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June 2, 2017

VIA IZIS AND HAND DELIVERY

Anthony Hood, Chairman  
District of Columbia Zoning Commission  
441 4<sup>th</sup> 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”)  
- Response to Agency Reports**

Dear Chairman Hood and Members of the Commission:

In support of the foregoing motion, please accept for filing the enclosed responses to the reports filed by the Office of Planning (“OP”), the District Department of Transportation (“DDOT”), and the Department of Energy and the Environment (“DOEE”). Attached hereto as Exhibit A are updated plan sheets reflecting modifications made in response to these reports.

**I. OP Report**

<b>OP Comment</b>	<b>Planning and/or Zoning Rationale</b>	<b>Applicant Response</b>
<u>Projections into Public Space:</u> Confirm that all projections, including the proposed ramps and stairs at the southeast and southwest corners of the building meet public space regulations for setbacks and the Buzzard Point streetscape guidelines.	Design of the public space and stairs could potentially have impacts on the design of the ground floor.	All projections into public space comply with public space regulations for setbacks and the Buzzard Point streetscape guidelines. Please see attached exhibits in <u>Appendix D: Public Space Projections</u> showing enlarged plans and sections of

		southwest and southeast stairs and ramps.
<u>LEED</u> : The design should achieve a higher LEED score.	Environmental protection is an important goal of the Comprehensive Plan, especially in waterfront locations. The CG zone and Buzzard Point Vision Framework also encourage buildings to achieve a high degree of sustainability.	An updated LEED scorecard is provided on Sheet A18 reflecting a commitment to design the building to a LEED Gold standard.
<u>Inclusionary Zoning</u> : Provide additional information regarding the provision of Inclusionary Zoning (IZ) units on-site as required for the habitable penthouse space.	The applicant originally proposed making a contribution to the Housing Production Trust Fund. While OP strongly supports the current proposal to provide on-site affordable housing units, the Applicant should demonstrate that the units proposed to be provided meet requirements, including that they be provided at 50% AMI; and that they be equitably distributed throughout the building and reflect the unit mix of market rate units.	The Applicant is providing approximately 5,850 square feet of affordable housing in the Project. Approximately 3,200 square feet of this commitment is required due to the habitable penthouse space. These units will be provided at the 50% AMI level. The Applicant is providing an additional 2,650 square feet of affordable housing that will be provided at the 60% AMI level for rental units.  Sheet A16 has been updated to include the proposed IZ unit mix. Sheet A15 has been updated to incorporate more 2-bedroom units into the overall unit mix.
<u>Rendered Views on the Waterfront</u> : Provide rendered views of the waterfront from the intersection of V and 1st Street SW and V and 2nd Street SW - showing the project with proposed improvements to the building	Additional rendered views should be provided for a full evaluation by OP and the Commission.	The Applicant has provided these views on Sheet 17A of <u>Exhibit A</u> .

<p>and public space, including mature landscaping.</p>		
<p><u>Vehicular Turnarounds:</u> Revise vehicular turnarounds at 1st and 2nd Street to minimize paved surface area, limit potential vehicular, bicycle and pedestrian conflicts, and frame the water views.</p>	<p>Given the project’s waterfront location and the District’s commitment to being the healthiest, greenest, and most livable city in the country within 20 years, the Applicant should strive to adopt resilience strategies that include incorporation of green infrastructure into public space to capture and hold run-off.</p>	<p>The Applicant will continue to coordinate with DDOT during the public space process regarding the final design of these spaces.</p>
<p><u>Right-of-Way Improvements:</u> Address right-of-way improvements in 2nd Street south of the building.</p>	<p>The District Department of Transportation (DDOT) anticipates that this area will be disturbed as a result of work related to installation of the Capital Bikeshare Station; therefore, the Applicant should plan to complete improvements in this area.</p>	<p>The Applicant agrees to improve the area south of the roundabout at the end of the 2<sup>nd</sup> Street right of way up to the 25’ natural buffer and will coordinate with DDOT during the public space process regarding the design of this space.</p>
<p><u>Building Materials:</u> Provide more information on the proposed building materials, including color and materials board, as well as precedents for material use in similar waterfront contexts to demonstrate durability.</p>	<p>Complete information is needed for staff and the Commission to fully evaluate the project.</p>	<p>Precedent images of proposed exterior materials have been assembled in <u>Appendix E: Precedent Image of Proposed Materials</u>. Material samples will be provided for the hearing presentation.</p>
<p><u>Waterfront Sections:</u> Provide revised waterfront sections to include detail for all knee- or retaining walls, vertical edge treatments, and to include the mean high water and the high high water level.</p>	<p>DOEE has requested that the Applicant review and revise the waterfront sections in order to provide a complete analysis of the proposed improvements and potential stormwater and flood impacts.</p>	<p>The Applicant has provided these revised waterfront sections on Sheets L21, L22.</p>
<p><u>Design/Treatment of River Shoreline:</u> Ensure that design and treatment of the Anacostia River shoreline</p>	<p>The CG Design Review Criteria (K § 512.4) and the Buzzard Point Vision Framework Riverwalk</p>	<p>The Applicant supplements the previous submission to incorporate a programmatic plan of the waterfront</p>

