



The SW Ecodistrict Plan

ADDENDUM



SEPTEMBER 2014



The 15-block study area in Southwest Washington, DC is bound by Independence Avenue to the north, Maine Avenue to the south, 12th Street to the west, and 4th Street to the east. This area comprises approximately 110 acres and includes privately and publicly owned land.

Unless otherwise noted, all streets are located in southwest Washington. The 'SW' suffix is presumed.

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|--|--|---|---|
| <ul style="list-style-type: none"> ① U.S. Department of Agriculture ② General Services Administration Central Utility Plant ③ Cotton Annex ④ U.S. Department of Energy (Forrestal Complex) ⑤ U.S. Postal Service ⑥ Federal Aviation Administration (Orville Wright Building) ⑦ Federal Aviation Administration (Wilbur Wright Building) | <ul style="list-style-type: none"> ⑧ US Department of Housing and Urban Development (Weaver Building) ⑨ General Services Administration (Regional Office Building) ⑩ U.S. Department of Education (Johnson Building) ⑪ Voice of America ⑫ US Departments of Health and Human Services / Education ⑬ Smithsonian Castle ⑭ Smithsonian Institution ⑮ The National Mall | <ul style="list-style-type: none"> ⑯ Reservation 113 ⑰ Reservation 115 ⑱ Proposed Eisenhower Memorial ⑲ Banneker Park ⑳ Jefferson Elementary School ㉑ DC Government Offices ㉒ DC Fire Department ㉓ DC Forensics Lab ㉔ Mandarin Oriental Hotel ㉕ Republic Properties ㉖ Potomac Center North, Inc. | <ul style="list-style-type: none"> ㉗ CIM Urban Reit, LLC ㉘ L'Enfant Plaza Hotel ㉙ L'Enfant Colony, LLC ㉚ PN Hoffman/The Wharf ㉛ NBL Associates ㉜ Private Residential ㉝ Boston Properties ㉞ 300 7th Street, LLC ㉟ Constitution Center ㊱ St. Dominic's Church ㊲ Federal Center Hotel Association |
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Overview

The *SW Ecodistrict Plan* was accepted by the National Capital Planning Commission in January of 2013. This addendum includes technical information that informed the plan and additional guidance on urban design principles as a result of several follow-up studies since the plan's completion. The addendum's purpose is to:

- › Provide technical information that informed the development of the *SW Ecodistrict Plan*.
- › Add clarity to the key public realm and development objectives of the *SW Ecodistrict Plan*.
- › Provide urban design principles that:
 - » Ensure new development is compatible with the monumental core of the nation's capital.
 - » Bridge the national and city interests as the area redevelops.
 - » Extend the civic character of the National Mall to Banneker Park.
 - » Create a site for a new museum or cultural use at Banneker Park.
 - » Preserve and enhance the importance of Maryland, Virginia, and Independence Avenues and 10th Street as significant elements of the monumental core and the nation's capital.

Use and Application

This appendix is a guiding document for future planning development decisions. It is not a regulatory document. It is intended to be used to:

- › Inform future planning/redevelopment for the area.
- › Provide predictability and continuity for development in the area.
- › Inform the development and implementation of Smithsonian Master Plans.
- › Inform review of planning and development proposals.

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1

General Development Principles

(SW Ecodistrict Plan pages 5 - 23)

HEIGHT AND MASSING¹

- › Building massing and design should reinforce the street wall and define L'Enfant² streets, landmark elements, view corridors, and open spaces.
- › New building massing and design should complement surrounding buildings in scale, proportion, setback, and alignment of horizontal, and vertical elements.
- › Building height should ensure the prominence of national symbols such as the U.S. Capitol, Washington Monument, and the Smithsonian Castle when viewed from within the city and from panoramic viewpoints.
- › Architectural embellishments, such as towers and spires should not compete with the Smithsonian buildings or views of the National Mall, the Capitol, and Banneker Park.
- › Building massing and design should encourage mid-block passage to improve walkability and scale of development.

BUILD-TO-LINES

- › Building design should form a consistent street wall at the property line. See build-to line exceptions for Independence Avenue (page 11) and Banneker Park (page 30).
- › Exceptions to the build-to-line may be provided for the provision of pedestrian entries and other outdoor features such as arcades, plazas, courtyards, outdoor seating and walk-up windows.

ROOFSCAPE

- › Roofscapes are critical visual elements to create successful buildings. Rooftop mechanical and telecom equipment should be integrated within the building mass. Antennas should be appropriately screened or hidden from view. Whenever possible, roof structures should be located so that they are not visible from the street. All roof structures should be attractively designed as integral parts of the overall building composition. Roof structures should maintain the same quality of materials, design interest, and architectural detail as other parts of the building façade.

FAÇADE COMPOSITION

- › Façades along primary streets should have a high level of design, materials, and articulation. The intent is to break down the scale of expansive buildings on a block to add variety, interest, and a pedestrian scale. This can be achieved in several ways:
 - › Providing multiple openings
 - › Varying elevations, planes, and building materials
 - › Highlighting structural bays, building bases, and roof lines
- › New building massing and design should consider the design of adjacent existing or proposed buildings.

¹The height and massing of the development scenario in the 2013 *SW Ecodistrict Plan* does not reflect the 2014 legislation to allow occupancy of the penthouse.

²When referring to L'Enfant streets, the *SW Ecodistrict Plan* and the Addendum include Virginia Avenue from Reservation 113 to Independence. This segment was added in the Ellicott Plan of 1792.

GROUND FLOOR

- › The ground floor level design and scale of building façades should enhance the pedestrian experience by being visually interesting, transparent, and active.
- › Breaks in the ground floor for vehicular and service entries should be minimized.
- › Blank walls on the ground floor should be minimized. If continuous lengths of blank walls are unavoidable, the blank walls shall be articulated to provide interest and variety to the streetscape.
- › Entries should be oriented to a public street or park and should be prominent and visually distinctive from the rest of the façade with creative use of scale, materials, glazing, projecting or recessed forms, architectural details, color, and/or awnings.
- › Buildings on parcels adjacent to Reservation 113 should be designed to engage the park with prominent entries and ground floor uses.

SIGNAGE, AWNINGS, AND PROJECTIONS ON INDEPENDENCE, MARYLAND, AND VIRGINIA AVENUES AND 10TH STREET

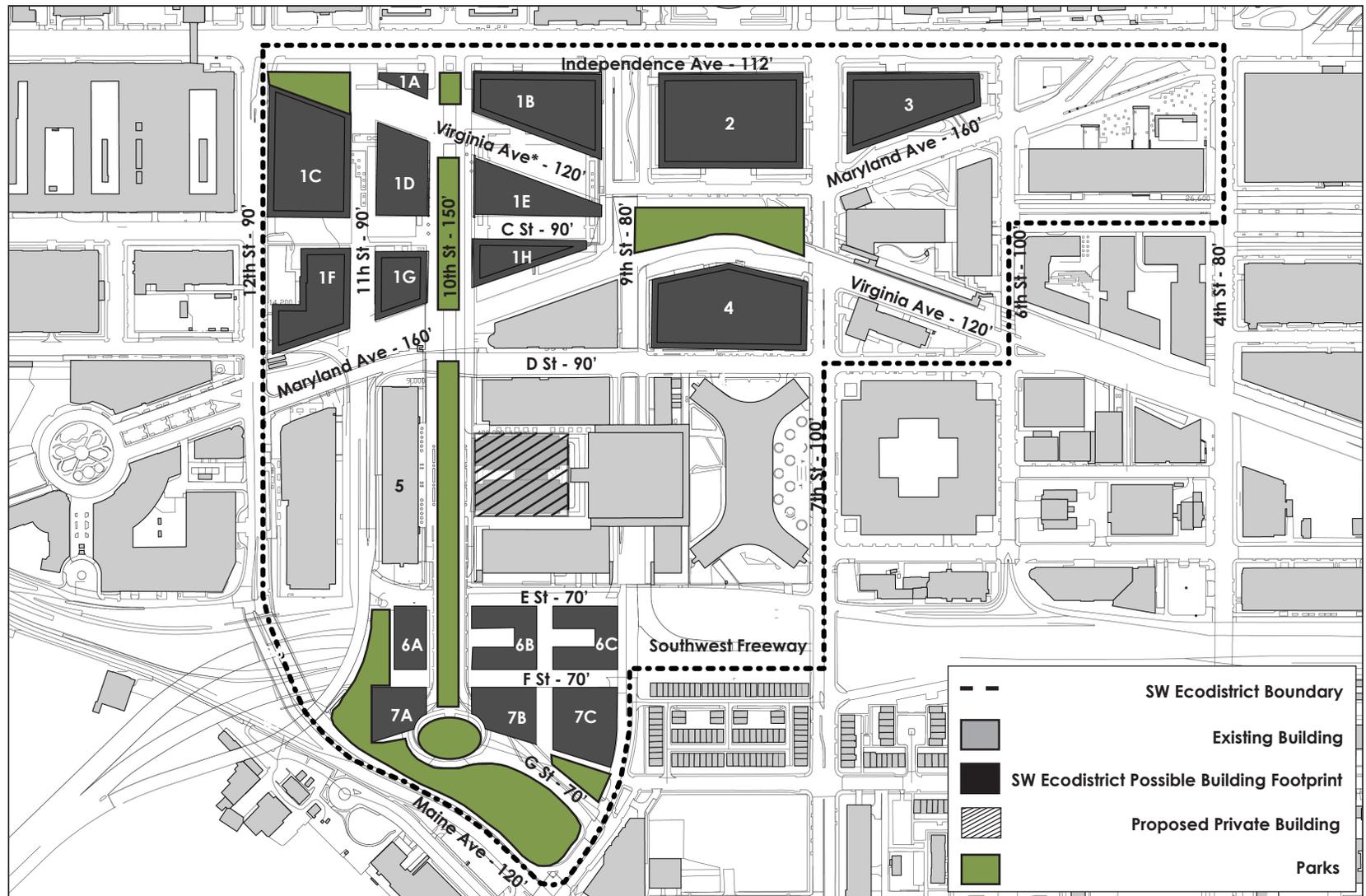
- › Signs should be distinctive, well-crafted and oriented toward the pedestrian.
- › No signs should be placed above the second floor of a building.
- › No fluctuating, pulsating, or moving lights designed to change appearance, or motion videos, should be permitted.
- › Awnings should be designed to be compatible and harmonious with the architectural character and overall façade organization of the building.

- › No projections into the right-of-way - such as unenclosed balconies - should be permitted on Independence and Maryland Avenues.

PUBLIC REALM

- › Use landscaping, including trees, shrubs, and ground cover plantings to create defined outdoor spaces; reinforce important views and corridors; and establish active and intimate spaces.
- › Use landscaping to provide shade, beauty, perspective, massing, and color to strengthen the identity of the area.
- › Design the public realm and infrastructure to foster a diverse and healthy urban ecology.
- › Hardscape elements should use the overall material selection of the National Mall and Federal Triangle — most are listed in the *National Mall Road Streetscape Manual*. These elements should take on their own character through combinations and finishes that create a unique vocabulary and sense of place for the SW Ecodistrict. These materials should be high-quality and durable.
- › Landscape elements should focus on native plants of the Mid-Atlantic region which are also tolerant of urban conditions. Plantings should include a complete palette of large canopy trees, understory trees, shrubs, perennials, and groundcover. Above-ground elements such as roof and vertical gardens should be used in areas where ground-level plantings aren't feasible.
- › Incorporate landmark elements into the public realm such as commemorative walks and public art. These should not compete with views of national symbols such as the U.S. Capitol or the Washington Monument.

SW ECODISTRICT STREET WIDTHS



ASSUMPTIONS

1. The allowable height per the Height of Buildings Act is determined by the width of the street in which the building fronts plus 20' up to 130'.
2. All of the parcels that are adjacent to the Maryland Avenue can achieve 130' in height from other adjacent streets.
3. Buildings fronting 10th Street can take their height from 10th Street (even as it becomes a bridge south of Maryland Avenue). The rationale is that several existing buildings which were built during urban renewal already front (and measure their height) from 10th Street (DOE, USPS, L'Enfant Plaza).

*Historically, L'Enfant Avenues are 160' in width. Some resource materials indicate that Virginia Avenue is 120' in this area. The *SW Ecodistrict Plan* showed its width at 120', suggesting that because of a change in conditions, a reduction could be evaluated for future consideration.

THE HEIGHT OF BUILDINGS ACT | NATIONAL INTERESTS TO PROTECT

Parcel	Which streets(s) does the parcel front?	Allowed Height per the Height Act/ Zoning Regulations*	National Interests to Protect	Additional Guidance
1a	Independence Ave / 10 th Street / Virginia Ave	130'/TBD*	Views of the Smithsonian Campus, the Washington Monument, Banneker Park, and views from the National Mall.	Special consideration should be given to design, height and massing to protect views of the Smithsonian Campus, the Washington Monument, and views from the Mall.
1b	Independence Ave / 10 th Street / Virginia Ave	130'/TBD*	Views of the Smithsonian Campus, the Washington Monument, Banneker Park, and views from the National Mall.	Special consideration should be given to design, height and massing to protect views of the Smithsonian Campus, the Washington Monument, and views from the Mall.
1c	Virginia Ave / 12 th Street	130'/TBD*	Views of the Smithsonian Campus, the Washington Monument, Banneker Park, and views from the National Mall.	Special consideration should be given to design, height and massing to protect views of the Smithsonian Campus, the Washington Monument, and views from the Mall.
1d	Virginia Ave / 10 th Street	130'/TBD*	Views of the Washington Monument, Smithsonian Castle, and Banneker Park.	Building design should respect views of the Washington Monument, Smithsonian Castle and Banneker Park.
1e	Virginia Ave / 10 th Street	130'/TBD*	Views of the Washington Monument, Smithsonian Castle, and Banneker Park. Reservation 113.	Building design should engage Reservation 113 and have an entrance that fronts the park. Building design should respect views of the Washington Monument, Smithsonian Castle and Banneker Park.
1f	11th Street / 12 th Street/ Maryland Ave	130'/TBD*	Views of the Capitol.	Building design should respect views of the Washington Monument, the Smithsonian Castle, and Banneker Park.
1g	10 th Street / Maryland Ave	130'/TBD*	Views of the Banneker Park, the Smithsonian Castle, and the Capitol.	Building design should respect views of the Capitol, the Smithsonian Castle, and Banneker Park.
1h	10 th Street / Maryland Ave	130'/TBD*	Views of Banneker Park, the Smithsonian Castle and the Capitol.	Building design should engage Reservation 113 and have an entrance that fronts the park. Building design should respect views of the Capitol and the Smithsonian Castle.
2	Independence Ave / Reservation 113	130'/TBD*	Views of the Smithsonian Campus and from the National Mall. Reservation 113.	Special consideration should be given to design, height, and massing to protect views of the Smithsonian Campus and views from the Mall. Building design should engage Reservation 113 and have an entrance that fronts the park.
3	Independence Ave/7th/Maryland Ave	130'/TBD*	Views of the Capitol, the Smithsonian Campus and from the National Mall. Reservation 113.	Special consideration should be given to design, height, and massing to protect views of the Smithsonian Campus and from the Mall.
4	Reservation 113 (Maryland Ave) / D Street / 7 th Street	120'/TBD*	Reservation 113	Building design should engage Reservation 113 and have an entrance that fronts the park.
5	10 th Street	N/A (street level uses)	Views of the Smithsonian Castle/Banneker Park	Street-level retail, educational, and cultural uses along the USPS building's 10 th Street frontage should not impact the lobby on the ground floor.
6a	10 th Street	TBD**	Views of the Smithsonian Castle and Banneker Park.	Building design should respect views of Banneker Park.
6b	10 th Street	TBD**	Views of the Smithsonian Castle and Banneker Park.	Building design should respect views of Banneker Park
6c	F, G, and 9 th Streets	TBD**	N/A	Building massing should respect neighborhood development.
7a	Banneker Park	TBD**	New museum/commemorative work on National Park Service property	Building massing should respect views of the Washington Monument from Maine Avenue. The building should step down and setback to respect neighborhood development.
7b	Banneker Park	TBD**	New museum/commemorative work on National Park Service property	The building should step down and setback to respect neighborhood development.
7c	Banneker Park	TBD**	New museum/commemorative work on National Park Service property	The building should step down and setback to respect neighborhood development.

*The allowable height per zoning will be determined through the District zoning rewrite. It may result in maximum allowable heights that are more restrictive than what the Height of Buildings Act allows.

** Building heights need further analysis.

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Street Character

(SW Ecodistrict Plan pages 16 - 21)

The *SW Ecodistrict Plan* defines the character of each street within the plan boundary as monumental, civic, local or city as defined below.

ECODISTRICT PLAN STREET TYPE

- › Monumental: These streets are defined by their significant views towards prominent monuments and civic and governmental structures. The land use mix, programming and design of these streets should generate and prioritize pedestrian activity and respect the character and dignity of the monumental core of the nation’s capital. This classification would correlate with the District’s primary streets classification. Careful consideration should be given to the design of retail, service, and entertainment uses.
- › Civic: This typology refers to 10th Street. While prominent viewsheds also play a significant role on this street, emphasis is placed on the need for the street to accommodate a variety of outdoor events, both planned and impromptu, permanent and temporary. This street has a more park-like setting that encourages pedestrian activity. The land use mix, programming, and design of these streets should encourage active ground floor uses that generate and prioritize pedestrian activity while respecting the character and dignity of the nation’s capital.
- › Local: Similar to the zoning code’s secondary street classification, these streets accommodate a greater mix of uses and day-to-day utilitarian uses like garage and ancillary residential entrances. These

streets also provide more east-west and north-south neighborhood connections.

