

DC Water Office Building Headquarters

STATEMENT OF THE APPLICANT TO THE DISTRICT OF COLUMBIA ZONING COMMISSION FOR A CONSOLIDATED PLANNED UNIT DEVELOPMENT AND ZONING MAP AMENDMENT

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A	Building Plat
B	Portion of Zoning Map
C	Portion of Future Land Use Map
D	Portion of Generalized Policy Map
E	Architectural Plans and Elevations
F	DC Water Memorandum Regarding Security Constraints at the Subject Property
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I. INTRODUCTION

The District of Columbia (the "District") as fee owner, submits this statement and the attached documents by and through the District of Columbia Water and Sewer Authority ("DC Water" or "Applicant"), the party entitled to possession and use of a portion of Lot 805 in Square 744S and a portion of Lot 801 in Square 744SS, as shown on the plat attached hereto as Exhibit A (collectively, the "Subject Property") in support of its application to the Zoning Commission for the District of Columbia (the "Commission") for the consolidated review and approval of a Planned Unit Development ("PUD") and a zoning map amendment to rezone the Subject Property from the CG/W-2 District to the CG/CR District. Pursuant to an act of the Council of the District entitled the "Water and Sewer Authority Establishment and Department of Public Works Reorganization Act of 1996" (D.C. Law 11-111) (D.C. Code Sections 34-2201.01 *et seq.*), as amended and supplemented, and an act of the United States Congress entitled the "District of Columbia Water and Sewer Authority Act of 1996" (Public Law 104-184), DC Water is authorized to use and possess the Subject Property and the District retains the fee interest in the Subject Property.

The Subject Property has a combined land area of approximately 119,875 square feet and is partially improved with surface parking and the O Street Pumping Station, which is a 20,000 gross square foot, two-story brick building operated by DC Water. The Subject Property is bounded by N Place and Canal Street to the north, the Anacostia River to the south, and private property to the east and west, all located in the southeast quadrant of the District.

As shown on the Zoning Map attached hereto as Exhibit B, the Subject Property is presently zoned W-2 and is located in the Capitol Gateway ("CG") Overlay District. The Applicant is seeking to rezone the Subject Property to the CG/CR District in connection with this application. The requested map amendment is consistent with the Comprehensive Plan's Future Land Use Map

designation of the Subject Property as mixed-use Medium Density Commercial and Medium-Density Residential (*see Exhibit C*). The requested map amendment is also consistent with the Comprehensive Plan's Generalized Policy Map designation of the Subject Property as a Land Use Change Area (*see Exhibit D*).

The Subject Property is surrounded by a variety of uses and properties that have been either recently constructed or approved for redevelopment. Notable projects include three developments reviewed by the Commission: (i) the Forest City redevelopment, located directly adjacent to and north and west of the Subject Property, which will consist of a movie theater, parking garage, two apartment buildings, and retail, arts, and entertainment uses, with all buildings rising to a maximum height of 110-130 feet (Z.C. Order 13-05); (ii) the Florida Rock redevelopment to the southwest, which will consist of two residential buildings, a hotel, and an office building, ranging in height from 95 feet to 130 feet (Z.C. Order 04-14B); and (iii) the Ballpark Square redevelopment to the northwest, which will consist of a new residential, hotel, and office building with ground-floor retail, rising to a maximum height of 130 feet (Z.C. Order 12-05).

The Subject Property is located to the northeast of Diamond Teague Park, a public plaza that is located at the terminus of 1st Street, S.E. and the Anacostia River. The Subject Property is also to the west of The Yards Park, which opened in 2010 and has become a popular destination in the emerging neighborhood. In 2011, construction was completed for the bridge that links Diamond Teague Park and The Yards Park along the Anacostia Riverwalk Trail.

As part of redevelopment of the Subject Property, the Applicant proposes to maintain the O Street Pumping Station and to construct a new office building addition around the existing structure to be used as the headquarters for DC Water. The building will have an overall density

of 1.39 floor area ratio (“FAR”) and will include approximately 167,180 square feet of gross floor area. The project will have a maximum building height of 100 feet, and will include 21 off-street parking spaces.

As set forth below, this statement and the attachments meet the filing requirements for a PUD and zoning map amendment application under Chapter 24 of the District of Columbia Zoning Regulations.

