

May 16, 2017

VIA IZIS AND HAND DELIVERY

Anthony Hood, Chairman
District of Columbia Zoning Commission
441 4th Street, NW
Suite 200-S
Washington, DC 20001

Re: **Z.C. Case No. 17-05: Application 2100 2nd Street, SW, LLC (“Applicant”)
for Review of a Building on Lot 10 in Square 613 (the “Property”)
- Pre-Hearing Submission**

Dear Chairman Hood and Members of the Commission:

On February 28, 2017, the Applicant submitted the above-referenced application for Design Review of a building located in the CG-5 Zone District. The proposed project will facilitate the redevelopment of the Property into a mixed-use residential building with ground floor retail along the Anacostia Waterfront (the “**Project**”). The Applicant would like to supplement the record with additional information in response to comments raised by the community and various government agencies regarding the Project.

I. Updates to Plans

The Applicant has continued working to refine the Project through numerous meetings with government agencies, including the Office of Planning (“**OP**”), District Department of Transportation (“**DDOT**”), and the Department of Energy and the Environment (“**DOEE**”). Based on this feedback, the Applicant has revised the Project to better connect to the Anacostia Riverwalk trail, to provide environmental, pedestrian-friendly streetscapes, and to ensure the Project is appropriately protected from flooding due to its proximity to the Anacostia River. A full set of updated plans is included with this submission as Exhibit A. The major changes to the project include (1) clarification of the scope of the work proposed; (2) modifying the design to accommodate the existing grade of the streets surrounding the Property; (3) updating the streetscape to comply with the Buzzard Point Streetscape Guidelines; (4) revising the design of

the Riverwalk Trail to be more resilient and natural along the edge of the river; and (5) providing small adjustments to the building architecture.

A. Scope of the Project

The Applicant has clarified that the scope of review for this application is limited to the instant property and its adjacent public space, as reflected on Sheet L12. Nevertheless, the Applicant continues to work with adjacent property owners, including the National Park Service (“NPS”), in an effort to coordinate the design of public spaces, including the extension of the Riverwalk Trail, streetscapes and general improvements to the Buzzard Point neighborhood and waterfront.

B. Flood Protection

The initial application was based on a proposal to raise the streets surrounding the Property out of the flood plain. The Applicant, however, has modified its proposal and it no longer requires raising the streets out of the flood plain. Rather, the Applicant is implementing flood protections at the base of the building to protect the residents, employees and visitors of the building.

Flood protection will be provided by means of a dry flood proofing method which consists of constructing a knee wall incorporated into the design of the façade flood proofed up to the enhanced Design Flood Elevation (DFE) of 12.7’ (DC Datum)/12.6’ (NAVD88) and providing removable flood shields (active barriers) at entries to the building which occur below DFE of 12.7’. Enhanced Design Flood Elevation is at the 100-year flood line plus two feet of vertical freeboard which is six inches higher than the current DOEE requirement for the AE flood zone described on page F1 of Appendix C of Exhibit A.

The knee wall will be constructed out of flood damage resistant materials per guidelines described in FEMA’s Technical Bulletin 2 “*Flood Damage-Resistant Materials Requirements*”. Sump pumps will be provided to handle inevitable seepage. Please refer to pages F4 through F9 of the Plans for information on the basis of design typical removable flood shields planned to be used for this project.

As part of the flood protection strategy, the Applicant will provide a Flood Emergency Operation Plan, and Inspection and Maintenance Plan. The Flood Emergency Operation Plan will provide a chain of command and responsibility with leadership responsibilities clearly defined for all aspects of the plan, procedures for notification of necessary parties, a list of specific duties assigned to personnel, storage location of materials necessary to properly install all floodproofing components, the method of installation, evacuation plan for all personnel, and an annual training and exercise program to keep personnel aware of their duties. The flood emergency plan will be posted in at least two conspicuous locations within the structure, with conceptual locations identified on page F10 of the plans. Flood warning time shall be a minimum of 12 hours. Provisions will be made for the evacuation of all occupants before the building is isolated by flood waters. For a case where some occupants who do not evacuate prior to the onset

of flooding, a dry flood proofed refuge area has been designated outside of the structure. This area will follow the same dry floodproofing method and is allocated on page F10 of the plans. Standing space of the refuge area can accommodate 920 occupants (standing room) excluding 10% of that area which has been allocated for circulation. Occupancy calculations used follow method for calculating standing space for assembly areas per IBC 2012, Table 1004.1.2 *Maximum floor area allowances per occupant.*

The Applicant will continue to work with DOEE staff to ensure that Flood Emergency Operation Plan does not conflict with other emergency plans for the area.

In addition, the Inspection and Maintenance Plan will be provided to include maintenance and inspection of the mechanical equipment of sump pumps and generators, flood shields and closures, walls and penetrations for cracks and potential leaks, and any berms that might have excessive vegetative growth.