- › City: These streets should be designed for the pedestrian and accommodate efficient multi-modal cross-town vehicular traffic connection to freeways and other parts of the city. These streets allow a greater mix of uses.



STREET FUNCTION AND CHARACTER





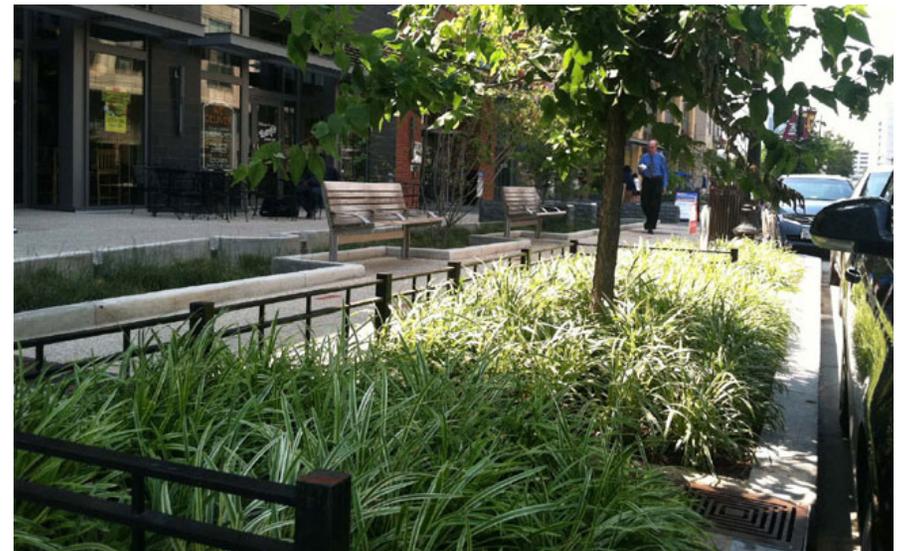
Civic street example: Las Ramblas, Barcelona



Monumental street example: Constitution Avenue, Washington, DC



City street example: 14th Street, NW, Washington, DC



Local street example: 1st Street, NE, Washington, DC

RIGHT-OF-WAY DESIGN SUMMARY

Street Name	Right-of-Way Classification		Development Design Guidelines		Proposed Right-of-Way Design Characteristics													
	SW Ecodistrict	District of Columbia	Active Ground-Floor Requirements	Parking / Service / Loading Access	Right-of-Way			Build-to-Line	Vehicular Accomodation				Pedestrian Accommodation				Transit Facilities	Bike Facility
	Design Role and Character	Functional Classification Map	Guidelines for first 30' including: use, first floor clear height, façade transparency, building entries	Should it be allowed in the future along this frontage without an exception?	Historic	Existing	Proposed		Cartway (includes gutter)	Travel	Parking	Potential for Curb Extensions at Intersections	Sidewalks	Tree Box / Furnishing Area	Sidewalk Area (Pedestrian Clear Zone)	Tenant Zone (Public Parking Area) Varies		Cycle tracks, Bike Lanes, Sharrows
Diagonal Avenues																		
Independence Avenue	Monumental	Principal Arterial	Yes	No	112'	112'	To be determined	Varies	80'	6 - 10' Lanes	2 - 10' off peak lanes	Yes	2 - 20' Sidewalks	Exist	Exist	Exist	Bus	To be determined
Potential variations on the design of right-of-way, with DDOT coordination, may include: intersection treatments, road diets, incorporation of curb extensions, accommodation of dedicated bike facilities, etc.																		
Virginia Avenue	Monumental	Not Applicable	Yes	No	120'	Section not Built	120'	0'	40'	2 - 12' Lanes	2 - 8' Lanes	Yes	2 - 40' Sidewalks	To be determined	To be determined	To be determined		To be determined
The design of the Right-of-Way, including dedicated width, will be evaluated with specific development/design proposals through a design review process																		
Maryland Avenue	Monumental	Local East of 12th, Collector East of 7th.	Yes	No	160'	Section not Built	160' as feasible	0'	40'	2 - 12' Lanes	2 - 8' Lanes	Yes	2-60' Areas = 2 - 14' Sidewalks at Building, 2 - 33' Landscape Zones, 2 - 13' Sidewalks at Roadway	7' Near Roadway	8' Near Building, 6' Near Roadway	6' Near Building		Sharrows
East-West Streets																		
C Street	Local	Local	Adjacent to Reservation 113	Yes - West of 9th	80'	90' (west of 9th Street)	90'	0'	40'	2 - 12' Lanes	2 - 8' Lanes	Yes	2 - 25' Areas	9'	10'	6'		To be determined
The function, configuration and continuity of C Street between 10th Street and 9th Street may vary dependent on potential redevelopment in Federal Triangle South and may be evaluated through a design review process.																		
D Street	Local	Minor Arterial	Yes	No	70'	90'	90'	0'	56'	3 - 12' Lanes	2 - 10' Off Peak Lanes	Review with Streetcar	2 - 17' Areas	7'	10'		Bus, Potential Streetcar	Not with Streetcar
E Street	Local	Not Applicable		Yes	N/A	N/A	70' (Potential)	0'	To be determined	2 - 11' Lanes	2 - 8' Lanes	Yes	2 - 13' Areas	7'	6'			To be determined
F Street	Local	Not Applicable		Yes	N/A	N/A	70' (Potential)	0'	To be determined	2 - 11' Lanes	2 - 8' Lanes	Yes	2 - 13' Areas	7'	6'			To be determined
G Street	Local	Local	Yes	No	90'	N/A	70' (Potential - west of 9th Street)	0'	32'	2 - 11' Lanes	Not provided	Yes	2 - 19' Areas	7'	10'	2'	Bus	2 - 5' Bike Lanes
North-South Streets																		
12th Street	City	Local	Yes	No	85'	90'	90'	0'	60'	6 - 10' Lanes	Not provided	To be Determined	2-15' Areas	5'	10'		Bus	To be determined
11th Street	Local / Freeway	Other Freeway and Expressway		Yes	N/A	90'	80'	0'	Varies - To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined
10th Street	Civic	Collector	Yes	No	85'	150'	150'	0'	2-20' = 40'	2 - 12' Lanes	2 - 8' Lanes	No - for flexibility for two way travel during events	2 - 24' Sidewalks, 52' Median	8'	10'	6'	Potential Bus	2 - 5' Cycle Tracks
9th Street	Local / Freeway	Other Freeway and Expressway /Collector		Yes	85'	80'	To be determined	0'	Varies - to be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined	To be determined
7th Street	City	Minor Arterial	Yes	No	85'	100'	100'	0'	72'	6 - 12' Lanes	Not provided	Review with Streetcar	2 - 14' Areas	4'	10'		Bus, Potential Streetcar	Not with Streetcar
6th Street	Local	Collector		Yes	100'	100'	100'	0'	40'	2 - 10' Lanes	2 - 10' Lanes	To be determined	2 - 30' Areas	7'	10'	13'		To be determined
4th Street	Local	Minor Arterial	Yes	No	80'	80'	80'	0'	56'	4 - 10' Lanes	2 - 8' Lanes	To be determined	2 - 12' Areas	6'	6'			To be determined

3

Independence Avenue

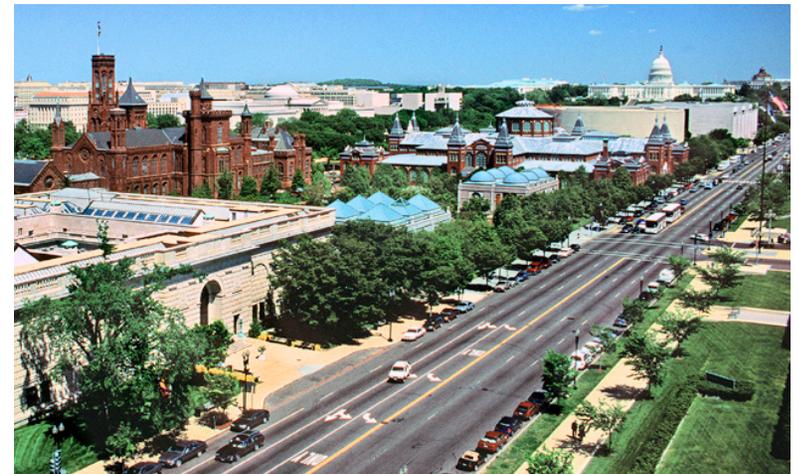
(SW Ecodistrict Plan pages 58 - 61)

Independence Avenue is characterized as a monumental street because it is adjacent to the Mall and Smithsonian campus, and connects to the U.S. Capitol. The role it plays is similar to Constitution Avenue on the north side of the Mall.

Independence Avenue is home to the Smithsonian's southern campus (north side) and several low profile federal buildings (south side). The height and setbacks of the federal buildings are such that they generally can not be seen over the rooflines of the Smithsonian buildings when standing on the Mall. The federal buildings also have a low-profile when viewed in between the Smithsonian buildings from the Mall. The result when experiencing the Mall is that of a truly public space framed by trees and civic institutions.

- › Building height and massing along Independence Avenue should respect the character and experience of the National Mall's public space and the scale of the Smithsonian Campus. New or redeveloped buildings along Independence Avenue should not compete with the Smithsonian buildings or privatize the character of the public space. Views of the tree line, the Smithsonian buildings, and open sky from the National Mall should be maximized (see explanation of the modeling that was developed for the *SW Ecodistrict Plan*, Addendum page 12 and 20).
- › Land use on Independence Avenue should encourage street life activity and be compatible with the National Mall and its adjacent cultural institutions.
- › New buildings on Independence Avenue should consider stepping back a few feet at 35-45 feet in height to reinforce a pedestrian scale and a relationship with the Smithsonian campus.

- › Careful consideration should be given to the height, massing, and design of any new building on parcel 1C (see page 6) because of its location at 12th Street, Virginia Avenue, and Independence Avenue, and its close proximity to the U.S. Agriculture building and the Smithsonian Campus.
- › The build-to line on Independence Avenue should align with the corner of the U.S. Department of Agriculture (USDA) that is inset at the intersection of 12th Street and Independence Avenue (see diagram on page 14).
- › Landmark elements such as public art or commemorative works should be considered at important intersections to orient visitors to the area but should not compete with views of national symbols. Potential intersections include:
 - ›› Independence Avenue and 10th Street
 - ›› Independence and Virginia Avenues



Independence Avenue looking northeast towards the U.S. Capitol

SW ECODISTRICT PLAN ASSUMPTIONS FOR INDEPENDENCE AVENUE HEIGHT AND MASSING

Several factors contributed to the proposed height and massing of the development scenario in the *SW Ecodistrict Plan*. These include the desire for a vibrant mixed-use neighborhood; GSA's asset management needs; the protection of views from the National Mall consisting of the Smithsonian buildings and the open sky; and the sense of symmetry of new development on Independence Avenue and with the Smithsonian Campus.

While the existing building height and setbacks (which are similar to those of the Smithsonian buildings) would best protect the open sky views and public character of the National Mall, the plan recognized that the existing scale of development would not meet all of the plan's objectives.

The proposed development scenario sought to balance all of these objectives. The development scenario and physical model (below) show the height of buildings on the south side of Independence Avenue at a maximum of 130' with a setback from the property line and a step back further up, inclusive of all penthouses and mechanical equipment. While this scenario has a greater impact on the national interests than what exists today, it maintains a sense of symmetry along Independence Avenue and a sense of openness from the Mall. The architectural features of the Smithsonian Castle and campus buildings are still prominent against the sky.¹

The *SW Ecodistrict Plan*/model assumed a setback of approximately 34' from the southern right-of-way

(ROW) line² to align with the corner of the USDA South Building that is inset at the intersection of 12th Street and Independence Avenue (see diagram on page 14) to align with the northeast reentrant corner of the USDA building at 12th and Independence.

The purpose of this setback is to maintain a similar setback as the Smithsonian buildings, and provide more ample sidewalk space and sunlight than what currently exists in front of the USDA south building. As important, the 34' setback helps to mitigate the impact of the proposed height (130' inclusive of penthouse and mechanical equipment) on Independence Avenue as viewed from the National Mall.

Finally, the model shows a cornice line for the buildings on Independence Avenue at approximately 80-90' height to create symmetry with the scale of the Smithsonian buildings. The stepback shown is approximately 5'.

¹ Additional modeling for this area will need to occur in the future to ensure a massing scenario that meets all of these objectives.

² Data source is DC GIS.



Model image of Independence Avenue looking east (left) and west (right) as proposed in the *SW Ecodistrict Plan*

INDEPENDENCE AVENUE EXISTING SETBACKS

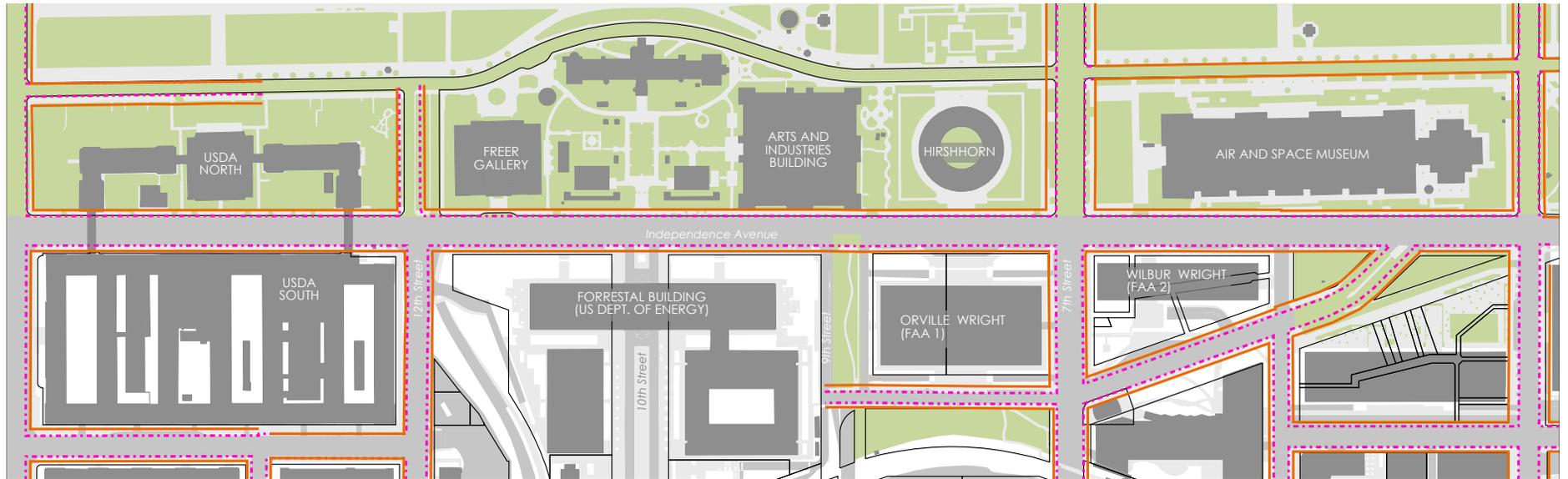
The existing height and setbacks vary by building on the south side of Independence Avenue; in general, the taller the building, the greater the setback. The Orville Wright building is the tallest building at 130' (with an additional penthouse) but it is set back approximately 87' from the property line (95' from the ROW line). The primary facade of the USDA South building has a setback of 6' from the ROW line but is 82' in height.