II. INFORMATION REGARDING DC WATER AND THE NEED FOR THE PROPOSED DEVELOPMENT

As a multi-jurisdictional regional utility, DC Water provides drinking water and wastewater services to more than 640,000 residential, commercial, and governmental customers along with 17.8 million annual visitors in the District of Columbia. DC Water also conveys and treats wastewater for 1.6 million customers in Montgomery and Prince Georges counties in Maryland, and Fairfax and Loudoun counties in Virginia. DC Water operates the Blue Plains Advanced Wastewater Treatment Plant (“Blue Plains”), the largest advanced wastewater treatment plant in the world, on a site that covers 150 acres at the southern tip of Washington, DC.

Currently the administration functions for DC Water are located in a five-story building at the Blue Plains campus, known as the Central Operations Facility (“COF”). The COF has reached its capacity, necessitating the use of much-valued land at Blue Plains for the placement of office trailers, rather than for its intended use as a critical treatment facility.

To alleviate the overcrowding at the COF and to free-up land for the expansion and improvement of the plant processing operations, DC Water needs to construct a new headquarters building. This proposed new building will, among other things, consolidate and relocate all administration-related personnel into one centrally-located facility.

III. PROJECT DESCRIPTION

A. Overview

As shown on the Architectural Plans and Elevations (the “Plans”) attached hereto as Exhibit E, the Applicant proposes to build a new office building headquarters for DC Water on the Subject Property. Located to the west of the historic Main Pumping Station and to the east of the National's Ballpark, the new headquarters building will be DC Water’s most sustainable construction project ever and will provide a visible connection to the community that DC Water serves. The proposed development will anchor DC Water’s new campus along the Anacostia River, which embraces DC Water’s relationship to the watershed and reflects DC Water’s stewardship of both the natural and built environments.

B. Project Components and Design

The proposed building will be located along the north side of the Anacostia River between First Street to the west and the historic Main Pumping Station to the east. The O Street Pumping Station will remain in full operation throughout the construction of the new building and after its completion, and will be largely encapsulated to allow containment of the operation beneath and inside of the new office building.

The new building has been designed as a world-class headquarters that integrates efficient building systems with the Subject Property itself to create a dynamic workplace environment. The design is a bold, innovative statement on the Anacostia River shoreline that reflects DC Water’s mission to provide reliable and cost-effective water and wastewater services in accordance with best practices. The headquarters showcases its building systems, inviting its employees to become stewards of the environment through the building’s educational opportunities. The project supports

continued operation of the O Street Pumping Station and uses the residual heat from sewage that is pumped to Blue Plains to heat and cool the new building, demonstrating innovation and the depth of commitment to DC Water's mission. With abundant daylight and panoramic river views, the new building provides a wonderful place to work.

As described in more detail in section D.1 below, the Subject Property features an entry drive, autocourt, pedestrian circulation paths, and lush plantings. The autocourt incorporates ADA parking and features channels or "runnels" that allow for rainwater collection. A long wood plank esplanade/boardwalk runs along the building's south façade connecting it to the autocourt and other site features. A metal grating promenade conceptually terminates Canal Street and is intended to be used as an observation platform from which to view the river.

The building's skin is carefully calibrated to respond to daylighting, views, energy efficiency, and to highlight its sculptural form. The south façade is primarily a glass and aluminum curtain wall. Two areas of the curtain wall facing southwest feature a second layer of tinted glass that reduces unwanted solar gain as determined by an energy model. The north façade is a variegated green rainscreen panel system with punched windows as needed for the interior program. A perforated version of the panel is used to face the loading area on the west side of the Subject Property. The building skin extends above the roof to incorporate a roof terrace guardrail. The roof plan includes mechanical penthouse elements and stairs, a trellis, pavers, and a vegetated roof, and offers panoramic views of the river.

Loading is facilitated on the west side of the building off of the future 1-1/2 Street, S.E. located to the west of the Subject Property. An operable door provides access to a loading yard with docks for the new office building and the functional O Street Pumping Station. Fifteen on-

site parking spaces are located along the closed Canal Street, one of which is ADA-accessible, and six additional ADA parking spaces are located in the autocourt. Pedestrians can access the Subject Property from a checkpoint at the intersection of Canal Street and N Place or from the west side of the building at the future 1-1/2 Street, S.E.

