

Docket Item # 17
BAR CASE # 2008-0194

BAR Meeting
November 5, 2008

ISSUE: Permit to Demolish
APPLICANT: Hunting Creek, LLC
LOCATION: 1199 South Washington Street
ZONE: RC/High Density Apartment Zone

STAFF RECOMMENDATION: Staff recommends approval of the Permit to Demolish, with the following conditions:

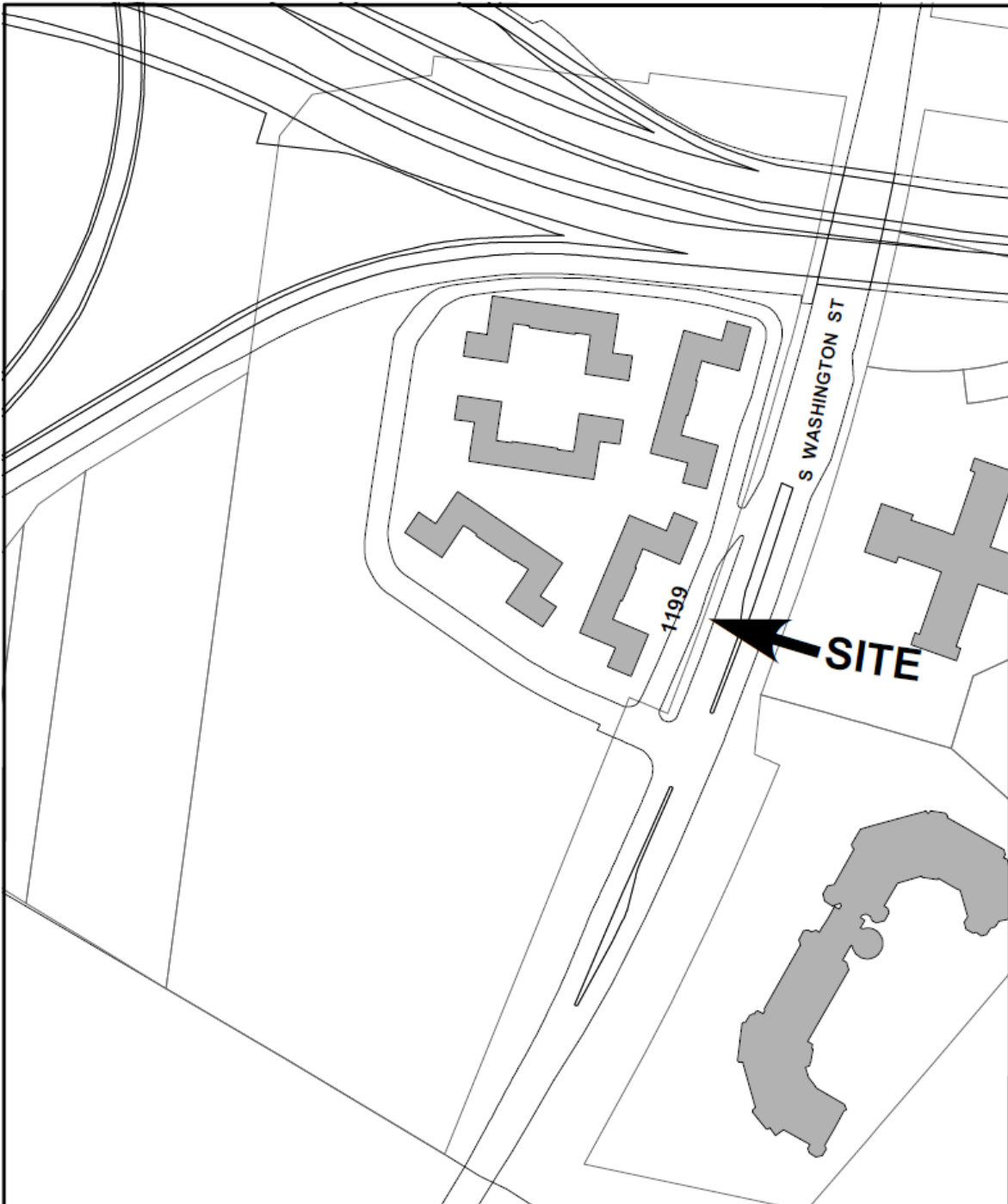
1. To ensure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for the initial Documentary Study by the next concept submittal, and documentary research shall commence immediately thereafter so that information about the history is available by the subsequent concept submittal. The Documentary Study shall be completed prior to submission of the preliminary site plan. Demolition activities may require archaeological monitoring. Prior to release of the final site plan, all required archaeological preservation measures shall be completed or a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*, shall be in place to recover significant resources in concert with construction activities. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

*2. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.

