

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Department of Energy and Environment



MEMORANDUM

TO: Anthony J. Hood
Chairman, DC Zoning Commission

FROM: Jay Wilson, DOEE
Green Building Program Analyst

DATE: October 16, 2017

SUBJECT: [Z.C. CASE NO.](#) 16-29 Application of Poplar Point RBBR, LLC at Howard Road, SE for a First-Stage Planned Unit Development and Zoning Map Amendment for Lots 97, 1025-1031, 1036, and 1037 in Square 5860 and Lot 91 in Square 5861

The District Department of Energy and Environment (DOEE) does not have comments to the applicant's height or setback requests, or for matters that will be fully addressed through any of DOEE's normal regulatory review processes. Rather, the comments contained herein address issues that the applicant should be made aware of in the early stages of design and entitlement. The items mentioned below are by no means comprehensive, but are a summary of specific items related to the site in question and some common issues that come up with many development projects. DOEE is always interested in meeting with developers and construction companies early in the development process in order to identify opportunities and to help avoid future regulatory problems.

DOEE recommends support and **approval** of the PUD application 16-29 for Poplar Point RBBR, LLC at Howard Road, SE. However, there remain several concerns that we recommend the Zoning Commission consider and ask the applicant to address as specific building plans and applications for Second Stage PUD are submitted:

The Applicant's pre-hearing submission outlines several environmental benefits addressed by the project, including minimum LEED v4 Gold certification for each of the buildings, transit-oriented development and strengthening of the connections to the Anacostia Metro Station, and compliance with the District's stormwater management regulations. While this is commendable and the submission demonstrates at a schematic level that the Applicant is on track for meeting the minimum environmental regulatory requirements, there remain some concerns with how the parcel addresses and is adjacent to potential development at Poplar Point, the integration of utilities, and overall resilience in light of increasing risks due to climate change. In addition, as Poplar Point is a particularly sensitive environmental area careful consideration should be given to the development of adjacent parcels to ensure access and preservation of this rich natural habitat. We feel that many of these issues can be addressed during the second-stage PUD application review process but would also like to raise these issues now for consideration.

Comprehensive policies related to preserving the natural environment:

Policy E-1.2.3: Retention of Environmentally Sensitive Areas as Open Space

Retain environmentally fragile areas such as wetlands and riparian areas along the Anacostia and Potomac Rivers as open space or parkland. In areas under federal jurisdiction... work with the National Park Service to conserve and carefully manage such areas, and to implement an effective "no net loss" policy.^{604.5}

Policy E-1.2.4: Identification, Protection, and Restoration of Wetlands

Identify and protect wetlands and riparian habitat on private and public land. Require official surveys when development is proposed in areas where wetlands are believed to be present to ensure that wetlands are preserved. Undertake wetlands restoration, enhancement, and creation projects to mitigate the impacts of stormwater runoff and improve plant and animal habitat.^{604.7}

Policy E-1.2.5: Wetland Buffers

Maintain open space buffers around existing and restored wetlands in order to reduce the likelihood of environmental degradation from urban runoff and human activities.^{604.8}

Policy E-1.5.1: Habitat Restoration

Encourage interagency efforts to restore native habitat along the District's rivers, streams, and woodlands, and public-private partnerships to recreate native habitat within the city.^{607.3}

Preservation of the natural environment:

- As the first project to be considered in this area, the project area is a component of the larger development which will engage and protect our natural resources at Poplar Point. The application references the Anacostia Waterfront Initiative development plan which anticipates an arch of development close to 295 and Suitland Parkway. Based on the AWI Plan, the vision is that additional development would occur north of their site. Therefore they are proposing that the north edge of their development to be an alley, turning its back to the existing wetlands. However, this arc of development north of the Howard

Road parcel is not a foregone conclusion and this area may include critical ecosystem functions such as species of local importance, critical aquifer recharge areas, fish and wildlife habitat conservation areas, or frequently-flooded areas and wetlands. DOEE sees numerous opportunities at Poplar Point from wetland restoration to green space access for the community. Therefore, the parcel directly north of the applicant site may remain natural with development focused on higher elevations closer to the point of Poplar Point and existing National Park Service offices.

