. There is a general--we tend, in our day and age, to be somewhat critical, perhaps justifiably, of the kind of project that Webb and Knapp and I.M. Pei did in those days. I happen to think there is some redeeming value to them which is often ignored.

MR. ROLLMAN: Well, that is certainly our intent.

MS. PLATER-ZYBERK: ...And it is an extremely difficult assignment because there is not a lot of precedent to help you figure out how to do it best. But I think it is important because it does guide the next steps that are taken and that is one of the reasons I think we spend so much time looking at these buildings and saying, well, instead of just saying "those other ones are wrong and we are going to do the right thing with this building," how do you try to make the whole thing in terms of perception and image as well integrated as you have managed with the plans?

north end is precisely what the District government has gone to great lengths to retroactively ban.^v Pier 4's bold, contemporary architecture appears to clash with that of the historic, colonially-designed headhouse and what was billed as a quiet waterfront area. The substantial increase in signage and development also presents night-time illumination concerns.

We encourage the Zoning Commission to request a design template that is consistent with the existing Southwest community and that of a world-class development.

Circulation

Combined with other developments in the pipeline, the HMW plan is likely to double the number of workers, residents, and visitors coming to Southwest between the SE/SW Freeway and M Street. The public and private transportation investments planned or recommended in the HMW plan and associated Grover-Slade Transportation Impact Study ("impact study") will help mitigate the impacts. But we find the proposed improvements to be deficient or lack adequate detail.

The plan and impact study envision two premium surface transit systems, the DC Circulator and Streetcar, each with two Southwest routes. Yet no streetcar or Circulator lines are included in the District's capital improvement plans. The only active planning for either system that we're aware of is for the elimination of Southwest's Circulator route. Recent studies by the National Capital Transportation Board and the Montgomery County Planning Board have confirmed that smart-growth land-use policies by themselves increase vehicle hours of delay.^{vi}

We look forward to a streetcar as long as it's sensitively planned from both an aesthetic and functional perspective. In particular, we believe overhead wires are inappropriate for the SWW area. We find the routing, which is more consistent with the American Planning Association's recommendations to be functionally superior to the District's Proposed System Plan for streetcars.^{vii} With regard to the internal SWW circulation, we suggest that three rather than four streetcar stops along the Wharf promenade is advisable. This will reduce conflicts and improve streetcar throughput.

The transportation study and plan make troubling assumptions. The impact study found that up to 35-45% of people going to/from the HMW site will use transit. This determination was based on the transportation modal split at selected developments the consultant found to be comparable to the HMW site. However the HMW site is on average between one to two times as far as the comparison sites to the nearest Metro station.

In addition, the impact study proposes reducing Maine Street capacity during rush hour. Currently, Maine Avenue allows three lanes of thru traffic during rush hour. The plan instead proposes setting aside one lane of traffic for parking at all times. Undoubtedly this is likely one reason a major intersection (9th St. & Maine Ave.) is anticipated to fail.

Three additional signalized intersections along Maine Avenue will exacerbate stop-and-go conditions. While we recognize the goal of facilitating access to the site and discouraging through traffic, it will undoubtedly mean more vehicular idling and exhaust in Southwest. We find the existing tree-lined boulevard to be superior and ask SWW project partners to identify strategies to ensure that vehicular travel times do not further decline. We note that Maine Avenue is a critical corridor for emergency vehicles.

With nearly half of arrivals/departures to the SWW coming via Metrorail, we believe the District and its partners should further study access improvements. The Waterfront-SEU station is one of the few stations in the District's core without a second entrance. We encourage further evaluation of an entrance at 6th St. & Maine Avenue to improve access and reduce pedestrian conflicts. Lacking a second entrance we request additional improvements to 4th Street or the construction of a southern entrance to the L'Enfant Plaza station.

We note provisions for bus lay-bys on Maine Avenue. We appreciate reduced number and sensitive location but some questions remain. How will tour buses be managed to prevent idling on neighboring streets? How will pick-ups be managed to facilitate loading of the buses, rather than loitering on Maine Avenue?

A substantial amount of the SWW area will be "limited access" -- for both pedestrians and vehicles. More details on who the access is limited to is critical. How will this access be managed? We also have concerns with back-ups and conflicts from queuing.

Given the lack of clarity and our experience with DDOT^{viii} we're concerned that the improvements planned or recommended in the HMW plans—not to mention improvements we believe are necessary—won't occur on time, if at all. We ask that improvements and a related timeline are clearly articulated in writing upon the approval of the SWW plan.

Open Space

With a number of designed open spaces linked by animated corridors, we find the open space plan promising. The Waterfront Park is an excellent example of HMW's commitment to improving the SWW's open spaces.