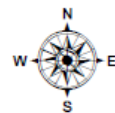
*3. The applicant/developer shall call Alexandria Archaeology immediately (703-838-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds.

*4. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

5. The statements in archaeology conditions above that are marked with an asterisk (*) shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements.



BAR CASE #2008-0194, 0195 11/5/2008



I. ISSUE:

The applicant is requesting approval of a Permit to Demolish from the Old and Historic Alexandria Board of Architectural Review, in order to demolish the existing garden-style apartment complex, known as Hunting Terrace, located at 1199 South Washington Street, and construct a new residential development consisting of four, five-story residential apartment buildings, set in a garden-style environment. The new development will be constructed by the IDI Group.

Located just south of the Interstate 495 Beltway along South Washington Street, the existing Hunting Terrace complex consists of five, 2-3 story apartment buildings, two fronting South Washington Street, three located behind the front two, oriented to the north and south. The existing buildings contain a total of 116 residential units.

Constructed in a garden-style setting, the remaining units of Hunting Terrace evoke a minimal Colonial Revival style, with modest elevations of brick, decorated with brick soldier courses separating the basement from the first floors. The buildings have low-pitched hipped roofs of asphalt shingles. Exterior elements such as windows and doors have been replaced or removed through the years. While a garden-style apartment complex, today Hunting Terrace does not have extensive landscape features found in other garden-style apartment along South Washington Street, such as Gunston Hall and the Monticello-Lee.

The buildings have been vacant since September 2007.

II. HISTORY:

Hunting Terrace was developed in 1943-1944, while the Hunting Towers across the street was developed in 1950. Originally, the Hunting Terrace Apartments consisted of eight buildings, all built in a minimal Colonial Revival style. The complex was designed by architect William H. Harris, who also designed the Yates Garden Complex in the Old and Historic Alexandria District. Similar to other garden-style apartments found in the City, Hunting Terrace was constructed to house workers moving into the area during and after World War II.

To provide sufficient land as a component of the work related to the new Woodrow Wilson Bridge project, the Virginia Department of Transportation (VDOT) condemned the Hunting Terrace apartments. Three of the original eight buildings were demolished, then the VDOT conveyed the remaining five buildings back to a corporate entity controlled by the original property owner.

Prior to the demolition of the three buildings, federal and state transportation agencies commissioned a study by URS/Grenier Woodward Clyde to study the historic and architectural significance of the Hunting Terrace apartments, as well as other buildings in the area. This study is known as "Supplemental Historic Architectural Survey of the Revised Area of Potential Effects of the Woodrow Wilson Bridge Improvement Project." The report included extensive documentary study of the buildings and a field analysis. The study concluded that the Hunting Terrace buildings had no architectural or historical significance. The Virginia Department of Historic Resources and the National Park Service concurred with the determination that the buildings did not meet the criteria for listing in the National Register of Historic Places. These conclusions were documented and accepted by the City in the Hunting Creek Area Plan, adopted

by City Council in 2005. Following this determination of eligibility, the three buildings were demolished in Hunting Terrace for the bridge project.

The remaining buildings of Hunting Terrace were purchased by the IDI Group with the intent to redevelop the site. Beginning in 2005, IDI began working with the City and a Stakeholder's group to discuss the possible schemes for the redevelopment, and how to balance the issues of affordable housing and historic preservation. While all schemes have included the assumption that the remaining buildings would be demolished, earlier proposals included schemes that had fifteen-story buildings on the back of the lot, with five-story buildings fronting South Washington Street.