Building	Detail number	Height	Setback from property line	Setback from ROW line
USDA South Building (main façade)	1	82'	0' from the property line along Independence Ave.	6' to ROW line
USDA South Building (corner that is inset)	1	82'	19' from the property line at the corner of 12th and Independence Ave.	34' to ROW line
Forrestal Building (Dept. of Energy)	3	88'	79' from the property line	88' to ROW line
Orville Wright (FAA)	5	130'	87' from the property line	95' to ROW line
Wilbur Wright (FAA)	6	83'	21' from the property line	33' to ROW line

Source: DC GIS Data

INDEPENDENCE AVENUE EXISTING AND PROPOSED SETBACKS

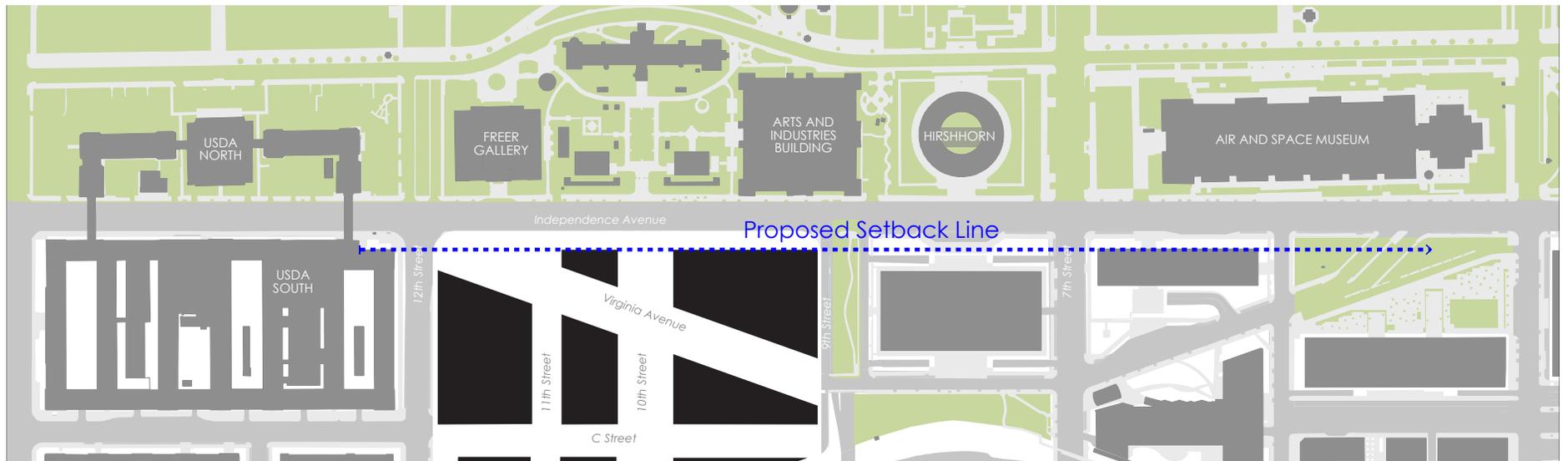
EXISTING CONDITIONS



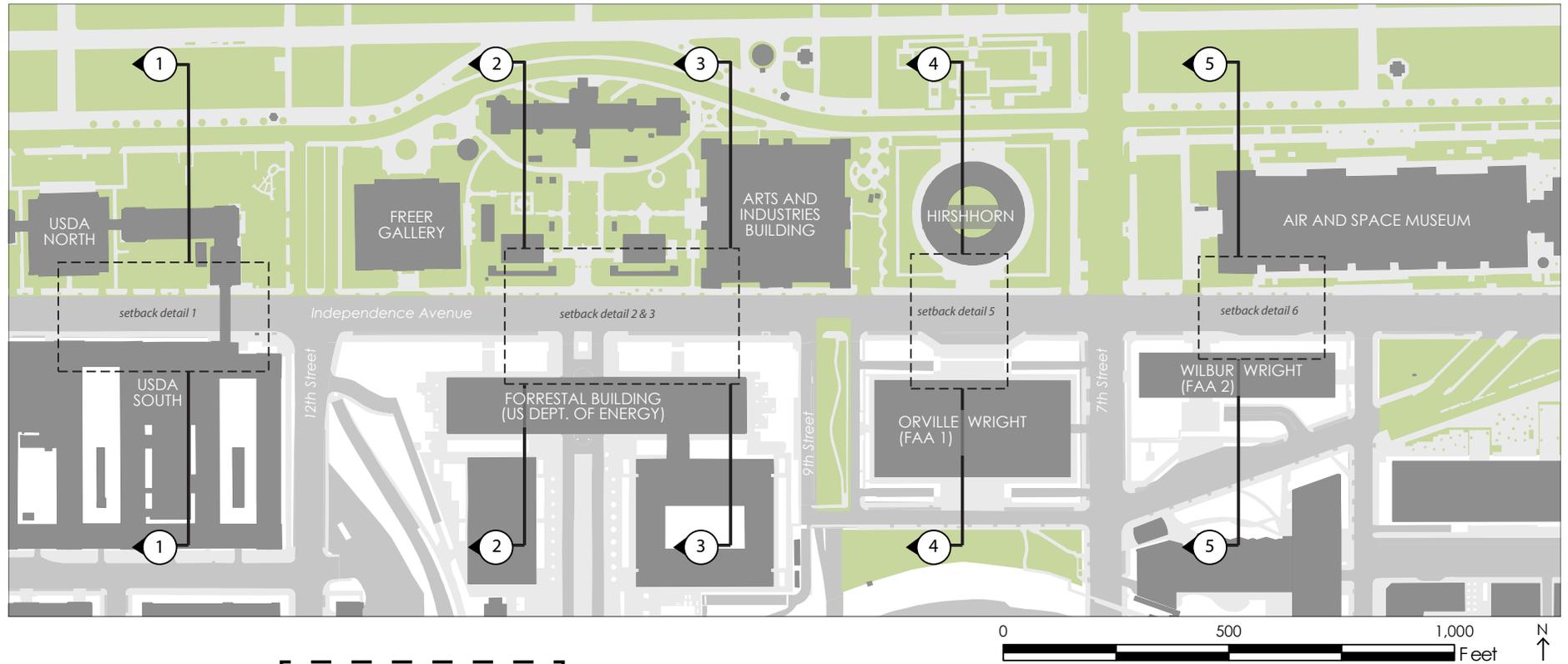
Existing Conditions Key

- Curb line - - - - -
- ROW line ————
- Property line ————

SW ECODISTRICT PLAN PROPOSED SETBACK OF 34' FROM THE SOUTHERN ROW LINE

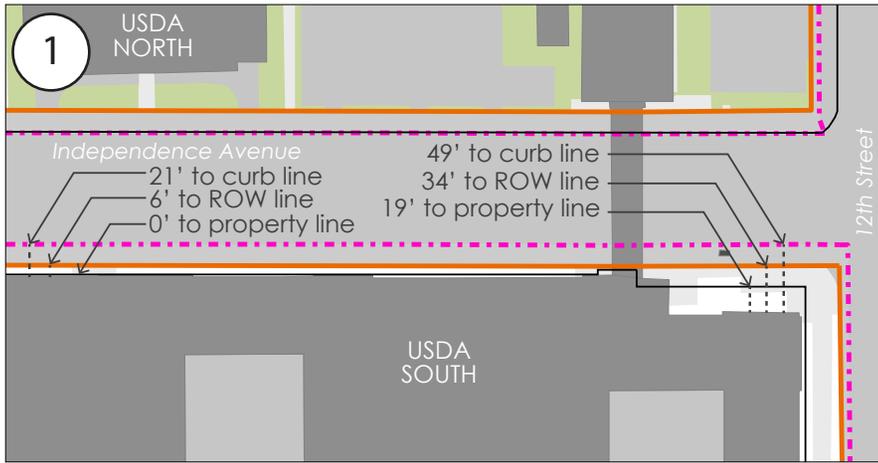
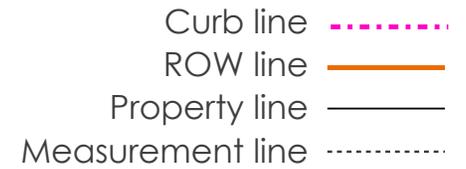


INDEPENDENCE AVENUE SECTIONS AND DETAILS

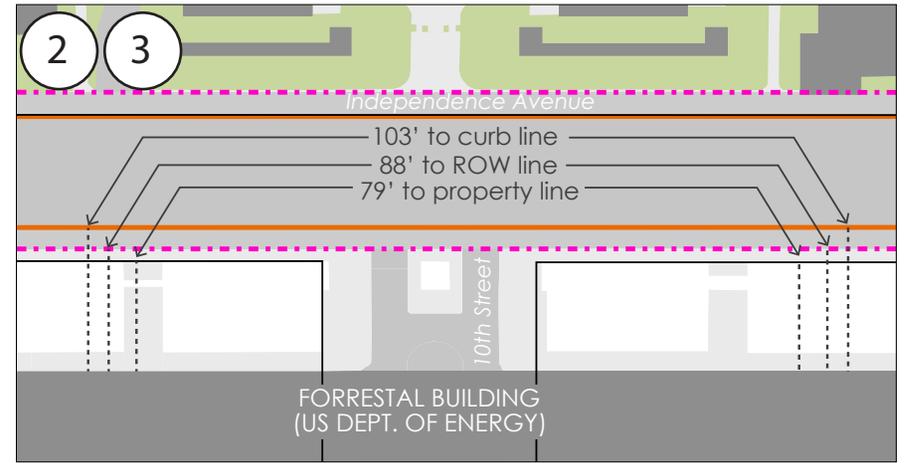


See dimensions for detail areas on page 16.

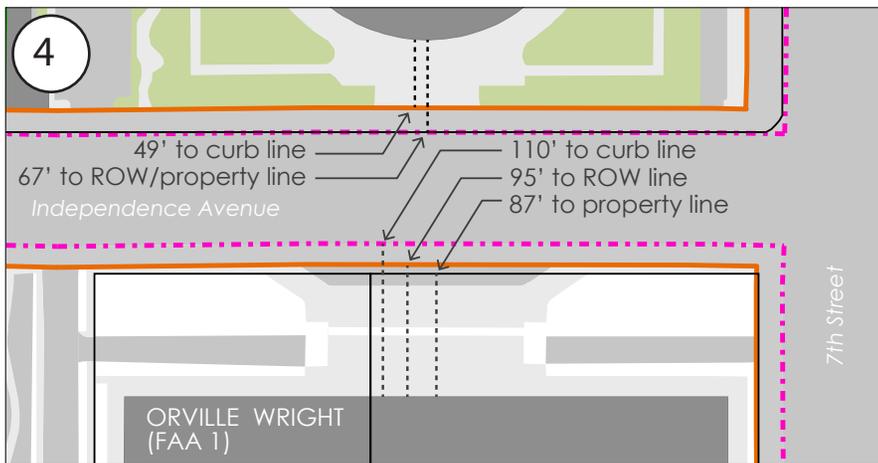
INDEPENDENCE AVENUE EXISTING SETBACKS



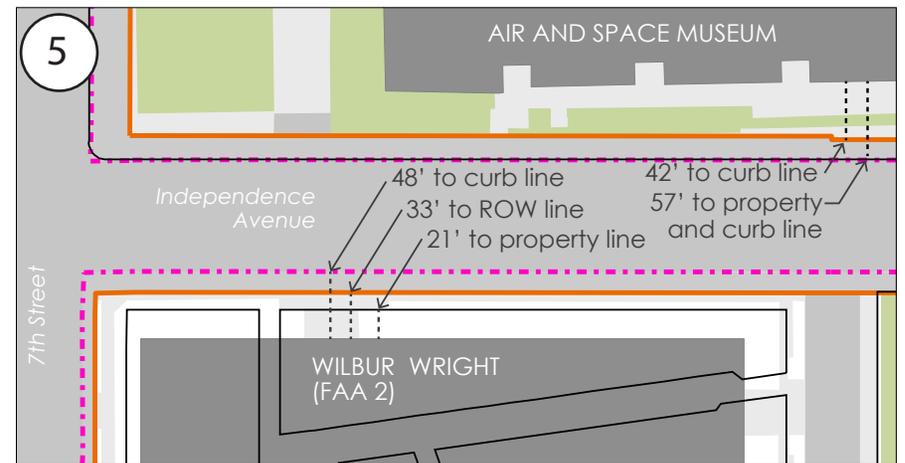
USDA BUILDING



FORRESTAL BUILDING (US DEPT. OF ENERGY)

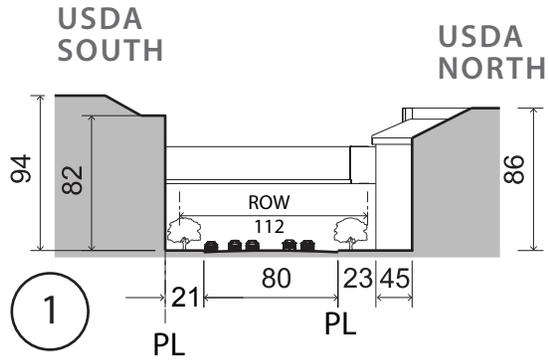


ORVILLE WRIGHT (FAA 1)

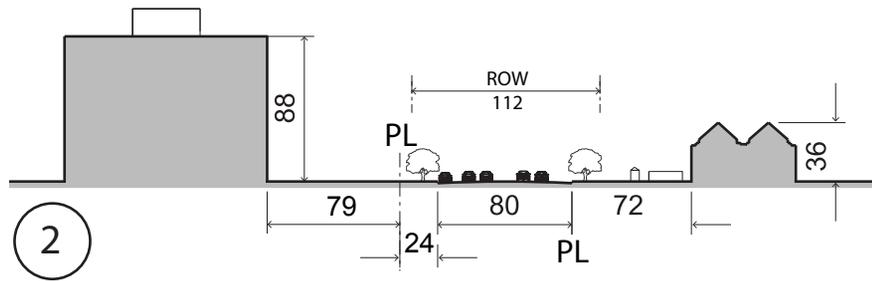


WILBUR WRIGHT (FAA 2)

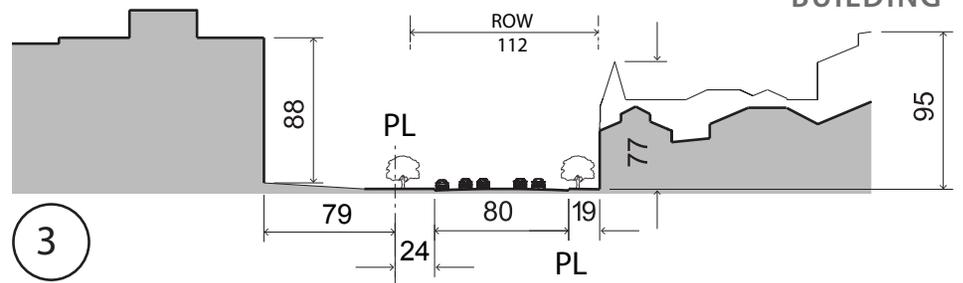
EXISTING HEIGHT AND SETBACK OF BUILDINGS ON INDEPENDENCE AVENUE



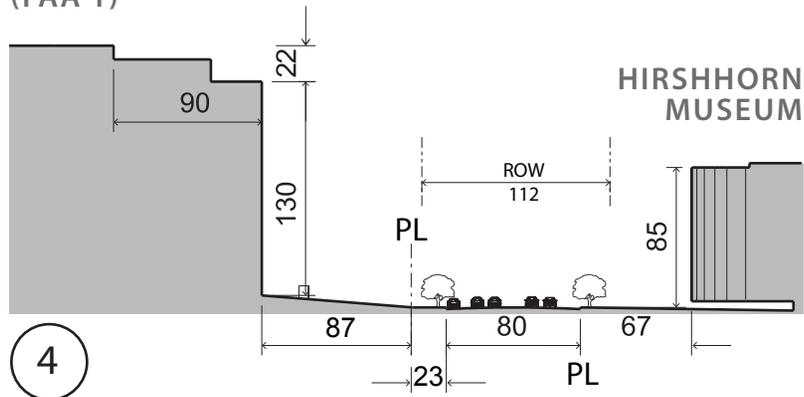
FORRESTAL BUILDING
U.S. DEPT. OF ENERGY



FORRESTAL BUILDING
U.S. DEPT. OF ENERGY

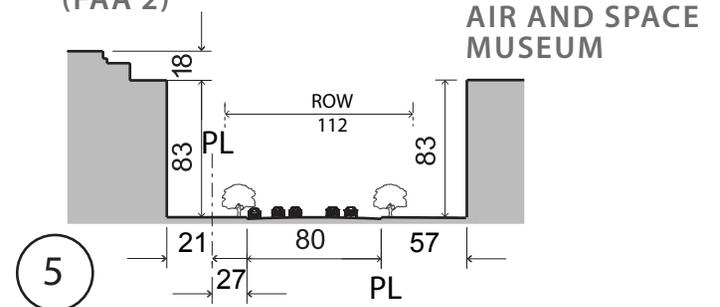


ORVILLE WRIGHT
(FAA 1)



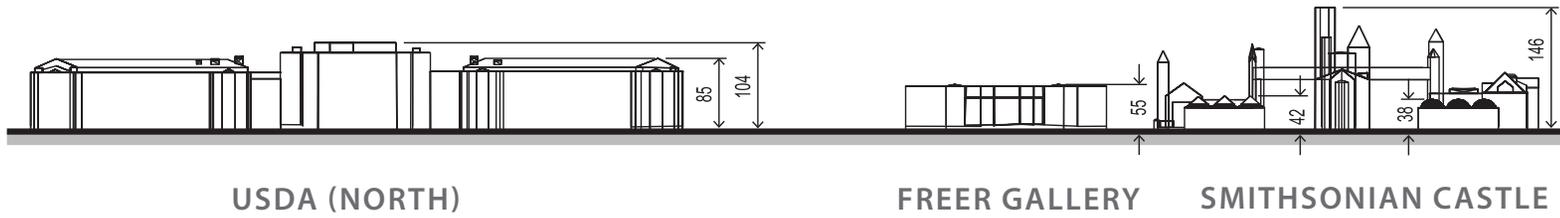
HIRSHHORN
MUSEUM

WILBUR WRIGHT
(FAA 2)

