

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS



Office of the Director

August 7, 2013

Victor L. Hoskins  
Deputy Mayor for Planning & Economic Development  
1350 Pennsylvania Avenue, NW, Suite 317  
Washington, DC 20004

**RE: The Wharf: Southwest Waterfront Redevelopment  
800 Maine Avenue, SW  
Environmental Impact Screening Form 12-0047**

Dear Mr. Hoskins:

The Department of Consumer and Regulatory Affairs (DCRA) has carefully reviewed and considered the recommendations of the reviewing agencies, ( the District Department of the Environment, the District Department of Transportation, the Solid Waste Management Administration of the Department of Public Works, D.C. Water and the Office of Planning) related to the referenced Environmental Impact Screening Form.

Based on the agencies' recommendations, it has been determined that the proposed action is not likely to have substantial negative impact on the environment, and submission of an Environmental Impact Statement (EIS) is not required. However, the applicant is required to follow any and all recommendations made by the reviewing agencies (see attached agency reports).

If you have questions regarding this decision, please contact Rabbiah Sabbakhan, Chief Building Official, at [Rabbiah.Sabbakhan@dc.gov](mailto:Rabbiah.Sabbakhan@dc.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Nicholas A. Majett".

Nicholas A. Majett  
Director

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**District Department of the Environment**

Office of the Director

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**MEMORANDUM**

TO: Rabbiah Sabbakhan  
Department of Consumer and Regulatory Affairs  
Attn: Toni Taylor

FROM: Ibrahim Bullo *IBH For IS*  
Environmental Review Coordinator

DATE: August 5, 2013

SUBJECT: Environmental Assessment: The Wharf project

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Attached is an environmental assessment of the subject project. The District Department of the Environment has reviewed the Environmental Impact Screening Form (EISF) and related documents for this project, with regard to our areas of concern as specified in the attached document. In summary, we find no apparent significant adverse impact or likelihood of substantial negative impact on the environment as a result of the proposed project. Therefore, the District Department of the Environment does not recommend preparation of an Environmental Impact Statement (EIS) for this project.

However, the air quality impact analysis submitted by the applicant listed four (4) sub-surface parking lots that are equipped with a total of twenty (20) roof-top ventilation shafts/stacks for venting the vehicle exhaust from the sub-surface parking garages. The applicant's analysis assigned a height of 130 ft above grade for fifteen (15) of these shafts and a height of 25 ft for the remaining five (5) shafts. Incorporation of plume downwash effects is important for roof-top (elevated) pollution release points in close proximity to buildings and other structures, and the analysis for the Wharf included plume downwash effects for all stacks. Any deviations to the building heights and the stack configurations used in the air quality impact analysis will likely alter the predicted impact significantly and may invalidate the air quality analysis. Hence, the applicant must adhere to the engineering design assumptions utilized in the air quality impact analysis.

Copy via e-mail:  
Edna Ebanks, DDOE

**ENVIRONMENTAL ASSESSMENT**  
**For**  
**The Wharf-Southwest Waterfront Development**  
**800 Main Avenue, SW**

**August 2013**

**Compiled by:**

**Ibrahim Bullo,**  
**Environmental Review Coordinator**

**District Department of the Environment**  
**Keith Anderson, Director**

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## LIST OF FREQUENTLY USED ACRONYMS

|                 |   |
|-----------------|---|
| AQD             | Air Quality Division                                      |
| BGS             | Below ground surface                                      |
| BMP             | Best management practice                                  |
| BTEX            | Benzene toluene ethyl and xylene                          |
| BZA             | Board of Zoning Adjustment                                |
| CFS             | Cubic feet per second                                     |
| CSA             | Comprehensive Site Assessment                             |
| DCOP            | Dust and Odor Control Plan                                |
| DDOE            | District Department of the Environment                    |
| DPW             | Department of Public Works                                |
| EHA             | Environmental Health Administration                       |
| EIS             | Environmental Impact Statement                            |
| EISF            | Environmental Impact Screening Form                       |
| EPA             | U.S. Environmental Protection Agency                      |
| FEMA            | Federal Emergency Management Agency                       |
| FIRMS           | National Flood Insurance Rate Maps, published by FEMA     |
| HDPE            | High density polyethylene                                 |
| HSP             | Health and Safety Plan                                    |
| HWD             | Hazardous Waste Division                                  |
| LUST            | Leaking underground storage tank                          |
| NAAQS           | National Ambient Air Quality Standards                    |
| NEPA            | National Environmental Policy Act                         |
| NO <sub>x</sub> | Nitrogen oxides   |
| OECEJ           | Office of Enforcement, Compliance & Environmental Justice |
| OSHA            | Occupational Safety and Health Administration             |
| PPM             | Parts per million   |
| PVC             | Polyvinyl chloride  |
| RCP             | Reinforced concrete pipe                                  |
| SCS             | Soil Conservation Service                                 |
| SSECP           | Soil and Sediment Erosion Control Plan                    |
| TPH             | Total petroleum hydrocarbons                              |
| TSD             | Toxic Substance Division                                  |
| USDA            | United States Department of Agriculture                   |
| USFWS           | United States Fish and Wildlife Service                   |
| UST             | Underground storage tank                                  |
| USTD            | Underground Storage Tank Division                         |
| VOCs            | Volatile organic compounds                                |
| WASA            | Water and Sewer Authority                                 |
| WPD             | Watershed Protection Division                             |
| WQD             | Water Quality Division                                    |

## **LIST OF MATERIALS REVIEWED IN RELATION TO THE PROJECT**

### **A. Materials Provided by Applicant:**

#### **EISF Application and the following documents:**

1. Existing Conditions Plan
2. Concept Erosion and Sediment Control Plan
3. Concept Stormwater Management Plan
4. Proposed Floodproofing Background and Methods
5. Conditional Letter of Map Revision (CLOMR)
6. D.C. Department of Consumer and Regulatory Affairs (DCRA), August 1997. The District of Columbia Wetland Conservation Plan.
7. D.C. Groundwater Resources Studies (series of four reports).
8. Johnston, P.M., 1964. Geology and Ground-Water Resources of Washington, D.C. and Vicinity. USGS Water Supply Paper 1776. Reston, Virginia.
9. U.S. Geological Survey (USGS), 1965. Topographic Map Washington West Quadrangle 7.5 Minute Series. Photo Revised 1982.
10. EISF applications and attachments filed on June 19, 2012 and November 14, 2012.
11. Haley and Aldrich 2008. Phase I Environmental Site Assessment Report SW Waterfront Redevelopment 600-100 Water Street SW. Prepared for Hoffman Struever Waterfront LLC Washington DC. Haley and Aldrich. Report issued on June 15, 2012.
12. PSI 2012. Phase II Environmental Site Assessment for Southwest Waterfront, Water Street and Maine Avenue SW, Washington DC 20024. Prepared for PN Hoffman and Associates Inc. PSI Project No. 0449105. Report issued on June 15, 2012.
13. PSI 2011. Preliminary Subsurface Exploration and Geotechnical Engineering Services. Southwest Waterfront Redevelopment Washington DC. PSI Project No. 0512328. Report issued on April 15, 2011.
14. The Wharf 2012. Site plan (EISF Submission) for Southwest Waterfront Washington DC. Issued on May 2012.
15. Seaman 2012. Commitment letter with comments response from Shawn Seaman and/or their representative, Project Director, Hoffman-Madison Waterfront regarding comments that were sent on July 27, 2012 from DDOE/WQD, commitment submitted on November 29, 2012.
16. A permit (permit no. 2011-00766) to construct piers and docks in the Washington Channel from Kathy Anderson, US Army Corps of Engineers issued on August 10, 2012 and certified by DDOE/ WQD on November 16, 2012.
17. Vicinity Map

### **B. Materials Provided by the Community:**

The District Department of the Environment has received no materials from the community regarding this proposed project.