These schemes would have required approval by City Council of a zoning map amendment to allow for additional height, exceeding the current 50' height limit, up to 150'. Several work sessions were held for the Old and Historic Alexandria Board of Architectural Review to discuss these schemes and appropriateness of the proposal within the Old and Historic District. On October 18, 2008, the City Council denied the request for of a zoning map amendment that was necessary to allow the additional height.

While following the process for the zoning map amendment, the applicant also submitted a concept proposing only five-story buildings, of 50' heights, which would not require a map amendment. This concept review follows the discussion of the Permit to Demolish and was discussed at the work session with the Board at the September 17, 2008, meeting.

The current proposal has been discussed with the National Park Service, as well as members of the Community, including the Old Town Civic Association.

III. ANALYSIS:

In considering a Permit to Demolish/Encapsulate, the Board must consider the following criteria set forth in the Zoning Ordinance, §10-105(B):

- (1) Is the building or structure of such architectural or historical interest that its moving, removing, capsulating or razing would be to the detriment of the public interest?
- (2) Is the building or structure of such interest that it could be made into a historic house?
- (3) Is the building or structure of such old and unusual or uncommon design, texture and material that it could not be reproduced or be reproduced only with great difficulty?
- (4) Would retention of the building or structure help preserve the memorial character of the George Washington Memorial Parkway?
- (5) Would retention of the building or structure help preserve and protect an historic place or area of historic interest in the city?
- (6) Would retention of the building or structure promote the general welfare by maintaining and increasing real estate values, generating business, creating new positions, attracting tourists, students, writers, historians, artists and artisans, attracting new residents, encouraging study and interest in American history, stimulating interest and study in architecture and design, educating citizens in American culture and heritage, and making the city a more attractive and desirable place in which to live?

In Staff's opinion, the remaining Hunting Terrace buildings do not meet the above criteria set forth in the Ordinance. While Hunting Terrace is over 50 years, and is a garden-style apartment building constructed in a minimal Colonial Revival architectural style, the complex has lost integrity due to the prior demolition of three of the original eight buildings, and changes to buildings themselves. In comparison to other garden-style apartment buildings in the Historic District and along South Washington Street, Hunting Terrace does not exhibit the same level of architectural detailing and landscaping as other complexes such as, Gunston Hall and the Monticello-Lee . In Staff's opinion, Gunston Hall and Monticello-Lee garden-style apartments are superior examples of Colonial Revival garden style apartment buildings, reflecting the rise in construction that occurred during and after World War II in this region. Staff also is cognizant that the City agreed with the findings of the Virginia Department of Historic Resources and the National Park Service, which determined that the buildings were ineligible for the National Register of Historic Places, at the time of the adoption of the Hunting Creek Area Plan in 2005.

Staff is always reluctant to recommend demolition of a building that has the potential for historic or architectural significance, however, factors exist that mitigate against adaptive use of these buildings. From a larger planning perspective, the redevelopment of the Hunting Terrace site meets many of the City's planning and housing goals.

Therefore, Staff recommends approval of the Permit to Demolish of the remaining buildings of Hunting Terrace. In Staff's opinion and in concurrence with the evaluations of the National Park Service and the Virginia Department of Historic Resources, these building are not historically or architecturally significant and do not merit any additional documentation prior to removal.

IV. STAFF RECOMMENDATION:

Staff recommends approval of the Permit to Demolish, with the following conditions:

1. To ensure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for the initial Documentary Study by the next concept submittal, and documentary research shall commence immediately thereafter so that information about the history is available by the subsequent concept submittal. The Documentary Study shall be completed prior to submission of the preliminary site plan. Demolition activities may require archaeological monitoring. Prior to release of the final site plan, all required archaeological preservation measures shall be completed or a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*, shall be in place to recover significant resources in concert with construction activities. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

- *2. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.

*3. The applicant/developer shall call Alexandria Archaeology immediately (703-838-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds.

*4. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

5. The statements in archaeology conditions above that are marked with an asterisk (*) shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements.