Two overarching goals of the HMW plan are to make the SWW busy and dynamic. While we don't necessarily disagree with these goals, the best plans strike a balance. Due to the dense arrangement of buildings, pavilions, and lack of ground floor setbacks, we find several impediments to a successful waterfront community in the District of Columbia.

Perhaps most importantly is that in the drive to "activate" the waterfront, the plan closes it off. The principle buildings, pavilions, and variety of furnishings form a virtual wall between the SWW and the surrounding community. Maine Avenue will no longer be a waterfront boulevard; instead it will become a relatively mundane city street. This design approach is inconsistent with the overarching goal of the urban design element of District's Comprehensive Plan:

"Enhance the beauty and livability of the city by protecting its historic design legacy, reinforcing the identity of its neighborhoods, harmoniously integrating new construction with existing buildings and the natural environment..."^{ix}

To ensure that the HMW plan doesn't cut off Southwest from the waterfront, we request the pavilions be scaled to their context and Parcel 11 building respect the M Street corridor. Some pavilions are three stories tall and large enough to house a supermarket. There is no precedent, capacity, or need for Baltimore Harbor-sized retail destinations in the SWW, much less metropolitan Washington, D.C.

The mews, arcades and other dense corridors represent exciting proposals, but more detailed plans are advisable to ensure they don't become dark, undesirable alleys. More clarity on how these fundamental circulation and design elements will be managed would help allay concerns.

Parcel 11 juts out into the M Street corridor, discordantly closing off half of the M Street view corridor. To preserve views of the water and bring it into consistency with the historic L'Enfant Plan, the building envelope should not extend to Lot 814. This compromise still affords stunning views of M Street and Maine Avenue, but brings it closer into alignment with M Street. M Street is arguably Southwest's most important street by virtue of its length, width, termini, and civic facilities that front on it.

Several of the SWW spaces feature grassy lawns. Many Southwesterners would undoubtedly appreciate grassy lawns. But there is little precedent for successfully maintaining grassy lawns in areas of intense pedestrian activity, particularly with the increasing popularity of dogs. We'd suggest more ecologically and functionally sustainable plantings.

We are concerned about accessibility. There are a number of grade changes through the length of the SWW. How will stairs and ramps be successfully and safely integrated? The "Temporary Stairs to Banneker (Memorial Overlook)" will serve as an important connection to the waterfront. But recognizing that this corridor is likely to be in place for more than a decade, the connection should be accessible for those with disabilities.

The terminus of M Street is arguably the most important open space component in the HMW plan. We support the basic M Street Landing framework but believe the individual components merit further discussion. The Landing is depicted in the Final Plan submitted by HMW with a sprawling arrangement of mundane fountains that could be found in any "town center" development. Indeed near replicas exist at the Waterfront and Columbia Heights Metro Station developments.

In last week's ANC meeting, HMW conveyed the basic components of the M Street Landing are not defined. They indicated they're also contemplating an ice-skating rink instead of the water feature depicted in the final Stage 1 submission. Given these alternatives might significantly affect the character, mix of uses, design of uses, and circulation, we believe this is the sort of decision appropriately evaluated at Stage 1.

The Waterfront Park to the south generally appears to be an acceptable design but we have concerns about the height and location of the pavilion. We appreciate the developer agreed to a community design process for this park. Given this extended review opportunity, we suggest that the location and size of the pavilion be deferred to Stage 2.

Sustainability

The HMW plan aims to create a "world-class waterfront destination. The city prides itself on being a leader in sustainable development. It seems then, the development would be slated to achieve the highest environmental standards.

If these goals aren't enough justification alone, the real costs and consequences should be. The city is on pace to spend over two billion dollars on sewer storage tanks. The federal government is issuing new rules acknowledging the inevitability of higher sea levels and questioning the

value of preventative structures.^x We were recently reminded of the vulnerability of these systems by the April flooding of Washington Harbour.

But rather than exceeding the city's environmental requirements, the HMW plan asks for multiple exemptions. We submit the more judicious course for a 26-acre development along the District's waterfront is a true low impact development that meets today's highest standard: LEED Platinum.

We are particularly disappointed that nearly half of the Waterfront Park area is impervious. Based on what we heard from HMW in meetings, we understood the area south of M Street would be a passive and contemplative space: a space presumably ripe for impervious surfaces.

In its July 11, 2011 presentation to the community, HMW indicated it's considering a plan to go all or partly "off the [electricity] grid." This undoubtedly would represent a substantial commitment toward a sustainable development. However, the proposal before the Zoning Commission tonight is not adequately sustainable.