### **C. In-House Reference Materials and Site Visits:**

Environmental Assessment for the Wharf Project

August, 2013

**1. Water Quality Division**

- a. DC Ground Water Resources Studies (series of four reports).
- b. The District of Columbia Wetland Conservation Plan, August 1997.
- c. Johnston, P.M., 1964. Geology and Ground-Water Resources of Washington, D.C. and Vicinity. USGS Water Supply Paper 1776. Reston, Virginia.
- d. District of Columbia Sewerage System, 1986.
- e. U.S. Geological Survey (USGS), 1965. Topographic Map Anacostia Quadrangle 7.5 Minute Series. Photo Revised 1979.
- f. (USGS), 1965, Topographic Map Washington West Quadrangle 7.5 Minute Series. Photo Revised 1982.

**2. Watershed Protection Division**

- a. DC Storm Water Management Guidebook.
- b. DC Erosion and Sediment Control Standards and Specifications.
- c. DC DPW/WASA General Sewerage Map.
- d. DC WASA Sewer and Water Counter Maps.
- e. DC Soil Survey (USDA-SCS).
- f. FEMA National Flood Insurance Rate Maps.
- g. Site visit.

**3. Fisheries and Wildlife Division**

- a. District of Columbia List of Endangered and Threatened Species.
- b. U.S. Fish and Wildlife Service List of Threatened and Endangered Species.
- c. Section 6 Guideline for Threatened and Endangered Species Act published by the U.S. Fish and Wildlife Service.

**4. Air Quality Division**

National Ambient Air Quality Standards.

**5. Underground Storage Tank Division**

- a. EPA UST database-UST Access.
- b. DC LUST database.
- c. Case files specific for the address.

**6. Toxic Substances Division**

As no toxic substances were identified, no in-house reference materials were reviewed.

**7. Hazardous Waste Division**

As no hazardous wastes were identified, no in-house reference materials were reviewed.

**8. Environmental Justice**

- a. 2000 Census Tract Data.
- b. D.C. Office of Planning State Data Center Data.
- c. US Census Tract Income Data.

## **I. INTRODUCTION AND PURPOSE**

### **A. INTRODUCTION**

The subject project is identified as The Wharf - Southwest Waterfront Development, located at 800 Maine Avenue, SW. The proposed project site is comprised a series of contiguous parcels of land along Maine Avenue SW. It is roughly bounded on the northeast and southeast by Maine Avenue SW and the District of Columbia Police and Fire Pier respectively and on the southwest and northwest by the Washington Channel and the Washington Marina, respectively. The site is currently developed with a variety of commercial buildings and structures, which include marinas, restaurants, nightclubs, hotels, cruise line, church, and a tennis complex. The site is located in a fully developed area.

### **B. PURPOSE OF THE PROPOSED ACTION**

The purpose of the proposed project is to redevelop the site as a mixed-use, urban, riverfront complex.

## **II. ENVIRONMENTAL POLICY ACT DIRECTIVES APPLICABLE TO DDOE**

As to this specific project, the District Department of Environment serves as an advisory agency on this project, in determining whether an environmental impact statement is required. Section 7201.2 of Title 20, D.C. Municipal Regulations requires that proposed major actions are to be assessed in a number of areas for their impact on the environment. The following areas, listed in the regulations, fall within the mandate of the District Department of the Environment. They are whether:

1. The action might have a significant adverse effect on a rare or endangered species of animal or plant, or the habitat of the species (§7201.2 (a));
2. The action might violate published national or local standards relating to hazardous waste (§7201.2 (b));
3. The action might significantly deplete or degrade ground water resources (§7201.2 (c));
4. The action might significantly interfere with ground water recharge (§7201.2 (d));
5. The action might cause significant flooding, erosion or sedimentation (§7201.2 (f));
6. The action might significantly diminish habitat for fish or wildlife (§7201.2 (h));
7. The action might create a potential public health hazard or would involve the use, production or disposal of materials that pose a hazard to people, animal or plant populations in the area (§7201.2 (i));
8. The action might violate any ambient air quality standard, contribute significantly to an existing or projected air quality violation, or expose sensitive receptors to significant pollutant concentrations (§7201.2 (j)); and
9. The action might cause significant adverse change in existing surface water quality or quantity (§7201.2 (l)).



### III. DDOE DIVISIONS INVOLVED IN REVIEWING THIS PROJECT

The divisions within the District Department of Environment that are responsible for reviewing this project are as follows:

| <u>Area Reviewed</u>   | <u>DDOE Division/Office</u>                               |
|--|---|
| Water quality  | Water Quality Division                                    |
| Sedimentation, storm water management and watershed protection | Watershed Protection Division                             |
| Vegetation and wildlife  | Fisheries and Wildlife Division                           |
| Air quality  | Air Quality Division                                      |
| Underground storage tanks/leaking underground storage tanks    | Underground Storage Tank Division                         |
| Toxic substances   | Toxic Substances Division                                 |
| Hazardous wastes   | Hazardous Waste Division                                  |
| Environmental justice concerns                                 | Office of Enforcement, Compliance & Environmental Justice |

Specific reports from each of the aforementioned divisions are presented in Section VI of this Report.

### IV. LIST OF NEEDED PERMITS AND APPROVALS REQUIRING DDOE INVOLVEMENT

The construction and operation of the various components associated with the proposed project could require permits and approvals from DDOE divisions. Table 1.0 provides a list of the environmental related permit and approval requirements which may be applicable to the proposed action:

**Table 1.0  
Permits and Approvals  
Associated with DDOE**

| <u>Action</u>   | <u>Permit/Approval Requirement</u> | <u>Approving Agency</u> | <u>Permit Issuing Agency</u> |
|---|------------------------------------|-------------------------|------------------------------|
| Stormwater Management                                     | Construction Permit                | DDOE                    | DCRA                         |
| Erosion and Sediment Control                              | Construction Permit                | DDOE                    | DCRA                         |
| Site Characterization Report & Corrective Action Plan for |                                    |                         |                              |

|  |          |      |      |
|--|----------|------|------|
| Soil and Groundwater Remediation                             | Approval | DDOE | DCRA |
| Wells  | Permit   | DDOE | DCRA |
| Air Pollution Equipment                                      | Permit   | DDOE | DDOE |
| Fishing  | License  | DDOE | DDOE |
| Biological Research  | Permit   | DDOE | DDOE |
| Underground Storage Tank Installation, Abandonment & Removal | Approval | DDOE | DDOE |

**V. ENVIRONMENTAL SETTING AND CONSEQUENCES**

**A. WATER QUALITY**

**1. Environmental Setting**

Geologically, the site is located on the western edge of the Atlantic Coastal Plain Physiographic Province, east of the fall line separating the Atlantic Coastal Plain and the Piedmont Physiographic Province of the District of Columbia. The Atlantic Plain is characterized by a sequence of marine and terrestrial sedimentary deposits. Groundwater was encountered in 22 out of 23 soil test borings at a depth of seven feet below existing ground surface (EISF II.12 and PSI 2011). The EISF (Part II.14) application and the topographic map for the site (USGS, 1965 and Johnston, 1964) indicate that there are streams within 100 feet of the project site.