V. CITY DEPARTMENT COMMENTS

Legend: C - code requirement R - recommendation S - suggestion F- finding

Code Enforcement:

- C-1 Prior to the issuance of a demolition permit or land disturbance permit, a rodent abatement plan shall be submitted to Code Enforcement that will outline the steps that will taken to prevent the spread of rodents from the construction site to the surrounding community and sewers.
- C-1 New construction must comply with the current edition of the Uniform Statewide Building Code (USBC).
- C-2 The developer shall provide a building code analysis with the following building code data on the plan: a) use group; b) number of stories; c) type of construction; d) floor area per floor; e) fire protection plan.
- C-3 The developer shall provide a separate Fire Service Plan which illustrates: a) emergency ingress/egress routes to the site; b) two fire department connections (FDC) to the building, one on each side/end of the building; c) fire hydrants located between forty (40) and one hundred (100) feet of each FDC; d) on site fire hydrants spaced with a maximum distance of three hundred (300) feet between hydrants and the most remote point of vehicular access on site; e) emergency vehicle easements (EVE) around the building with a width of eighteen (18) feet (one way) and twenty-two (22) feet for two-way traffic; f) all Fire Service Plan elements are subject to the approval of the Director of Code Enforcement.
- C-4 Fire Department ladder truck access is required for 48% of the perimeter of all buildings over 50 feet in height. This requires a truck to be able to position itself between 15 and 30 feet from the face of the building. All elevated structures used for this purpose shall be designed to AASHTO HS-20 loadings.
- C-5 Building is over 50 feet in height and as such is required to have ladder truck access to a 48% perimeter of the buildings by public roads or recorded emergency vehicle easements (eve). For a building face to be considered accessible by a ladder truck the curb line shall be at least 15 feet and no more than 30 feet from the face of the building. The face of the building may not articulate back into the mass of the building more than 7 feet horizontally in the first 75 feet of vertical dimension of the building. Alternatives that demonstrate equivalency to this requirement will be considered on a case by case basis.
- C-6 The final site plans shall show placement of fire easement signs. See attached guidelines for sign details and placement requirements.
- C-7 The applicant of any building or structure constructed in excess of 10,000 square feet; or any building or structure which constructs an addition in excess of 10,000 square feet shall contact the City of Alexandria Radio Communications Manager prior to submission of final site plan. The proposed project shall be reviewed for compliance

with radio requirements of the City of Alexandria to the satisfaction of the City of Alexandria Radio Communications Manager prior to site plan approval. Such buildings and structures shall meet the following conditions:

- a) The building or structure shall be designed to support a frequency range between 806 to 824 MHz and 850 to 869 MHz.
- b) The building or structure design shall support minimal signal transmission strength of -95 dBm within 90 percent of each floor area.
- c) The building or structure design shall support a minimal signal reception strength of -95 dBm received from the radio system when transmitted from within 90 percent of each floor area.
- d) The building or structure shall be tested annually for compliance with City radio communication requirements to the satisfaction of the Radio Communications Manager. A report shall be filed annually with the Radio Communications Manager which reports the test findings.

If the building or structure fails to meet the above criteria, the applicant shall install to the satisfaction of the Radio Communications Manager such acceptable amplification systems incorporated into the building design which can aid in meeting the above requirements. Examples of such equipment are either a radiating cable system or an FCC approved type bi-directional amplifier. Final testing and acceptance of amplification systems shall be reviewed and approved by the Radio Communications Manager.

- C-8 Prior to submission of the Final Site Plan #1, the developer shall provide three wet stamped copies of the fire flow analysis performed by a certified licensed fire protection engineer to assure adequate water supply for the structure being considered. The three copies shall be submitted to the Site Plan Division of Code Enforcement, 301 King Street, Suite 4200, Alexandria, VA 22314.
- C-9 Provide Stairway Identification. A sign shall be provided at each floor landing in interior vertical exit enclosures connecting more than three stories designating the floor level, the terminus of the top and bottom of the stair enclosure and the identification of the stair. The signage shall also state the story of, and the direction to the exit discharge and the availability of roof access from the stairway for the fire Department, in accordance with USBC 1020.1.6.
- C-10 The drawings do not show steps or stairs. Stairs must comply with USBC. Stairways of 3 or more risers require handrails.
- C-11 The new handrails must comply with USBC for a minimum/maximum height of 30 to 34 inches. The ends must extend 12" beyond the top and bottom risers. The handgrip position must not be more than 2-1/4" in cross-sectional dimension, or the shape must provide an equivalent gripping surface. The handgrip portion must have a smooth surface with no sharp corners. The space between the wall and handrail must not be less than 1-1/2".