Community Benefits

A revitalized SWW will benefit the Southwest community. HMW plan documents identify dozens of specific benefits and amenities. We appreciate what is included. Yet we find the commitment inadequate for the residents who will be most affected: Ward 6, specifically Southwest residents.

Many of the items benefit the city as a whole or another area of the city, such as Ward 8. With regard to the site specific improvements, many were part of the Land Disposition Agreement as compensation for the prime waterfront land. Some benefits, like a clubhouse for the Capital Yacht Club are not public.

Most of the identified physical benefits, like the reconstruction of Maine Avenue and the marine bulkhead are public infrastructure repairs typically part of a city's capital program. While the improvements are certainly appreciated, they are but a small part of the deferred and necessary improvements needed in Southwest.

Unlike other areas of the city which have rejected any significant growth, Southwest is an area that is absorbing a substantial portion of the city's growth. At the same time, Southwest is the only quadrant that is not part of the District's Great Streets program. Southwest is the only quadrant where the District is cutting transit services. Southwest is the only quadrant that has no community center, youth center, senior center or settlement house open to all residents. Southwest is the only quadrant where children and youth have no place for structured non-athletic developmental and youth leadership activities when school buildings are closed; troubled and underemployed adults must journey outside the neighborhood for support groups, and counseling; and seniors of all incomes lack recreational supports and services. Southwest's fifty-year old library has not received any improvements, nor is it slated to for the next twenty years.

To help mitigate the substantial adverse impact from the \$2 billion SWW plan, we request that the HMW and the District partner with ANC designated SW entities, including the CBCC and SWNA, to design and complete a Community Enrichment and Services Plan by the completion of the final phase of the HMW plan or 2022.

- 1) Said Plan shall involve a Developer/Community /City Partnership to define and finance the preparation of designated space in SW to house multiple programs and services needed by SW residents of all ages and that would attract quality not-for profits with subsidized below market rents. Such space could be in an existing re-purposed building or part of new development accessible to SW residents of all ages and incomes.
- 2) Said Plan shall include space of sufficient size to hold a number of activities at a time and include spaces for small group meetings, one to one counseling sessions and multiple larger spaces for activities. We suggest that minimum of 30,000 sq ft will be needed.
- 3) Said Plan shall take into account the varied opportunities and potential partners within the SWW, i.e. Graduate School, Cultural Facility, public parks to be programmed, etc. That agreements are made with each potential partner about what they can bring to the project, such as Graduate School offering classes targeted to neighborhood.

Conclusion

Southwesters are looking forward to a revitalized SWW and appreciate the work of the Hoffman-Madison Waterfront team in partnership with the the Deputy Mayor's Office for Economic Development to develop a plan. Indeed, several of the properties immediately bordering the Waterfront have come to an agreement with HMW, and now support the current plan. But these settlements are an effort to have assurances against the most egregious impacts that were part of the original HMW proposal. The Southwest Neighborhood Assembly, which represents all Southwesters finds further refinement of the plan is necessary to ensure a world-class development that is integrated, accessible, sustainable, and a benefit.

- ⁱ“Southwest Washington Urban Renewal Area.” Historic American Buildings Survey; National Park Service.
- ⁱⁱ ScienceNOW, the daily online news service of the journal Science; “The Mental Hazards of City Living”
- ⁱⁱⁱForgery, Benjamin; “Southwest on Stage: two projects bring color, drama to long-neglected neighborhood” On Site, Winter 2010-2011.
- ^{iv} U.S. Commission of Fine Arts. Meeting Transcript: June 16, 2011.
- ^vD.C. Council efforts have included the “Billboard Blight Removal Approval Resolution of 2009”
- ^{vi} Refer to the National Capital Region Transportation Planning Board’s “Aspirations Scenario” and the 2009-2011 Montgomery County Growth Policy
- ^{vii}The American Planning Association (APA) streetcar recommendation is part of the report entitled: “Buzzard Point Community Planning Assistant Team Alternative Futures: Final Recommendations. This is the final report from the 2009-2010 charrette it conducted with near Southwest and near Southeast stakeholders.
- ^{viii}The incorrectly designed intersection at 4th & M Streets SW has been the site of numerous pedestrian-car accidents, including one death. Despite Council member intervention (refer to <http://www.tommywells.org/2011/01/ddot-outlines-4.php>), improvements remain incomplete.
- ^{ix} Comprehensive Plan for the National Capital: District Elements. December 19, 2006
- ^x “Darryl Fears. “A new way of thinking as sea levels rise’ Washington Post: June 26, 2011.