**2. Environmental Consequences**

Sections 7201.1 (c), (d) and (l) of the Environmental Policy Act implementing regulations provide that a project should be assessed to determine whether:

- (c) The action might significantly deplete or degrade ground water resources;
- (d) The action might significantly interfere with groundwater recharge; or
- (l) The action might cause significant adverse change in the existing surface water quality or quantity.

## Water Resources/Wetlands

The EISF was reviewed for water-related issues in accordance with the D.C. Environmental Policy Act and regulations, Section 7201.1(c), (d), and (l).

### Ground Water

*The following addresses Sections 7201.2(c) and (d) of the Environmental Policy Act regulations.*

The EISF (Part III.2) indicates that the maximum depth of excavation is 30 feet. The applicant states that groundwater was encountered at depths greater than three feet below ground surface (EISF Part II.12). However, the review of geotechnical report more precisely indicates that groundwater was encountered at seven feet depth. The applicant's response to EISF application question III. 24 indicates that dewatering will be required during the construction and post-construction phases of the project. Because of the circumstance at the site of planned subgrade structures below the groundwater table and its seasonal fluctuation at the site, DDOE WQD concurs that dewatering will be required during both the construction and post-construction phases of the project. Based on the response from Shawan Seaman (from Hoffman-Madison Waterfront, The WHARF agent/representatives) on November 29, 2012 (dated on September 10, 2012), the applicant submitted a copy of a permit obtained from US Army Corps of Engineers to construct piers and docks in the Washington channel. In accordance with DDOE/WQD's records, this permit was certified on November 16, 2012. Therefore, there may be a small to no impact on groundwater flow in the area as a result of the proposed project. However, the applicant is reminded that any contaminated groundwater encountered during the construction phase, must be contained in holding tank(s) and treated appropriately before discharging to the sewers or offsite disposal.

The applicant's responses to EISF questions III.36, III.37, III.47, and III.48 indicate that there will be no use of pesticides or other substances in project limits that will affect groundwater quality. The applicant responses to EISF questions II.7 indicates that there are contaminated soils within the project limits that affect groundwater quality. Furthermore, the review of the historical information revealed historic gas station, dry cleaners, gas plants and hydraulic trash compactor in the subject property; and dozens of leaking underground storage tanks (LUSTs) in topographically up-gradient adjacent properties within 1/8 miles from the subject property (Phase I Environmental Site Assessment, Haley and Aldrich 2008). A Phase II investigation also revealed the presence of TPH-DRO, TPH-GRO, VOCs, SVOCs, PCBs and metals in the soils on the subject property (PSI 2012).

If any contaminated groundwater is encountered or rainwater comes in contact with any contaminated soil during the construction phase of the project, the applicant (Seaman 2012, and/or their representatives) has committed to the following:

- (1) Containerizing the contaminated groundwater or rainwater in a holding tank, obtaining a representative water sample from the tank and having it analyzed in a laboratory using USEPA approved methods. If the containerized water is contaminated:

- (a) Above DC Water's Pretreatment Standards, obtain a discharge permit from DC Water before discharging to the sanitary sewer;
  - (b) Below DC Water's Pretreatment Standards but exceeds DC Surface Water Quality Standards, contact DDOE/WQD for discharge authorization including any work plan, treatment system, and obtain required permits from USEPA prior to the start of work;
- (2) Hiring an independent environmental consultant to investigate the case if any contaminated soil is identified during construction;
  - (3) Containerizing all installation/investigation-derived wastes from sites known to be contaminated or potentially contaminated, collect representative samples and analyze samples in the laboratory using USEPA approved methods for offsite disposal;
  - (4) Taking all responsible steps to minimize or prevent any discharge of contaminated water and soils which has a reasonable likelihood of adversely affecting human health or the environment;
  - (5) Providing work completion report and all investigation records to DDOE/WQD within 30 business days; and
  - (6) Completing all works in accordance with all permit conditions, Federal and District Laws and Regulations.

As a result the project is anticipated to have minimal or no impact on groundwater quality. According to the EISF (Part II.1 and Part III.2), the proposed development reduces impervious area by 33 percent on the subject property. Therefore, the proposed development at the site is anticipated to have minimal to no impact on groundwater recharge in the area.

### **Surface Water**

*The following addresses Section (l) of the Environmental Policy Act regulations.*

The EISF (Part II.14 and 15), and the topographic map for the area (USGS 1965) indicate that the project site is located within 100 feet from the nearest hydraulically down-gradient natural surface water body. The applicant submitted a copy of permit obtained from US Army Corps of Engineers to construct piers and docks in the Washington channel. In accordance with DDOE/WQD record, this permit was certified on November 16, 2012. Consequently, the project is anticipated to have minimal to no impact to the surface water flow.

The applicant states that the project will not adversely affect existing surface water quality (EISF III.34) and other substances will not affect surface water quality (EISF Part III.48). However, as mentioned in the groundwater section of this EISF approval, contamination sources exist on the subject and nearby properties. Based on the response from Shawan Seaman (from Hoffman-Madison Waterfront, The WHARF agent/representatives) on November 29, 2012 (dated on September 10, 2012), the applicant has committed to handle the case in the same manner stipulated in the groundwater section of this EISF approval. Therefore, no contaminated groundwater will be allowed to discharge to the water bodies including the District's municipal

separate sewer system (MS4). As a result, the project is anticipated to have minimal to no impact to surface water quality.

## **B. SEDIMENTATION AND STORM WATER MANAGEMENT/ WATERSHED PROTECTION**

### **1. Environmental Setting**

Topographically, the project site is relatively level with a slight slope to the southwest towards the abutting Washington Channel. The runoff from the project site is collected through existing drainage systems on and adjacent to the project site and discharged into the Washington Channel. The applicant proposes to use a mix of green roofs, low impact development practices, and a series of below-grade cisterns to retain/reuse runoff up to the 3.2-inch storm event to bring the site into compliance with the District stormwater management requirements.

### **2. Environmental Consequences**

Section 7201.1(f) of the Environmental Policy Act implementing regulations provides that a project should be assessed to determine whether:

The action might cause significant flooding, erosion or sedimentation.

A review of the EISF application and the erosion and sediment control and stormwater management control conceptual plans submitted for the project shows the 2-year pre- and post-development runoff quantities to be 44 cfs and 99 cfs, respectively, and the 15-year pre- and post-development runoff quantities to be 64 cfs and 142 cfs, respectively. There is a net increase of 55 cfs for the 2-year storm and 78 cfs for the 15-year storm. The net increase in 2-year and 15-year runoff will be accommodated and regulated using green roofs, low impact development practices, and a series of below-grade cisterns. The site development plan also shows appropriate erosion and sediment control measures necessary for the construction phase.