- C-12 Required exits, parking, and accessibility within the building for persons with disabilities must comply with USBC Chapter 11. Handicapped accessible bathrooms shall also be provided.
- C-13 Handicap parking spaces for apartment and condominium developments shall remain in the same location(s) as on the approved site plan. Handicap parking spaces shall be properly signed and identified as to their purpose in accordance with the USBC and the Code of Virginia. Ownership and / or control of any handicap parking spaces shall remain under common ownership of the apartment management or condominium association and shall not be sold or leased to any single individual. Parking within any space identified as a handicap parking space shall be limited to only those vehicles which are properly registered to a handicap individual and the vehicle displays the appropriate license plates or window tag as defined by the Code of Virginia for handicap vehicles. The relocation, reduction or increase of any handicap parking space shall only be approved through an amendment to the approved site plan.
- C-14 Toilet Rooms for Persons with Disabilities:
(a) Water closet heights must comply with USBC 1109.2.2
(b) Door hardware must comply with USBC 1109.13
- C-15 Toilet Facilities for Persons with Disabilities: Larger, detailed, dimensioned drawings are required to clarify space layout and mounting heights of affected accessories. Information on door hardware for the toilet stall is required (USBC 1109.2.2).
- C-16 The developer shall declare on the plans if the parking structure is considered a public parking structure complying with Chapter 4 of the USBC or an open parking structure. If the structure is declared as an open parking structure, the developer shall submit information detailing how the structure meets the openness criteria. If the structure is declared a public parking structure, the plans shall reflect required water and sewer lines, FDC's and oil / water separator locations.
- C-17 The public parking garage (Use Group S-2) is required to be equipped with a sprinkler system (USBC 903.2.9).
- C-18 The public parking garage floor must comply with USBC 406.2.6 and drain through oil separators or traps to avoid accumulation of explosive vapors in building drains or sewers as provided for in the plumbing code (USBC 2901). This parking garage is classified as an S-2, Group 2, public garage.
- C-19 Enclosed parking garages must be ventilated in accordance with USBC 406.4.2.
- C-20 The proposed building must comply with the requirements of HIGH-RISE building (USBC 403.1).
- C-21 The applicant shall comply with the applicable accessible signage requirements of USBC 1110.

Historic Alexandria:

R- Table pending evaluation of building positioning in relationship to the viewshed from Freedmen's Cemetery Memorial.

Alexandria Archaeology:

1. To insure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for the initial Documentary Study by the next concept submittal, and documentary research shall commence immediately thereafter so that information about the history is available by the subsequent concept submittal. The Documentary Study shall be completed prior to submission of the preliminary site plan. Demolition activities may require archaeological monitoring. Prior to release of the final site plan, all required archaeological preservation measures shall be completed or a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*, shall be in place to recover significant resources in concert with construction activities. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

*2. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.

*3. The applicant/developer shall call Alexandria Archaeology immediately (703-838-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds.

*4. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

5. The statements in archaeology conditions above that are marked with an asterisk (*) shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements.

6. The final site plan shall not be released until the City archaeologist confirms that all archaeological field work has been completed or that an approved Resource Management Plan is in place.

7. Certificates of Occupancy will not be issued for this property until the final archaeological report has been received and approved by the City Archaeologist.

Open Space Recommendation

The developer shall integrate aspects of the historic character of the property into the design of open space for this project and shall provide and erect interpretive signage that highlights the history and archaeology of the site. The archaeological consultant (see Archaeology Comment) shall provide information about the history of the site for use by the designers as early as possible during the concept review process. Preliminary plans shall indicate themes and possible locations of interpretive markers. The actual locations shall be part of the first submission of the final plan for review. Prior to release of the final site plan, the consultant shall provide text and graphics for the signage subject to approval by OHA/Alexandria Archaeology, RPCA, and Planning and Zoning.