<p>complies with the Buzzard point Riverwalk Guidelines and provide detailed information regarding proposed plantpalette, provisions for public access, and ongoing private maintenance of the space.</p>	<p>Guidelines require the provision of detailed information with respect to treatment of the waterfront. The Applicant has not provided sufficient information for OP and the Commission to complete a full analysis.</p>	<p>depicting seating, the location of art features and educational placards. See Sheets L25 and L25A.</p>
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**II. DDOT Report**

<b>DDOT Condition</b>	<b>Applicant Response</b>
<p>Implement the following mitigations as proposed by the Applicant:</p> <ul style="list-style-type: none"> <li>o Install an eastbound right turn lane with a storage length of 150 feet at the intersection of 2nd Street &amp; P Street;</li> <li>o Construct the 2nd Street cycle track from V Street to the Anacostia Riverwalk Trail. The cycle track requires a total of 10 feet and the total carthpath cross section requires 3840 feet.</li> <li>o As part of the public space reconstruction, construct a bus pad in V Street and other supportive elements to support a future bus stop at the corner of V Street and 1st Street.</li> </ul>	<p>The Applicant proposed these mitigations and continues to be committed to implementing them.</p>
<p>Provide a 19-dock Capital Bikeshare station and first year's operating costs;</p>	<p>The Applicant agrees with this condition.</p>
<p>A total of two electronic displays showing real-time transportation. Displays should be located in the residential lobby and a common, shared space easily visible to restaurant and retail patrons such the Anacostia Riverwalk Promenade;</p>	<p>The Applicant agrees to install one electronic display in the residential lobby and another electronic display in another public location to be determined through the public space process.</p>
<p>Showers, changing facilities, and lockers for use by retail and restaurant employees to</p>	<p>The Project is not required to comply with this requirement of the Zoning Regulations,</p>

<p>encourage bicycling as required by current zoning regulations;</p>	<p>as the Project is not a new construction or an increase of more than 25% of the existing square footage of the building. The Applicant will provide lockers for retail employees. However, given the structure of the existing building and required depth of retail space, the Applicant is cannot commit to providing showers and changing facilities.</p>
<p>Unbundle parking costs from the price of lease or purchase of residential units.</p>	<p>The Applicant agrees with this condition.</p>
<p>Update the Loading Management Plan to include flagger assistance for all loading deliveries to mitigate the back-in movements for all trucks serving the site, which is required as a condition of approval for the curb cuts by the Public Space Committee.</p>	<p>The Applicant agrees with this condition. The revised Loading Management Plan is attached as <u>Exhibit B</u>.</p>
<p>Modify the Anacostia Riverwalk Treatment in the following ways:</p> <ul style="list-style-type: none"> <li>■ Replace the "rough paving" on the active trail with a paving that provides a visual cue to indicate an intersection between active and passive uses. A "rough paving" with a noticeable texture should not be used in the active trail; and</li> <li>■ Install a narrow band of textured paving at the edge of the active trail where the passive trail intersects with the active trail. This textured paving provides a tactile and visual cue to passive trail users that they are crossing an active trail.</li> </ul>	<p>The Applicant agrees with this condition, and updated plans are provided on Sheets L12, L13 of <u>Exhibit A</u>.</p>
<p>Improve the entirety of the ROW on 2<sup>nd</sup> Street south of the roundabout.</p>	<p>The Applicant agrees to improve the area south of the roundabout at the end of the 2<sup>nd</sup> Street right of way up to the 25' natural buffer and will coordinate with DDOT during the public space process regarding the design of this space.</p>
<p>Provide a minimum 6-foot wide sidewalk connection to all satellite parking locations.</p>	<p>The Applicant is not required to provide satellite parking under the Zoning</p>