The proposed floodplain management plan for the project shows that the first-floor elevation will be raised to 1.5 feet above the Base Flood Elevation (BFE) and flood-proofing techniques, as outlined in ASCE 24 and ASCE 7, will be used to bring the site into compliance with DCMR 20, Chapter 31 – Flood Hazard Rules and the flood provisions of DCMR 12 – DC Construction Codes Supplement of 2008, or the latest amendment. The project's proposed floodplain management plan also acknowledges that extreme flood events could occur with more frequency and intensity. Therefore, the development team will submit detailed evacuation and floodproofing operation and maintenance plans to DDOE to address more extreme flood events during the building permit process.

The applicant is also required to obtain a United States Environmental Protection Agency National Pollutant Discharge Elimination System General Construction Permit because the proposed area of disturbance (28.0 acres) is greater than one acre. This is a federal requirement and is one of the permits required in order to receive final sediment and erosion control and stormwater management approval from the District Department of the Environment.

Based on review of the submitted EISF package and a site visit on April 03, 2013, WPD does not anticipate any significant adverse impact or the likelihood of substantial impact to the environment, provided that the proposed erosion and sediment control, stormwater management and floodplain management measures are implemented. Therefore, preparation of an Environmental Impact Statement is not required in the areas of concern to WPD

## **C. VEGETATION AND WILDLIFE**

### **1. Environmental Setting**

The site for this project is at 800 Main Avenue, SW an urban setting.

### **2. Environmental Consequences**

Section 7201.1 (h) of the Environmental Policy Act's implementing regulations provide that a project should be assessed to determine whether:

The action might significantly diminish habitat for fish, wildlife or plants.

As indicated above, the proposed project is in an urban setting. There are no known endangered species at the site, and, given the urban nature of the site, there is limited habitat for fish, wildlife or plants.

After review of the plans for the above project, and based on a site visit and other in-house documents, the Fisheries and Wildlife Division has determined that there is no apparent significant adverse impact or likelihood of substantial negative impact to the environment as a result of the proposed project. Therefore, preparation of an environmental impact statement is not recommended for the areas of concern to the Fisheries and Wildlife Division.

## **D. AIR QUALITY**

### **1. Environmental Setting**

The proposed project site, also identified as The Wharf - Southwest Waterfront Redevelopment, is located between Maine Avenue, SW, and the Washington Channel, and is bisected longitudinally by Water Street, SW. It occupies approximately 1,080,000 square feet (approximately 24.8 acres) of land situated on the southwest side of Maine Avenue, SW, between I-395 and 6th Street, SW. The project site is located within ZIP Code area 20024 and is centered at approximately 38E 52' 41" North latitude and 77E 01' 25" West longitude.

The proposed three-phase redevelopment project consists of a mixed-use development- retail, residential, office, hotel, cultural, and marina, with over three (3) million square feet of overall development. The proposed project involves permanent closure and removal of the existing Water Street, SW. Parking needs for the new development are accommodated via multiple

subsurface parking garages. The proposed redevelopment project is expected to create a net new parking of 658 parking spaces.

Vehicular access to the proposed project will be available via multiple signalized entrances along Maine Avenue, SW. The Wharf redevelopment project is expected to begin in 2013 and anticipated to conclude in 2018.

The project site is located within the National Capital Interstate Air Quality Control Region, which includes the Washington, D.C. metropolitan area. The region currently meets the National Ambient Air Quality Standards (NAAQS) for all criteria air pollutants with the exception of ozone and fine particulates. The U.S. Environmental Protection Agency (EPA) has designated the region as a “non-attainment area” for ozone. Until recently, EPA had also designated the region as a “non-attainment area” for carbon monoxide (CO); however, EPA redesignated the region as an “maintenance area” for CO because the region has not violated the NAAQS for CO since 1988.

Air quality in the Washington, DC-MD-VA metropolitan area has exceeded the federal health standard for ozone in the recent several years. The highest levels of ozone generally occur during the summer (May to September) when the warmer temperature and sunlight intensity enhances the formation of ozone. In the Washington, DC-MD-VA area, 28 percent of the volatile organic compounds (VOCs) that form ozone come from mobile sources. About one-third of this “mobile source” pollution is attributed to commuting traffic and the rest comes from the trips throughout the day, such as business travel or truck deliveries. Large industrial facilities such as power plants and factories cause only a small portion (about three percent) of the VOC emissions in the Washington, D.C. region. The remaining portion of VOCs is emitted from a multitude of small sources, including printers, service stations, construction contractors, paints, and cleaning solvents.

## 2. Environmental Consequences

The Environmental Policy Act sets out the impact on air quality as a potential significant impact. Specifically, section 7201.2 (k) of the regulations provides that a project should be assessed to determine whether:

The action might violate any ambient air quality standard, contribute significantly to an existing or projected air quality violation, or expose sensitive receptors to significant pollutant concentrations.

The Environmental Impact Screening Form (EISF) application Part III items 9 through 16a and 16b sets out a series of questions to which an applicant must respond which are designed to elicit information regarding potential air quality impacts. Based on an applicant’s responses to these questions, the applicant may be required to submit an air quality analysis of emissions (in pounds or tons of pollutants per day) of CO, volatile organic compounds (VOCs), and nitrogen oxides

(NOx) resulting from the operating of mobile sources associated with the proposed project. Applicants submitting an air quality analysis are required to use the most current version of the EPA's mobile emissions factor model in deriving the emissions estimates. Applicants are also required to provide an analysis of the impact from mobile sources on CO concentrations (in parts per million) in the vicinity of the proposed project. This analysis, at a minimum, must be conducted in accordance with the procedures identified in the District Department of the Environment's (DDOE) "Guidance on the Review of Air Quality Studies Performed as a Result of the EISF" using an approved air quality dispersion model (the default model is the latest version of CAL3QHCR posted on the EPA regulatory model website) and must include a comparison of the resulting air quality with both the one (1) hour average and eight (8) hour average National Ambient Air Quality Standards (NAAQS) for CO.

In Part III of the EISF application, the applicant's response to question 9 indicates that the proposed project will house 50 or more families. The response to question 10 states that the proposed project will provide more than fifty (50) new parking spaces. The answer to question 11 states that the proposed project will consist of shopping and/or commercial facilities having 50,000 or more square feet of gross floor space. The response to question 12 indicates that the proposed project will consist of entertainment and/or recreation facilities, including but not limited to theaters, auditorium, sport stadiums, bowling alleys, etc. having the capacity to accommodate more than 400 persons at one time. The response to question 14 indicates that the proposed project will increase traffic volume that would result in a street volume-to capacity ratio of 0.90 or greater. The response to question 15 indicates that the proposed project will increase traffic volume that would result in a vehicle delay of 55 or more seconds at any signalized intersection.

The applicant's response to question 16a states that the proposed project will not result in an emission into the atmosphere of odorous or other air pollutants from any source, in any quantity and of any characteristic and duration, which is, or is likely to be, injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life and property. The response to question 16b indicates that the applicant will use a water spray to control fugitive dust during the project, in accordance with the approved Erosion and Sediment Control Plan.