Finally, as part of the flood protection strategy, the Applicant will seek a code modification to change the building's designation from residential to mixed-use, as defined by FEMA. This will allow for existing below grade parking levels which are located below the Base Flood Elevation. The requested code modification will follow requirements per DCRA Administrative Bulletin CC2016-02, *Special Hazard Areas; Garages below the base flood elevation in buildings or structures with residential occupancies; Permits; and Code Modification Applications.* The Applicant will provide all necessary FEMA forms to DOEE at various stages of design, permitting and construction, including FEMA Floodproofing Certificate (FEMA Form 81-65) and FEMA Elevation Certificate (FEMA Form 81-31).

C. Streetscape Design

The Applicant has modified the streetscape of 1st, 2nd, and V Streets since the initial application based on feedback from OP, DDOT, and DOEE. The Applicant, as shown on pages L12 through L22 of the plans, is showing the DDOT-requested width and materials for abutting sidewalks and driving lanes. It is also showing DDOT standard landscaping for the streetscape improvements. These improvements include significant plantings along V, 1st, and 2nd Streets, café seating and interim plantings on 1st Street. The Applicant will also provide the 2nd Street Cycle Track between the waterfront and V Street, a Capital Bikeshare station, and a pedestrian connection to the Bikeshare station. Finally, the Applicant will provide a concrete foundation for a bus stop along V Street.

The Applicant has also revised the proposed curb cuts to further improve the pedestrian experience: it reduced the width of the 1st Street curb cut from 24 feet to 20 feet and increased the pedestrian refuge area on 2nd Street between the parking and south loading facilities from 6 feet to 14 feet. The Applicant will also install a mountable curb along the edge of the 2nd Street Cycle Track to manage interaction between 50-foot trucks (restricted to the northern loading curb on 2nd Street) and cyclists within the cycle track, per DDOT's request. An updated loading management plan is attached as Exhibit B; also attached as Exhibit C are updated truck maneuvering diagrams.

Finally, the Applicant has increased the amount of permeable area within the streetscape to help with flood mitigation and storm water management. This approach includes incorporating more plantings than required by other District guidelines and standards, providing larger planters than required, and installing bio-filtration riparian gardens at the end of 2nd Street. These significant improvements to the streetscape provide an environmental, attractive, and pedestrian and cycling-friendly interaction at the Project.

D. Riverwalk Design

The attached plans reflect an updated riverfront design, which reduces the amount of hardscape and introduces more natural features. This “natural edge” balances the desire to create a natural buffer along the water’s edge with opportunities for human interaction along the waterfront. The Applicant has overlaid the 25 foot natural buffer with passive recreation opportunities such as a sundeck and oyster shell path. These spaces are framed with native plants and grasses that enhance the experience. The riverfront design introduces additional softscape elements that improve stormwater management, including bio-retention zones and a floodable forest, providing scenic opportunities along the Riverwalk Trail. See Sheets L13, L15, L16, L17, L21 and L22.

The Property is uniquely positioned adjacent to NPS property and, as such, coordination with NPS will be imperative in creating a seamless experience along the Riverwalk Trail. The Applicant has engaged NPS over the past eight months to discuss points of synergy between the properties and to keep NPS apprised of the Applicant’s proposal. The Applicant will continue its dialogue with NPS as it moves forward to establish a cohesive waterfront design.

E. Architectural Updates

The Applicant has made slight modifications to the building’s architecture, as shown on the plans in Exhibit A. First, the Applicant removed the metal screens, which were previously shown on the west façade, to minimize the materials along the 2nd Street façade. Additionally, the Applicant has removed the hedge planters at the perimeter of the penthouse in response to comments from government agencies. Finally, the Applicant has added a raised pool and tree planters on the rooftop terrace as tenant amenities. All of the rooftop items are set back at a 1:1 ratio or more.

The plans included in Exhibit A provide additional details regarding the Project, including the mix of residential units, the Inclusionary Zoning units provided at the Project (discussed further below), and a detailed signage plan.

II. Requested Relief

The Applicant is modifying its requested relief from the penthouse height requirement for mechanical equipment. As detailed in the initial application, the Applicant requested relief from the penthouse mechanical height limitation of 15 feet for (1) the elevator overrides, (2) trash chutes, and (3) stair pressurization fans. Based on feedback from OP, the Applicant has revised

this request to eliminate the need for height relief for the trash chutes and the stair pressurization fans. The Applicant, however, continues to request penthouse mechanical height relief for the elevator overrides. In order to provide accessible access to the penthouse, the Applicant must bring the elevators to the roof of the building. Based on the size of the existing building, the height of the elevator override to access the roof is not possible to accommodate within 15 feet. The Applicant has spoken with numerous elevator consultants, and there have been no elevator override options that could be accommodated within the required 15 feet, as shown on pages A49 and A50 of the plans. The proposed elevator override height exceeds the 15 feet of allowed penthouse mechanical height by 2.5 feet. All elevator overrides are set back by at least a 1:1 ratio. Therefore, the Applicant continues to request relief from the penthouse mechanical height limitation for the elevator override only.

