

## MEMORANDUM

**TO:** District of Columbia Zoning Commission

**FROM:** Andy Litsky, Chairman  
Advisory Commission 6D,  
Southwest, Navy Yard & Buzzard Point

**DATE:** November 21, 2016

**SUBJECT:** ANC REPORT, ZC CASE NO. 16-02, Consolidated PUD for DC United Stadium LLC

## SUMMARY

ANC 6D has generally supported the notion of a DC United Soccer Stadium on Buzzard Point contingent upon a clearly defined and unambiguous transportation plan, that it enhanced the existing residential neighborhoods not only to the East but also to the North and, and made a strong contribution to the well-being of all the adjacent communities. However, we find that few if any of those contingencies have been met.

Accordingly, at a duly noticed meeting of ANC-6D, held on October 17, 2016, at which a quorum was present (a quorum being four Commissioners), and by a vote of 7 - 0 - 0, the Commission opposed the approval of the DC United Consolidated PUD until numerous issues as stated our resolution (Exhibit 29) were sufficiently addressed by the Applicant and District Departments in coordination with the ANC and the Community.

While the ANC is pleased with a number of adjustments that the Applicant has made to the PUD as a result of our initial objections – namely significantly improved use of the previously ill-defined plans for the adjacent site and green space which had only a one or two year lifespan at best, and enhanced activation and incorporation of retail and commercial spaces on the eastern edge of the stadium -- the ANC continues to withhold its approval until a revised PUD adequately addresses continued concerns stated in this report that specifically address issues of transportation, environment and lack of attention to the needs of the adjacent neighborhoods. We urge that the DC Zoning Commission and the relevant District Agencies – in particular, Office of Planning, Department of Transportation, Department of Health, Department of Public Works, Department of General Services, Department of the Environment – and the members of the Council of the District of Columbia give these concerns great weight.

## TRANSPORTATION

This ANC-6D Report to Zoning continues to express strong concerns about vehicular, bicycle and pedestrian routing and access, parking insufficiency, proximity of the stadium to mass transit and lack of

planning thereto, a review of faulty assumptions and contradictions, ill defined planning to direct patrons to the site, inappropriate access and egress through local streets to the East, North and West, insufficient plan for alternative and mass transportation (including Uber/Lyft), lack of binding and written LOIs regarding access to parking facilities as well as binding LOIs prohibiting contemporaneous scheduling of events in or adjacent to Nationals' Park and the proposed DC United Stadium.

ANC-6D believes that the DC United PUD must be reviewed and evaluated in the context of the larger Buzzard Point discussion especially whereas the SW Small Area Plan, which enjoyed widespread community support and Council review, avoided virtually any discussion of Buzzard Point and consequent supervisory discussion by the Council. Therefore, the DC United PUD both stands alone as an independent PUD but as also the predicate of a larger Buzzard Point Vision Framework, to which ANC-6D has expressed extremely strong, point-by-point objections and to which after seven months the Office of Planning has provided neither acknowledgement nor a response. Consequently, ANC-6D addresses this PUD independently but also contextualizes the DC United Stadium Plan within the so called Buzzard Point "Vision Framework."

ANC-6D vigorously disputes the contention of the OP Final Report on this PUD that the Buzzard Point Vision Plan states on p. 17 that "revitalization is consistent with the aspirations with the aspirations and needs of nearby residents and the city as a whole with a focus on roads and public spaces." In direct contravention of that assertion, ANC-6D has consistently expressed strong, point-by-point objections to the Buzzard Point Vision Framework as did more than 140 Southwest residents who attended a special meeting last winter with OP and DDOT to go over the plan. Not only were many questions left unanswered, but in the preceding seven months neither DDOT *nor* the Office of Planning have provided acknowledgement any response to our ANC concerns. Indeed, as their "vision" is aspirational -- at least in this aspect -- so is their willingness to address and respond to direct criticism.

This ANC-6D Report to Zoning on this matter includes our on-going concerns about vehicular, bicycle and pedestrian routing and access, parking insufficiency, a review of faulty assumptions, inappropriate use of local streets, lack of binding agreements relating to access to adequate parking as well as written agreements that outlaw contemporaneous scheduling of events in or adjacent to Nationals' Park and the proposed DC United Stadium.