The building and Subject Property together represent integrated sustainable and resilient design. The project is expected to achieve LEED Platinum and an even higher threshold, making it one of the most sustainable office buildings in the region. The building's ground floor is set one foot above the 500 year flood plain, and low impact development ("LID") planters and native plantings will promote infiltration and reduce runoff. The building skin is optimized for views and daylighting while preventing glare and unwanted solar radiation, and mechanical systems are anticipated to use pump station wastewater as a source of heat recovery. Furthermore, rainwater from the building's roof will be collected in a cistern to be used for toilet flushing.

As indicated in the memorandum from DC Water regarding the Subject Property's security constraints, attached hereto as Exhibit F, the Subject Property is deemed essential to supporting the United States government. Development of the Subject Property must therefore incorporate certain security measures and access restrictions, which impact operation and design of the new building and surrounding area, as described in detail in the attached memorandum.

C. Matter-of-Right Development under Existing W-2 Zoning Requirements

The Subject Property is currently zoned CG/W-2. The purpose of the Waterfront ("W") Districts is to encourage a diversity of compatible land uses at various densities, including combinations of residential, office, retail, recreational, arts and cultural, and other miscellaneous uses. 11 DCMR § 900.4. The W-2 District permits office use as a matter-of-right. 11 DCMR §

901.1(p). The W-2 District permits as a matter-of-right a maximum building height of 60 feet and a maximum density of 4.0 FAR, not more than 2.0 FAR of which may be used for non-residential purposes. 11 DCMR §§ 930.1 and 931.3.

D. Development under Proposed CR Zoning Requirements

The Applicant proposes to rezone the Subject Property to the CG/CR District in connection with this application. The CR District is intended to encourage a diversity of compatible land uses that may include a mixture of residential, office, retail, recreational, light industrial, and other miscellaneous uses. 11 DCMR § 600.1. The CR District permits office use as a matter of right. 11 DCMR § 601.1(q). As a matter-of-right, property in the CR District can be developed with a maximum building height of 90 feet and a maximum density of 6.0 FAR, not more than 3.0 FAR of which may be used for non-residential purposes. 11 DCMR § 630.1 and 631.1. PUDs in the CR District can be developed to a maximum building height of 110 feet and with a maximum density of 8.0 FAR. 11 DCMR §§ 2405. The CR District also requires that at least 10% of the lot area located immediately adjacent to the main entrance to the principal building or structure must serve as a transitional space between the street or pedestrian right-of-way and the building or structure. 11 DCMR § 633. Rear yards are only required for residential buildings. 11 DCMR § 636.1. Side yards are not required for any use, but if a side yard is provided, it must have a minimum width of three inches per foot of building height, but not less than eight feet. 11 DCMR § 637.

The parking and loading requirements for buildings are based upon the proposed use of the property. An office building in the CR District is required to provide one parking space for each additional 1,800 square feet of gross floor area in excess of 2,000 square feet. 11 DCMR § 2101.1.

An office building with 50,000-200,000 square feet of gross floor area, is required to provide two loading berths at 30 feet deep, two loading platforms at 100 square feet, and one service/delivery space at 20 feet deep. 11 DCMR § 2201.1.

D. Tabulation of Development Data

The tabulation of the project's development data is included in the Plans attached hereto as Exhibit E.

E. Flexibility under PUD Guidelines

The PUD process was created to allow greater flexibility in planning and design than might otherwise not be possible under conventional zoning procedures. Thus, the Applicant seeks flexibility with respect to the following provisions of the Zoning Regulations. As permitted under 11 DCMR § 2403, the Commission may grant such flexibility in its discretion.

A. Flexibility from the Public Space at Ground Level Requirements

Section 633 of the Zoning Regulations requires that in the CR District an area equivalent to 10% of the total lot area shall be provided for all new development (§ 633.1). This space is to be located immediately adjacent to the main entrance to the principal building to serve as a transitional space between the street or pedestrian right-of-way and the building (§ 633.2), and is required to be open and available to the general public on a continuous basis (§ 633.5). In this case, the Subject Property incorporates significant open space. However, as described in the memorandum from DC Water regarding the Subject Property's security constraints, attached hereto as Exhibit F, the Applicant is unable to provide this public open space at the entrance to the building. Moreover, due to security constraints, the spaces will not be open and available to the general public on a continuous basis. Instead, the two entrances to the Subject Property will be

protected by security zones and guarded check-points, and will be secured by best practice security measures.

