

November 22, 2016

Chairman Anthony Hood
District of Columbia Zoning Commission
441 4th Street NW, Suite 210S
Washington, D.C. 20001
Emailed to: zcsubmissions@dc.gov

**Re: Z.C. Case No. 16-02 D.C. United Stadium:
Application for Review and Approval of a Consolidated Planned Unit Development**

Dear Chairman Hood,

On behalf of the Board of Directors and our community of 447 apartments at **Harbour Square Owners, Inc.**, we are writing to express our strong opposition to the approval of the D.C. United Stadium Consolidated Planned Unit Development (PUD) by the D.C. Zoning Commission. We urge you and the Members of the D.C. Zoning Commission to delay approval of this PUD until such time as D.C. United has submitted for review and approval a comprehensive transportation plan that will fully address the needs of Southwest, Navy Yard, and the Buzzard Point communities.

Harbour Square Owners, Inc. strongly support and endorse the Resolution from ANC 6D Regarding the DC United Consolidated PUD unanimously approved by the ANC 6D on October 17, 2016. We urge the DC Zoning Commission to delay approval of the referenced PUD until such time as the issues noted in the resolution are fully addressed by the Applicant and the District Departments. A copy of the ANC 6D Resolution is attached.

We also wish to highlight other critical issues to our community as follows:

1. The absence of a cohesive and comprehensive transportation plan that includes, among other issues, a focus on the significantly increased traffic flows along **FOURTH STREET SOUTHWEST** so as to address the daily gridlock patterns and prevent unsafe conditions.

2. **FOURTH STREET** is the **only** street that provides emergency access to more than 3,750 residents who live South of M Street, S.W. and the Washington Channel. Currently **FOURTH STREET** is a congested and gridlocked street. During the baseball season and on days when the Nationals Park games or events are held, traffic along **FOURTH STREET** moves at bumper-to-bumper speed. These traffic conditions occur during the evening and daytime hours. Earlier this year, two lanes of **FOURTH STREET** (a two-way street) were set aside for bicycle lanes, leaving two lanes for cars travelling north and one lane for cars travelling south. This traffic pattern **cannot** sustain any portion of the 19,000 soccer fans travelling to and from the proposed stadium.

3. **FOURTH STREET** south of M Street, S.W. is also the heart of our neighborhood and the likelihood of thousands of "pedestrians walking past our homes." Waterfront and Navy Yard-Ballpark Metro stations are a 20-minute walk from the soccer stadium. Therefore it is highly likely that fans exiting at Waterfront Station may seek a short-cut to the soccer stadium via **FOURTH STREET**.

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4. There is no proper mass transportation plan to get people to and from the stadium other than by foot, bicycle, and the availability of 3,950 parking spaces in the vicinity of the stadium.

5. The stadium site was predicated on the placement of a streetcar, which figures prominently on every traffic plan and was instrumental in site selection. The DDOT director has stated there will be no streetcar in SW. Why continue to pretend this is a solution when key DC transportation officials state it is not true?

6. In September 2014, DDOT published a DC Circulator Transit Development Update which identified six new routes and four route extensions during a 10-year growth plan. One of the extensions included the Union Station-Navy Yard Route to be extended to Southwest Waterfront by 2017; and a new route from the Convention Center to Southwest Waterfront in 2018. ¹ Unfortunately in 2015 the D.C. City Council voted to abolish all funding for all extensions and new D.C. circulator routes. This is in spite of a 2014 study which reported that the soccer stadium will bring \$109.4 million in direct economic benefits to the District.²

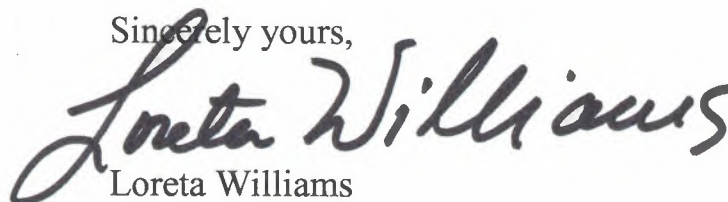
¹ <http://www.dccirculator.com/?s=2014-DC-Circulator-Transit-Development-Plan-Update-Report>

² <https://www.washingtonpost.com/news/digger/wp/2016/10/13/escalating-feud-over-stadium-design-threatens-d-c-uniteds-plans/>

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We thank you for your consideration of the issues raised herein and we look forward to learning of your decision regarding this serious community issue.