<p>Final designs of these improvements will be determined during the public space permitting process when satellite parking locations are known.</p>	<p>Regulations, as the Project provides more than the required parking spaces for the Project. Nevertheless, the Applicant is in discussions with the James Creek Marina to provide offsite parking on the parcel to the west of the Property. The James Creek Marina is already accessible by sidewalk. The Applicant will, however, provide a crosswalk between the properties across 2<sup>nd</sup> Street at V Street to ensure the safety of the pedestrians traversing between the two properties.</p>
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**III. DOEE Report**

<b>Comprehensive Plan Policy</b>	<b>DOEE Comment</b>	<b>Applicant Response</b>
<p><u>Policy E-1.2.1</u>: Improve Environmental Conditions along the Anacostia River and other water bodies, including shorelines, wetlands, islands, tributaries, and rivers themselves. Particular attention should be given to eliminating toxic sediments, improving river edges to restore vegetation and reduce erosion, enhancing wetlands and wildlife habitat, creating new wetlands and reducing litter.</p> <p><u>Action E-1.2.A</u>: Work collaboratively with federal agencies, upstream jurisdictions, the Anacostia Waterfront Corporation, and environmental advocacy groups to implement conservation measures for the Anacostia River, including:</p> <ul style="list-style-type: none"> <li>- Creating naturalized or bio-engineered river</li> </ul>	<p>DOEE recommends that the project take measures that would account for and provide greater resiliency due to the increased flood risks and storm surge resulting from climate change. This would include raising occupied space above the 500 year floodplain, dry flood proofing, locating main exits at higher elevations and finalizing an egress and emergency management plan.</p>	<p>Importantly, all residential units are located well above (at least 21 feet) the 500 year flood plain. The Applicant also notes that it is providing a secondary refuge area on 1<sup>st</sup> Street, per DOEE’s comments, which can accommodate approximately 81 individuals during a flood event with direct access to a street. A revised flood emergency plan on Sheet F10 showing second refuge area reflects this area.</p> <p>The Applicant is confident that because 12.75% of the building is dedicated to retail space and because it is providing dry flood proofing 6 inches beyond what is otherwise required that a code modification to allow occupiable spaces within the flood plain will be granted for this building. This waiver is typically sought during the permitting process as it requires fully designed building</p>