Flexibility from Section 633 will not result in any negative impact. The project's design and program is cognizant of the urban design that the District hopes to achieve for the Subject Property. Although the project will be secured through security buffers and check points, these features will not prevent the public from being able to access the building for public meetings, business, or planned tours and/or planned events. Moreover, by securing the Subject Property, DC Water will be able to continue serving safe and reliable drinking water to city residents and visitors, and will be able to better protect its facilities by concentrating its resources in a single location.

B. Flexibility from the Parking Space Number Requirements

Section 2101.1 of the Zoning Regulations requires one parking space for each 1,800 square feet of gross floor area in excess of 2,000 square feet of gross floor area. Section 2104.1 provides that the number of parking spaces may be reduced to 75% of the amount ordinarily required for buildings located within a radius of 800 feet of a Metrorail station entrance. In this case, 92 on-site parking spaces are required for the proposed office use. Since the Subject Property is located within 800 feet of a Metrorail entrance, the PUD is required to provide 69 on-site parking spaces (75% of 92). However, the Applicant proposes to provide 21 on-site parking spaces.

As will be described in the Traffic and Loading Report prepared for this project by Gorove/Slade Associates, the Applicant's transportation consultant, the proposed number of parking spaces is sufficient to meet the anticipated parking demand for the building. The Subject Property is located in close proximity to multiple public transportation options, including Metrorail, Metrobus, car-share locations, and Capitol Bikeshare docks. In addition, the PUD will

include on-site bicycle parking. The proposed development is consistent with the Comprehensive Plan's goals of investing in transit-oriented development, improving pedestrian facilities, and providing multi-modal corridors that incorporate and balance a variety of mode choices. As a result of the ample alternative transportation options, the proposed 21 parking spaces are sufficient to serve the needs of the uses within the building.

C. Flexibility from the Roof Structure Requirements

The Applicant requests flexibility from the roof structure requirements of the Zoning Regulations because, as shown on the Roof Plan sheet included in the Plans, (i) there are multiple roof structures, requiring flexibility from 11 DCMR § 411.3; (ii) neither of the roof structures is set back at a 1:1 distance from the surrounding enclosing walls, requiring flexibility from 11 DCMR § 400.7; and (iii) the larger roof structure on the west side of the building will have multiple heights, requiring relief from 11 DCMR § 411.5.

As shown on the Plans, the building includes two roof structures: one located on the west side of the building that encloses storage space, bathrooms, a seating area, stair tower, and an elevator; and one located on the east side of the building that encloses a second stair tower. The number and location of the roof structures is driven by the layout and design of the office use within the building and the need to wrap the new building around the existing O Street Pumping Station. The roof structures are separated due to the Building Code requirement to provide separate means of egress to the roof, and to break up massing. Each roof structure is only as tall as it needs to be and provides the maximum possible setbacks from exterior walls. The western roof structure is two heights (one height for the main portion of the structure and a taller height over the elevator override equipment) in order to minimize visibility. Although a single, taller structure could

theoretically be built for the entire roof structure, doing so would be unduly restrictive and unreasonable, given that it would add unnecessary massing to the roof and would undermine the purpose of the Regulations, which is to exercise a degree of architectural control over roof structures. *See* 11 DCMR § 411. Moreover, the proposed roof structures are clad in quality materials that match the façade materials of the overall building and integrate well into the overall building design. Thus, the intent and purposes of the Zoning Regulations will not be materially impaired and the light and air of adjacent buildings will not be adversely affected.