- The current development proposal changes grades to bring the whole development site above the 500-year floodplain. While this improves the flood resilience of the site, it locates back-of-house function along the northern edge of the site and creates an alley condition with a 4'-6" retaining wall at that location. Attached is an exhibit from the applicant showing the section through their site with this change in elevation. If this adjacent site is developed, significant fill would be required so that new development could meet proposed north-south streets. If the site is not developed, the applicant should work closely with the District and the National Park Service to develop the appropriate slope and pedestrian entrance at the north end of streets between parcels A and B and between B and C.
- **DOEE recommends that the northern edge of the proposed development be reconsidered with the understanding that Poplar Point development may not occur directly north of this site and that an alley may not be the most appropriate treatment. In addition,**

Comprehensive policies related to stormwater management:

Policy E-3.1.1: Maximizing Permeable Surfaces

Encourage the use of permeable materials for parking lots, driveways, walkways, and other paved surfaces as a way to absorb stormwater and reduce urban runoff. ^{613.2}

Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff

Promote an increase in tree planting and landscaping to reduce stormwater runoff, including the expanded use of green roofs in new construction and adaptive reuse, and the application of tree and landscaping standards for parking lots and other large paved surfaces. ^{613.3}

Stormwater Management:

- The project is located in the Municipal Separate Storm Sewer System (MS4) sewershed. Stormwater management and reduction of run-off is critical to maintaining clean rivers and watersheds.
- A conceptual stormwater management plan was included with the submission. It indicates that the project will meet the regulatory requirements for retention and treatment mostly through the use of green roofs. Given the proximity to the Anacostia River and susceptibility to riverine flooding, the development team is especially encouraged to further refine this plan and generate additional retention volume, especially at grade, capturing stormwater volume up to a 1.7" storm event. Any stormwater retained

above the 1.2” volume would qualify the project for the District’s stormwater retention credit trading program.

- **Capturing a higher storm level volume will benefit the developer’s application by ensuring its’ commitment to the environment and providing needed relief from stormwater runoff. Hence, DOEE’s Watershed Protection Division (WPD) recommends the project capture a 1.7” rain storm event.**

Comprehensive policies related to building design, energy efficiency, and renewable energy:

Policy E-2.2.4: Alternative Energy Sources

Support the development and application of renewable energy technologies such as active, passive, and photovoltaic solar energy, fuelcells, and other sustainable sources. Such technology should be used to reduce the dependence on imported energy, provide opportunities for economic and community development, and benefit environmental quality. A key goal is the continued availability and access to unobstructed, direct sunlight for distributed-energy generators and passive-solar homes relying on the sun as a primary energy source. ^{610.6}

Policy E-3.2.1: Support for Green Building

Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities. ^{614.2}

Sustainable design and renewable efficiency:

As an application for first-stage PUD, a detailed analysis of the sustainable design and energy efficiency measures cannot be completed at this time. We strongly support the Applicant’s pre-hearing submission to certify the development under the LEED v4 rating system at the Gold level. DOEE will continue to work with the applicant to achieve high levels of building performance and to integrate renewable energy systems.

- As a building subject to the risks from climate change, the design should showcase best-in-class building design that reduces greenhouse gas emissions and increases the passive survivability of the building during power outages, including reducing energy use with a focus on the building envelop and passive ventilation systems, and incorporating solar photovoltaic technology and battery storage.
- Given the scale of the development, the site may be particularly suitable for district energy systems such as wastewater thermal, combined heating and power (CHP), solar plus battery storage, or fuel cells. Integration of such systems could help the project near net-zero energy performance, consistent with the goals of the Sustainable DC Plan.
- A critical goal of the Sustainable DC Plan is to increase the use of renewable energy to make up 50% of the District’s energy use. This is a major priority of the current District administration; as the Mayor signed legislation in the summer of 2016 to increase the District’s Renewable Portfolio Standard (RPS) to 50% with a local solar carve out of 5.0% by 2032. This legislation has produced significant potential benefits for the business

and development community as the District has the best financials for solar energy in the country.

Finance:

- Financial tools like the DC Property Assessed Clean Energy (DC PACE) program can pay for increases in construction cost for on-site generation, any strategies that increase efficiency above the baseline code requirements, or stormwater management strategies that garner return on investment through the District's Stormwater Retention Credit Trading program. This financing does not increase debt on the property and is repaid over time as a special assessment on the property tax. **DOEE recommends that the applicant investigate opportunities to take advantage of financial tools that would allow increased commitment to sustainability.**

CONCLUSION:

DOEE supports the applicant's commitment to sustainability and recommends support and approval of the application for first-stage PUD for 16-29 for Poplar Point RBBR, LLC with additional consideration of how the site integrate with the future Poplar Point development and preserved natural habitat areas. Redesign of the northern edge of the site to allow and encourage access could increase property value and desirability by DC residents and become a showcase project for the District.

LEGEND

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- SERVICE
- PARKING
- RETAIL