<p>edges that maximize habitat value;</p> <ul style="list-style-type: none"><li>- Requiring open space buffers consistent with the recommendations of the Anacostia Waterfront Initiative Framework Plan; and</li><li>- Preventing the net loss of parkland and improving access to the waterfront and river trails.</li></ul>		<p>plans. The Applicant will continue to coordinate with DOEE during the permitting process to secure this waiver and to finalize its egress plan.</p> <p>Because this is an existing building, there are distinct challenges in raising the building out of the 500 year flood plain, including:</p> <ul style="list-style-type: none"><li>- Likely elimination of parking, loading and ADA access because there is insufficient room to provide adequate ramping to access the spaces;</li><li>- Elimination of ground floor retail due to the fact that a 4 foot tall knee wall would be required around the perimeter of the building, rendering the retail space inviable.</li></ul> <p>The project is otherwise not inconsistent with the cited policies of the Comprehensive Plan as follows:</p> <ul style="list-style-type: none"><li>• Currently the shoreline at Riverpoint is severely eroded, the volunteer trees that sit there have little to no topsoil or understory. Further, the trees are in poor health. The species found there are short-lived species. The design brings in a more durable, bio-engineered edge that can withstand wave action and is more resistant to erosion via a combination of retaining blocks and native plantings. The canopy species (Native Willows) have been selected for their quick establishment period and ability to</li></ul>
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		<p>maximize shade and soil stability quickly. They are large canopied trees and will provide significant habitat opportunities.</p> <ul style="list-style-type: none"> <li>• The Applicant has aligned with the 25' natural edge, and developed it in a way that marries native habitat, stabilized edge, improved soils, and both active recreational opportunities and passive places to linger. This is achieved through the incorporation of the Riverwalk trail (active and passive), in addition to secondary trail along the water, a floodable "forest," kayak beach, and wooden boardwalk with seat edges.</li> <li>• Overall the quality of the waterfront landscapes will improve through a more stable, bioengineered edge, while maintaining shade and human comfort</li> <li>• Improved streetscapes with generous sidewalks and shade trees will greatly enhance pedestrian access to the waterfront</li> <li>• A new cycle track on 2nd Street will connect to the active trail, providing a strong bicycle link to the waterfront from neighborhoods to the north</li> <li>• Biofiltration gardens, planters, and wetlands will be planted with native and adapted perennials and grasses that will filter/clean water while providing valuable habitat.</li> </ul>
<p><u>Policy E-3.1.1</u>: Maximizing Permeable Surfaces: Encourage the use of permeable materials for parking lots, driveways,</p>	<p>Capturing a higher storm level, as required in the Anacostia Water Development Zone (AWDZ), will benefit</p>	<p>This project is not receiving District or federal funding and as such, is not subject to the stormwater retention requirements of the AWDZ. The Applicant is</p>



<p>walkways and other paved surfaces as a way to absorb stormwater and reduce urban runoff.</p> <p><u>Policy E-3.1.2: Using Landscaping and Green Roofs to Reduce Runoff:</u> 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.</p>	<p>the developer’s application as it exhibits commitment to the environment and provides needed relief from stormwater runoff from a currently highly industrialized area. Hence DOEE’s Watershed Protection Division (WPD) recommends the project capture a 1.7” rain event.</p>	<p>meeting stormwater requirements and has designed the area of the building to capture a 0.8” rain event while the remainder of the site will capture a 1.2” rain event.</p> <p>The project is otherwise not inconsistent with the cited policies of the Comprehensive Plan as follows:</p> <ul style="list-style-type: none"> <li>• The project utilizes permeable surfaces in the green strip between the curb and the public sidewalk along the property frontage.</li> <li>• The project has maximized the use of green roof, with the vast majority of the upper roof planted.</li> <li>• Additional landscaping is used to break up large paved areas along the 1st Street public sidewalk.</li> <li>• Additional landscaping, bio-retention, and wetlands have been woven into the Riverwalk Trail to help break up large paved surfaces.</li> </ul>
<p><u>Policy E-4.1.3: Evaluating Development Impacts on Air Quality:</u> Evaluate potential air emissions from new and expanded development, including transportation improvements and municipal facilities, to ensure that measures are taken to mitigate any possible adverse impacts. These measures should include construction controls to reduce airborne dust, and requirements for landscaping and tree planting to absorb</p>	<p>In addition to [complying with the minimum requirements], the Air Quality Division (AQD) recommends that the applicant consider using lower-emitting technologies to the extent possible to provide power, heating and cooling.</p> <p>If a traditional boiler is being considered, AQD recommends that the</p>	<p>The Applicant has investigated the use of solar panels within the project and it is, unfortunately, not feasible. The rooftop spaces are dedicated to meeting the stormwater retention requirements, leaving little room, if any, for solar panels. Vertical integration of solar panels is not feasible since this is an apartment building and requires operational windows.</p> <p>This project is utilizing VRF units and is not using a traditional boiler.</p>