ANC-6D continues to assert there exists no reliable Transportation Plan for the Stadium & Buzzard Point. DC United's transportation plan is not informed by and/or directly contradicts a number of transportation proposals advanced by DDOT, team consultants, Office of Planning (each of which is currently in the Case File), and most specifically, the Buzzard Point Vision Plan which purports to present Half Street as the "Transportation Spine of Buzzard Point." In addition, and in answer to specific questions about the current Buzzard Point Plan, we have also heard statements quotes made in public meetings from both the Directors of Transportation and the Office of Planning that contradict the recommendations of their own departments in this matter.

**Southeast-Southwest Special Events Study**, Final Presentation on March 6, 2014 made a number of disturbing assertions in their “Project End Game” portion of the report that runs directly counter to DDOT’s own claims about what is necessary to make this stadium work.

That report states (underlining is by ANC-6D to highlight those sentences):

“Transit System Needs: One of DDOT’s main goals for the District is to increase the use of reliable and convenient transit modes. The roadway capacity is constrained, and there are very limited opportunities to add capacity to the network. As such, it is critical for the entire area that reliable and convenient transit options are available. **One major improvement needed in the transit system is the implementation of a North-South Streetcar line that could provide transit service into Buzzard Point, allowing for direct transit access to the Soccer Stadium.** If the North-South Streetcar is delayed or does not go south of M Street, the implications could be a lower transit share, since the only option for rail transit is the Green Line (Waterfront, Navy Yard-Ballpark, or Anacostia). Walking distances from the Green Line Metro stations to the Soccer Stadium are close to a mile and beyond what is considered “walkable.” To ensure the target transit share of 45 percent or higher can be achieved, it is critical that the streetcar to Buzzard Point be implemented.”

#### “5.6 Transit Improvements

Transit service to Buzzard Point is currently provided by two modes: Metrorail and bus. The Metro Green Line would carry the largest proportion of transit trips to the special events, either to Nationals Park or the D.C. United Stadium. As described in Chapter 3, WMATA operates several Metrobus service lines that pass along M Street and South Capitol Street and into Buzzard Point to P Street on the 74 bus route. **The Study assumed the development of the North-South Streetcar line providing service into Buzzard Point. It was assumed that the streetcar service operated at a ten-minute headway, providing a total capacity of 960 passengers per hour.**”

ANC-6D questions the value of much of the contents of the study itself since it directly states that its entirety is predicated upon the development of a North-South Streetcar providing service into Buzzard Point. We now know that a streetcar is no longer planned for this site.

ANC-6D also questions the mitigation measures proposed by Gorove Slade that “DC United stadium, situated near major transportation facilities, has the potential to have a quality transportation experience on game days” that they proposed on July 17, 2014. ANC-6D expects that during the intervening 24 months DDOT, Gorove Slade and DC United should have moved the ball beyond simply “potential.” More precise plans *should* have emerged – in writing, not just in intent. ANC-6D insists that the Applicant and DDOT must stop kicking the can down the road when it comes to transportation planning for this site. ANC-6D expects that the Zoning Commission require that transportation details should emerge significantly prior to when the stadium becomes close to operational. Waiting for details in a Transportation Management Plan is, at best, a poor way to proceed. ANC-6D requests that the Commission require more details on how this stadium will operate.

**The M Street SE/SW Transportation Plan** section in DDOT’s report on this PUD admits that “it did not fully envision the implications of entertainment and events uses within the M Street SE/SW study area.” The ANC-6D has significant on-going concerns regarding access and egress for emergency vehicles and personnel to this tiny peninsula located on the most geographically isolated section of the District of Columbia with Fort McNair to the West and the Anacostia to the South and East, and upon which Office

of Planning envisions, in addition to a soccer stadium with 19,000 seats, the inclusion of 6,000 units of housing – equal to the amount of housing now in existing new Southwest. The District has not put plans in place should such limited roadways be foreclosed by natural or other disaster. ANC -6D strongly suggests that the Zoning Commission make such planning compulsory pre-decision.

Our Commission is insistent that identified mitigation measures are necessary to reduce the impact the stadium has on the surrounding neighborhood. Guiding spectators to efficient routes for various modes must be incorporated with the plan *prior* to construction. ANC-6D notes on p. 18 of DDOT's Report that although "they aim to provide a safe and efficient roadway network" that they acknowledge that the Applicant shows 18 intersections within the study area are expected to be significantly impacted. A large portion of residential Southwest is comprised of superblocks a number of which border on Fourth Street Southwest. There is only one way in and one way out for the residents in thousands of units along Fourth Street south of M. The impact of failing intersections is not sustainable under any circumstances. But with an aging population – and with some housing complexes approaching NORC (Naturally Occurring Retirement Community) status -- that increasingly depend upon EMS services that is simply contrary to acting in the interests of public safety. The ANC insists that the Applicant develop a more effective plan for Fourth Street, SW. We cannot simply allow the mention of such a problem in the DDOT report go forward without further comment and without insistence on a resolution.