D. Additional Areas of Flexibility

The Applicant has made every effort to provide the highest level of detail in the drawings to convey the quality and appropriateness of the project's design and uses for this location. Nonetheless, some flexibility is necessary with respect to certain details. Thus, the Applicant requests modest flexibility in the following areas:

- i. To vary the location and design of all interior components, including partitions, structural slabs, doors, hallways, columns, stairways, and mechanical rooms, provided that the variations do not change the exterior configuration of the building.
- ii. To vary the number, location and arrangement of parking (vehicular and bicycle) spaces.
- iii. To vary the sustainable design features of the building, provided the total number of LEED points achievable for the project is not below 80 points under the LEED Platinum rating standards.
- iv. To vary the final selection of the exterior materials within the color ranges and material types as proposed, based on availability at the time of construction without reducing the quality of the materials; and to make minor refinements to exterior details, locations, and dimensions, including: curtain wall mullions and spandrels, window frames, doorways, glass types, belt courses, sills, bases, cornices, railings and trim; and any other changes in order to comply with all applicable District of Columbia laws and regulations that are otherwise necessary to obtain a final building permit.

IV. THE PROJECT MEETS THE STANDARDS OF THE ZONING REGULATIONS AND PUD REQUIREMENTS

A. Standards Applicable to an Application for a Zoning Map Amendment

The Zoning Act sets forth a number of criteria that must be applied by the Commission when adopting and amending the Zoning Regulations and Zoning Map. The Zoning Act states that the Zoning Regulations are designed to "promote the health, safety, morals, convenience, order, prosperity, or general welfare of the District of Columbia and its planning and orderly development as the national capital" D.C. Code § 6-641.01 (2001). The Zoning Act further provides that:

[z]oning maps and regulations, and amendments thereto, shall not be inconsistent with the comprehensive plan for the national capital, and zoning regulations shall be designed to lessen congestion in the street, to secure safety from fire, panic, and other dangers, to promote health and the general welfare, to provide adequate light and air, to prevent the undue concentration of population and the overcrowding of land, and to promote such distribution of population and of the uses of land as would tend to create conditions favorable to health, safety, transportation, prosperity, protection of property, civic activity, and recreational, educational, and cultural opportunities, and as would tend to further economy and efficiency in the supply of public services. Such regulations shall be made with reasonable consideration, among other things, of the character of the respective districts and their suitability for the uses provided in the regulations, and with a view to encouraging stability of districts and of land values therein.

D.C. Code § 6-641.02 (2001). The Commission must apply those standards and criteria in determining whether to approve a requested map amendment. The proposed rezoning of the Subject Property from the CG/W-2 District to the CG/CR District in conjunction with the PUD as requested herein will promote each of the purposes described above.

B. PUD Process is Appropriate Mechanism for the Project

The PUD process is the appropriate mechanism for guiding the development of the Subject Property. It allows the project to be developed within the statutory purview of the Zoning Commission while at the same time providing opportunities for input from various agencies and parties. Through the PUD process, the Office of Planning and other District agencies will have the opportunity for greater participation in the fulfillment of the District's planning objectives for this area. Similarly, the adjacent property owners and area residents will have the opportunity to express their views about the proposed development. Accordingly, the use of the PUD process gives the community and District agencies an opportunity to work with the Applicant to ensure a well-planned development.

C. PUD Requirements under Chapter 24 of the Zoning Regulations

1. Area Requirements under Section 2401.1

The Zoning Regulations require a minimum land area of 15,000 square feet for a PUD to be located in the CR District. 11 DCMR § 2401.1(c). The Subject Property has a land area of 119,875 square feet and thus meets the area requirement of 11 DCMR § 2401.1.

2. Height and FAR Requirements under Sections 2405.1 and 2405.2

The PUD regulations for the CR District permit a maximum building height of 110 feet and a maximum density of 8.0 FAR, no more than 4.0 FAR of which may be devoted to commercial uses. 11 DCMR § 2405.1 and 2405.2. The proposed PUD has a maximum building height of 100 feet and an overall density of 1.39 FAR, and thus does not exceed the PUD height and density allowances.

3. Impacts of the Project under Section 2403.3

The proposed PUD will have a favorable impact on the surrounding area. Overall, the proposed development will significantly improve the area by virtue of the exceptional architectural design of the building, which carefully considers the nearby uses, urban and environmental context, and location adjacent to the Anacostia River. The proposed PUD will provide much-needed new office space for DC Water, and will bring hundreds of DC Water employees to the area to take advantage of and support the restaurant, retail, and community amenities currently being developed in the area. Moreover, the Subject Property is extraordinarily well-served by public transportation, with numerous bus routes and the Navy Yard Metrorail station in close proximity. Thus, the proposed development will generate a nominal amount of vehicular trips and will not have any unmitigated adverse traffic impacts on the surrounding neighborhood.