Environmental Consultants and Contractors, Inc., (ECC) was authorized by Mr. Shawn D. Seaman of Hoffman-Madison Waterfront, LLC, to perform an Air Quality Impact Assessment (AQIA) of the site identified as The Wharf - Southwest Waterfront redevelopment, located on Water Street, S.W., in Washington, D.C. This AQIA report was prepared for submission as part of the District Environmental Impact Screening Form (EISF) process. The analysis primarily focused on the expected changes in Nitrogen Oxides (NOx), Volatile Organic Compounds (VOCs), and Carbon Monoxide (CO) concentrations in air on and near the proposed redevelopment project.

#### Roadway Intersections:

ECC modeled the impact to ambient CO concentrations along area roadways from the proposed project using the latest version of CAL3QHC (V.2.0). Future expected CO concentrations were calculated for scenarios with and without the proposed redevelopment. Three signalized



intersections are currently present in the vicinity of the Study Site. The proposed development includes four additional signalized intersections. Table below summarizes the signalized intersections in the redevelopment project.

| Intersection Name                                   | Current Signalized | Proposed Signalized |
|---|--------------------|---------------------|
| Maine Avenue and 7th Street, SW                     | Yes                | Yes                 |
| Maine Avenue and 9th Street, SW                     | Yes                | Yes                 |
| Maine Avenue and 6th Street, SW                     | Yes                | Yes                 |
| Maine Avenue, SW, and future The Wharf Driveway #3  | N/A                | Yes                 |
| Maine Avenue, SW, and future The Wharf Driveway #10 | N/A                | Yes                 |
| Maine Avenue, SW, and future The Wharf Driveway #12 | N/A                | Yes                 |
| Maine Avenue, SW, and future The Wharf Driveway #13 | N/A                | Yes                 |

N/A = Currently Does Not Exist.

ECC estimated CO exposure at twenty-eight (28) receptor locations shown in Figure 3 of the AQIA report. The receptors are located near the signalized intersections and they are expected to capture areas most likely to be impacted by CO emissions from project's traffic.

**Parking Lots:**

The study area currently includes 12 surface parking lots, six (6) areas of street surface parking, and five (5) covered parking areas (passively vented). The Wharf redevelopment project includes four (4) two-level subsurface parking garages that are equipped with 20 mechanically ventilated shafts (stacks). The configuration of these stacks was based on existing mechanical plans, conceptual plans, and the ventilation requirements mandated by the 2012 International Building Code (0.75 cfm per square foot, IBC 2012). ECC assigned most ventilation stacks the full approximate height of the structures they are designed in (130 feet); approximately one in four stacks were specified as a low-elevation discharge of approximately 25 feet above grade. Downwash characteristics were modeled based on the full height of the largest proposed site structures. A map of the existing and proposed parking facilities is provided as Figure 4 of AQIA report.

| Existing Parking Spaces | Proposed Parking Spaces | Net New Parking |
|-------------------------|-------------------------|-----------------|
| 1,682                   | 2,340                   | 658             |

ECC estimated the impact of the proposed parking scenarios by using the latest version of AERSCREEN, the current EPA-recommended screening model for dispersion of airborne pollutants.

The Air Quality Division completed its review of the EISF of the above project. AQD did not require an evaluation of the impacts on ground-level ozone, lead, or nitrogen oxides for the following reasons:

**Ozone (O3):** As indicated above, ozone is a regional problem that cannot be subjected to project-specific analysis.

**Nitrogen**

Dioxide (NO<sub>2</sub>): In October 2011, the District was designated “unclassifiable/attainment” for the new 2010 annual and 1-hour NO<sub>2</sub> NAAQS. Based on available air quality data at the time, the U.S. Environmental Protection Agency (EPA) determined that the District is attaining the 2010 NO<sub>2</sub> NAAQS. However, new monitoring requirements have not yet been implemented. There is no need to conduct project-level NO<sub>2</sub> modeling unless the District is designated nonattainment in the future, based on ambient monitoring that meets the requirements of the new NAAQS,

Lead (Pb): Also in October 2011, the District was designated “unclassifiable/attainment” for the new 2008 Pb NAAQS. Based on available air quality data at the time, EPA determined that the District is attaining the standard and there is no evidence of violations. However, new monitoring requirements have not yet been implemented. There is no need to conduct project-level Pb modeling unless the District is designated nonattainment in the future, based on ambient monitoring that meets the requirements of the new NAAQS,

**Total CO Concentrations (2018)**

| Emission Source                              | Maximum One-Hour (ppm) | Average Eight-Hour (ppm) |
|--|------------------------|--------------------------|
| Regional Ambient CO                          | 4.20                   | 2.00                     |
| Mobile Vehicles                              | 3.58                   | 2.51                     |
| Parking Lots and Covered Parking             | 2.56                   | 1.79                     |
| Total CO Concentration Without Redevelopment | 10.34                  | 6.30                     |
| Regional Ambient CO                          | 4.20                   | 2.00                     |
| Mobile Vehicles                              | 8.28                   | 5.80                     |
| Parking Garage                               | 0.44                   | 0.31                     |
| Total CO Concentration With Redevelopment    | 12.92                  | 8.11                     |
| NAAQS Standards                              | 35.00                  | 9.00                     |

Any installation of fuel burning equipment (such as boilers) with heat input ratings greater than 5 MMBTU/hr, stationary generators, or other stationary air pollutant emitting equipment will need to go through a separate air quality permitting process prior to their construction being initiated. It was specifically noted in the EISF that emergency generators were expected to be installed, which would require such permits prior to initiating installation of the units.

Additionally, where applicable, 20 DCMR 800, Control of Asbestos, must be followed during demolition of existing structures at the site.

If any soil vapor extraction or groundwater remediation is required at the site, the applicant must comply with the requirements of 20 DCMR 717, Soil and Groundwater Remediation.

Fugitive dust must be controlled by methods ensuring compliance with 20 DCMR 605, Control of Fugitive Dust.

The air quality impact analysis submitted by the applicant listed four (4) sub-surface parking lots that are equipped with a total of twenty (20) roof-top ventilation shafts/stacks for venting the vehicle exhaust from the sub-surface parking garages. The applicant’s analysis assigned a height

of 130 ft above grade for fifteen (15) of these shafts and a height of 25 ft for the remaining five (5) shafts. Incorporation of plume downwash effects is important for roof-top (elevated) pollution release points in close proximity to buildings and other structures, and the analysis for the Wharf included plume downwash effects for all stacks. Any deviations to the building heights and the stack configurations used in the air quality impact analysis will likely alter the predicted impact significantly and may invalidate the air quality analysis. Hence, the applicant must adhere to the engineering design assumptions utilized in the air quality impact analysis.

Based on this review and provided the project is implemented as proposed, the AQD believes that the proposed project would not violate any air quality standard. So, in regard to Section 7201.2 (k) of the Environmental Policy Act, the preparation of an environmental impact statement is not recommended for areas of concern to the Air Quality Division.

## **E. UNDERGROUND STORAGE TANKS/LEAKING UNDERGROUND STORAGE TANKS**

### **1. Environmental Setting**

As per the USTB records review of the data maintained within the District Department of the Environment (DDOE), there is NO active or registered Underground Storage Tank (UST) System currently in service dispensing regulated substance at the address of the proposed project. Also, there is NO active Leaking Underground Storage Tank (LUST) case opened, i.e. existing petroleum or hazardous substances contamination of soil and/or ground water from the operation of USTs at this address.