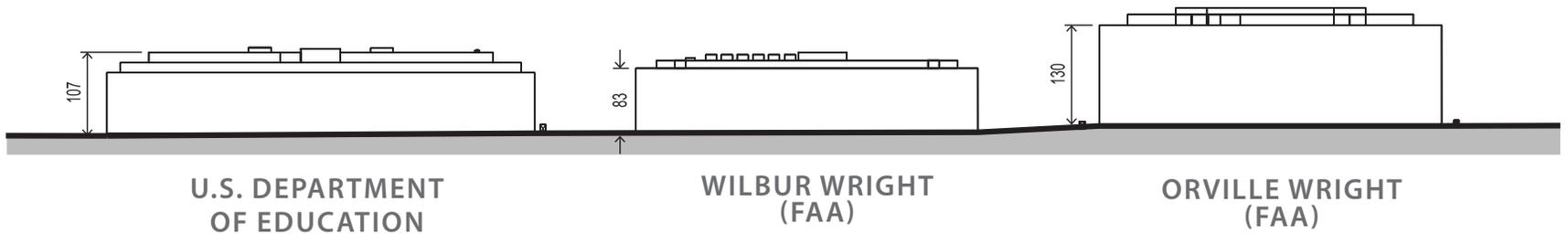


AIR AND SPACE
MUSEUM

INDEPENDENCE AVENUE: EXISTING ELEVATION ALONG THE NORTH SIDE



INDEPENDENCE AVENUE: EXISTING ELEVATION ALONG THE SOUTH SIDE

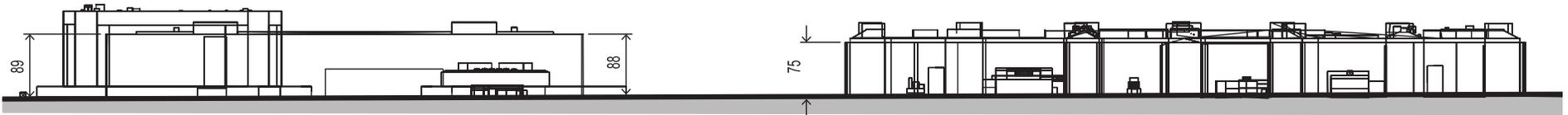




ARTS AND INDUSTRIES
BUILDING

HIRSHHORN

AIR AND SPACE MUSEUM



FORRESTAL BUILDING
(U.S. DEPT. OF ENERGY)

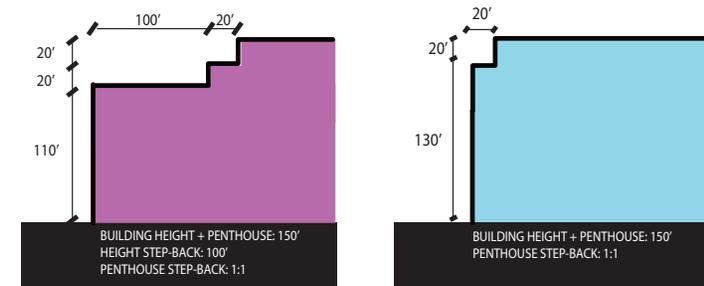
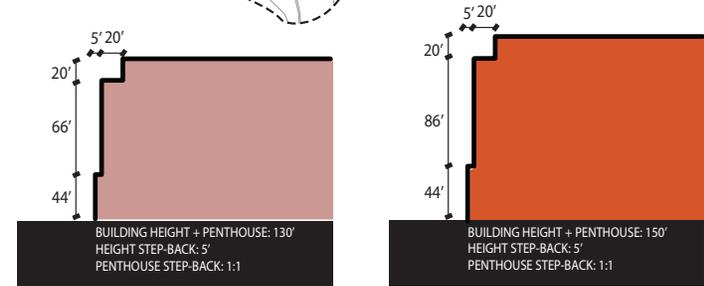
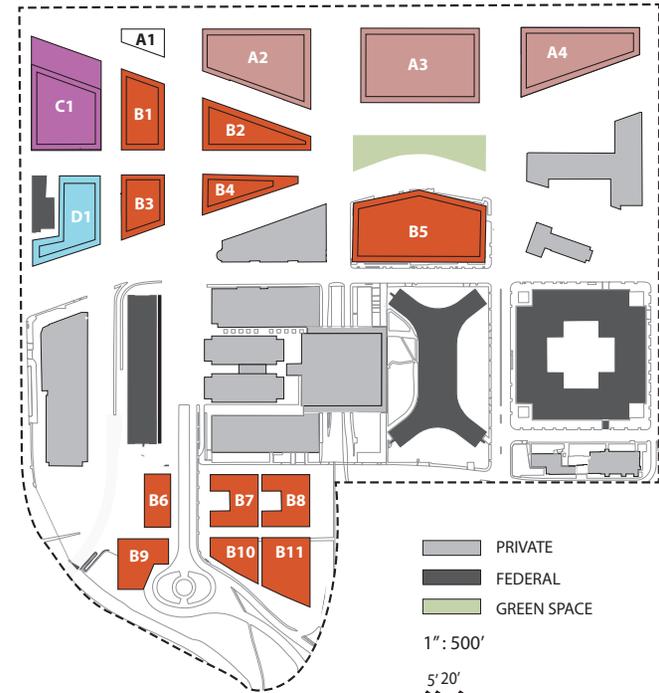
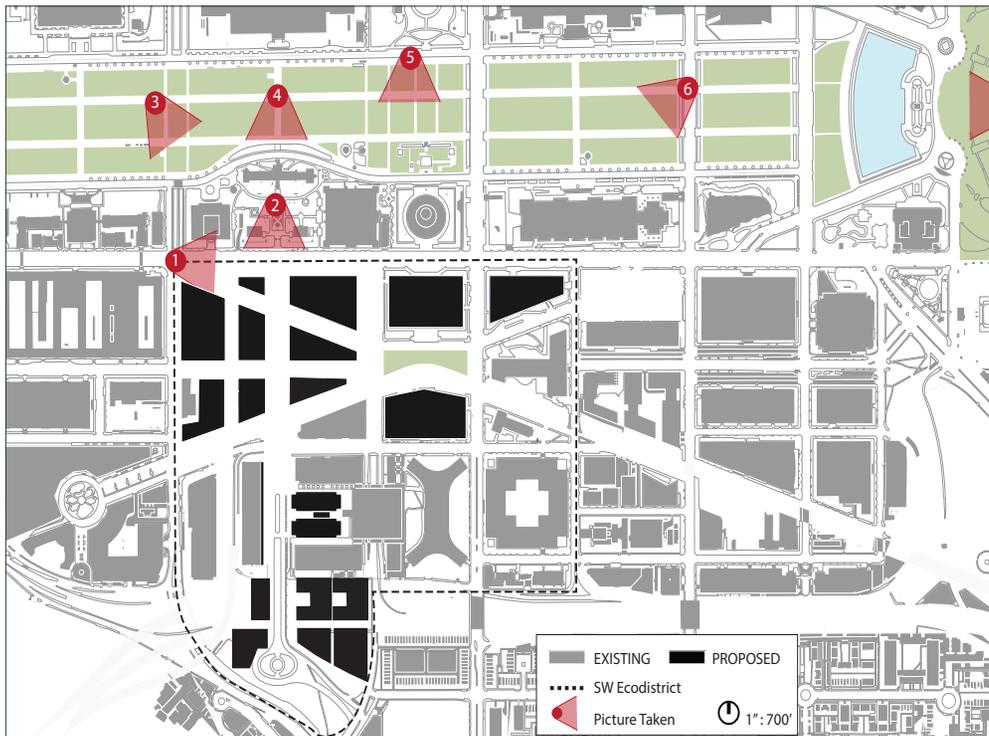
USDA (SOUTH)



ADDITIONAL RENDERINGS OF THE SW ECODISTRICT PLAN ASSUMPTIONS

Since the development of the *SW Ecodistrict Plan*, NCPC has modeled several height and massing scenarios for the potential areas of redevelopment in the SW Ecodistrict. The modeling on pages 21 - 23 illustrates an additional height and massing alternative which could be considered when additional master planning occurs.

The additional modeling includes the same setback of 34' from the ROW line on Independence Avenue, but changes the maximum allowable height to 110' (not inclusive of a penthouse). It assumes a penthouse per the District's zoning regulations set back at a 1:1 ratio and up to 20' in height.¹ This would reduce the development square footage from the scenario that was modeled in the plan but could have less of an impact on the national interests described above because the top 20' of the building (the penthouse) would be set back.

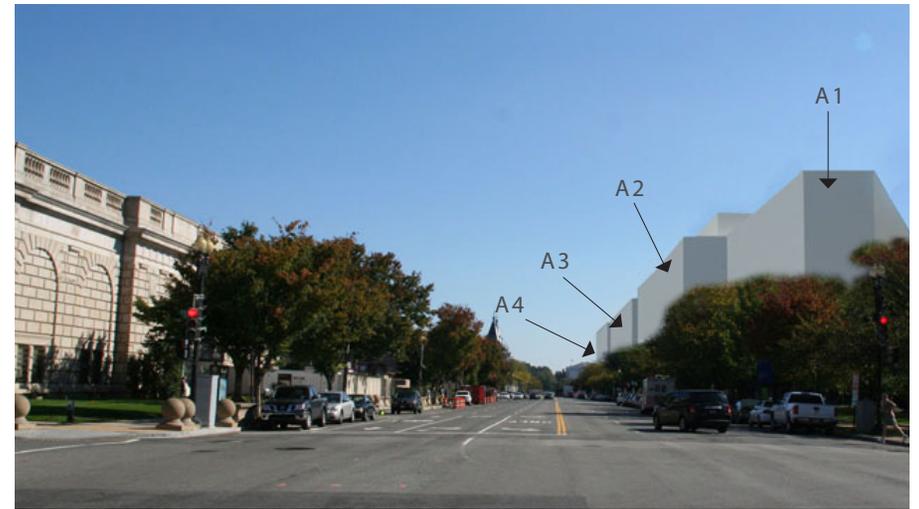


¹ NCPC assumed a penthouse of 20' in height contingent on 2014 legislation and potential changes to the zoning code.

VIEW 1 Independence Avenue and 12th Street (looking east)



EXISTING CONDITIONS

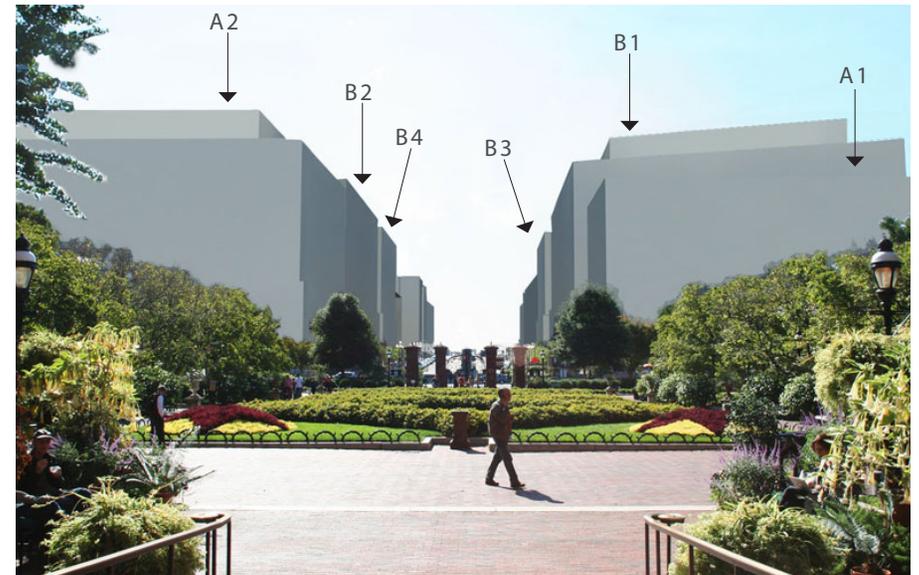


SW ECODISTRICT PLAN VARIATION

VIEW 2 Haupt Garden at Independence and 10th Street (looking south on 10th Street toward Banneker Park)



EXISTING CONDITIONS



SW ECODISTRICT PLAN VARIATION

VIEW 3 The National Mall (at approximately 12th Street) looking southwest



EXISTING CONDITIONS



SW ECODISTRICT PLAN VARIATION

VIEW 4 The National Mall (at approximately 10th Street) looking south



EXISTING CONDITIONS

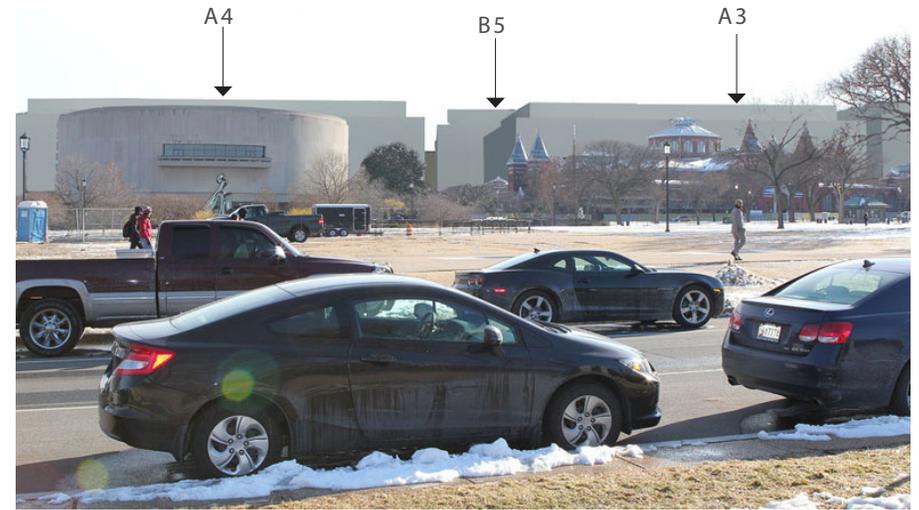


SW ECODISTRICT PLAN VARIATION

VIEW 5 The National Mall (at approximately 7th Street) looking south



EXISTING CONDITIONS



SW ECODISTRICT PLAN VARIATION

VIEW 6 The National Mall (at approximately 4th Street) looking southeast.



EXISTING CONDITIONS



SW ECODISTRICT PLAN VARIATION

4

Maryland Avenue

(SW Ecodistrict Plan pages 70 - 77)

Maryland Avenue is a significant radial avenue that terminates at the U.S. Capitol. It is characterized as a monumental street and is defined by its significant views of the Capitol. It is also considered the sister street to Pennsylvania Avenue in the L'Enfant Plan. In the SW Ecodistrict, it will serve as a mixed-use corridor in this evolving neighborhood. As a result, programming and design along Maryland Avenue should respect the character and dignity of the monumental core of the nation's capital.

- › The design of buildings and streetscape on Maryland Avenue should maintain the prominence of the Capitol dome against the sky. Additional landmark elements should be considered at the Maryland Avenue and 10th Street intersection to orient the visitors to the area. They should not compete with views of the Capitol.
- › Intersection to orient visitors to the area. They should not compete with views of the Capitol.

Additional information on Maryland Avenue is available in the following District documents:

- › Maryland Avenue Small Area Plan (District Office of Planning)
- › Maryland Avenue Transportation Study (District Department of Transportation)
- › Long Bridge Study (District Department of Transportation)



Top: Maryland Avenue looking east towards the U.S. Capitol.
Bottom: Maryland Avenue looking west towards Reservation 113.

5

Virginia Avenue

(SW Ecodistrict Plan pages 58 - 61)

Virginia Avenue is characterized as a monumental street. Historically it was defined by its iconic views of the Washington Monument. Its historic width in the L'Enfant Plan is 160. However, the *SW Ecodistrict Plan* shows the right-of-way at 120' suggesting that because of the changed conditions, a reduction in width could be evaluated.

- › Building design, height, and massing along Virginia Avenue should respect the views of the Washington Monument and maintain its prominence as a symbol surrounded by open sky.
- › Virginia Avenue terminates at Triangle Park (see page 34) where there is an opportunity for a landmark commemorative element to be integrated into an urban plaza.
- › Curb cuts along Virginia Avenue may be necessary if a parcel also fronts Independence Avenue and/or 10th Street (where they should not be allowed).

Top: The Navy Memorial, adjacent to the Market Square development, serves as a successful example for the Triangle Park at Virginia and Independence Avenues.

Bottom: Recreating Virginia Avenue will restore a prominent view of the Washington Monument.



6

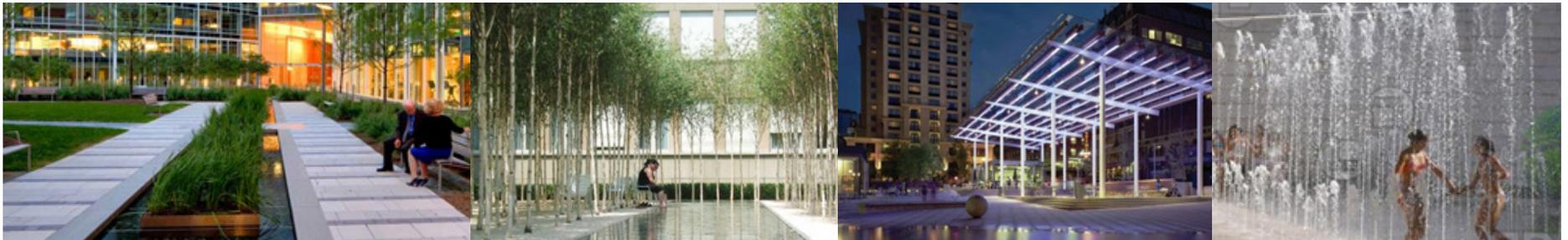
10th Street

(SW Ecodistrict Plan pages 62 - 69)

10th Street, a half-mile long urban garden promenade, is planned as an extension of the National Mall that connects the monumental core with Banneker Park and the waterfront. It provides opportunities for play, respite, public events/programs, commemoration, and public art. Its character is a hybrid of hardscape, softscape and waterscape with an overall theme of sustainability.