4. Not Inconsistent with Comprehensive Plan Under Section 2403.4

As discussed in the Comprehensive Plan analysis attached hereto as Exhibit G, the project is not inconsistent with the Comprehensive Plan.

D. Public Benefits and Project Amenities

The PUD guidelines require the evaluation of specific public benefits and project amenities for a proposed project. Public benefits are defined as "superior features of a proposed planned unit development that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from the development of the site under the matter of right provisions...." 11 DCMR § 2403.6. A project amenity is further defined as "one type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds attractiveness, convenience or comfort of the project for occupants and immediate neighbors." 11 DCMR § 2403.7. Additionally, when deliberating the merits of a PUD application, the Zoning

Commission is required to "judge, balance and reconcile the relative value of the project amenities and public benefits offered, the degree of development incentives requested, and any potential adverse effects according to the specific circumstances of the case." 11 DCMR § 2403.8. Public benefits and project amenities may be exhibited in a variety of ways and may overlap with a furthering of the policies and goals of the Comprehensive Plan.

The Applicant's project will help to achieve a number of the goals of the PUD process by creating a new office building for DC Water with thoughtful, high-quality, environmentally-friendly design that incorporates the existing O Street Pumping Station on the Subject Property. These and the other public benefits and amenities, described in more detail below, reflect and implement the goals of the PUD process, enhance the surrounding community, and benefit the District as a whole.

1. Urban Design, Architecture, Landscaping and Open Space (Section 2403.9(a)) and Site Planning, and Efficient and Economical Land Utilization (Section 2403.9(b))

As shown on the Plans, the project architect designed a building that will have a positive impact on the character of the surrounding neighborhood. The project includes a significant amount of landscaping features. As shown on the Site Plan included as part of the Plans, the closed Canal Street is located to the east of the new building and serves as the entrance to the new campus. Canal Street has been designed with permeable concrete pavers, LID plantings, and 15 parking spaces that serve the building. Canal Street offers the first glimpse of the Anacostia River beyond and the proposed design for the street respects the historic viewshed.

The southern end of Canal Streets leads to a plaza and autocourt. The autocourt contains six ADA parking spaces and 20 bicycle racks and incorporates paving that is punctuated by

channels that guide rainwater to surrounding plantings and a rainwater cistern that collects water for toilet flushing in the building. South of the plaza and autocourt is an elevated promenade that is made of pervious aluminum grating and rises over native plantings and stretches to the edge of the Anacostia River.

Along the Anacostia River to the south of the building is the esplanade that is set one foot above the 500-year flood plain and serves as a gathering space for employees to experience and understand fluctuations in water levels. At the southwest edge of the esplanade, elongated steps lead to demonstration gardens and serve as an informal amphitheater for scheduled events. Rounding the Subject Property onto 1-1/2 Street, S.E. to the west is the visitor entry, which is highlighted by LID street planters and native plantings.

Moreover, with respect to site planning and efficient and economical land utilization, the Applicant's proposal to develop the Subject Property with a new building while maintaining the existing O Street Pumping Station constitutes a significant urban design benefit. The requirement that the new office building not impact the operation of the existing pumping station, combined with the fact that below-grade infrastructure greatly limits the locations for structural footings, has necessitated an innovative approach to structuring the new building. The design conceals a four-story, 190-foot long, east-west truss that supports the building without bearing on the existing facility. The truss is integrated into the building's north façade so as to avoid any negative impacts to the interior space. The new building encapsulates the O Street Pumping Station on the south and east sides so that the pumping station will not be visible from the river. Overall, the new office building has been designed to maximize views and solar orientation, and provide an ideal office footprint, which together results in a distinctive and iconic sculptural form.