ANC-6D is further concerned that the last time that Fourth Street, SW was addressed as the subject of a traffic study by DDOT was in March, 2003. That was prior to the redevelopment of the old Waterside Mall, prior to an award of redevelopment rights at The Wharf, and a full year prior to site selection for a new baseball stadium, let alone one for DC United. The transportation weaknesses inherent along Fourth Street, South of M cannot continue to be addressed peripherally by allowing DDOT and transportation consultants to cobble together portions of an array of old traffic studies undertaken on behalf of various developers and picking out those portions of what they choose to fold into a "new" study to buttress the ideas that they want to support. The time has come to call them out on this in writing and on the record.

It is also remarkable is that the Buzzard Point Vision Plan -- although still in draft after nearly a year, yet held up as one of the foundations upon which the DC United Stadium is based -- speaks boldly (although irrationally) about how Half Street will be "The Transportation Spine of Buzzard Point" yet neither the Applicant, nor DDOT, nor OP bothers to raise that point in their reports. How peculiar. It is also odd that of the 18 intersections not expected to be significantly impacted not once is Half Street, even mentioned. It is as though each of the proponents are happy to recognize Half Street once it emerges *below* P Street, but none care to acknowledge precisely how cars magically arrive at those coordinates.

ANC-6D contends that there is a reason for that. If you divert their attention, perhaps no one will point out the inconstancy. Frankly, our Commission that it is simply a callous disregard for the population living North of P Street and South of M between Second and South Capitol Streets, SW. How else could the Office of Planning allow a report to be published that shows "the new" Half Street as a transportation solution when DPW leaders tell us that "the now" Half Street is not even wide enough to tow illegally parked cars during Nationals games?

When ANC-6D and Southwest Neighborhood Assembly co-sponsored a July 18, 2016 meeting at Arena Stage to discuss transportation issues in Southwest 175 people attended in addition to Directors Dormsjo, Shaw, and top officials from DPW and the First District Commander. When confronted with

this Half Street dichotomy and shown pictures demonstrating the extreme difference between what is planned and what exists now, Director Dormsjo noted the dramatic difference but had no explanation. OP Director Shaw simply smiled at the photographs and stated that he could not account for the dramatic differences other than to say, "My employees are .... visionaries."

Perhaps this blue smoke and mirrors approach to Half Street is because the residents are largely economically disadvantaged. This approach would *never* be pulled in a community that held some modicum of political power. ANC believes that there is intent behind the Buzzard Point Plan that presumes forced removal of housing in order to construct this stadium and the remainder of Buzzard Point. ANC-6D is universally opposed to the imposition of eminent domain in order to construct this stadium **or** provide transportation access to Buzzard Point. However, when making direct inquiries to the top leadership of DDOT and OP, none would go on the record to confirm that the transportation recommendations within The Buzzard Point Plan presumed a de facto plan to remove any existing housing. Our Commission strongly urges the members of the Zoning Commission to clarify the intent of this Administration before moving forward and embracing the aspects of the Buzzard Point Plan put forward by the Applicant, DDOT and OP.

ANC-6D has long contended that operating two large stadiums half a mile apart from each other require much more than simple attestation by the Applicant that everything is in order. ANC is in agreement with the DDOT report that requests additional levels of commitment and detail to ensure that contemporaneously scheduled events do not occur at both stadiums. Are there letters of agreement/commitment between the Nationals and DC United? Are there letters of agreement/commitment between MLB and MLS? The Zoning Commission must insist that they be produced. This cannot wait for a TOPP. They must be provided now and not wait for a TOPP.

Parking insufficiency is a critical challenge to the success of this PUD, particularly since this 19,000 seat stadium is built with no public parking. ANC-6D is encouraged by plans to have the majority of patrons take public transport, walk or bike but this also requires the firm commitment and expectation that there will be sufficient parking spaces provided off site for DC United to properly operate. Over the course of time, the Applicant has produced maps illustrating where agreements exist for 3,900 off-site parking spaces. At present, Applicant claims that they have 3,750 spots, but there is a question fungibility since no LOIs have been presented to back up that claim. This became particularly apparent after we last questioned The Nationals in early October about agreements that DC United claimed to have for access to parking at two venues owned by the Lerners. Nationals officials informed us at that time such agreements did not exist.