<p>carbon monoxide and other pollutants. <u>Policy E-4.1.4: Stationary Sources:</u> Maintain controls on gaseous and particulate emissions from stationary sources of air pollution in the city, such as power plants and refrigeration plants. Particular attention should be given to monitoring the air quality impacts of local power plants, which are the largest stationary sources of air pollution in the District.</p>	<p>Applicant consider more efficient technologies such as cogeneration or tri-generation.</p> <p>AQD does not recommend ground-level or near ground-level ventilation locations for underground parking structures.</p>	<p>There are no ground level or near ground level vents for the underground parking structure. All intake or exhaust air vents are located above 12.71' elevation, which is 6" above required Design Flood Elevation.</p> <p>The project is otherwise not inconsistent with the cited policies of the Comprehensive Plan as follows:</p> <ul style="list-style-type: none"> <li>• The project will utilize DOEE's stringent Dust Control Regulations during the construction process to help reduce the introduction of air born dust.</li> <li>• Street Trees are proposed along the project frontage. Currently there are no existing street trees along the project frontage to absorb pollutants.</li> <li>• Additional landscaping, beyond what is otherwise required, is proposed along the 2<sup>nd</sup> Street building frontage and at the end of 2<sup>nd</sup> Street.</li> <li>• Additional landscaping, bio-retention, and wetlands have been woven into the Riverwalk Trail to help remove carbon monoxide and other pollutants.</li> </ul>
<p><u>Policy E-2.2.1: Energy Efficiency:</u> Promote the efficient use of energy, additional use of renewable energy, and a reduction of unnecessary energy expenses. The overarching objective should be to achieve</p>	<p>Given the market conditions and the District's goal of net zero energy properties by 2032, it is strongly encouraged that the project team revisit their energy model,</p>	<p>The Applicant is committing to design the building to a LEED Gold standard.</p> <p>The project is otherwise not inconsistent with the cited Comprehensive Plan policies as follows:</p>

<p>reductions in per capita energy consumption by DC residents and employees.</p> <p><u>Policy E-2.2.4: Alternative Energy Sources:</u> 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.</p> <p><u>Policy E-2.2.5: Energy Efficient Building and Site Planning:</u> Include provisions for energy efficiency and for the use of alternative energy sources in the District’s planning, zoning and building standards. The planning and design of new development should contribute to energy efficiency goals.</p> <p><u>Policy E-3.2.1: Support for Green Building:</u> Encourage the use of green building methods in new construction and rehabilitation projects, and develop green building methods for operation and maintenance activities.</p>	<p>commitment to increased energy efficiency and seek opportunities to incorporate next generation technology.</p> <p>To create a more resilient and economically progressive project, it is strongly encouraged that the project incorporate solar panels that would generate a minimum of 1% - 3% of the buildings’ total energy use.</p> <p>DOEE recommends that the applicant investigate opportunities to take advantage of financial tools that would allow increased commitment to sustainability.</p>	<ul style="list-style-type: none"> <li>- The Applicant will evaluate the energy efficiency of the project at critical design milestones to ensure the project is on track to meet energy performance goals. This includes whole-building energy modeling as an integrated design analysis tool to evaluate the benefit for potential upgrades to lighting, controls, HVAC, Domestic hot water, building enclosure, and site energy end-uses. The project will review and work to reduce energy consumption and energy expenditures for the future residents of the project as well as common area and back-of-house where possible.</li> <li>- The Applicant will achieve a minimum of (60) LEED points, needed to be certifiable as a LEED-Gold building under the United States Green Building Council LEED for New Construction v2009. Additionally, some of the Innovation in Design credits under consideration for the project include Integrated Pest Management and Green Cleaning which are in line with LEED for Existing Buildings Operation &amp; Maintenance criteria.</li> </ul>
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**IV. Miscellaneous**

In addition to the modifications discussed above, the Applicant has further refined the plans as follows:

- Additional planting was provided in the pedestrian refuge area between curbcuts on 2<sup>nd</sup> Street, per a condition of the Public Space Committee (Sheet A19, L12, L13);
- Renderings of the southeast portion of the building have been updated to reflect refined elevations and removal of all projections into NPS property (Sheets A51, A52).

**V. Conclusion**

We look forward to presenting this case to the Commission on June 5, 2017. If you have any questions, please do not hesitate to contact Christine at (202) 721-1116 or Meghan at (202) 721-1138. Thank you for your attention to this application.

Sincerely,



Christine A. Roddy



Meghan Hottel-Cox

Enclosures

**Certificate of Service**

I certify that on June 2, 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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