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**DC for Reasonable Development
Testimony Zoning Commission Case 16-02
November 28, 2016**

DC for Reasonable Development is an unincorporated non profit association of citizens and groups living, working, and operating around the city who seek to protect their personal and property issues before the zoning and planning officials in the District of Columbia.

We have participating members around the PUD site that will be directly and concretely affected by the PUD application in this manner.

DC4RD references and incorporates wholly any testimony given by ANC-6D, Near Buzzard Point Residents Advisory Council and participating members of NeRAC, the testimony put on the record by Harbour Square Owners, Inc., and expertise and testimony that may be provided by Mrs. Claudia Barragan, and Mr. Mike Ewall, among others. Further, DC4RD's testimony seeks to supplement the thorough testimony of the aforementioned groups and individuals. ^{EMPOWER DC}

Again, as in prior PUD applications, the Office of Planning has woefully let down the public in that they have failed to provide a comprehensive review of the potential adverse impacts the PUD presents to the surrounding community.

Quality of Life Impacts

The OP reports show that no studies of noise or air quality have been conducted to determine how this project will affect the surrounding neighborhood. No relevant District agencies have weighed in to determine the waste, emissions, and other issues the stadium and significant commercial uses at this site will bring onto the surrounding community.

The residential communities in the surrounding community are a frontline environmental justice community, that is concretely impacted and threatened by this project. The Buzzard Point surrounding communities represent some of the last historically black working class communities in DC. They must be protected and this is more acutely shown by the census which demonstrates that 40,000 black people have been pushed out by projects like that in this PUD without evaluation and protections from rising land use and values associated therein.

Relevant Comprehensive Plan policies, among others: Policy AW-2.2.6: South Capitol Neighborhood Buffers; 1907.2 (b), (e), and (g); Policy AW-1.2.5: African-American Heritage.

DCMR 10A-1903.3 Diversity is one of the strengths of the Lower Waterfront community. The Southwest neighborhood, in particular, is one of the most racially and economically diverse areas in the District of Columbia. The neighborhood is a microcosm of the city at large; this is

one of the defining characteristics of the community and it is highly valued by residents. 1903.3

DCMR 10A-1909.5 See the Citywide Elements for additional policies and actions on the waterfront, including Parks, Recreation, and Open Space Section PROS-3.2 on waterfront parks (including the Anacostia RiverParks Network) and PROS-3.4 on trails (including the Anacostia Riverwalk), Environmental Protection Element Section ED-1.2 on wetlands and E- 4.2 on water pollution and water quality improvements, Urban Design Element Section UD-1.3 policies on waterfront access, and Infrastructure Element Sections IN-2.2 and IN-2.3 on stormwater runoff and the combined sewer overflow project.

Yet, despite the guidance as well as the directives of the Comprehensive Plan and interrelated planning documents for the area around the PUD site, and despite the significant public sums of money being given to a luxury stadium and wealthy DC united owner, we see and hear the people of the surrounding community through their own voices, and through that of the ANC, simply asking that the construction impacts of seriously contaminated areas be truly mitigated and eliminated as conditions for any approval. And the same goes for operations of the stadium. Why are these critically important residents as noted in the Comp Plan being ignored?

The proposed very large stadium and potential cumulative projects that will follow do not fulfill the Comprehensive Plan policies of opening access to the waterfront, when a giant stadium will deny as such.

Relevant Comprehensive Plan policies, among others: Policy PROS-3.2.4: Waterfront Visibility and Accessibility; Policy AW-1.1.8: Barriers to Shoreline Access; Action AW-1.1.A: Anacostia Waterfront Framework Plan; Policy PROS-3.2.2: Connecting Neighborhoods to the Rivers.

Jobs and Existing Small Businesses

The PUD application gives no sense of how many jobs will this project will truly create for local neighbors in the Buzzard Point community, if they will be of a living wage, and there is no sense or reports from any relevant agencies to determine how many local residents in the surrounding communities will be sought after and employed in the jobs created by this project. There are no reports on the record from DC's Department of Employment Services and Department of Small and Local Business Development. Further, there has been no evaluation of how the project among the others around Buzzard Point will displace the existing small businesses currently serving the surrounding communities.

Relevant Comprehensive Plan policies, among others: E-4.1; E-4.1.3; E-4.2; E-4.3; E-4.3.5; E-4.5.C; E-4.8.2; ED-3.2; ED-3.2.1; ED-3.2.6; ED-3.2.7; ED-3.2.A; ED-3.2.D; ED-4.2.4; ED-4.2.7; ED-4.2.12

Impacts on Public Services

There is no sense from DC Water to get specificity as to the water needs of the proposed project such as how much fresh water this project will require on a daily basis and will the fresh water capacity currently serving the surrounding community be affected by this new stress on the public water systems. It is fair to say that the amount of sewage coming from this proposed project will be far greater than the existing water and sewer needs.

The Office of Planning has not considered the coordination of the municipal public systems that will be impacted by this project, among the others in the area, and hence there is no qualitative understanding of contributions from the public and the applicant to upgrading the municipal water, electric and gas systems that will serve this PUD project. For example, there are no reports from DC Water, Washington Gas or Pepco on the record.

OP has not determined the capacities of these utilities in serving the PUD site, and the existing community simultaneously. There is no sense of who will pay the repair bill for a catastrophic collapse of any of these public utility systems during construction or after the project is operating.