2. Transportation Features (Section 2403.9(c))

The proposed development will include a number of elements designed to promote effective and safe vehicular and pedestrian movement, through appropriate transportation management measures and convenient connections to public transportation services. The Applicant has engaged Gorove/Slade Associates to provide transportation planning and engineering assistance. Thus far, Gorove/Slade's efforts have revolved around three major tasks: (1) reviewing transportation elements of the site plan, (2) preparing a scoping document of the CTR for submission to DDOT, and (3) initiating the base transportation analyses. The scope of the transportation analysis is under development based on the DDOT CTR guidelines and a subsequent scoping meeting is planned to be scheduled in the coming weeks. The project team anticipates that DDOT will expect a full CTR including a traffic impact analysis, a multimodal transportation review, a parking demand study, and loading review, to address the impacts of the PUD. The CTR that will be prepared will include discussion and analysis on the following topics:

- **Introduction** - An introduction to the project describing the surrounding roadway network, transit, car-sharing facilities, bicycle facilities, and pedestrian infrastructure. A review of nearby developments and District initiatives will also be included.
- **Design Review** – The development program, site access and circulation, loading, parking, and bicycle facilities associated with the project will be reviewed. Potential Transportation Demand Management strategies will be recommended as well.
- **Vehicular Impacts** – The operation of nearby intersections with the additional trips generated by the PUD will be compared to the existing operations as well as the future operations without the PUD to determine the vehicular impacts of the development. This analysis will include a review of potential mitigation options and crash data as supplied by DDOT for vehicular safety implications.
- **Transit, Pedestrian, and Bicycle Impacts** – The surrounding transit, pedestrian, and, bicycle networks will also be reviewed for any potential impacts that the PUD may have once constructed.

The CTR will be submitted at least 45 days prior to the PUD hearing. The initial PUD submittal will occur well before that deadline and thus the study is still often a work in progress as is the case now. Gorove/Slade will base all analyses on the actual PUD submittal, so that recommendations can be incorporated into the prehearing submission while meeting DDOT's 45-day deadline.

3. Environmental Benefits (Section 2403.9(h))

The Applicant is fully committed to providing a high-quality office building in the District of Columbia that is sensitive to the natural environment and holistically benefits the project's employees. The Applicant will ensure environmental, economic, and social sustainability through a variety of sustainable design features and strategies that will enhance the already sustainable nature of the Subject Property's location. The proposed development provides a host of environmental benefits, including street tree planting and maintenance, landscaping, renewable energy and energy efficient sources, methods to reduce stormwater runoff, and green engineering practices. As shown on the conceptual LEED checklist included with Plans, the building will be pursuing LEED Platinum certification and will integrate many sustainable design features, including (i) an innovative heat recovery system that captures heat from O Street Pumping Station's sewage; (ii) an ideal footprint for daylighting that greatly reduces the hours that require electric lighting; (iii) energy efficient skin with solar shading elements that will reduce unwanted solar heat gain; (iv) a rainwater harvesting system that will capture rainwater from the building and Subject Property to be used for toilet flushing in the building; (v) a vegetated roof; and (vi) native plantings throughout the Subject Property. The main lobby and portions of the Subject Property will include educational and interpretive materials that highlight the innovative

sustainable components of the project and express DC Water's mission. Overall, the new DC Water headquarters building will be an important addition to the District's position as a leader in the development of truly sustainable cities.

4. Employment and Training Opportunities (Section 2403.9(e))

The design and construction of the proposed building is subject to a Fair Share Objective for Minority and Women Business Enterprises program participation of 28% and 4%, respectively, for the professional services component (design phase), and 32% and 6%, respectively, for the construction component.

The design-builder, Skanska Building USE, is also required to (i) comply with the DC Water Works Employment Plan requirements, which include but are not limited to providing an Employment Plan and apprenticeship information and regularly submitting employment data through an online reporting system; and (ii) provide additional employment data as may reasonably be requested for presentation in DC Water's Employment Report to the Board of Directors and others on a periodic basis at no additional cost to the project. The program also requires the contractor to flow down the Employment Plans to first and second tier subcontractors that meet certain criteria, and to comply with reasonable requirements of the permanent program that may be imposed during the employment program development process and/or at incorporation of the permanent employment program into the contract.

5. Uses of Special Value to the Neighborhood (Section 2403.9(i))

The proposed DC Water headquarter building, located next to the historic Main Pumping Station, will be DC Water's most sustainable construction project ever and will provide a visible connection to the community that it serves. The headquarters will anchor DC Water's new campus

along the Anacostia River, which embraces DC Water's relationship to the watershed and reflects its stewardship of the natural and built environments.