Code

C-1 All required archaeological preservation measures shall be completed in compliance with Section 11-411 of the Zoning Ordinance.

Archaeology Findings

F- There is a possibility for the discovery of evidence of Native American occupation on this property, because it is located on the shoreline of Hunting Creek. Models of prehistoric site distribution suggest that this is a likely place for temporary camp sites. Historically, the lot was the site of the Broomilaw/Alexandria Brick Company. The property therefore has the potential to yield archaeological resources that could provide insight into Native American life in Alexandria prior to the arrival of Europeans and into industrial activities in the 19th and 20th centuries.

National Park Service Comments:

The National Park Service is pleased to see the height of the proposed development has been significantly reduced and the architectural design seems to be more in keeping with the Washington Street Guidelines and Standards. There is still much room for improvement in reducing the height of the structures since, as Kate Barrett points out, the fill and parapet add eight additional feet to the overall height. We still have major concerns regarding the Resource Protection Area environmental impacts, particularly stormwater drainage flowing into Hunting Creek, and how vehicles will enter into and exit from the proposed development by way of a new driveway. Another consideration that should not be forgotten is how this proposed development will be compatible with the new landscaping around the Woodrow Wilson Bridge location and the City of Alexandria and National Park Service design plans for a gateway entrance area between south Alexandria and the Parkway.

Building Comments

1. The existing low rise residential buildings to be demolished are 2-stories and 2- story plus day-lighted "English basement" with light colored brick facades facing Washington Street (east) and Huntington Creek (south), and with flat roofs. The four replacement buildings are 5 stories (2 to 2/12 times as high).

2. Building over 5 to 7 stories are typically referred to as high rise. A more relevant question to the city would be whether the city's fire trucks can reach to the 5th floor.
3. Sections of the proposed building have visible mansard roofs on the 5th story, which visually reduce the height of the buildings. A projecting building cornice at bottom of 5th floor also helps to reduce the apparent visual height (but not as effectively as the mansard roofs). As the apparent height of the buildings is an issue, I would recommend mansard roofs on the 5th story of the entire building elevations facing Washington Street and Hunting Creek to visually reduce the apparent height. Alternately, putting mansard roofs at "book-ends" of Washington Street facade and projecting cornice below 5th story in center would help reduce the apparent visual height (i.e. reversing the pattern shown on sheet A2.2).
4. Light colored brick walls appear to be less massive than dark walls; the wall materials are not noted on drawings. The use of traditional multi-pane windows, paneled doors and architectural details are more in scale with other building in Alexandria, and more appropriate.
5. The projecting street facades of the 4 proposed buildings are visually less massive than Hunting Towers or Porto Vecchio and 2 to 3 stories lower (see sheet A3.2).
6. The apartment structures would be 5 stories at approximately 53 feet in height with two underground parking levels. It would be double the current height and appears to be within Alexandria City's requirements for Old and Historic Alexandria (50 feet). The City of Alexandria has the site zoned much higher at 150 feet. The NPS has stated on record that we oppose anything higher than the existing.

(*Explanatory Note from Planning Staff that the current height limit for the property is 50 feet. The applicant's request to change the height limit for a portion of the property from 50 to 150 feet was not approved by City Council as noted within the test of this report.)

7. The by-right plan is significant improvement over the previous proposals, but can be further developed to reduce the visual impact at the south gateway to Alexandria and the GWMP.
8. Additionally, it would be less visually intrusive on the Parkway/Washington Street and provide a gradual stepped appearance to the 50-foot height if the front set of buildings were 4-story while the back set remained 5-story. Building style choices seem appropriate.

Site Comments

9. A mature large deciduous tree at SE corner will be obliterated by proposed site plan, but if this tree was left it would help visually screen the view of development from northbound vehicles on the GW Memorial Parkway.

