

NOTICE Comments on Hilco/PRGS Status Update of November 8, 2021

NOTICE thanks the Hilco PRGS Team for its detailed presentation with particular focus on open space and transportation items. It is encouraging to see the plan is evolving based on site assessments, engineering, discussions with adjacent property owners, and comments received from the neighborhood.

Before getting into specifics at the power plant site, NOTICE would like to make a few general comments about development in Old Town North after the passage of the Small Area Plan:

- Development is proceeding much faster than anticipated, and thus the neighborhood is feeling the pressure of several multi-family buildings under construction simultaneously, with no time to adjust between buildings, and no time to adequately review development plans.
- The Arts District bonus density was created to provide incentives to developers to create Art Spaces; the goal was to enable MetroStage and The Art League to remain in the neighborhood. This goal has been met, and dramatically exceeded, with nearly all new development proposals taking advantage of bonus density for Arts Spaces, in addition to bonus density for affordable housing.
- This “double bonus density” is resulting in buildings that are taller and larger than originally anticipated. This reduces the opportunity for the increased open space, public parks, tree canopy and walkable sidewalks specified in the OTN SAP.
- In the absence of an arts deployment strategy, the neighborhood is uncertain what benefit it is getting from the new arts spaces which are causing large increases in height and density.
- The development review process gives little leeway for the neighborhood to state its preferences for amenities it desires. Developers are already burdened with the City’s extensive Standard Conditions and requests for voluntary contributions, and not inclined to give more. Thus some important neighborhood objectives are given little weight in the staff comments.
- NOTICE wants to be clear in stating that its expectations include:
 - Meaningful Arts and Cultural uses that provide a benefit to the neighborhood, including activating the street, offering frequent performances for the public, incorporating and interpreting OTN history, providing classes, or offering visual interest.
 - Meaningful open space on each block, accessible to the public and not in a private courtyard or rooftops.
 - Increased tree canopy and preservation of mature trees (and better maintenance of the City’s Street trees).
 - Retail activation along Montgomery and St. Asaph Streets.
 - Continuation of a mixed income community with new development attracting a variety of income levels, not just the very well off and very poor.
 - Addition of nine (9) new acres of public parks for a resident population that will exceed 7,700 and also serve adjoining neighborhoods.

With regard to the power plant site specifically:

NOTICE found many things to like in the plan that was presented on November 8, namely:

- Orienting the road patterns so that the spaces between buildings maximize opportunities for views of the Potomac River.
- Creation of a central plaza configured to provide a variety of opportunities for passive and active enjoyment.
- Emphasis on non-vehicular design for the Fairfax Street extension along the eastern edge of the property.
- Potential for an Arts and Cultural Anchor at Block A, with additional elements at the central plaza.
- Potential for a dock for a water taxi.
- Variety of open space treatments in different blocks and portions of the site.

Height: Trees and other plantings will be severely compromised by the heavy shade cast on large areas by multiple tall buildings. While a tall signature building may be a good attention getter and act as a landmark, lower heights should prevail on the site to lend a human dimension. Thriving greenery in the development will improve the cityscape now viewed from the Potomac River. OTN SAP specifically calls for establishing “*minimum heights*” as part of the CDD Concept Plan approval(s) to ensure a variety of heights and building types” on the site. NOTICe recommends reducing the CDD proposed heights to Master Plan limits of no more than 85’- 120 feet and 85’ to 140 feet on all blocks and incorporating some lower heights on the property. OTN SAP explicitly states that the heights and density in the plan for the site are intended to be the maximum, including any regulatory bonuses.

Density: Hilco is proposing to use the maximum density of 2,150,000 planned in OTN SAP for the innovation district on its parcel, assumed in the SAP at 19.6 acres and now roughly 18.8 acres. We note that an additional 85,000 GFA is planned for the PEPCO portion of the site (roughly 5.8 acres) that is not included in the CDD application. The CDD site height and density maximums were developed with broad public consultation, intended to incentivize development of innovation and arts uses and these uses should be maintained in the CDD. Footnote 9 on page 38 of the SAP states that “The amount of development for the CDD zone for the former power plant site are (sic) intended to be the maximum amounts of developments subject to the recommendations of the plan.”