Currently, DC Water's administration functions are located at the COF's five-story Blue Plains plant, and scattered throughout other water and sewer facilities within the District. As part of the Non-Process Facilities Master Planning effort, approved by the DC Water Board of Directors in September, 2013, DC Water has developed a holistic plan for all office space to take strategic advantage of the existing facilities around the District and eliminate leased space. DC Water has undertaken a detailed analysis of its facility needs, and concluded that there is no available room for expansion of office facilities at Blue Plains, since DC Water is already challenged by the lack of space at Blue Plains for future process improvements if required by permit or desired for innovation.

The COF has reached its capacity, necessitating the use of much-valued land at Blue Plains for the placement of office trailers, rather than for its intended use. To alleviate the overcrowding at the COF, and to free-up land for use in the expansion and improvement of the plant processing operations, DC Water identified the need to construct a new headquarters building at a location off-site from Blue Plains. Based on an in-depth feasibility study, DC Water determined that it was in its best interest to utilize property already under its control, and an ideal location would be at the Main and O Street Pumping Stations' campus along the north side of the Anacostia River. The new headquarters building will, among other things, consolidate and relocate all administration-related personnel into one centrally-located facility. By relocating nonessential personnel off of the Blue Plains industrial campus, DC Water will be better positioned to manage risks and mitigate accidents caused by operations or natural disasters. This plan preserves space for strategic growth

and allows for flexibility in using DC Water land, which will optimize operational efficiencies and improve response time to customers.

The headquarters building will demonstrate that DC Water's mission is essential to every living organism. DC Water distributes safe and clean drinking water and treats and recovers valuable resources through wastewater collection and treatment. The new facility will also emphasize DC Water's historic role in serving the DC metropolitan region for over a century by providing scheduled educational programming inside the building and throughout the Subject Property. Interpretive and interactive exhibition spaces will tell the story of DC Water's past, present, and future efforts to protect the public's health and act as a vital steward of the environment, from the Rock Creek, Potomac, and Anacostia Rivers, to the Chesapeake Bay.

DC Water also intends to achieve the highest level of sustainability for the project, consistent with the project's budget goal, including attainment of a LEED Platinum certification in furtherance of DC Water's strategic goals and commitment to protecting the environment, particularly in the areas of storm water management, energy conservation, and the use of renewable energy. This sustainability goal will be achieved by incorporating innovative design concepts, including (i) 100% retention and recapture of storm water onsite; (ii) installation of heat recovery and rejection systems, utilizing the large central sanitary sewer conduits existing at the O Street Pumping Station; and (iii) incorporation of LID landscaping features, such as bio-swales, pervious pavements, and native vegetation, which will serve as both educational and demonstrational components. DC Water hopes to partner with local community groups and other key stakeholders to host specialized tours and allow the public to enjoy even greater access to the Subject Property during planned events during the summer.

6. Other Ways the PUD Substantially Advances the Major Themes and Policies of the Comprehensive Plan (Section 2403.9(j))

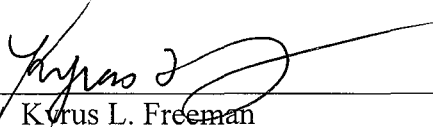
The PUD will substantially advance the policies and actions of the Comprehensive Plan's Infrastructure Element, which are essential to the District's future, both to meet the demands of existing users and to accommodate future change and development. *See* 10A DCMR § 1300.1. The critical infrastructure issues facing the District are addressed in the Infrastructure Element, and include improvements to water quality and public health by addressing the city's combined sewer and wastewater system, and modernization of the water distribution system. As set forth in the Comprehensive Plan compliance analysis attached hereto as Exhibit G, the proposed PUD helps to further the District's specific policies related to drinking water, wastewater, and stormwater systems. For example, construction of the new headquarters building will ensure that DC Water has adequate facilities to repair and replace aging infrastructure; to upgrade the water distribution system to meet current and future demand; and to ensure that DC Water can provide adequate water supply and pressure to all areas of the District.

IV. CONCLUSION

For the reasons stated above, the Applicant submits that the PUD and zoning map amendment meet the standards of Chapter 24 of the Zoning Regulations and are consistent with the purposes and intent of the Zoning Regulations and Zoning Map. Accordingly, the Applicant requests that the Zoning Commission determine that the application has merit and that a public hearing on the application should be scheduled.

Respectfully submitted:

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