ANC-6D encourages the Zoning Commission to require that Applicant to produced signed LOIs for each of the lots where DC United has assured us that such agreements exist so that we all can be quite clear about the amount of DC United parking that will be actually be available on opening day, how long those agreements will be in effect, how long those street grade lots where agreements may exist are anticipated to remain unbuilt and which, if any, of the LOIs they have included in that count may have flipped from office to residential. We recognize that these agreements will require constant negotiation over time, because circumstances change. But it is incumbent upon Zoning Commission to ensure that what is presented as fact now is, indeed, fact. This data cannot wait for a TOPP.

ANC-6D is has called out from the beginning of this discussion the lack of a specific plan for curbside management to ensure accessible drop-off and pick-ups, taxis, charter bus and especially Uber/Lyft and other hired vehicles which do not have the same regulatory constraints. Curbside space in the area is

severely limited and we are depending upon the Zoning Commission to instruct the Applicant that these accommodations must not impact the adjacent neighborhood. No plan assures that they will. The Applicant contends that this can be addressed by the TOPP. We disagree. Indeed, in the “Roadway Configuration and Curbside Management” chart produced on September 16, 2016, the Applicant shows no fixed plan, but a series of maybes. While signage decisions and wayfinding may be delayed to a TOPP, the precise areas for hired vehicles must be planned ahead of time, not left to be filled in at a later date – especially since there will be great numbers of patrons who will find it easier to call for private carriage than cram onto the Green Line and walk ¾ of a mile to the stadium.

ANC-6D is also unconvinced that in the levels of support that the Applicant is providing for bike valet is sufficient. We believe that many more DC United patrons will choose to bike to this stadium than to the Nationals because it is ¾ of a mile away from public transit. We also agree with DDOTs suggestion that the Applicant ought to fund the capitol costs and one year of operations for a Capital Bikeshare location adjacent to the stadium. The Applicant should fully commit to covering all costs associated with bikeshare corrals.

ANC-6D remains unconvinced that either the Applicant or the City has made specific overtures to Metro to encourage additional bus service in the area. The 74 bus line runs along P Street but does not connect the stadium to either the Navy Yard or Waterfront Metro stations. Regardless of intent, with Metro’s great difficulties we believe that the 74 bus is not at the top of their “to-do” list. Providing a plan to resolve transportation options from the Green Line into Buzzard Point cannot wait, as DDOT suggests in their report, for the TOPP. This is critical. If it can’t be done, we must know that now.

Moreover, ANC-6D vigorously disputes the contention on p. 26 of the DDOT report where they present a gibberish response to our continued requests for answers about their promised return of the Circulator to Southwest. Yes, indeed it *was* promised to return in 2017. However, as in July’s Transportation meeting at Arena Stage, Director Dormsjo made it clear that this was not going to happen for a number of reasons. We appreciate his honesty. We wish that his staff would similarly level with the ANC, the Southwest Community – and this Zoning Commission.

ANC-6D is also concerned that the Community Benefits Agreement provides allocated funding for purchasing busses to specifically reinstate the North/South route from Southwest to the Convention Center. But it appears that DDOT has already discounted that significant benefit because of the existing 74 bus over which they have no control. The benefit was promised in the CBA. ANC-6D expects that will be adhered to.

## **ENVIRONMENT**

The cascading impact of the construction and eventual operation of the DC United Stadium to the communities to the north are palpable in areas other than transportation. And none of those issues is more contentious than those related to environmental safety.

ANC-6D recognizes that the near Buzzard’s Point residential community is a close knit neighborhood currently facing definite health consequences as a result of the excavation and remediation of the soccer stadium site. Although a great deal of preliminary work has been on-going for months to prepare this extraordinarily contaminated site for future development, including tearing down and removal of structures that contained asbestos and other hazardous materials, little or no effort has been directed

toward preparing community residents to deal with the enormous environmental impact that the removal of all of the chemicals and contaminants may have on their health. Significant vapor contamination from dust, gases and fumes is inevitable on site since the clean-up plan includes removal of such contaminated soil both on and below the surface.