### **2. Environmental Consequences**

1. A detailed environmental site assessment/excavation during the construction stages will reveal any unknown or buried tanks and other subsurface conditions, such as, petroleum contamination. Any unknown or buried tanks found should be reported to DDOE for an inspection before removal or abandonment-in-place.
2. The soil excavated from areas must be screened in the field to determine the environmental impacts. If the samples test results indicate levels above the DC standards for TPH-DRO, TPH-GRO and BTEX, or is above established disposal criterion for VOC – impacted soil, the soil must be shipped to an approved off-site treatment facility, reuse of contaminated soil onsite is not acceptable. Contaminated soil should be tested and reported to DDOE if above our standards after post excavation confirmatory analysis.
3. Contaminated groundwater during the dewatering stage must be treated according to the District’s water discharge standards. A pretreatment discharge permit must be obtained from WASA prior to any discharge to any sanitary or combined sewer.
4. There may be other contaminants on the property that are not under the purview of UST or LUST Programs, these may be related to aboveground activities, such as petroleum

spills, waste oil dumping, car repair shops, mechanic shops, paint shops, pesticides use, etc and may require the involvement of other Programs within the DDOE .

5. As a best management practice, a remediation plan should include dust and contaminants odor control measures that prevent or minimize off-site migration.
6. It is noted that the Project that does not involve the installation of new underground storage tanks system for storing petroleum or hazardous materials. Any UST System installed on the property should be managed and operated in accordance with all applicable District and Federal Regulations. Should UST installation be part of the future operational plans, the Developer is required to contact our office for further guidance, to request an inspection during installation and to register the tanks before operation commences. Failure to comply with this requirement may result in enforcement action.

Accordingly, based on this review, the UST/LUST Division has determined that there is no apparent significant adverse impact or likelihood of substantial negative impact to the environment as a result of the proposed project.

## **F. TOXIC SUBSTANCES**

### **1. Environmental Setting**

There are no known toxic substances in use at the site, nor does the project plan indicate any will be used, disturbed or created in concentrations that would constitute a significant adverse impact on the environment.

### **2. Environmental Consequences**

Section 7201.1(j) of the Environmental Policy Act implementing regulations provides that a project should be assessed to determine whether:

The action would create a potential public health hazard or would involve the use, production or disposal of materials that pose a hazard to people, animals or plant populations in the area.

Based upon the plan submitted, there is no indication that adverse environmental impacts would occur in the areas of interest to the Toxic Substance Division for the following reasons:

- No species of plants or animals were identified as threatened or endangered and therefore would not be affected if there were any releases of pesticides during construction of the project;
- There are no reported effects of pesticides to public health and safety originating from this site where pesticides may have been applied according to label directions; and
- Pesticide products will not be applied at this site as part of the project according to the information provided.

In view of the above, the Toxic Substance Division has determined that there is no apparent significant adverse impact or likelihood of substantial negative impact to the environment as a result of the proposed project. Therefore, the Division does not recommend that an environmental impact statement be required for this project.

## **G. HAZARDOUS WASTES**

### **1. Environmental Setting**

There are no known hazardous wastes present at the site of the proposed project in concentrations that would result in a significant adverse impact on the environment. Review of the project plan does not indicate the production or disposal of hazardous wastes in concentrations that would result in a significant adverse environmental impact.

### **2. Environmental Consequences**

Sections 7201.1 (b) and (j) of the Environmental Policy Act implementing regulations provide that a project should be assessed to determine whether:

- (b) The action might violate published national or local standards relating to hazardous wastes; and
- (j) The action might create a potential public health hazard or would involve the use, production or disposal of materials that pose a hazard to people, animals or plant populations in the area.

There is no indication that the proposed action would violate published national or local standards relating to hazardous wastes, nor will the action create a potential public health hazard or involve the use, production or disposal of materials that pose a hazard to people, animals or plant populations in the area.

In view of the above, the Hazardous Waste Division has determined that there is no apparent significant adverse impact or likelihood of substantial negative impact to the environment as a result of the proposed project. Therefore, preparation of an environmental impact statement is not recommended for areas of concern to the Hazardous Waste Division.

## **H. ENVIRONMENTAL JUSTICE**

Environmental justice, as defined by the U.S. Environmental Protection Agency, is “the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations and policies.” It follows that environmental *injustice* occurs when certain segments of society, such as low-income and minority communities, bear a disproportionate share of the harmful effects of governmental decisions. The District Department of the Environment

(DDOE), of course, strives for environmental justice in all its actions—including the review of this proposal.

Federal law and a presidential order guide the District’s environmental justice policies. First, Title VI of the Civil Rights Act of 1964 prohibits intentional discrimination on the grounds of race, color, or national origin under any program or activity receiving federal financial assistance.<sup>1</sup> Second, President Clinton’s Executive Order 12898 directs each federal agency to make achieving environmental justice part of its mission by identifying and addressing as appropriate, disproportionately high and adverse human health effects of its programs, policies and activities on minority populations.<sup>2</sup> Projects with disproportionate negative impact directly contravene these legal requirements.

The above federal obligations also govern District agencies that receive federal assistance. Since DDOE is one of those agencies, its mandate to protect and restore the environment, conserve natural resources, provide energy-related policy, and improve the quality of life in the District of Columbia falls at least in part under federal purview. Thus, in the interest of environmental justice, DDOE must also examine the potential adverse impacts on the communities in which environmentally burdensome projects are sited, especially those communities that are predominantly low-income and/or minority.

One aspect of this examination is to provide opportunities for community input in the EISF review process and to ensure that meetings and notices are accessible to minority and low-income communities potentially affected by a proposed project. This project, however, will not need that level of community involvement: DDOE’s Office of Enforcement and Environmental Justice (OEEJ) has found no indication that this project—a 23 acre redevelopment plan, including commercial and residential buildings that are all LEED certified—would be environmentally burdensome or would otherwise pose a disparate and unjustified health risk to the community in which it would be sited.

In support of that conclusion, OEEJ reviewed the submitted EISF and demographic information related to the project area using EJView and other databases.<sup>3</sup> The project area<sup>4</sup> has fewer residents living in poverty than the District as a whole (8 percent—versus 17.6 percent). The area has a lower percentage of minority citizens than the District as a whole (51 percent—versus 61.5 percent for the District as a whole). In terms of vulnerable populations, 2 percent of the project area’s residents are children four years old or younger; 19 percent are seniors 65 years and older.

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<sup>1</sup> 42 U.S.C §§ 2000d *et seq.*

<sup>2</sup> Executive Order 12898 (Feb. 11, 1994). This Executive Order remains in effect.

<sup>3</sup> EJView is an EPA assessment tool, *available at* <http://epamap14.epa.gov/ejmap/entry.html>. An EISF review may also include data from the U.S. Census Bureau’s 2000 census and 2005-2009 American Community Survey, the D.C. Office of Planning’s State Data Center, and commercial databases such as [www.city-data.com](http://www.city-data.com).

<sup>4</sup> This review includes the project site surrounded by a one-half mile buffer.