10. The building height should be considered 58' tall (above the curb line of Washington Street) when you factor in the 5' of fill and the 3' parapet. We would also want to know if any rooftop structures would be taller than the 3' parapet. However, the comment that David Vela made in his letter of 09/06/07 may still apply: "The IDI proposal indicates buildings along Washington Street to be measured from a regraded elevation, as determined by cross section, to be above the curb line of Washington Street. Since the current and historic elevation of buildings is, and was, well below the current and original elevations of Washington Street, this new building footprint elevation would be an unacceptable alteration to the historic landscape of the George Washington Memorial Parkway."
11. In our comments to the previous plans, we noted that the drive that is in front of the existing buildings provides commercial vehicles with a way to turnaround before they enter the parkway. It is not clear if the new "Hunting Creek Way" can be used for this purpose. Even if it can be used for that purpose, I question how long it will be before the residents of this project will begin to object having large trucks drive through what they will perceive as a private drive.
12. The planting conceptual plan is unreadable and we should request a readable one.
13. The property would be accessed through GWMP lands and would require an updated or new ROW.
14. The increase in living space will have an impact on the ingress and egress of the property by increasing the amount of vehicles accessing the property from GWMP. More information is needed to assess. The plans suggest a transportation impact study and management plan will be required. It appears S. Alfred Street (side street to S. Washington) will be eliminated, and I was unclear how Porto Vecchio might be impacted. No information about traffic patterns included. As is the case at Belle Haven cross traffic to GWMP is a big safety concern.
15. NPS property lines are not shown on the map. NPS owns the roadway and frontage. Landscaping and maintenance of it will be issues.
16. An environmental mitigation easement appears to fall mostly outside of the development, however very close. Landscaping and retaining wall could be an issue, and NPS may have recommendations for plantings to be consistent with RPA and wetlands on shoreline. We ought to check the language on the easement. For this and the RPA we probably do not want to encourage human access to the area, and the plans do not suggest a trail or other access. I believe a section of the shoreline wetland is in really good shape.
17. Subsurface parking facility looks to fall closely within the water table for Hunting Creek and Potomac. There may be soil or groundwater issues associated with this.
18. Storm water management will be an issue to ensure water is treated before entering the river. Some BMPs are suggested but we should review. There may be a possibility to consider a green roof and pervious concrete.

19. NPS supports including housing accommodations for low-income population.
20. There is a connection between this project and Alexandria Gateway sign and landscaping proposal.
21. The proposed trees on the eastern edge of the development along Washington Street/Parkway are a good device to help screen and break-up the views of the buildings when directly in front of the development. However, more emphasis on and perhaps additional plantings along the southern border (and to some extent northern border) should be considered to help screen and break-up the views of the buildings when traveling from the north or south along Washington Street proper or the Parkway.
22. Avoid removal of existing mature vegetation that will help screen development.
23. The vegetation plan nearest Washington Street/Parkway (at least front half of development) should be compatible with the 1932 Parkway (Mount Vernon Memorial Highway) planting plan as well as the Woodrow Wilson Bridge plan for the Urban Deck over the Beltway, and if appropriate, any City of Alexandria plan.
24. Entry and exit access rights need to be re-verified with respect to property lines, especially the southern access. The fill areas created for the Parkway may extend to near here. Set backs from Washington Street/Parkway with respect to proposed development of the property needs revisiting as well.

Resource Protection Area Comments

25. Development falls within Resource Protection Area (RPA). We should check the language on the RPA to see if there is a conflict. The existing development down there also falls within the RPA, but because this is a new development, we should ask questions. There may be some opportunities to mitigate to improve the riparian area.
26. The National Park Service is not in agreement with allowing the expansion of this development into the 100-foot buffer of the Resource Protection Area (RPA). The current plans for the Hunting Creek Plaza show construction of an asphalt roadway and landscaping within the RPA. According to the Chesapeake Bay Program Office: “Streamside forest buffers provide habitat for wildlife, stabilize banks from erosion, and keep river waters cool, an important factor for many fish. In addition to preserving the watershed, forest buffers also naturally absorb nutrients and sediments, thus improving water quality in neighboring streams.”