The Applicant continues to request relief from the drive aisle width requirement for the parking garage due to the existing column structure of the building, as detailed in the initial application.

III. Flexibility

The Applicant requests the following flexibility with the approval:

- (a) To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, mechanical rooms, and toilet rooms, provided that the variations do not change the exterior configuration or appearance of the structure;
- (b) To provide a range in the number of residential units plus or minus 10% from the number depicted on the plans and in this statement;
- (c) To provide a range in the number of vehicular parking spaces plus or minus 10% from the number depicted on the plans and in this statement;
- (d) To vary the final selection of the color of the exterior materials based on availability at the time of construction so long as it remains within the color range proposed;
- (e) To continue coordination of the streetscape design with DDOT during the public space process;
- (f) To modify the number and location of retail entrances, based on the number of tenants ultimately secured for the retail space;

- (g) To make minor refinements to exterior details and dimensions, including balcony enclosures, belt courses, sills, bases, cornices, railings and trim, or any other changes to comply with Construction Codes or that are otherwise necessary to obtain a final building permit, or to address the structural, mechanical, or operational needs of the building uses or systems;

IV. Community Engagement

The Applicant has engaged with the community regarding the Project throughout the process. The Applicant met with the ANC Commissioners at two administrative meetings – one on March 6, 2017, and the second on March 28, 2017. The Applicant also presented to two full ANC meetings – one on April 3, 2017, where the ANC voted to support the Public Space application for the curb cuts at the Project, and one on May 8, 2017, where the ANC voted unanimously to support the Design Review application before the Zoning Commission.

The Applicant revised the Project substantially in response to community concerns. The primary community concerns for the project related to (1) affordable housing; (2) pet relief area; and (3) neighborhood-serving retail. Regarding affordable housing, the Applicant originally proposed paying into the Housing Affordable Trust Fund in lieu of providing affordable units at the project. However, the Applicant is now providing affordable units on site, with a total of approximately 5,850 square feet of affordable housing within the Project. Approximately 3,200 square feet, which is approximately eight percent of the residential penthouse space, is required to be set aside at 50% of the Area Median Income (“AMI”). Additionally, the applicant is setting aside approximately 2,650 square feet, which is approximately eight percent of “bump out” space at the building, at 60% of the AMI.

Regarding a pet relief area, the Applicant is proposing two pet relief areas as part of the Project - one inside the building at the Garage Level (as shown on page A20 of the plans) and one exterior to the building on First Street (as shown on page A19 of the plans). Although the Applicant is addressing this issue on-site for its residents, the Applicant will continue to work with other Buzzard Point developers with the goal of developing a coordinated and comprehensive response to this issue as development continues in the neighborhood.

Finally, the Applicant has responded to the ANC’s interest in expanding neighborhood-serving retail. The Applicant is proposing two separate retail zones within the project: one along V Street and one along the river. The retail spaces along the river are ideal spaces for restaurants since they can provide outdoor seating to enjoy the waterfront views. The retail spaces along V Street are ideal for neighborhood serving retail spaces, and the Applicant is actively pursuing a number of neighborhood serving retailers such as a food market, coffee shop and pharmacy. Depending on the retailers that are ultimately secured, this space could be dedicated entirely to a market or be broken up into four smaller, distinct retail spaces. The Applicant recognizes that in order to make this building attractive to potential tenants, residents must have convenient access to the day-to-day goods and services.

By revising the application to address the ANC's and the broader community's concerns for development of the Buzzard Point area, the Applicant has improved the Project to enable the development of a stronger community. Due to these changes, at its May 8th meeting, the ANC voted unanimously in support of the application.

V. Resumes and Outlines of Testimony

Four witnesses will testify on behalf of the Applicant at the hearing: David Orr on behalf of the ownership team; Yulia Beltikova, the project architect; Claire Agre, the landscape architect; and Amelia Martin and Jami Milanovich, the transportation engineers. Each of these witnesses except the Applicant's representative is being offered as an expert in their respective fields, and their resumes are attached as Exhibit D for reference. Outlines of the testimony for each witness are also attached as Exhibit E. The Applicant anticipates needing 55 minutes for its presentation.

VI. Conclusion

The Applicant believes it has made positive changes to the project and it looks forward to continuing its dialogue with the many stakeholders, including government agencies and the community. The Applicant looks forward to presenting to the Commission at the public hearing on June 5, 2017.

Sincerely,



Christine A. Roddy



Meghan Hottel-Cox

Enclosures

Certificate of Service


I certify that on May 17, 2017, I will deliver a copy of the foregoing document via hand delivery or first class mail to the addresses listed below.

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