However, the proposal and the project area demographics do not require heightened scrutiny. No information indicates that the environmental burden on neighbors will disproportionately increase as a result of the project. OEEJ concludes that no racial or ethnic minority or low-income group of people will bear disproportionate negative environmental consequences resulting from the District's action.

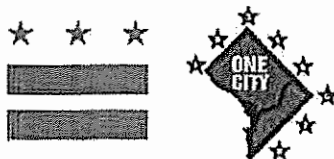
## **VI. DDOE RECOMMENDATIONS AND MITIGATION MEASURES**

The District Department of the Environment, a reviewing agency pursuant to the Environmental Policy Act and its implementing regulations, recommends to the Department of Consumer and Regulatory Affairs that the Wharf project does not require the preparation of an environmental impact statement. Our recommendation is based on the fact that none of our reviews have identified any significant adverse impact or the likelihood of a substantial negative impact to the environment as a result of the proposed project.

However, the air quality impact analysis submitted by the applicant listed four (4) sub-surface parking lots that are equipped with a total of twenty (20) roof-top ventilation shafts/stacks for venting the vehicle exhaust from the sub-surface parking garages. The applicant's analysis assigned a height of 130 ft above grade for fifteen (15) of these shafts and a height of 25 ft for the remaining five (5) shafts. Incorporation of plume downwash effects is important for roof-top (elevated) pollution release points in close proximity to buildings and other structures, and the analysis for the Wharf included plume downwash effects for all stacks. Any deviations to the building heights and the stack configurations used in the air quality impact analysis will likely alter the predicted impact significantly and may invalidate the air quality analysis. Hence, the applicant must adhere to the engineering design assumptions utilized in the air quality impact analysis.

In addition the applicant is also required to obtain a United States Environmental Protection Agency National Pollutant Discharge Elimination System General Construction Permit because the proposed area of disturbance (28.0 acres) is greater than one acre. This is a federal requirement and is one of the permits required in order to receive final sediment and erosion control and stormwater management approval from the District Department of the Environment


**GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning and Sustainability Administration**

**MEMORANDUM**

**To:** Rabbiah Sabbahkan  
Acting Division Chief – Permit Operations  
DCRA-BLRA  
ATTN: Toni Taylor

**From:** Sam Zimbabwe   
Associate Director for Policy, Planning and Sustainability Administration

**Date:** June 10, 2013

**Subject:** BLRA No. 12-00472 – The Wharf: Southwest Waterfront Redevelopment  
800 Maine Avenue, SW

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**Application**

The Applicant, the Deputy Mayor for Planning & Economic Development (DMPED), through their authorized agent, Hoffman-Struever Waterfront, LLC., has applied to the Zoning Commission for approval of a proposed PUD and map amendments. The entire Wharf development is comprised of 11 parcels, which in total comprise 3.2 million square feet of space, to include: 2,125 residential units; 500K square feet of office; 625 hotel rooms; 275K square feet of retail; a 2500 seat theatre; 100K square feet for cultural; and 25K square feet for maritime use. The Wharf development will be constructed in three phases over an expected timeline of ten years. All eleven parcels of the Wharf redevelopment project have received Stage 1 PUD approval from the Zoning Commission. At this time, Stage 2 PUD approvals have been granted by the Zoning Commission only for Parcels 2, 3, 4, 5, and 11. Parcels 1 and 6 through 10 have not received Stage 2 PUD approval and, accordingly, no Zoning Orders have been issued.

**DDOT's Role in the EISF Review**

DDOT generally reviews and comments on BLRA applications after the zoning process is complete and a Zoning Order has been issued. Zoning orders often contain conditions which need to be reviewed prior to the issuance of permits. For the pending BLRA application, DDOT's review is requested after the approval of the Stage 1 Planned Unit Development, but *prior* to Stage 2 approvals of all the associated Wharf parcels, because the



Applicant will be installing substantial across the site and in the public space. DDOT understands the need to have all the utility infrastructure installed at one time and that a piecemeal installation would be highly inefficient and disruptive to the project as well as the transportation network.

### **Previous Zoning and Public Space Actions**

DDOT noted in its Stage 1 report to the Zoning Commission that while vehicle delay will likely increase significantly, overall failure of the roadway network adjacent to the site is not expected. Accordingly, a large mode shift is expected and several public space improvements are proposed to accommodate walking and biking and future transit use. DDOT has expressed concern over the overall future level of traffic generation, and the Applicant has committed to a monitoring approach to ensure that site-generated vehicular traffic remains within acceptable limits.

The Applicant is undertaking substantial streetscape improvements in and around the site, including new sidewalks, new trees, bike parking; installation of a new cycle track; new utilities in Maine Ave; bump outs; bus stop relocation and rebuilding to accommodate future street car stops; and a new Capital Bikeshare station. DDOT has had on-going meetings with the Applicant including several Preliminary Design Review Meetings (PDRMs) to review proposed public space improvements. Those improvements that are constructed in the public space will have to be constructed to DDOT standards and will require review and approval by DDOT and/or the Public Space Committee (PSC). In addition, to the above public space elements, the Applicant will be installing new utilities along the Maine Ave street frontage in order to serve the increased development of the proposed Project, and the Applicant has coordinated with DDOT on the location and design of these utilities.

### **Future Reviews**

The Applicant has received stage 2 PUD approval for approximately half of the eleven parcels comprising the Wharf development. DDOT's reports to the Zoning Commission generally have had no objection with the caveat that the Applicant is to coordinate closely with DDOT on the multiple large-scale public space elements discussed prior and that the Applicant takes steps to limit future demand of vehicular traffic.

### **Conclusions**

DDOT has no objections to the requested BLRA permit provided the Applicant adheres to the conditions of zoning approval set forth in the existing *and future* Zoning Orders for all 11 parcels associated with the Wharf development, as several parcels have not been granted Stage 2 approval. In addition, several large-scale public space elements need to be coordinated with DDOT, including the reconstruction of the intersection of Maine Ave & M Street; the relocated bus stops (upgraded for streetcar); and the Maine Ave cycle track; as well as the reconstruction of Maine Avenue once all new utilities have been installed. Finally, utility sizing and their vertical and horizontal locations within the road bed need to be coordinated with DDOT in order to properly anticipate future DDOT transportation investments, including a potential streetcar line. DDOT's support of the BLRA application is conditioned on the Applicant coordinating with DDOT on design and construction of these and all other public space elements.

SZ:bw



**MEMORANDUM**

TO: Rabbiah Sabbakhan, Acting Division Chief, Permit Operations, DCRA  
 cc: Toni Taylor, DCRA Program Support Specialist  
 FROM: Jennifer Steingasser, Deputy Director Development Review & Historic Preservation  
 DATE: August 21, 2012  
 SUBJECT: BLRA No. 12-00472 Environmental Impact Screening Form (EISF)  
 Southwest Waterfront, "The Wharf", Maine Street SW

Pursuant to Chapter 71, Title 20, *Environmental Policy Act Regulations*, the Office of Planning has reviewed Part 2, Item 14 *Impact on the Growth Character of the Community or Neighborhood* as outlined in the Environmental Impact Screening Form.