Sincerely yours,



Loretta Williams
First Vice President
Harbour Square Owners, Inc.
500 N Street S.W.
Washington, D.C. 20024

Attachment: Resolution ANC 6D dated October 17, 2016

Cc: Charles Allen, Council Member, Ward 6
callen@dccouncil.us

Andy Litsky, Chairman, ANC- 6D
alitsky@anc6d.org

Naomi Mitchell, Community Liaison, Office of Charles Allen
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Seth Shapiro, Ward Six Community Liaison for Mayor Muriel Bowser,
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Southwest + Navy Yard + Buzzard Point

A Resolution from ANC-6D Regarding the DC United Consolidated PUD

Whereas, although 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, and that it enhanced the existing residential neighborhoods not only to the East but to the North and West as well, and made a strong contribution to the well-being of all the surrounding communities, and

Whereas, the DC United PUD must also be reviewed and evaluated in the context of the larger plans for Buzzard Point 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 it is also the predicate of a larger Buzzard Point Vision Plan. Consequently, ANC-6D addresses this PUD independently but also contextualizes the DC United Stadium Plan within the Buzzard Point Framework Plan Transportation Study, and

Whereas, there currently exists an insufficient Transportation Plan for the Stadium & Buzzard Point. The DC United PUD'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 as well, and most specifically, the Buzzard Point Vision Plan, and

Whereas ANC-6D report to Zoning on this matter will include 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 contemporaneous scheduling of events in or adjacent to Nationals' Park and the proposed DC United Stadium, and

Whereas, 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, and upon which Office of Planning envisions, in addition to a soccer stadium, the inclusion of 6,000 units of housing – equal to the amount of housing now in existing new Southwest, and

Whereas, ANC-6D continues to have 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 long term parking facilities as well as binding LOIs prohibiting contemporaneous scheduling of events in or adjacent to Nationals' Park and the proposed DC United Stadium. As well, the DC United PUD transportation plan is not informed by and/or contradicts a number of transportation proposals by DDOT, OP, as well as the Buzzard Point Vision Plan, and

Whereas, ANC-6D also takes issue with the necessity of the 2018 deadline for completion. The implications for a delay on the transition to the Buzzard Point site pale in comparison to the implications of adopting a plan with deficient urban planning, transportation planning, and health and safety planning, and

Whereas, ANC-6D continues to have concerns about the commercial usage and the overly enthusiastic plans for the adjacent site and green space which appears to have only a one or two year lifespan at best, the lack of a plan to successfully integrate the stadium into the surrounding neighborhoods – both to the South *and* North -- on non-event days, and lack of a clearly articulated plan for street level commercial and retail spaces, and

Whereas, ANC-6D would like to see better activation plan for 2nd Street planned seating areas incorporating vendors and kiosks, as well as a safety and security plan, and

Whereas, ANC-6D specifically opposes a four lane street on the east side of the stadium that is currently being supported by adjacent property owners and which is incompatible with long-planned Anacostia Riverwalk Trail pedestrian and bicycle access along Second Street onto Buzzard Point, and

Whereas, ANC-6D is also concerned about the potential placement of full motion video signage outside of the stadium the light pollution from which would significantly impact the surrounding neighborhood. While such signage may not be allowed now, ANC-6D would request that the Applicant eschew any such signage in the future regardless of impending Council legislation, and

Whereas, ANC-6D is universally opposed to the forced removal of housing -- both public and market rate – in order to construct this stadium. If there is a de facto plan to remove any existing housing between the Stadium and M Street, SW in order enter and access Buzzard Point – as seems indicated in the Buzzard Point Plan that instructs the CTR -- that fact needs to be articulated now by OP, DGS, DMPED and Mayor Bowser. This is especially concerning since Half Street is not sufficiently wide to become “the Transportation Spine” to DC United Stadium and a neighborhood of 6,000 units of housing, and

Whereas, 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 many 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, and

Whereas, ANC-6D requests that the District of Columbia and the Applicant halt the Voluntary Cleanup of the proposed stadium site, slated to begin on December 1st, until we are assured that these efforts meet best management practices and the requirements outlined in the environmental concerns described in the Community Health and Safety Study (CHASS) recently conducted by the DC Department of Health that makes the following recommendations:

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

Whereas, that 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 established 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 finally 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 an optional baseline health assessment for all residents living in the area adjacent to the proposed stadium.

Therefore, 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 unanimously opposed the approval of the DC United Consolidated PUD until the issues as stated above are sufficiently addressed by the Applicant and District Departments in coordination with the ANC and the Community. The ANC will withhold its approval until it is presented with a revised PUD that adequately addresses our above stated concerns. We urge that the DC Zoning Commission and the relevant District Agencies – in particular, Office of Planning, Department of Transportation, Department of Public Works, Department of General Services and the members of the Council of the District of Columbia give our concerns great weight under the law.



Andy Litsky
Chairman, ANC-6D
Southwest, Navy Yard & Buzzard Point

October 17, 2016