The Chesapeake Bay Local Assistance Board further states: “In their natural condition, these lands provide for the removal, reduction or assimilation of sediments, nutrients and potentially harmful or toxic substances in runoff entering the bay and its tributaries, and minimize the adverse effects of human activities on state waters and aquatic resources”.

Non-point source pollution such as runoff from roadways and lawns carry excessive nutrients and sediment into the Chesapeake Bay and its rivers; upsetting the delicate balance of the Bay ecosystem. Although a soundwall currently exists in the RPA, which was constructed by the Woodrow Wilson Bridge project, it does not pose the same level of threat to natural resources as a roadway and landscaped areas. Therefore, we strongly urge that the City of Alexandria direct the developer to revise the limits of development to be outside the Resource Protection Area.

27. The Resource Protection Area (RPA) as identified on the site plan runs through the proposed project. The following elements of the project will be constructed within that zone:
- a. Two portions of the buildings including the underground garage.
 - b. The swimming pool and deck
 - c. A portion of Hunting Creek Way
 - d. The public overlook
 - e. Two retaining walls
 - f. The ambulance access road

There are areas of flexibility in the requirements for building within the RPA which might allow the road(s) but swimming pools were specifically cited as “inappropriate.” Also, clearing in the buffer area for construction purposes is also deemed “inappropriate.” The city’s guidelines for exceptions to the RPA require a public hearing. There is an exemption in Virginia’s RPA requirements that would allow public access for passive recreation and also for public roads.

VI. IMAGES:

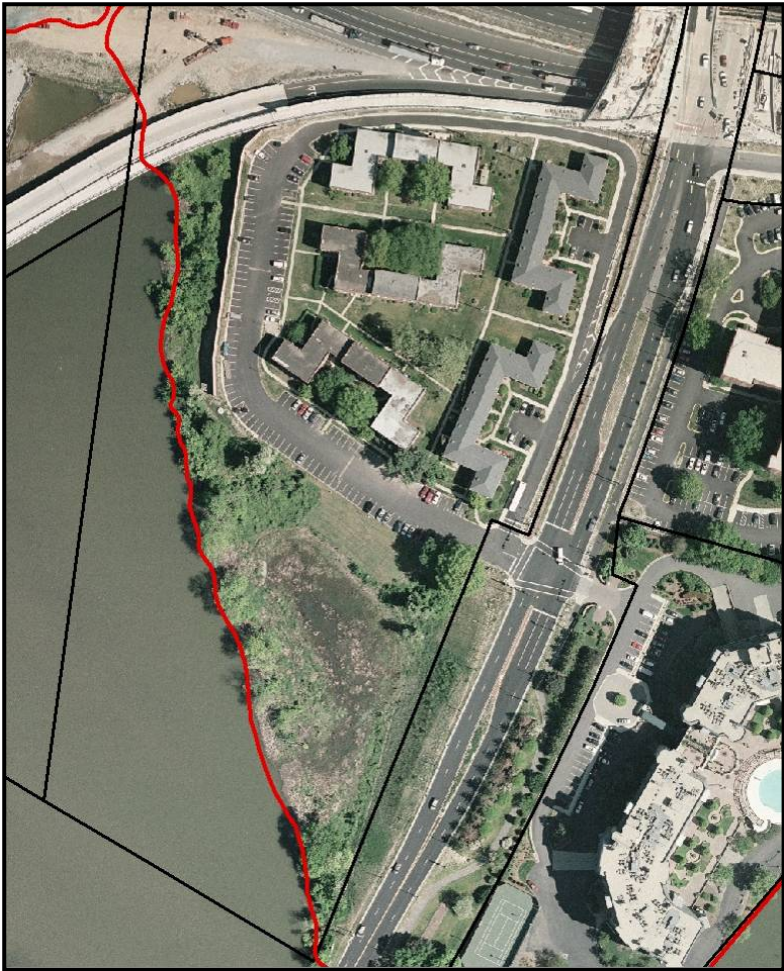


Figure 1: Hunting Terrace Existing Site



Figure 2: Existing Hunting Terrace Buildings



Figure 3: Existing Hunting Terrace Site



Figure 4: Existing Hunting Terrace Site



Figure 5: Existing Hunting Terrace Site