**Conclusion: The Office of Planning concludes that there are no significant impacts.** Under the relevant regulations, OP has determined that the proposed project would not disrupt or divide the physical arrangement of an existing community nor adversely induce significant growth or concentration of population. OP also notes that this site is subject to Zoning Commission (ZC) Case # 11-03 and 11-03A.

**Brief Project Description:**

|   |  |
|---|--|
| Applicant                                   | Hoffman-Madison, for the DMPED   |
| Address:                                    | 800 Maine Avenue SE  |
| Legal Description:                          | Squares 390, 391, 471 W, 472, 473, 473 W; Lots: multiple   |
| Ward:                                       | 6  |
| Proposal:                                   | New mixed use development including office, residential, hotel, entertainment, and retail buildings to a maximum height of 130 feet; underground parking, and significant amounts of new public open space along the Washington Channel.   |
| Zoning:                                     | PUD/C-3-C <sup>1</sup> - C-3-C allows a broad range of permitted uses, including office, residential, hotel, retail, entertainment, and open space to a maximum height of 90 feet by right and 130 feet through a PUD, and a maximum density of 6.5 FAR by right and 8.0 through a PUD, although these are restricted to the specific height, density, building bulk and siting, and open space design approved by the Zoning Commission through the ongoing PUD review process.   |
| Zoning Commission (ZC) Review and Approval: | The proposal appears to be generally consistent with the approval given by the ZC in Case No. 11-03 (December 16, 2011). 11-03 was "Stage 1" or preliminary approval of the SWW development plan, including zoning, overall site plan, general height, location, use mix and bulk for buildings, and open space and circulation plans. All of the parcels and open spaces are also required to go through a further ZC "Stage 2" review and approval process, intended to address the detailed design or both buildings and open spaces.<br><br>For Case 11-03A, the ZC held a series of "Stage 2" public hearings in June and July, 2012 for parcels 2, 3, 4, and 11 as well as open spaces associated with those parcels, the east Waterfront Park, and 7 <sup>th</sup> Street open space designs. While Stage |

<sup>1</sup> The application correctly notes the existing zoning for the portion of the SWW development site that is subject to this application as W-1 (low density waterfront related zoning), however the site is also subject to the zoning related conditions of Zoning Commission case 11-03 and 11-03A, including the establishment of PUD related C-3-C zoning (high density mixed use).



|   |   |
|---|---|
|   | 2 review focusses on detailed design, aspects of the site plan, circulation plan, and building form were, as is typical of Stage 2 review, modified somewhat through this review. Any site or building construction will be required to conform fully to the Stage 2 approvals.   |
| Comprehensive Plan Future Land Use and Policy Map Designations: | Land Use Map: Mixed high Density Residential / Commercial<br>Policy Map: Land Use Change Area<br>The proposal is not inconsistent with these designations.  |
| Comprehensive Plan:   | As detailed in the Office of Planning report to the Zoning Commission for ZC Case 11-03 for this site, the proposal would particularly further policies of the Land Use (LU-1.2.1, LU-1.2.2, LU-1.2.6, LU-1.3.1 and LU-1.3.2); Transportation (T-1.1.4, T-1.2.3 T-1.2.1, T-2.4.1 and T-2.4.2); Economic Development (ED-2.3.1 through ED-2.3.4); Parks, Recreation and Open Space (PROS-1.4.3 and PROS-3.2.3); and Urban Design (UD-1.1.1, UD-1.3.1, UD-1.3.2, and UD-1.3) Citywide Elements.<br><br>The proposal also furthers the objectives and policies of the Lower Anacostia Waterfront / Near Southwest Area Element for the Southwest Waterfront area (AW-1.1.2 to AW-1.1.9; AW-1.2.2, AW-2.1.1, AW-2.1.2, and AW-2.1.4). |

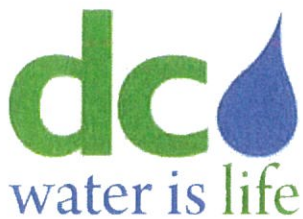
Item 14. OP analysis of whether the proposed project will disrupt or divide the physical arrangement of an existing community; might adversely impact the environment; and/or might induce significant growth or concentration of population that might adversely impact the environment:

| Will the proposed project:  | Yes: | No: |
|---|------|-----|
| Create a new source of significant light or shadow which would adversely impact other properties?   |      | X   |
| Substantially degrade or obstruct any scenic view or vista now observed from public areas?  |      | X   |
| Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the Comprehensive Plan), which was adopted for the purpose of avoiding or mitigating environmental effect? |      | X   |
| Induce significant growth or concentration of a population that might adversely impact the environment?   |      | X   |
| Create a demand for additional community services (schools, police, recreational facilities, etc.)?   |      | X   |

**Overall Finding:**

Redevelopment of this large, important waterfront site as a higher density mixed use development is anticipated in the 2003 Anacostia Waterfront Framework Plan and the current Comprehensive Plan. In light of the Zoning Commission approval of the Stage 1 PUD for the redevelopment of this site in ZC Case 11-03, and in review of cumulative adverse impacts of Item 14, the Office of Planning concludes that the proposed project **will not** disrupt or divide the physical arrangement of an existing community that might adversely impact the environment; or induce significant growth or concentration of population that might adversely impact the environment.

JLS/jl



August 2, 2012

Ms. Toni Taylor  
DCRA, Permit Operations  
1100 4<sup>th</sup> St. SW  
Washington, DC 20024

Re: EISF Review BLRA#12-00472  
The Wharf: Southwest Waterfront

Dear Ms. Taylor,

The DC Water and Sewer Authority (DC Water) reviewed the EISF for this project as transmitted by the DC Department of Consumer and Regulatory Affairs on July 5, 2012. Currently, due to the magnitude of the proposed water and sewer replacement there will be significant excavation along Maine Ave. SW and intersecting roadways. This work will likely have significant impacts on traffic maintenance. The project also includes bulk heading along the Washington Channel and modifications to the storm sewers that currently outlet through the bulk head. This work will likely entail obtaining a permit from EPA. Water and sewer disruption to the surrounding community can also be anticipated. DC Water will work in conjunction with the developer and review this project, including review of the project plans for technical sufficiency of the water and sewer design. As appropriate, a temporary discharge permit maybe required for construction dewatering. If the plans are in conformance with the standard design manual and all fees have been paid, DC Water will issue a Water and Sewer Availability Certificate and recommend issuance of a building permit.

Sincerely,

Brian T. McDermott  
Director Permit Operations

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF PUBLIC WORKS



Solid Waste Management Administration

*Memorandum*

**To: Rabbiah Sabbakhan**  
Chief Code Official

**From: Tony Duckett**   
Associate Administrator SACD, DPW

**Subject: The Wharf: Southwest Waterfront Redevelopment 800 Main Ave SW –  
BLRA NO. 12-00472**

Date: November 13<sup>th</sup> 2012

**This project will not cause a negative environmental impact, provided that, project developers and owners are in compliance with applicable laws and regulations governing solid waste management during all phases of the project. District laws require that the property and the abutting public space be maintained free of litter, dust management, and debris daily, and that all solid waste be properly containerized and removed at sufficient frequency by a licensed solid waste collector.**

The Department would like to speak to the project manager.

Please call me with additional information if needed (202-645-3906).