And OP has not coordinated an evaluation of emergency response capacity with the Fire Department or MPD about this project considering the volume and density of new residents and commercial entities in case of an emergency or in terms of daily safety protections currently serving the community.

Relevant Comprehensive Plan policies: CSF-1.1; CSF-1.1.1; CSF-1.1.2; CSF-1.2.2; CSF-1.2.6; CSF-3.2; CSF-4; CSF-4.2; IN-1.2; IN-1.2.2; IN-2.1.1; IN-5; IN-6; IN-6.1.3

Affordable housing

This project does not provide an affordable housing benefit under the PUD regulations. DC4RD is particularly concerned about the surrounding residential districts to the north, west, and east are considered low-rise family rowhouses and townhomes, and low rise apartments. Many people own their homes and rent in this location and will face rising property taxes and rents due to this project among others in the Buzzard Point community. Mr. Kenner quoted that this PUD project will generate 1 billion in economic activity. This definitively predicts increasing displacement pressures on the existing community that must be mitigated, or require denial of the PUD application.

The Office of Planning has not done analysis of how this project may impact the existing community and land values. There are no reports in writing from the Dept of Housing and Community Development (DHCD) to weigh in on these affordability issues. DHCD is the agency monitoring and managing affordability, and affordable units around DC, including the the residential areas around Buzzard Point, to inform the Commission about statistics as to current

affordability numbers – like the number of units, levels of affordability, what existing affordable family housing is at risk – in the surrounding community?

Is it fair to say, OP has not worked with all relevant city agencies to ensure that there is minimal to no disruption to the surrounding zone districts and land values. One such tool is to seek a freeze on property taxes for the impacted community over the next 15 years, which can be included as a condition in the Order to mitigate displacement and destabilization of the surrounding districts.

Relevant Comprehensive Plan Policies, among others: H-2.1; H-2.1.3; H-2.1.1; H-2.1.4; H-2.1.A; H-2.1.E; H-2.2.3; H-2.2.E; H-1.1.3; H-1.2; H-1.2.1; H-1.2.7

DDOT – TRANSPORTATION

DDOT has determined that some there are limited bus lines around the site are at capacity now. And all are now aware of how limited and dangerous the Wmata Metro system has been and will be given it is also near or at capacity.

DDOT has not determined the capacity of the Metro to simultaneously serve the PUD project and continue to serve the existing community given the new transit trips predicted for this project. Same goes for buses.

Neither DDOT nor OP have coordinated with the developer to determine any contributions for including more public transit services, to offset Wmata safety repair costs, and other public right of way improvements.

When does DDOT say, enough, that the public transport systems and streets can not handle any more development without system upgrades and expansion, especially given the remapping of the site to high-density districts.

Two or more shared car services and bike services cannot be proven to solve the failing intersections and this area will become a traffic nightmare, beyond what it already is, impacting the surrounding neighbors parking, streets, noise, air, and more, and do so in obvious adverse ways.

DCMR 10A-1912.18 Action AW-2.2.E: South Capitol Transportation Improvements

Conclusion

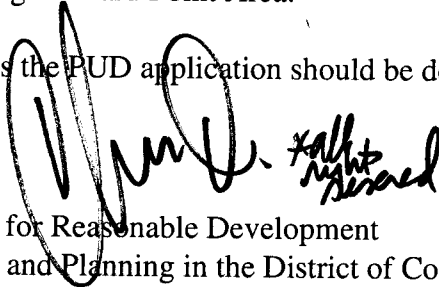
For the above reasons, among others, the PUD application is inconsistent with the Comprehensive Plan as a whole. Particularly troublesome is the lack of the government's comprehensive public review to determine adverse affects on the surrounding community

pursuant to the PUD regulations and Chapter 25 of the DC Comprehensive Plan, among other policies.

The impacts will certainly adversely affect the residential communities surrounding the PUD site in the surrounding Buzzard Point Area.

For these reasons the PUD application should be denied.

/s/n Chris Otten



Chris Otten, DC for Reasonable Development
Expert in Zoning and Planning in the District of Columbia
202 810 2768
dc4reality@gmail.com

Relevant Comprehensive Plan policies, among others: UD-2.2.1; UD-2.2.2; UD-2.2.4; UD-2.2.8; LU-2.3.2; LU-2.3.3; LU-2.3.4; LU-2.4.8; H-1.3.A; E-4.1; E-4.1.3; E-4.2; E-4.3; E-4.3.5; E-4.5.C; E-4.8.2; ED-3.2; ED-3.2.1; ED-3.2.6; ED-3.2.7; ED-3.2.A; ED-3.2.D; ED-4.2.4; ED-4.2.7; ED-4.2.12; CSF-1.1; CSF-1.1.1; CSF-1.1.2; CSF-1.2.2; CSF-1.2.6; CSF-3.2; CSF-4; CSF-4.2; IN-1.2; IN-1.2.2; IN-2.1.1; IN-5; IN-6; IN-6.1.3; H-2.1; H-2.1.3; H-2.1.1; H-2.1.4; H-2.1.A; H-2.1.E; H-2.2.3; H-2.2.E; H-1.1.3; H-1.2; H-1.2.1; H-1.2.7; inter-alia.