Open Space: NOTICe is pleased with the initial efforts to define attractive areas of open space and to add to the potential acreage of open space. We await refinements in these proposals. Our initial, specific comments are:

- Provide more green open space along the Slaters Lane tree canopy line.
- Provide increased tree canopy and ensure that no mature trees are harmed or removed within and around the CDD.
- Screen the substation with a Living Wall to interpret the site’s agrarian/rural history.
- Preserve Slaters Lane (historically Bellevue) and the rail tracks as recommended in OTN SAP Historic Interpretation Guide.
- Consider repurposing part of the Bruce Scallon mural fence screen on the site as an interpretation of the site’s industrial history.
- Include a dog park within the Linear Park

Roads/Connectivity: NOTICe recognizes it is early in the process and that traffic studies are only just beginning. We do have concerns about the traffic impacts on Slaters Lane and the George Washington

Memorial Parkway, and will continue working with Hilco to ensure that site traffic can be handled appropriately with minimal impact on the residential areas to the north and south of the site.

- NOTICe agrees with bringing North Fairfax and North Royal Streets into the site.
- NOTICe recommends only one vehicular connection to Slaters Lane from Hilco's portion of the Power Plant site. Consistent with OTN SAP, this connection should be located west of the current proposed location, roughly where the PEPCO gated entrance to Slaters Lane exists now. *(As noted in the OTN SAP, another at Royal Street may be proposed when the PEPCO half of the power plant property along Slaters Lane is developed.)*
- Hilco's vision of a Woonerf or shared street that prioritizes pedestrians supports SAP's goal of a "land use strategy which is intended to favor pedestrians over cars".
- Overall layout of roads and blocks is good.
- Support the orientation of CDD roads to provide views toward the river.
- Consider locating a public EV super charging station and bicycle repair station on the site.

Land Use: NOTICe is looking for a CDD plan that will enable the arts and innovation district uses envisioned in SAP. We do not see evidence of any particular thoughts in this regard in the materials presented so far. If it is difficult to show an innovation use on CDD-level plans, then the accompanying narrative should make clear what efforts are being made to provide substantive innovation uses and provide space for less lucrative but very important arts uses such as studios and galleries.

- OTN SAP recommends a range of 20 to 50% non-residential uses; the Hilco plan so far appears to allocate a much greater percentage of the site to residential uses. We would like to know the exact percentage to ensure that it is within the 20 to 50% range.
- SAP's vision for the site is that it functions as an "innovation district". NOTICe has not yet seen any attempt to define what would constitute innovation on the site – either as a design, environmental or energy initiative, or place to host innovative uses identified in OTN SAP
- The generous height and density in SAP were recommended to incentivize an innovation use, therefore NOTICe does not support use of additional "double" bonus density on the site for any other proposed uses.
- The SAP also envisioned that the Old Town North Arts and Cultural District would provide affordable housing and makers' spaces for artisans, artists studios, galleries, performing arts spaces, and other aspects of the arts. The new buildings proposed by other developers for south of the power plant site do not fulfill this vision. NOTICe expects that the power plant site will provide some of these uses that, along with publically accessible open green space, were key to the neighborhood acceptance of SAP.

In addition to these comments, NOTICe members had specific questions that we hope will be addressed in a future presentation. These include:

Expected quality of the soil after remediation.

Width of sidewalks and prevalence of outdoor dining opportunities.

Streets having on-street parking.

Providing sufficient room for the spread of the roots of large trees.

Bicycle and pedestrian paths that are separated or wide enough to allow safe use by both.

Thank you for engaging with the community and we look forward to a collaborative relationship to yield the best possible project for this unique site.

Sincerely yours,

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for the NOTICe Board of Directors

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