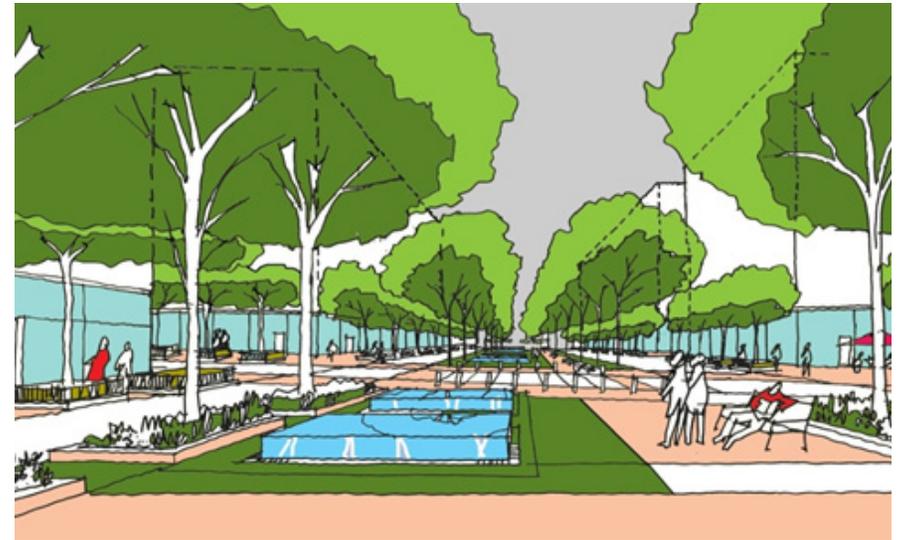
- › It is characterized as a civic street and prominent view corridor that also needs to accommodate active edges and a variety of outdoor events, both planned and impromptu, permanent and temporary. This street has a more park like setting that encourages activity.
 - › 10th Street should be designed to function and read as the sustainability spine of the Ecodistrict, showcasing the district water and energy systems.
 - › Building massing and design along 10th Street, should frame views of Banneker Park and the Smithsonian Castle.
- › New buildings on 10th Street should step back a few feet at 35' - 45' in height (similar to Independence Avenue) to create a continuous pedestrian scale.
 - › Landmark elements such as public art and commemorative works should be considered at important intersections to orient visitors to the area. It should not compete with views of the U.S. Capitol. Potential intersections include:
 - ›› Independence Avenue and 10th Street
 - ›› Maryland Avenue and 10th Street
 - › More detail regarding the 10th Street Programmatic Concept can be found at www.ncpc.gov/swecodistrict.

Examples of elements that could be used on 10th Street.

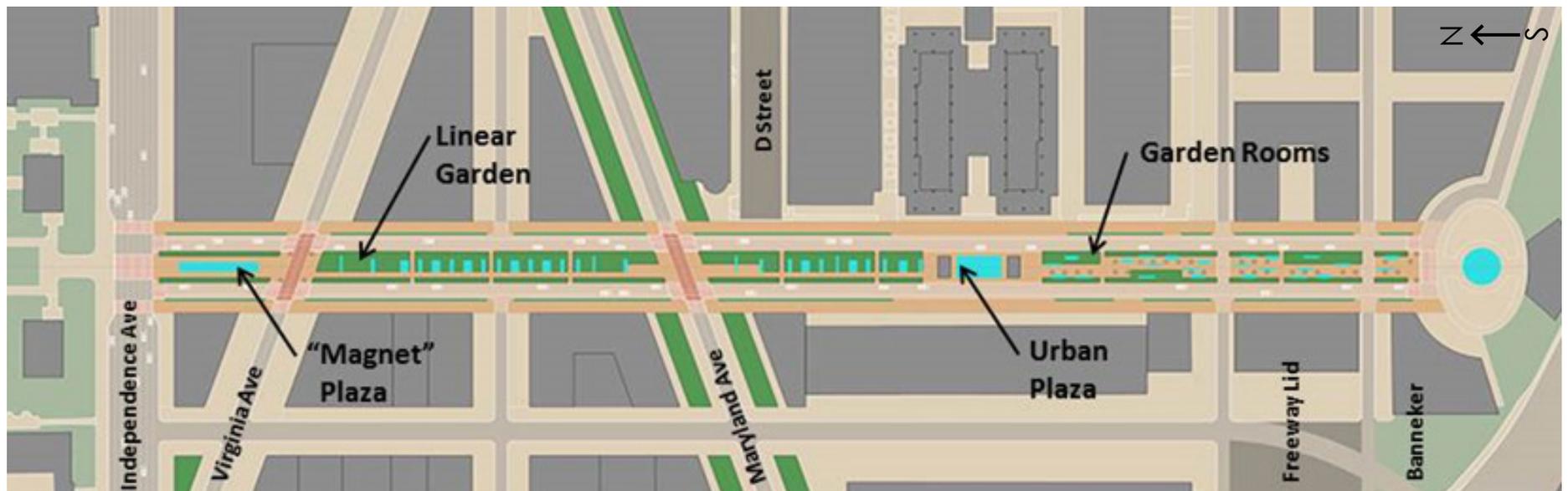




A depiction of a possible garden room looking south towards the Banneker Fountain.



Large trees and a linear garden would be feasible in between Independence Avenue and Maryland Avenue.



The proposed redevelopment of 10th Street provides for distinct park features to be located in the median. This space could also accommodate special events and serve as an extension of the National Mall.

10TH STREET STORMWATER INFRASTRUCTURE STUDY

One of the most important aspects of 10th Street will be its ability to house a district water system that allows the area to meet its stormwater management and potable water reduction goals. In April of 2014, NCPD completed the SW Ecodistrict Stormwater Infrastructure Study which looks at the technical and financial feasibility of proposed district water system in the *SW Ecodistrict Plan*.

The purpose of the study is to:

- › Establish the role of the 10th Street corridor to store and convey captures and treated stormwater.
- › Determine the incremental value for stormwater capture and reuse between 10th Street corridor alternatives through transformational investments in the SW Ecodistrict.
- › Identify potential pathways to reduce the gap in capital and operation costs.

The study looks at:

- › Climate and seasonal rainfall
- › Per capita water demand by use
- › Capital costs
- › Operational costs
- › Jurisdictional requirements
- › Public open space improvements

The findings of the study include:

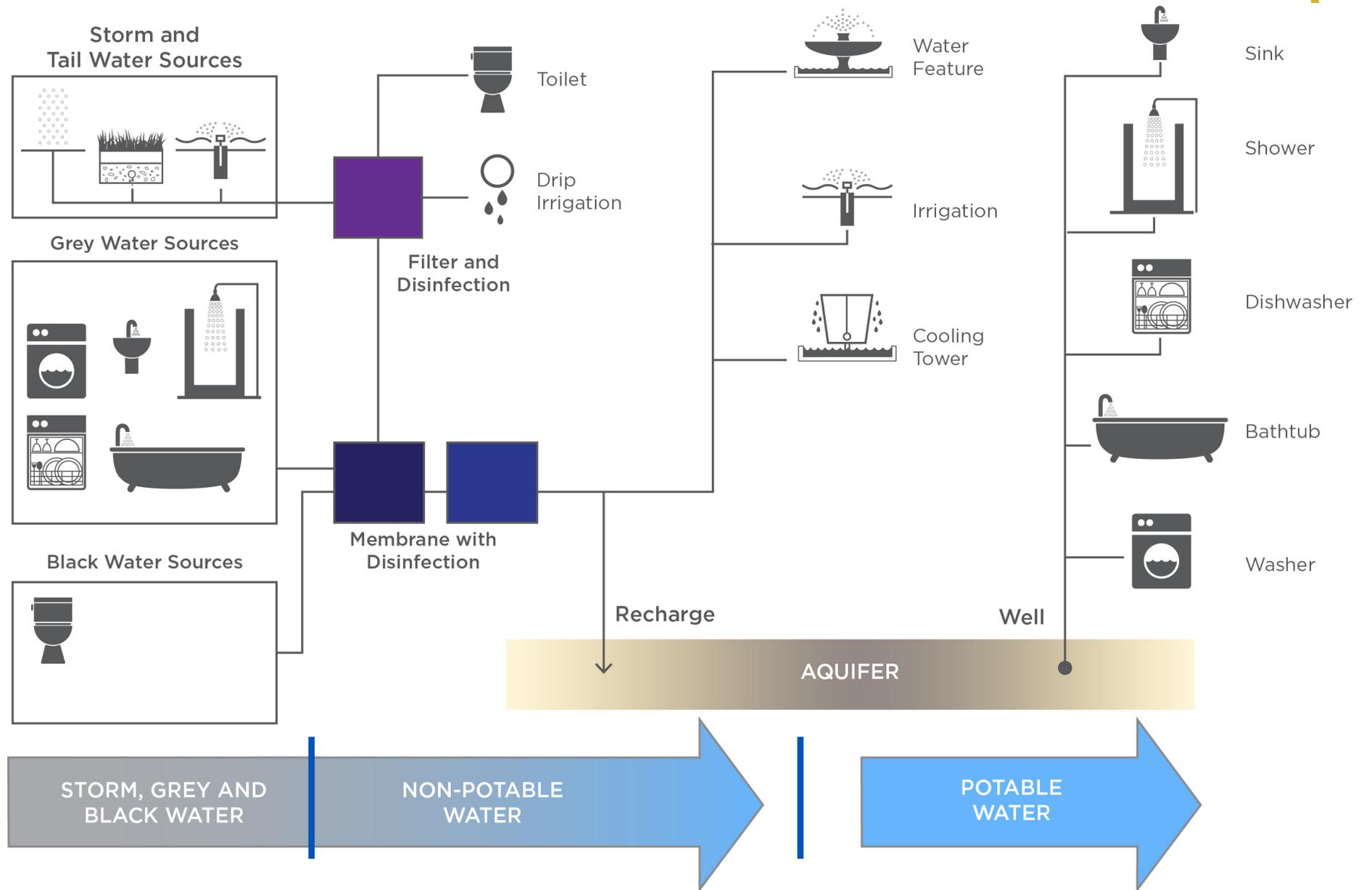
- › Not only is the district water system technologically feasible, it has a reasonable payback period.
- › At a minimum, collecting all the stormwater, reusing it for non-potable water use, and earning stormwater credits should be a given.

- › Treating stormwater and using well water to meet the ecodistrict's water needs is more complicated. It is still technologically feasible, however, with a payback similar to a LEED Platinum building.
- › The most challenging aspect of the district water system is figuring out who will manage it.
- › If "aggregators" of stormwater credits are emerging in Washington, DC in response to the new stormwater regulations, could they be a likely entity to manage this system?

To download the complete SW Ecodistrict Stormwater Infrastructure Study, go to: www.ncpd.gov/swecodistrict.



Water system improvements at a district scale will lead to the transformation of the Ecodistrict's environmental character.



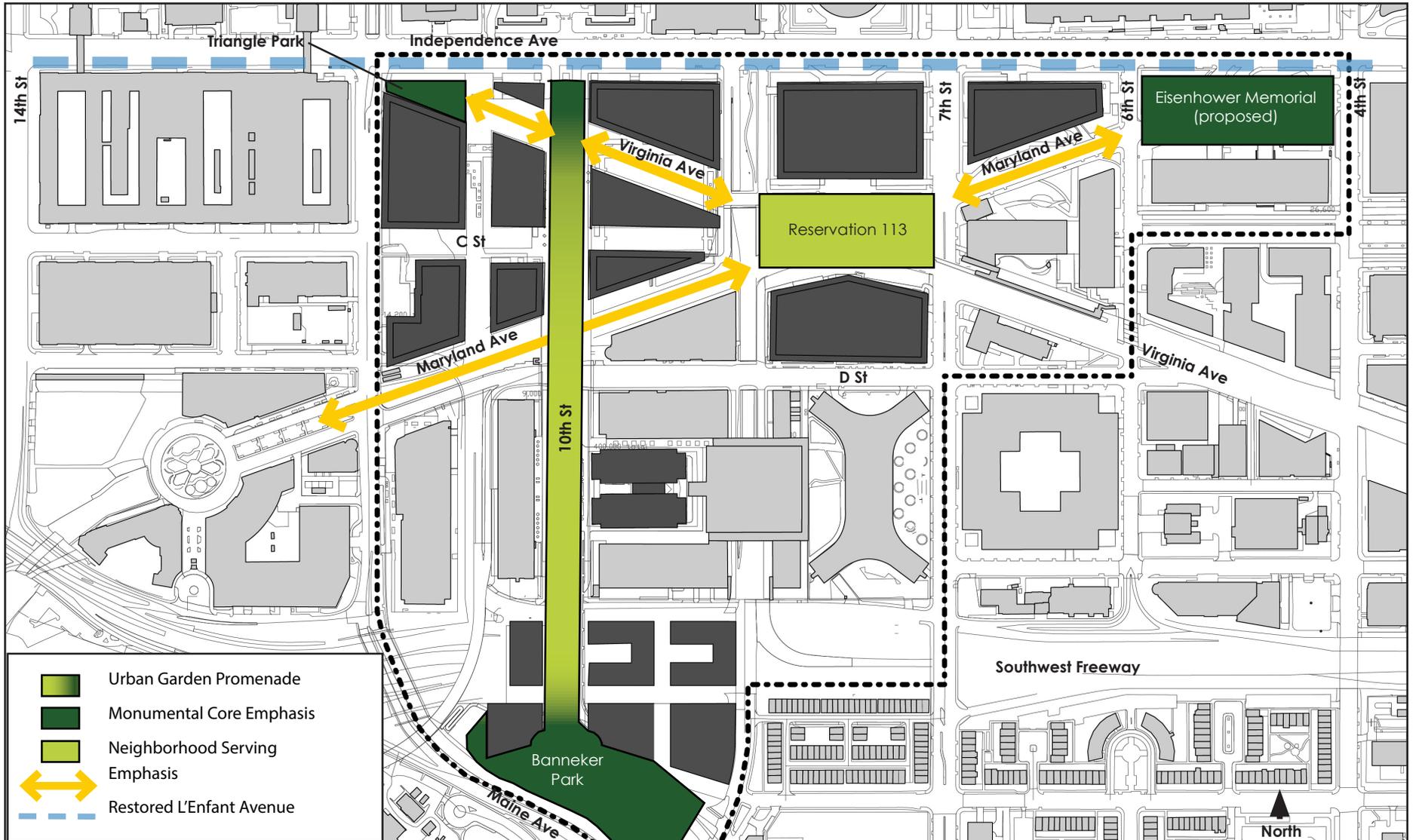
The Stormwater Study discusses the strategy above as the preferred approach for the various waters in the SW Ecodistrict.

7

Public Open Space

(SW Ecodistrict Plan pages 6 - 9)

Parks are an important element in this neighborhood that bridge the local and capital city. Each park has a different emphasis and a variety of functions.





Reservation 113

(SW Ecodistrict Plan pages 70 - 77)

Reservation 113 is envisioned as a prominent L'Enfant reservation where two great avenues convene. It is an outdoor room created by surrounding buildings.

- › Reservation 113 should function as an important urban square in the L'Enfant Plan and as a significant commemorative site. It should also support the program of a quality neighborhood park.
- › Commercial activity should be encouraged around the park or in designated areas within the park.

- › The park design should reinforce the view of the U.S. Capitol.
- › Buildings on parcels adjacent to Reservation 113 should be designed to engage the park with prominent entries and ground floor uses.



Left: Bryant Park, New York City

Right: Conceptual rendering of Reservation 113 as shown in the SW Ecodistrict Plan.



9

Banneker Park

(SW Ecodistrict Plan pages 68 - 69)

Banneker Park is as an extension of the monumental core and the National Mall. It has been identified in the *Memorials and Museums Master Plan* as a site for a nationally significant cultural facility. It will also serve as the gateway to the National Mall from the waterfront.

- › Locate, mass, and configure any new buildings to respect the location and scale of nearby residential development.
- › A modern, terraced landscape at Banneker Park is envisioned to enhance the park to provide a gateway to the National Mall.

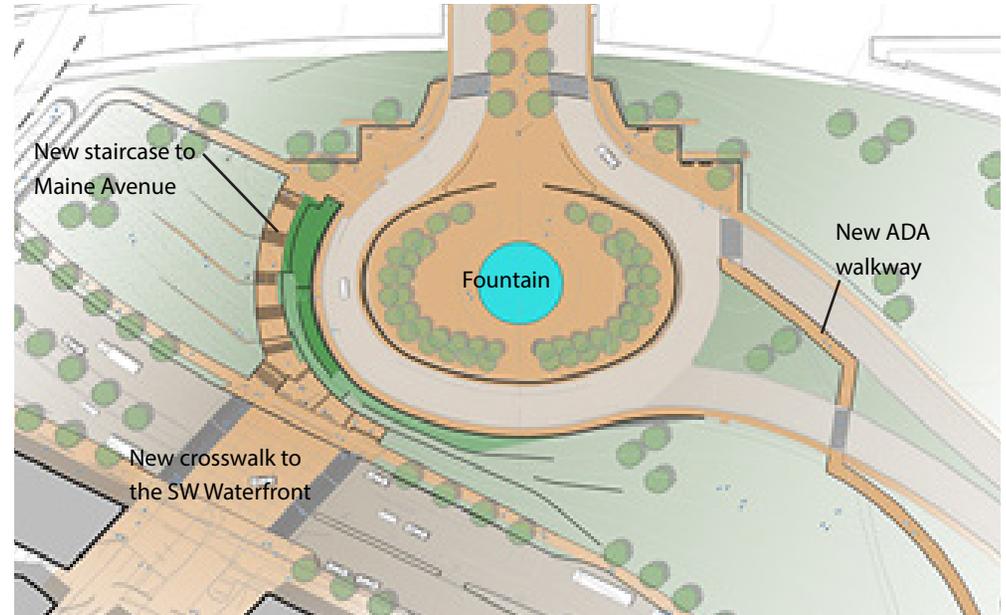


Below: Looking up at Banneker Park from Maine Avenue



BANNEKER PARK INTERIM CONNECTION BETWEEN 10TH STREET AND THE WATERFRONT

- › In January of 2014 the National Capital Planning Commission commented favorably on a concept design for an interim connection at Banneker Park. More permanent access will be designed when a Master Plan is developed for the entire site. The purpose of the Banneker connection is to provide a safe, functional, and aesthetically pleasing pedestrian connection that links Banneker Park with the new mixed-use development project on the waterfront called The Wharf. The Wharf project developers are required to build this connection as part of the approval of their planned unit development proposal. The proposed design includes a new stairway, ADA access, and minor upgrades to the landscape.