ANC-6D is extremely distressed with the paucity of information contained in the report of the Department of Energy and Environment in this case. DDOE reviews PUDS for environmental issues that the Applicant needs to be aware of during early stages of planning, as well as to identify opportunities for increasing environmental and urban sustainability benefits during development. As such, our ANC had presumed that DOEE would have provided significant guidance to the Zoning Commission about what is widely acknowledged to be the most environmentally degraded building site in the entire District of Columbia – and one which barely escapes declaration as a brownfield. What they provided instead were four paragraphs on Greenbuilding & Renewable Energy, and three paragraphs each on Stormwater Management, Air Quality and Resilience and Flood Preparedness. There are no words.

ANC-6D believes that DOEE should have prepared a report to assess how they expect the Applicant will operate in coordination with the District, nearby Buzzard Point residents and other stakeholders together in a timely manner to prevent, assess, safely clean up and sustainably use this portion of Buzzard Point to achieve greater economic development. They missed that opportunity. That is not to say that they have not been active, for they have. They just refuse to put anything in writing. For the better part of a year, ANC-6D has attended meeting after meeting – most held at our insistence – to plead with the Applicant, their consultants, DOEE and other District Agencies to acknowledge the severity of the levels of toxicity on site and to encourage them to **put in writing** plans to address these exigencies.

Consequently, ANC-6D is putting on the record what we believe ought to have been included in the DDOE report to ensure that this most environmentally contaminated site is properly perceived, addressed, and managed throughout remediation and construction of DC United Stadium. The vulnerability of the near Buzzard Point residential community is fully explained in the health risk assessment that the DC Department of Health prepared called the Community Health and Safety Study (CHASS). CHASS is a risk assessment that was done because of the community concerns brought forward by ANC-6D to DOH, DMPED and DOEE about the overall health impact that the construction of the soccer stadium and other major construction projects ( i.e. Pepco Waterfront Substation and the new South Capitol Street Bridge) would have on the residents who live near Buzzard Point.

The timing of these major projects combined with the vulnerability of the near Buzzard Point community and fact that the residents are already being negatively affected by Buzzard Point contaminants may lead to unforeseen and detrimental health and quality of life challenges that may forever damage and threaten the continued existence of these low-moderate income residents. The CHASS is the first risk assessment ever done in the District of Columbia focusing on a community prior to the construction of a major project. It has no mechanism or funding to implement any of the recommendations. It also has no one assigned from DOH to ensure that the recommendations are even implemented. But it does

make clear recommendations that ANC-6D hopes will be fully embraced and carried out by the District of Columbia and by the Applicant for this project and on others on Buzzard Point going forward. ANC-6D is entering the CHASS document in the Case File as a "Supplement A" to our own Report. We expect that its contents and recommendations will be viewed as those of ANC-6D.

ANC-6D believes that Best Management Practices Plan needs to be adopted to protect the health, safety and well-being of all individuals who will be exposed to construction on the DC United Stadium Site and who live near Buzzard's Point including community members and construction workers.

The plan should include but not be limited to the following:

- Full implementation of all 5 recommendations by DOH in CHASS risk assessment.
- Air quality monitoring done at the site and within the community to ensure that no chemicals/contaminants travel from the site through dust or vapor intrusion.
- Posting flag people and barricades to prevent trucks from deviating from approved truck routes and thus traveling through community with contaminated soil.
- Multiple truck washing stations and decontamination areas on-site to inspect trucks and ensure that no chemicals are carried on their tires and that truck beds are sealed completely with special material to prevent chemicals from seeping out onto the roads and highways.
- Utilization of sealed containers and water transportation for any chemicals that are removed that pose a danger to human health including those in high concentrations that can be inhaled, such as benzo(a)pyrene and arsenic.
- Sealing off of seriously hazardous portions of the site (such as the former Salvage Yard with tents that would keep airborne dust trapped within and prevent community exposure during excavation and remediation.
- A significant lowering of the threshold for acceptable risk to take into account the vulnerability of the near Buzzard's Point community as defined in the CHASS risk assessment conducted by DOH on the near Buzzard's Point community.
- A prohibition of overnight construction permits during the voluntary clean-up phase of the project to ensure that the highest standards and precautions are carried out with necessary visibility during the day.
- A halt of all construction activities for extended periods if air quality levels exceed adjusted necessary threshold for a community exposed to Brownfield's as in the case of the near Buzzard's Point residential community.
- A halt of all construction activities if community health monitoring shows an increase in or occurrence of health consequences that can be directed to of the voluntary clean-up.
- A consistent health monitoring plan for the residential nearby residential community throughout the voluntary clean-up and construction of the stadium by a Federally Qualified Health Center serving under the guidance of the CDC and DOH.
- Placement of silk fencing/netting around the entire site with the proper monitoring of the fencing to capture contaminants coming off site through dust.