Below: The interim connection at Banneker Park is a key element of the SW Ecodistrict's public realm.



10

Triangle Park

(SW Ecodistrict Plan pages 58 - 61)

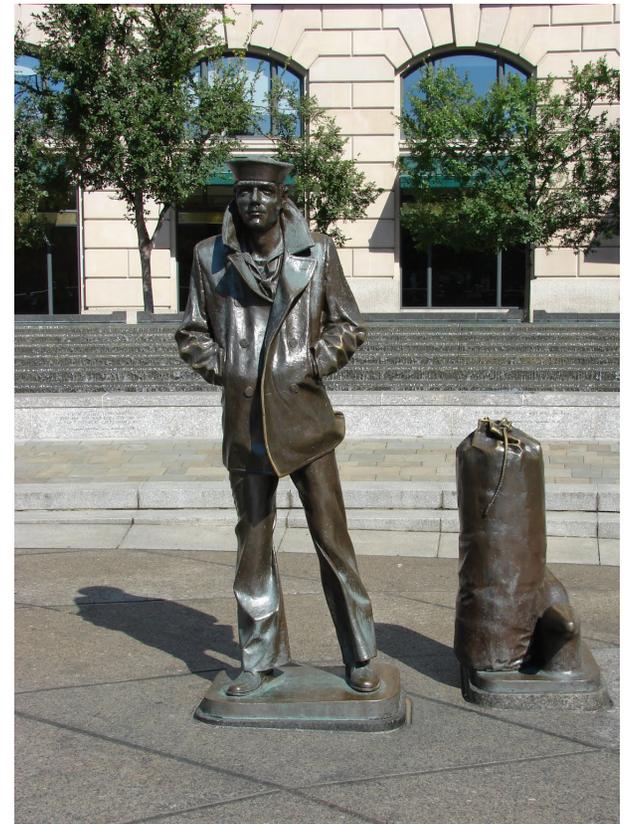
Triangle Park, located at 12th and Independence presents an opportunity for a civic plaza and commemorative elements at the terminus of Virginia Avenue.

- › Site design should capitalize on its relationship to the National Mall along the 12th Street axis and views of the Washington Monument.

- › The design of the building to the south (parcel 1C) should give form and shape to the plaza and support activity within the plaza.

Below: The Navy Memorial frames a key view north along 8th Street to the National Portrait Gallery. The design of this memorial should be used as inspiration for the future Triangle Park at 12th and Independence.

Right: Lone Sailor Statue at the Navy Memorial



11

Public Comments

NCPC released the SW Ecodistrict Addendum for a 30-day public comment period on June 5, 2014. The following comments were received:

PUBLIC COMMENTS - EMAILS & CORRESPONDENCE

From: Beth Zgoda [mailto:bzgoda@yahoo.com]
Sent: Friday, June 06, 2014 9:21 AM
To: Southwest EcoDistrict
Subject: Comment on the SW Ecodistrict Addendum

Good morning,

I have been reviewing the SW Ecodistrict Addendum and appreciate the attention that is being given to ensure that developers have clear guidelines that will preserve and create thriving pedestrian realms. There are many good suggestions, such as limiting driveway access and making facades interesting, but I won't list them all.

I would recommend the following changes to improve clarity:

- The text on page 4, Facade Composition, includes "This can be achieved by" followed by a bullet list. There may be other creative options for adding interest to the facade. Giving the designers room to develop their own strategies will help create variety and interest along the blocks. I would recommend changing the quoted text to read, "Some of the options for achieving this include." This will allow for innovative approaches, rather than relying on our ability to think of and list all the options here.
- The Right-of-Way Design Summary will be very helpful, but it needs to be very clear. Currently, the columns "Tree Box" and "Sidewalk Area" include a "7' minimum" and "10' minimum", respectively, in the column headings. This would seem to imply that these items could never be less than 7' or 10' throughout the District. If you look down the column at individual cells, however, you will see smaller sizes: 4-6' for tree boxes and 6-8' for sidewalks. Assuming the cell content is correct, then the headings should be revised to read, "Tree Box/Furnishing Area: Minimums include curb," or something like that.
- With regard to tree boxes, it might also be worth providing some advice on tree selection. If the tree selected will have a spread that will protrude into the sidewalk area, then the branches should start high enough on the tree to clear pedestrian's heads.

Thanks for all your hard work!

Beth Zgoda

Ward 4

From: Matthew Patterson [mailto:mhpatterson@gmail.com]

PUBLIC COMMENTS CONTINUED

Sent: Monday, June 09, 2014 10:39 AM
To: Sullivan, Diane E.
Subject: NCPC Website Email

I had attended a public meeting at the NCPC previously on the SW Ecodistrict.

I had a concept for the L'Enfant Plaza corridor stretching from the Smithsonian Castle to Benjamin Banneker park that I would like to share:

I believe that with so many monuments in DC to the government and government figures, there ought to be more of a focus on the foundation of that government: the American people and their unique cultural, scientific, and artistic contributions to the nation.

Given the linear nature of the walk along L'Enfant Plaza, I believe that a great overarching theme to be woven throughout would be that of a Cultural Timeline of the American people. The different seating areas, benches, fountains, trees, etc. would provide a great place to incorporate tributes large and small to contributions by American citizens to our nation over our history.

From scientific research, to jazz, poetry, baseball, films, there are countless contributions that could be highlighted. It would create a unique experience as visitors transition from the federal space of the mall, which is very government oriented, down to Banneker park and the new Wharf and waterfront, which is much more oriented toward DC locals and average American citizens.

I hope NCPC will consider the concept of a Timeline of American Cultural Contributions as an overarching theme of the L'Enfant Plaza green walk. I have received very positive feedback to the idea thus far.

Thank You,

Matthew Patterson

Resident of Southwest Waterfront

PUBLIC COMMENTS CONTINUED

From: Chris Carrington [mailto:cris.sean@gmail.com]
Sent: Monday, July 07, 2014 5:18 PM
To: Southwest EcoDistrict
Subject: NCPC Website Email

Benjamin Banneker Park needs to be protected and strengthened to honor a man who was a big part in Washington's history. Unfortunately, neither NCPC nor the District of Columbia have heeded calls to provide the proper memorial to Banneker that he deserves.

With hundreds of statutes all across Washington, many of which honor foreigners, artists, writers, and war generals, it is a shame that a scientist such as Benjamin Banneker who lived in Washington and helped create the city we have today, is not honored in a similar light.

For example, our city honors Louis Laguerre, a French photographer and painter with a memorial adjacent to the National Museum of American Art and another non-American, Edmund Burke, a conservative philosophical statesman from Ireland with a prominent statute on Connecticut Ave. And of course we honor numerous war generals with enormous statues that pay tribute to their efforts to do nothing more than kill their opponents. Surely Banneker is worthy of more honor than a mere photographer and from France, an Irish politician, or the countless war leaders of yore.

Yet Banneker, an American surveyor of the nation's capitol who also wrote and published America's most accurate astronomical almanac of its time is not only without such a memorial, but NCPC's plan intends to further marginalize the underutilized park bearing his name. NCPC, has not once offered any proposals to properly memorialize Banneker, and one has to wonder if it is because Banneker is an African American?

If not, why else is NCPC content on taking its current path?

PUBLIC COMMENTS CONTINUED

From: Lindsley Williams [mailto:LWilliams@his.com]

Sent: Thursday, July 03, 2014 8:47 AM

To: Sullivan, Diane

Subject: Comments on SW Ecodistrict "Addendum" Document

I have been favorably impressed with the dual initiatives in play in the southwest sector of Washington, D.C. — the Federally-led "SW EcoDistrict" and the District Government-led "Maryland Avenue" small area plan. They bring credit, properly, to both leaders and to those that joined them in their respective efforts.

Your Agency recently released, for comment, a document that is clearly intended to explore some of the nuances of the overall plan as it now stands, thus trying to add specifics to the broader overall plans, in this case the Federally-led "SW EcoDistrict." Such an effort is inherently in line with the role NCPC should play in advancing that plan, doing so as much as possible via guidance, not regulation.

This email comments on the document as issued for comment; I hope you will find it helpful. These are my personal views, not offered on behalf of any client, firm, or organization.

- The cover page — This is the same as earlier plan, but zooms in to just part of the overall area. Now I find the trees too dense and of an unlikely conifer style that is likely not what anyone wants: suggest you hire a new arborist/illustrator. Moreover, the depiction of the Eisenhower site with just trees is misleading beyond the trees illustrated.
- The first diagram, page 2, numbers buildings and has a key to these; however, the color/font do not read well as the text is dark and blends into the background.
- As noted above, I see the document (mostly) as supplementing the overall plan; clearly the document does not seek to establish brand new goals or objectives. But, there are some areas where the context has changed, and the underlying assumptions must be re-evaluated. Where that is the case, this document in final form is not the place to do that, at least in my opinion. Yet, page 3 identifies its purposes with two words: "addendum" and "appendix" (the latter just once, possibly an editing glitch). To me, neither term conveys what I understand the bulk of the document to be: supplemental information and interpretations.
- Page 4 — several comments:
 - Under "Height and Massing," "Embellishments" would be better cast as "complementing" and even 'also bringing attention to" the views of the Capitol, National Mall or Banneker Park. "Compete" is subject to too many interpretations wherein height or area metrics alone would sway approval/acceptability,
 - Under "Build to Lines," "Exceptions" might better read "Further exceptions."
 - Finally, the whole discussion of "Roofscapes" now has a fundamental problem that permeates the document, the failure to incorporate recent changes in the Height Act. The cure is to note the statutory change and anticipate a later modification of the whole plan to account for this; surely, however, the statutory change should be noted as a fact somewhere early in the document.

PUBLIC COMMENTS CONTINUED

- Page 5 is filled with “shoulds” and this is appropriate, but there is at least one “shall” that is inconsistent and ramps up the document from guidance to inadvertent regulatory tone.
- Page 6 depicts Virginia Avenue at 120 Feet when the historic right of way is 160. If the plan called only for this incomplete width, I missed it and object even if past the relevant comment period; in any event, the diagram should have a note that marked anything less than 160 explicit. That said, I would think consideration could be given to joining the properties north and south of the portion of Virginia west of 10th Street so that the overall development potential would be increased, taking advantage of the significant height of the deck at 10th and step down as Virginia’s view shed approaches Independence.
- Pages 6 and 7 attempt to set out Federal/District interests relative to the Height Act. This section was prepared prior to the amendments of May 2014. If retained, the section should note the new authority even if it does not provide a “penthouse” plan as such (likely needs a supplemental study to revise the underlying SW Ecodistrict Plan itself, in my opinion).
- Pages 11-17 discuss Independence Avenue and how buildings along it, either side, approach that major right of way. At this time, some diagrams cover only a portion of the overall Federal presence on Independence Avenue, which I feel runs from the Rayburn House Office Building to the 14th Street limit of Agriculture’s South building. The sections should cover this as well, and pretty much do. However, I think it is important to get actual measurements on Agriculture South’s setback from the property line. My reading of GIS images is that it may be at the line; your table shows almost 9 feet. Also, I have provided you with dated “Street Width” information that should be verified and, if correct, those data should supplant that in your sectional diagrams. Aside: the term “reentrant” needs explanation or find another way to explain this without using that opaque term.
- Page 13 — Please explain the red line shown in the diagram now in lower right corner; unexplained, it looks like some kind of building restriction line (unwanted mandate, not what an addendum should impose if that’s what it is).
- Page 23 — Consider comments above about Virginia Avenue as they might affect content on this page as well.
- Page 25 — Consider rearranging the diagrams on the page so the 10th Street plan is rotated so that “north is up” (to match all other diagrams in the draft
- Page 29 — Reservation 113 will be fundamentally impacted by the rail lines that already penetrate it; this should be noted. These rail lines currently cross north-south streets on old structures that have to be replaced before they fail, and their geometry brings rail cars to a very sharp, inherently dangerous, curve, Given this (my interpretation), I would strongly recommend that the freight rail lines be allowed to follow alignments that could pass thru a portion what is now the GSA building to the south. This would allow replacement bridges to be put into place track-by-track, the first being the southernmost (of four, two for freight, two more for passenger service). Once the first new freight track was in place, the second could shift south as well, but rail service would be retained intact. The upshot would be a reduction in the area of Reservation 113 lost to railroad encroachment. All curved track should have guard rail as a further safety measure.
- Missing Page — The document should add something about the commuter rail station and platforms that can serve the mix of carriages that VRE, MARC, and Amtrack utilize; this should also project that there would be access under roof from the platforms to WMATA’s L’Enfant complex below.

(END)

PUBLIC COMMENTS CONTINUED

The Committee of 100
on the Federal City



Founded 1923 July 7, 2014

Chair
Nancy J. MacWood Diane Sullivan, Senior Urban Planner
National Capital Planning Commission

Vice-Chair
Monte Edwards Suite 500 North
401 9th Street, NW
Washington, D.C. 20004

Secretary
Meg Maguire

Treasurer
Carol F. Aten Via E-Mail and U.S. Mail

Trustees
Bill Crews RE: Comments on the Draft Southwest Ecodistrict Plan Addendum

Dorothy Douglas Dear Ms. Sullivan:
Alma Gates

Erik Hein The Committee of 100 on the Federal City (Committee of 100), founded in
Cornish Hitchcock 1923, is the District of Columbia’s oldest citizen planning organization. We
George Idelson are pleased to provide selected comments on the Draft Southwest Ecodistrict
Loretta Neumann Plan Addendum which the National Capital Planning Commission released
Laura M. Richards, Esq. on June 5, 2014 for a thirty-day public review period, ending July 7, 2014.
Lance Salonia The Committee of 100 previously provided comments and recommendations
Marilyn J. Simon on *The Southwest Ecodistrict Plan: Creating a More Sustainable Future*
Dr. Beverley Wheeler (Public Review Draft, July 2012). Those comments were dated September
Frank Vespe 10, 2012.

Bill Wright
Evelyn Wrin
George Clark, Esq.,
Emeritus

Historical Background
The Committee of 100 on the Federal City has long been concerned with
protecting and enhancing, in our time, Washington’s historic distinction,
natural beauty and overall livability. The Committee is concerned with
respecting the L’Enfant Plan of 1791 and the McMillan Commission Plan of
1901-02, while accommodating the needs of the 21st Century. The Southwest
Ecodistrict occupies an important location in Washington’s Monumental
Core, south of the National Mall. The Southwest Ecodistrict is also important
in that it provides links from the National Mall to the Southwest Waterfront.
At present, those links leave much to be desired. One of the benefits of the

945 G Street, N.W.
Washington, D.C.
20001
202.681.0225
info@committeeof100.net

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Southwest Ecodistrict is that it has the potential to greatly improve those linkages. The Southwest owes its origins to the street layout of the L’Enfant Plan, but that original street layout has undergone major modifications over time. Some key elements of the area, such as the railway alignment through the area, date from the mid 19th Century. One of the most egregious deviations from the L’Enfant Plan are the alterations of Maryland Avenue that were made for railroad use and continue today as depressed train tracks that represent a physical barrier to north-south connectivity.¹ Maryland Avenue was designed as a monumental street in the L’Enfant Plan as the sister street to Pennsylvania Avenue.² Many of the changes to the area result from urban renewal plans from the 1950s and implemented over the next 30 years. In many respects those urban renewal design concepts have not proven satisfactory and this area is now cut off from adjacent areas, has limited activity and activity linkages, and has not achieved its potential as a contributing neighborhood in the city.

The SW Ecodistrict Plan seeks to address many of these problem issues, while also setting a high environmental standard. We commend NCPC for undertaking this project and for undertaking the additional studies that are summarized in *The SW Ecodistrict Plan Addendum*, particularly the study of building heights within the study area. The Committee raises a number of issues and questions with respect to transportation planning and building heights. In evaluating the potential impacts new buildings would have on iconic landscapes and views, e.g. views to and from the Mall and views and street sections along the monumental Virginia, Maryland and Independence Avenue corridors, the Committee stresses caution and restraint and additional studies.

The SW Ecodistrict Plan Will Provide Important Input for the DC Rail Plan
The addendum contains technical and background information that informed the development of the *SW Ecodistrict Plan* and is intended to inform future planning and development proposals (*SWE Add.*, p. 3). An important recent development is the DC Council’s appropriation of a half million dollars to prepare a DC Rail Plan.

¹ *The SW Ecodistrict, A Vision Plan for a More Sustainable Future*, January 2013, page 71: “Although planned as prominent avenues, the portions of Maryland and Virginia Avenues that are located in the study area are considered non-contributing elements to the NRHP listing because of alternations made to the corridors when the rail line was constructed in the mid-1800s.”

² *SWE Addendum*, page 22.

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Currently, we are the only state³ without a rail plan,⁴ yet we are a growing hub of commuter and long distance rail transportation. The SW Ecodistrict will contribute significantly to that growth. The DC Rail Plan has the potential to set policy for freight, passenger and commuter rail transportation within DC, including coordination with other DC transportation planning programs – the statewide multimodal context (moveDC) and the transportation planning programs of neighboring states (COG’s Transportation Planning Board) – as well as the Union Station Master Plan and the SW Ecodistrict Plan.

The SW Ecodistrict Plan recognizes that the southwest tracks and the Long Bridge present bottlenecks for passenger, commuter and freight rail operations and further recognizes the importance of adding a fourth track in SW (*SWE Plan*, pp. 72 and 75) in order “to accommodate freight and maximize commuter rail” (id., p.70). Indeed, to move the projected 28,000 people a day that will make the SW Ecodistrict work, commuter rail will likely have to be greatly expanded to move a proportion of those people into and out of the city.

Can the SW Tracks be Expanded?

Buildings have encroached on the Maryland Avenue right-of-way (id., p.75). The concepts for adding a fourth track are based on the 160-foot original width of Maryland Avenue, but a significant section of the 160-foot original right-of-way of Maryland Avenue is currently closed. The *Maryland Avenue Southwest Plan* (April 2012) explained at page 1-8:

The Avenue right-of-way has been formally closed between 9th and 12th Streets SW.
Reestablishing the 160’ wide Avenue will require the cooperation of multiple property owners.

In this area, the property controlled by the railroad is reduced to the point that adding a fourth track does not appear to be possible. This drawing illustrates the diminished width controlled by the railroad (*MD Ave SW Plan*, page 1-9):

³ 49 US Code §22701 (Definitions) provides:

(3) State.— The term “State” means any of the 50 States and the District of Columbia.

(4) State rail transportation authority.— The term “State rail transportation authority” means the State agency or official responsible under the direction of the Governor of the State or a State law for preparation, maintenance, coordination, and administration of the State rail plan.

⁴ Statewide Rail Plans are required under the Passenger Rail Investment and Improvement Act of 2008 (Public Law 110-432) (PRIIA). PRIIA also requires the inclusion of projects in rail plans to be eligible for federal funding. Section 302 of the Act authorizes the appropriation of funds for “congestion grants” to States or to Amtrak (in cooperation with States) for capital projects to reduce train delay and increase ridership on high priority rail corridors. The regulations that implement these requirements are contained in U.S. Code, Title 49, Subtitle V, Part B, Chapter 227

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In this area between 9th and 12th Streets, the width of the area controlled by the railroad appears to be the 58 feet that Congress authorized in 1901 (where the “tracks are depressed on Maryland Avenue shall not exceed fifty-eight feet between the inside faces and profiles of the parallel retaining walls, measured at the level of the said tracks”), allowing room for only the tracks that now exist. Using the design criteria that CSX has proposed in the Virginia Avenue Tunnel DEIS the existing width of the right-of-way for the SW tracks cannot accommodate a fourth track.⁵

To assist in the preparation of the DC Rail Plan, the *SWE Addendum* needs to address whether and how the existing three SW rail tracks can be expanded to four tracks.⁶ The addendum apparently is based on the ability to restore Maryland Avenue to its original 160 foot width, but the addendum needs to explain the rationale for how Maryland Avenue will be restored and how a fourth track can be accommodated.

Expanding The Long Bridge is Not a Permanent Solution.

The current two-track Long Bridge is at capacity today and a new four-track bridge shared by passenger, commuter and freight rail as proposed in the Long Bridge Study will be at capacity by 2040. However, the data contained in the current Long Bridge Study considerably understates the number of freight and commuter trains that will need to cross the Potomac River by 2040. As

⁵ Applying this design criteria to the SW tracks would mean the current three track configuration, with its width of 58’, does not have sufficient side clearance to meet current design standards (46 feet for two tracks, plus 3 feet, plus 18 feet, plus 3 feet for the third track equals 70 feet). To add a fourth track would require a width of 92 feet (46 feet for two tracks times two for four tracks). Using current CSX design criteria, the existing width of the right-of-way for the SW tracks cannot accommodate a fourth track.

⁶ In discussing the height of buildings, the addendum appears to assume that Maryland Avenue will be restored to its original width as the basis for Assumption 2 on page 6 of the *SWE Addendum*: “All of the parcels that are adjacent to the Maryland Avenue can achieve 130’ in height from other adjacent streets (so with regard to building height, it does not matter if Maryland Avenue is built).” That conclusion is reinforced by the table at page 10, that specifies a Proposed Right-of-Way of 160 feet, but under the heading “Existing” states: “section not built.”

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explained in the attached January 7, 2014 letter to the Long Bridge Project Manager a new four-track bridge will barely provide the capacity needed for the Amtrak, VRE and CSX trains that are projected to use the rebuilt bridge. Both the Office of Planning's *Maryland Avenue Southwest Plan* and NCPC's *SW Ecodistrict Plan* recommend that MARC trains through-run from Union Station to Alexandria. If more than three MARC trains attempt to use the projected four-track Long Bridge the capacity will be exceeded. If the goals and objective of the *Maryland Avenue* and the *SW Ecodistrict Plans* are to be realized, the criteria for evaluation and the recommendations of the Long Bridge Study need to change.

In fact, the capacity of a four track bridge will be even less adequate because the projections for commuter expansion are understated in the Long Bridge Study. DDOT's current draft *moveDC Plan* understates the current number of VRE passengers by 20 percent and understates current MARC passengers by a similar factor. In fact, in 2012, VRE carried upwards of 19,000 passenger trips per day, not the 16,000 as stated in the *moveDC* draft (page 3-25, *Virginia State Rail Plan*, November 2013). MARC's ridership has doubled in the past 15 years, and in 2012 amounted to 36,000 daily riders, not the 30,000 stated in the draft *moveDC Plan (MARC Growth and Investment Plan Update 2013 to 2050*, September 9, 2013).

VRE's ridership growth has averaged 6 percent annually between 2002 and 2012 and VRE is predicted to grow between 60 and 85 percent by 2025. (p. 3-25, *Virginia State Rail Plan*, November 2013). By 2020, Phase I of the VRE System Plan calls for maximizing the number of trains VRE can operate under existing agreements, which effectively limits VRE capacity to about 25,000 weekday passengers. Railroad capacity investments proposed for Phases II and III will provide the additional capacity needed to enable VRE to carry up to 50,000 weekday passenger trips by 2040, which is consistent with identified demand (p. 3, *Virginia Railway Express System Plan 2040 Brochure*, March 27, 2014).

MARC's plan shows that ridership has doubled in the last 15 years to 36,000 daily riders and will increase to 75,000 daily riders by 2040; and MARC has instituted reverse commute and weekend service, further increasing the service it provides. In the future, MARC plans to "thru-run" trains from Maryland, through Union Station to L'Enfant Station and on to Virginia. (*MARC Growth and Investment Plan Update 2013 to 2050*, September 9, 2013). Further discussion of projected commuter rail expansion is contained in the attached Committee of 100 Council testimony concerning the draft *moveDC Plan*.⁷

⁷ See Attachments: C100 Move DC Testimony, June 26, 2014 and C100 Long Bridge Letter, January 7, 2014

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Providing Four Tracks in SW and on the Long Bridge Will Not Be Adequate

These comments have discussed the physical constraints and the growth projections, but there is a simpler way to understand both the problem and the kind of solution that is needed. There are commuters in Maryland just as there are commuters in Virginia that would use commuter rail. Amtrak wants to expand high speed rail south of Union Station. The freight that travels through Maryland travels through Virginia. The infrastructure north of Union Station can provide a useful framework with which to consider what is needed south of Union Station.

North of Union Station MARC operates on shared tracks with CSX and Amtrak:

- The Brunswick line operates on the 2-track CSX Metropolitan Subdivision,
- The Penn Line operates on the 3-4-track Amtrak NE Corridor tracks, and
- The Camden line operates on the 2-track CSX Capitol Subdivision

In this context the question becomes: Why are we talking about increasing the 3-track bottlenecks south of Union Station to 4-tracks, when the same rail operations north of Union Station require 7-8-tracks? It makes no sense.

The Need to Separate Passenger and Commuter Rail from Freight Rail Operations.

In order to provide service to the projected 125,000 commuter rail riders by 2040, the operations of VRE, MARC, and Amtrak will have to be separated from the operations of CSX. It's time to reexamine the NCPC proposal for a rail tunnel under the Potomac River between Virginia and Anacostia (*Extending the Legacy: Planning America's Capital for the 21st Century, 1997*). NCPC proposed a Potomac River crossing that would carry both freight and passenger trains. The freight segment could be either a tunnel or a bridge that would connect with the rail right-of-way that extends from Blue Plains to the Benning rail yard. That alignment would carry freight around the downtown, monumental core, leaving the Long Bridge and SW tracks for use by Amtrak and commuter rail, and allowing electrification of those tracks.

There is a significant interdependence between the SW Ecodistrict Plan and the DC Rail Plan: both will need to address how to greatly increase the capability of moving a lot more people using commuter rail.

Building Heights and Visual Impact on the National Mall

The Committee of 100 has concerns about the proposed guidelines for building height and massing along Independence Avenue. It appears from the photos in the report, that the proposed building heights

⁸ "DC is a gateway, rather than a destination, for rail freight" (Draft *moveDC Plan*, page F-14)

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would have significant visual impacts with respect to the National Mall and the Smithsonian buildings on the south side of the National Mall, particularly the sky line and sky views from the Mall as well as along the length of Independence Avenue.

Land Use

There is very little discussion in the Addendum about the land use mix envisioned, except for statements about ground floor retail. Yet achieving some amount of new private development, especially hotel, residential and retail, is critical to obtaining additional activity in the area, and a reason for people to go there.

We also have some questions about building footprints. For example, building site 1A appears to be a very small building footprint. Is major development on that site feasible and, if not, what kind of use might be located on the parcel?

Open Space

While some open spaces are discussed (Reservation 113 for example), additional information on the landscape quality of other spaces would be useful, such as along Virginia Avenue and Maryland Avenue, where the Office of Planning study provides some background.

Areas to the East and West

It appears that NCPC has kept the SW Ecodistrict relatively compact in order to make the study work manageable. Future studies should address the neighboring areas to the east and west and in order to efficiently manage the initiative long term, extend east to Second Street SW and the Center Leg Freeway. At some time, the “area to the west”, bounded by 12th Street, Independence Avenue, 15th Street, and Maine Avenues should also be addressed, an area comprised largely of federal buildings. Integrating this area, especially as it is redeveloped and reused, with the SW Ecodistrict, is critical. Linkages along Maryland Avenue to the Tidal Basin could also be addressed in that work.

Next Steps

The Committee of 100 on the Federal City appreciates the opportunity to comment on *The SW Ecodistrict Plan Addendum*. We look forward to the next steps as specific issues are refined and the SW Ecodistrict moves forward into implementation.

Respectfully submitted,

Richard Houghton, Chair

Monte Edwards, Member

John Fondersmith, AICP, Member

PUBLIC COMMENTS CONTINUED



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July 3, 2014

Diane Sullivan
National Capital Planning Commission
Suite 500 North 401 9th Street NW
Washington, DC 20004

Dear Ms. Sullivan:

The National Coalition to Save Our Mall (Coalition) is a not-for-profit, 501(c)(3) organization founded in 2000 to provide an organized voice for the public on Mall matters and to advocate comprehensive, visionary planning for the Mall in the 3rd century. The Coalition offers the following additional comments on the National Capital Planning Commission's 2013 accepted SW Ecodistrict Plan and the current Draft Addendum dated June 5, 2014. (The Coalition originally provided comments on the Plan in a letter dated September 18, 2012):

- We commend the Commission and staff for the SW Ecodistrict Plan and current draft Addendum partnership planning initiative for urban sustainability and livability in this 110 acre 15-block (square) section of Southwest Washington DC south of the National Mall;
- We strongly support the Plan's focus areas dealing with 10th Street and Banneker Park and the Maryland Avenue revitalization as consistent with the Coalition's long time concerns and interest directly related to the National Mall;
- We reiterate earlier concerns that the implementation of the SW Ecodistrict Plan needs to be related to the larger need for planning in the tradition of the historic L'Enfant and McMillan visions. Care needs to be taken that the Plan and Addendum do not treat different parts of the National Capital in ways that could undermine and/or destroy the integrity of the city as a unified design and symbolic whole.

With regards to certain 10th Street Corridor Addendum provisions we have the following concerns:

- The Addendum suggests "Interim streetscape improvements to 10th Street" to relate access from the Mall to the Waterfront and vice versa." **We suggest permanent streetscapes and designing the street as a direct connection to and from the Mall with any buildable sites or vacant existing buildings designated for National Mall functions.**
- Page 7 of the Addendum indicates that building heights allowed for 10th Street "need further analysis." The Coalition would oppose 150 foot buildings (as indicated on Page 6) along 10th Street and suggest no higher than 90 foot buildings be permitted

With regard to Maryland Avenue revitalization we have the following comments:

- We have questions regarding the status of the DC Office of Planning Maryland Avenue, SW Small Area Plan. Is the Small Area Plan part of the District Elements

National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849
301-340-3938 jfeldman@savethemall.org
www.savethemall.org

of the Comprehensive Plan for the National Capital? If not it cannot be a guide for finding development proposals to be, for zoning purposes, **"not inconsistent with the Comprehensive Plan."**

- Having indicated that, we certainly strongly support the Plan statement (Page 76) that the Plan "Provides recommendations on how to improve the public realm and pedestrian experience, such as **maintaining the 160 foot wide vista to the U.S. Capitol.**" (Emphasis added)
- Neither the Plan nor the Addendum indicates the specific extent of the proposed "deck-over of Maryland Avenue." We believe the least amount of decking should be allowed. It should be designed and treated similarly to Pennsylvania Avenue north of the Mall as L'Enfant and McMillan intended.

Again, we commend the Commission and staff for this Ecodistrict partnership effort. We believe that the Ecodistrict Plan (both Federal and District Elements) need to be adopted as part of the Comprehensive Plan for the National Capital and the partnership would be strengthened if a single entity with strong public representation would be created by Congress to oversee the coordination and implementation of the Plan and its Addendum for the entire 110 acre.

Sincerely,

Judy Scott Feldman, Ph.D.
Chair and President

The National Coalition to Save Our Mall is a 501(c)(3) non-profit organization dedicated to educating the public about the National Mall as our premier civic space for learning about and experiencing democracy and to advocating for comprehensive, visionary planning for the National Mall in its 3rd century.

NCPC RESPONSE TO PUBLIC COMMENTS

The table below includes a summary of the public comments received and an explanation of how NCPC staff have addressed the comments.

Overall Comments		
	Public Comment	Response
1	We reiterate earlier concerns that the implementation of the SW Ecodistrict Plan needs to be related to the larger need for planning in the tradition of the historic L’Enfant and McMillan visions. Care needs to be taken that the Plan and Addendum do not treat different parts of the National Capital in ways that could undermine and/or destroy the integrity of the city as a unified design and symbolic whole.	While the SW Ecodistrict Plan emphasizes sustainability as an overarching theme, it also envisions the transformation of this area into a neighborhood/district whose character seamlessly integrates into the Monumental Core of the Capital, including the National Mall and adjacent civic spaces.
2	It appears that NCPC has kept the SW Ecodistrict relatively compact in order to make the study work manageable. Future studies should address the neighboring areas to the east and west and in order to efficiently manage the initiative long term, extend east to Second Street SW and the Center Leg Freeway. At some time, the “area to the west”, bounded by 12th Street, Independence Avenue, 15th Street, and Maine Avenues should also be addressed, an area comprised largely of federal buildings. Integrating this area, especially as it is redeveloped and reused, with the SW Ecodistrict, is critical. Linkages along Maryland Avenue to the Tidal Basin could also be addressed in that work.	While the study area in the SW Ecodistrict Plan was specifically defined, the plan considered the areas beyond the boundary especially as it relates to connectivity, transportation, and viewsheds. NCPC agrees that future plans and studies, and implementation efforts should take the broader area into account.
3	The cover page — This is the same as earlier plan, but zooms in to just part of the overall area. Now I find the trees too dense and of an unlikely conifer style that is likely not what anyone wants: suggest you hire a new arborist/illustrator. Moreover, the depiction of the Eisenhower site with just trees is misleading beyond the trees illustrated.	The Addendum cover is now the same as the plan. It is not the intent of the image to show large numbers of conifer trees.
4	The first diagram, page 2, numbers buildings and has a key to these; however, the color/ font do not read well as the text is dark and blends into the background.	The font is now white.
5	As noted above, I see the document (mostly) as supplementing the overall plan; clearly the document does not seek to establish brand new goals or objectives. But, there are some areas where the context has changed, and the underlying assumptions must be re-evaluated. Where that is the case, this document in final form is not the place to do that, at least in my opinion. Yet, page 3 identifies its purposes with two words: “Addendum” and “appendix” (the latter just once, possibly an editing glitch). To me, neither term conveys what I understand the bulk of the document to be: supplemental information and interpretations.	As noted, the information in the Addendum is largely technical information and assumptions that informed the development of the plan. It also includes summaries of additional work that has been completed since the plan was finalized. This document serves as an addition to the plan and is therefore called an Addendum.