- A phone number at DOH for near Buzzard Point residents to report health concerns/problems during the voluntary clean-up.
- Temporary relocation help for residents who experience reoccurring health consequences, such as frequent asthma attacks during the clean-up process.
- Hand health monitoring in addition to stationary monitoring around the site and in the community to take place several times a day and consistently throughout the voluntary clean-up on a daily basis and as long as construction occurs at the site.
- Hiring of a health advocate to assist with the monitoring and serve as a community liaison to ensure best management practices are carried out during the voluntary clean-up.
- Emergency training program to teach to inform workers of job hazards and instruct them about general work practices. The training should also provide translation services for non-English speaking workers.
- Proper precautions training and protective equipment and gear must be provided to every construction worker including the option for them to undergo health monitoring while working to assist with clean-up. The training should also provide translation services for non-English speaking workers.
- Placement of an on-site safety officer to monitor all on-site activities and makes sure that all steps in the Best Management Practices Plan is carried out. This officer should be a certified industrial hygienist specializing in contamination exposure risk reduction and be independent of the construction companies working on the remediation and construction of site.
- On site safety coordination would also coordinate community meetings with D.C. United to keep the community up-dated about the on-site and offsite safety plan.
- Restricting on-site vehicles to prevent spreading toxic contamination beyond site.
- Preparation of a temporary evacuation plan for residents that will allow them to leave in the event of an accident or contamination spill.
- Indoor air monitoring of Q Street residential corridor including units along First & Q Street and 2nd & Q Street (closest residents) to monitor for vapor intrusion and in-door air contamination from any dust or vapors generated from the site.
- Real time air monitoring of entire site that can be accessed by residents through internet and a digital display in the community.
- Regular air quality monitoring reports provided to the ANC on a weekly basis and communicated by the health advocate.
- Information on where the contaminated soil from the soccer stadium site will be trucked and written assurance that the proper precautions will be taken to protect the community that lives where the soil will be unloaded to be cleaned or permanently disposed.
- A cap on the number of trucks that can transport contaminated soil in a given day during clean-up to make sure that the proper precaution are taken with each vehicle and that no requirements for safety are overlooked by workers or supervisors.
- A pause in the voluntary clean-up effort until a plan to implement the above steps and other recommendations and requests by ANC are implemented through written agreement developed

through an MOU to protect the community from getting sick and dying from toxic chemical exposure over the years from the soccer stadium site.

ANC-6D also requests that the District of Columbia and the Applicant halt the Voluntary Cleanup of the proposed stadium site, slated to begin on December 1<sup>st</sup>, until we are assured that these efforts meet best management practices and the requirements outlined in the environmental concerns described in the recent study Community Health and Safety Study (CHASS) conducted by the DC Department of Health [attachment A to this report] that makes the following recommendations:

- Improved program coordination to include all project components and construction projects to minimize impacts upon the surrounding community.
- Enhanced community engagement and notification with respect to program and project developments through regularly scheduled public meetings.
- Provision of proactive development, prevention and control measures as well as a written plan to enforce policies and regulations for dust control.
- Creation of on-going field monitoring of soil, water and air quality by an independent entity.

Further,

- ANC-6D recommends that there be a written agreement with DC DOH requiring them to monitor the health status of residents living adjacent to the stadium throughout construction.
- There be created a Health Advocate to conduct oversight of the implementation of the safety plan, with the vested authority to stop construction in the event of health and safety violations, provide real time monitoring and oversight of the site construction and report to the IG's Office to avoid conflicts of interest. This would create a standard going forward for all projects being developed on contaminated sites throughout the District of Columbia.
- There be immediate distribution of preventative remediation measures, including the distribution of air purifiers, HEPA (dust) mats and vacuums for residents living south of M St., east of Delaware, west of S. Capitol Street; and
- The District of Columbia, through its Department of Health or another approved FQHC, provide optional baseline health assessment for all residents living in the area adjacent to the proposed stadium.

## **In Conclusion**

ANC-6D continues to believe that a soccer stadium can be built on this site in Buzzard Point --- but only once having addressed the issues we've elaborated upon in this Report. The implications of delay on developing this specific site, with its extraordinary challenges, pale in comparison to adopting a plan that moves ahead ignoring broad deficiencies in transportation planning, inattention to environmental concerns and the implications that ignoring each will have upon our community health and well being.

We just pray that this done right.