Comments by Section <i>General Development Principles</i>		
Public Comment	Response	
6	<p>The text on page 4, Facade Composition, includes "This can be achieved by" followed by a bullet list. There may be other creative options for adding interest to the facade. Giving the designers room to develop their own strategies will help create variety and interest along the blocks. I would recommend changing the quoted text to read, "Some of the options for achieving this include." This will allow for innovative approaches, rather than relying on our ability to think of and list all the options here.</p>	<p>The text now reads "This can be achieved several ways including:..."</p>
7	<p>Page 4: Under "Height and Massing," "Embellishments" would be better cast as "complementing" and even "also bringing attention to" the views of the Capitol, National Mall or Banneker Park. "Compete" is subject to interpretations wherein height or area metrics alone would sway approval/acceptability,</p>	<p>NCPC has concerns that the suggested word "complement" may also be subject to interpretations. NCPC will keep the text as written.</p>
8	<p>Page 4: Under "Build to Lines," "Exceptions" might better read "Further exceptions."</p>	<p>If read alone "further" exceptions will confuse the reader. NCPC will keep the text as written.</p>
9	<p>Page 4: Finally, the whole discussion of "Roofscape" now has a fundamental problem that permeates the document, the failure to incorporate recent changes in the Height Act. The cure is to note the statutory change and anticipate a later modification of the whole plan to account for this; surely, however, the statutory change should be noted as a fact somewhere early in the document.</p>	<p>We have added a footnote to the Height and Massing section on page 4 that reads: The height and massing of the development scenario in the SW Ecodistrict Plan does not reflect the 2014 legislation to allow occupancy of the penthouse.</p>
10	<p>Page 5 is filled with "shoulds" and this is appropriate, but there is at least one "shall" that is inconsistent and ramps up the document from guidance to inadvertent regulatory tone.</p>	<p>Fixed.</p>
11	<p>Page 6 depicts Virginia Avenue at 120 Feet when the historic right of way is 160. If the plan called only for this incomplete width, I missed it and object even if past the relevant comment period; in any event, the diagram should have a note that marked anything less than 160 explicit. That said, I would think consideration could be given to joining the properties north and south of the portion of Virginia west of 10th Street so that the overall development potential would be increased, taking advantage of the significant height of the deck at 10th and step down as Virginia's view shed approaches Independence.</p>	<p>The plan recognizes the importance of reestablishing the Virginia Avenue corridor to create a visual and physical connection to the Washington Monument and the National Mall. While the historic width of L'Enfant Avenues is 160', some reference material show Virginia Avenue at 120' in this area. The SW Ecodistrict Plan showed the width of Virginia Avenue at 120', suggesting that because of a change in conditions, a reduction could be evaluated for future consideration.</p>
12	<p>Pages 6 and 7 attempt to set out Federal/District interests relative to the Height Act. This section was prepared prior to the amendments of May 2014. If retained, the section should note the new authority even if it does not provide a "penthouse" plan as such (likely needs a supplemental study to revise the underlying SW Ecodistrict Plan itself, in my opinion).</p>	<p>Regardless of the new legislation, the National interests remain the same as does the allowable height of the building per the Height of Buildings Act. The Addendum now includes a footnote on page 4 that states the 2014 legislation was not in existence when the 2013 plan was developed. The impact of the new legislation did however inform the more recent modeling for Independence Avenue (see pages 20-23).</p>

Comments by Section <i>General Development Principles cont.</i>	
Public Comment	Response
<p>13 Page 7 of the Addendum indicates that building heights allowed for 10th Street “need further analysis.” The Coalition would oppose 150 foot buildings (as indicated on Page 6) along 10th Street and suggest no higher than 90 foot buildings be permitted</p> <p>The Right-of-Way Design Summary will be very helpful, but it needs to be very clear. Currently, the columns "Tree Box" and "Sidewalk Area" include a "7' minimum" and "10' minimum", respectively, in</p>	<p>130' as indicated on page 7. In general, the Height of Buildings Act allows building height to be the width of the street plus 20' up to a maximum of 130'. The map has been clarified.</p> <p>With the exception of the parcels at 10th Street and Independence Avenue, NCPC has not modeled massing scenarios for 10th Street. It is possible that the other parcels on 10th Street could accommodate 130' in height with a penthouse without compromising national interests because the street is 150' wide. Additional massing studies are needed.</p>
<p>14 The Right-of-Way Design Summary will be very helpful, but it needs to be very clear. Currently, the columns "Tree Box" and "Sidewalk Area" include a "7' minimum" and "10' minimum", respectively, in the column headings. This would seem to imply that these items could never be less than 7' or 10' throughout the District. If you look down the column at individual cells, however, you will see smaller sizes: 4-6' for tree boxes and 6-8' for sidewalks. Assuming the cell content is correct, then the headings should be revised to read, "Tree Box/Furnishing Area: Minimums include curb," or something like that.</p>	<p>The references to “minimums” have been deleted.</p>
<p>15 With regard to tree boxes, it might also be worth providing some advice on tree selection. If the tree selected will have a spread that will protrude into the sidewalk area, then the branches should start high enough on the tree to clear pedestrian's heads.</p>	<p>A list of native species/tree types will be available later this fall (2014).</p>
<p>16 There is very little discussion in the Addendum about the land use mix envisioned, except for statements about ground floor retail. Yet achieving some amount of new private development, especially hotel, residential and retail, is critical to obtaining additional activity in the area, and a reason for people to go there.</p>	<p>There is an entire section on land use in the SW Ecodistrict plan (pgs. 10-15). The Addendum only includes statements about ground floor retail because they were not included in the Plan.</p> <p>The development scenario in the SW Ecodistrict Plan proposes that site 1A be a cultural use because of its small building footprint and assumes the building could be expanded below grade under Virginia Avenue.</p>
<p>17 The document should add something about the commuter rail station and platforms that can serve the mix of carriages that VRE, MARC, and Amtrak utilize; this should also project that there would be access under roof from the platforms to WMATA's L'Enfant complex below.</p>	<p>The SW Ecodistrict Plan discusses mobility, the commuter rail station, and the platforms in the mobility section (pgs. 16-21).</p>

Comments by Section <i>Street Character</i>		
Public Comment	Response	
18	<p>Independence Avenue: The Committee of 100 has concerns about the proposed guidelines for building height and massing along Independence Avenue. It appears from the photos in the report, that the proposed building heights would have significant visual impacts with respect to the National Mall and the Smithsonian buildings on the south side of the National Mall, particularly the sky line and sky views from the Mall as well as along the length of Independence Avenue.</p>	<p>The SW Ecodistrict Plan is not a regulatory document – it is only guidance. The proposed development scenario represents the best thinking at the time of the plan’s development. While the SW Ecodistrict Plan will not be revisited, staff will consider public/stakeholder comments on the Addendum’s height and massing when commenting on the District’s zoning proposal for the area or conducting additional studies.</p>
19	<p>Independence Avenue: Pages 11-17 discuss Independence Avenue and how buildings along it, either side, approach that major right of way. At this time, some diagrams cover only a portion of the overall Federal presence on Independence Avenue, which I feel runs from the Rayburn House Office Building to the 14th Street limit of Agriculture’s South building. The sections should cover this as well, and pretty much do. However, I think it is important to get actual measurements on Agriculture South’s setback from the property line. My reading of GIS images is that it may be at the line; your table shows almost 9 feet. Also, I have provided you with dated “Street Width” information that should be verified and, if correct, those data should supplant that in your sectional diagrams. Aside: the term “reentrant” needs explanation or find another way to explain this without using that opaque term.</p>	<p>At the time of the plan’s development, NCPC’s analysis of Independence Avenue buildings and build-to-lines focused on the area between 4th and 14th. NCPC staff will extend this analysis east to the Rayburn Building as staff develops specific comments on the District’s zoning proposal.</p> <p>We have replaced the term “reentrant” with “the corner of the USDA building that is inset at the intersection of 12th Street and Independence Avenue”.</p> <p>We also show a new section on pages 16 that clearly dimension the property lines, right-of-way line, and curb line based on DCGIS data.</p>
Comments by Section <i>Street Character cont.</i>		
Public Comment	Response	
20	<p>Independence Avenue: Page 13 — Please explain the red line shown in the diagram now in lower right corner; unexplained, it looks like some kind of building restriction line (unwanted mandate, not what an Addendum should impose if that’s what it is).</p>	<p>The red line in the diagram on pg. 14 illustrates the proposed build-to-line on Independence Avenue that informed the SW Ecodistrict Plan. It is 34’ from the southern right-of-way line (it varies from each property line). The rationale for this setback is that potential new development along Independence Avenue would create a strong building line that aligns with the inset of the USDA South building at the corner of 12th and Independence. It also allows for more open space than the existing sidewalk in front of the USDA South building. Several of the existing buildings are set back much further which mitigates the impact of the building height on views from the Mall (for example the Orville Wright building is 130’ in height but is set back 87’ from the property line).</p> <p>The SW Ecodistrict Plan and Addendum are only guidance. Staff will consider public/stakeholder comments on the Addendum when commenting on the District’s zoning proposal for the area or conducting additional studies.</p>
21	<p>10th Street: The Addendum suggests “Interim streetscape improvements to 10th Street” to relate access from the Mall to the Waterfront and vice versa.” We suggest permanent streetscapes and designing the street as a direct connection to and from the Mall with any buildable sites or vacant existing buildings designated for National Mall functions.</p>	<p>The 10th Street Programmatic Concept that the NCPC approved in January of 2014 includes a long-term programmatic approach for 10th Street. For more information on the 10th Street Programmatic Concept go to www.ncpc.gov/swecodistrict.</p>

Comments by Section | *Street Character cont.*

	Public Comment	NCPC Response
22	<p>10th Street: Benjamin Banneker Park needs to be protected and strengthened to honor a man who was a big part in Washington's history. Unfortunately, neither NCPC nor the District of Columbia has heeded calls to provide the proper memorial to Banneker that he deserves. With hundreds of statutes all across Washington, many of which honor foreigners, artists, writers, and war generals, it is a shame that a scientist such as Benjamin Banneker who lived in Washington and helped create the city we have today, is not honored in a similar light. For example, our city honors Louis Laguerre, a French photographer and painter with a memorial adjacent to the National Museum of American Art and another non-American, Edmund Burke, a conservative philosophical statesman from Ireland with a prominent statute on Connecticut Ave. And of course we honor numerous war generals with enormous statues that pay tribute to their efforts to do nothing more than kill their opponents. Surely Banneker is worthy of more honor than a mere photographer and from France, an Irish politician, or the countless war leaders of yore. Yet Banneker, an American surveyor of the nation's capital who also wrote and published America's most accurate astronomical almanac of its time is not only without such a memorial, but NCPC's plan intends to further marginalize the underutilized park bearing his name. NCPC has not once offered any proposals to properly memorialize Banneker, and one has to wonder if it is because Banneker is an African American? If not, why else is NCPC content on taking its current path?</p>	<p>In accordance with federal law, only Congress may authorize a memorial subject on National Park Service land. The authorization for this proposed memorial has expired. Only after a memorial is authorized does NCPC evaluate memorial proposals at a given site.</p> <p>The SW Ecodistrict Plan discusses the history of Banneker Park and the work of the Washington Interdependence Council to place a memorial of Benjamin Banneker at Banneker Park (pg. 63).</p>
23	<p>10th Street: I had a concept for the L'Enfant Plaza corridor stretching from the Smithsonian Castle to Benjamin Banneker park that I would like to share: I believe that with so many monuments in DC to the government and government figures, there ought to be more of a focus on the foundation of that government: the American people and their unique cultural, scientific, and artistic contributions to the nation. Given the linear nature of the walk along L'Enfant Plaza, I believe that a great overarching theme to be woven throughout would be that of a Cultural Timeline of the American people. The different seating areas, benches, fountains, trees, etc would provide a great place to incorporate tributes large and small to contributions by American citizens to our nation over our history. From scientific research, to jazz, poetry, baseball, films, there are countless contributions that could be highlighted. It would create a unique experience as visitors transition from the federal space of the mall, which is very government oriented, down to Banneker park and the new Wharf and waterfront, which is much more oriented toward DC locals and average American citizens. I hope NCPC will consider the concept of a Timeline of American Cultural Contributions as an overarching theme of the L'Enfant Plaza green walk. I have received very positive feedback to the idea thus far.</p>	<p>The 10th Street Programmatic Concept does not discuss this level of detail. It serves more as a planning tool that discusses the technical feasibility of changing the street/bridge structure. For example; it studied the viability of a tree-lined street out to Banneker Park. In areas where large trees are not possible, the concept shows more plazas and hardscape without going into detail about character, art, landscape palette, etc.</p> <p>The specific design of 10th Street will be further developed as part of a future process likely led by several agencies including DDOT and FHWA.</p>

Comments by Section <i>Street Character</i>		
Public Comment	Response	
24	<p>10th Street: Page 25 — Consider rearranging the diagrams on the page so the 10th Street plan is rotated so that “north is up” (to match all other diagrams in the draft)</p>	<p>The diagram would be too small to read if it was rotated on the page. To make it less confusing, we have added directional north/south arrows.</p>
25	<p>Maryland Avenue: We have questions regarding the status of the DC Office of Planning Maryland Avenue, SW Small Area Plan. Is the Small Area Plan part of the District Elements of the Comprehensive Plan for the National Capital? If not it cannot be a guide for finding development proposals to be, for zoning purposes, “not inconsistent with the Comprehensive Plan.”</p> <p>Having indicated that, we certainly strongly support the Plan statement (Page 76) that the Plan “Provides recommendations on how to improve the public realm and pedestrian experience, such as maintaining the 160 foot wide vista to the U.S. Capitol.” (Emphasis added)</p> <p>Neither the Plan nor the Addendum indicates the specific extent of the proposed “deck-over of Maryland Avenue.” We believe the least amount of decking should be allowed. It should be designed and treated similarly to Pennsylvania Avenue north of the Mall as L’Enfant and McMillan intended.</p>	<p>The Maryland Avenue Small Area Plan was adopted by City Council and is therefore part of the District Elements of the Comprehensive Plan for the National Capital.</p> <p>The Plan and Addendum do not discuss the Maryland Avenue decking in significant detail because it is beyond the scope of these documents. The recently completed Maryland Avenue Transportation Study and the Long Bridge Study offer the most up to date information. They can be located at:</p> <p>www.ddot.dc.gov/page/maryland-avenue-sw-transportation-study</p> <p>www.longbridgeproject.com</p>
26	<p>Maryland Avenue: To assist in the preparation of the DC Rail Plan, the SWE Addendum needs to address whether and how the existing three SW rail tracks can be expanded to four tracks. The Addendum apparently is based on the ability to restore Maryland Avenue to its original 160 foot width, but the Addendum needs to explain the rationale for how Maryland Avenue will be restored and how a fourth track can be accommodated.</p> <p>Footnote: In discussing the height of buildings, the Addendum appears to assume that Maryland Avenue will be restored to its original width as the basis for Assumption 2 on page 6 of the SWE Addendum: “All of the parcels that are adjacent to the Maryland Avenue can achieve 130’ in height from other adjacent streets (so with regard to building height, it does not matter if Maryland Avenue is built).” That conclusion is reinforced by the table at page 10, that specifies a Proposed Right-of-Way of 160 feet, but under the heading “Existing” states: “section not built.”</p>	<p>The SW Ecodistrict Plan promotes expansion of the tracks as indicated in the project recommendations on page 75. It also acknowledges that the 4th track is subject to additional study.</p> <p>As mentioned above, the most recent analysis for Maryland Avenue can be found in DDOT’s Maryland Avenue SW Transportation Study and the Long Bridge Study at</p> <p>www.ddot.dc.gov/page/maryland-avenue-sw-transportation-study</p> <p>www.longbridgeproject.com</p>

Comments by Section <i>Public Open Space</i>		
Public Comment	Response	
27	<p>Maryland/Virginia Avenues: While some open spaces are discussed (Reservation 113 for example), additional information on the landscape quality of other spaces would be useful, such as along Virginia Avenue and Maryland Avenue, where the Office of Planning study provides some background.</p>	<p>The Plan and Addendum do not go into this type of detail for all of the streets. The Plan lists a Streetscape Plan as a next step that needs to be done.</p>
28	<p>Reservation 113: Page 29 — Reservation 113 will be fundamentally impacted by the rail lines that already penetrate it; this should be noted. These rail lines currently cross north-south streets on old structures that have to be replaced before they fail, and their geometry brings rail cars to a very sharp, inherently dangerous, curve, given this (my interpretation), I would strongly recommend that the freight rail lines be allowed to follow alignments that could pass thru a portion what is now the GSA building to the south. This would allow replacement bridges to be put into place track-by-track, the first being the southernmost (of four, two for freight, two more for passenger service). Once the first new freight track was in place, the second could shift south as well, but rail service would be retained intact. The upshot would be a reduction in the area of Reservation 113 lost to railroad encroachment. All curved track should have guard rail as a further safety measure.</p>	<p>As mentioned above, freight movement and the rail lines are discussed in more detail in the Maryland Avenue SW Small Area Plan, the Maryland Avenue SW Transportation Study and the Long Bridge Study.</p> <p>http://planning.dc.gov</p> <p>www.ddot.dc.gov/page/maryland-avenue-sw-transportation-study.</p> <p>www.longbridgeproject.com</p>



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