

Re: BZA Case No. 21361 — 1253 Morse Street NE
ANC 5D Vote: Opposition

Chairperson and Members of the Board:

Advisory Neighborhood Commission 5D submits this letter in **formal opposition** to BZA Case No. 21361. At its properly noticed public meeting on **November 18, 2025**, ANC 5D voted to oppose the application. In accordance with the Zoning Regulations, ANC 5D designates **Commissioner Anna Roblin (5D03)** and **ANC 5D Zoning & Development Committee Co-Chair Skip Keats** as its representatives for testimony and questions before the Board. Commissioner Roblin's full oral testimony from the **October 29, 2025**, hearing is attached and incorporated by reference. Skip Keats' Findings Reports are also attached and incorporated herein.

NOTE: After the BZA hearing on October 29, 2025, Ms. Roblin and Mr. Keats met with the development team to discuss issues and request submittal of their revised plans. The agreed date for submittal was Wednesday, 12 November 2025, to allow the commissioners to review the revised documents (burden of proof, architectural drawings, and shadow study) before the ANC public meeting. Unfortunately, the developer's team submitted the requested items to the BZA on the afternoon of the ANC meeting, *November 18, 2025*, which meant the commissioners had no time to review them. The findings reports were based on their prior submittals *before November 18*.

I. Core ANC 5D Objections

ANC 5D's opposition is based on long-standing community concerns, extensive review of the case file, and the severe impacts this project would have on the character, scale, and livability of the Morse Street corridor. Our key objections include:

1. Incompatibility with Morse Street's block character and family-focused housing pattern.

Morse Street—especially the 1200 block—is historically composed of smaller family-scale rowhomes and semi-detached homes. This proposal significantly increases density and massing on a small semi-detached lot, conflicting with the established pattern of modest residential structures and the community's clearly stated desire to maintain housing appropriate for families and long-term residents.

2. Continued introduction of high-density conversions on this block is not supported.

The ANC has consistently opposed over-densification on Morse Street because it threatens the integrity of remaining family-sized homes, accelerates displacement pressure, and erodes architectural cohesion. The proposed side addition, rear extension, and unit count further intensify this pattern.

3. Extensive factual errors, omissions, and misrepresentations in the applicant's filings.

The ANC cannot support an application with a record containing repeated and material errors in the two earlier incarnations of the documentation.

These concerns are detailed extensively in Co-Chair Keats' two Findings Reports. The first findings report (20251008_anc5dzdc_21361_finding_memo) discussed Exhibits 9 and 11. The second report (20251027_anc5dzdc_21361_findings_memo) discussed exhibits 18A and 18C that superseded exhibits 9 and 11. As noted above, the most recent equivalent submissions, exhibits 41, 42, 43, and 44 were submitted too late for either the zoning committee or the commissioners to review.

The findings included:

- Misstatements about adjacent property height and configuration

- Incorrect references to non-existent alleys and streets
- Omission of the critical light-well and egress conditions at 1251 Morse
- Inconsistencies with unit sizes and RF-1 requirements
- Failure to submit an adequate, professional-level shadow study
- Architectural drawings that do not reflect existing conditions

These deficiencies significantly undermine the validity of the application.

4. Adverse impact on light, air, and privacy for neighboring properties.

As described in both Commissioner Roblin's testimony and the Findings memoranda, the proposed massing would likely materially reduce available light and air for adjacent residences—including 1251, 1255, 1257, and 1259 Morse Street—and may introduce life-safety concerns regarding the 1251 light-well and potential egress blockages.

The sun studies that were shown at the commission meeting of the existing building (exhibit 41) do not show the current separation between 1251 and 1253 Morse, although the sun study (exhibit 42) for the redeveloped 1253 does. What cannot be determined is if the reduced bump-out on the northwest side of 1253 Morse will decrease or maintain the current light for 1251 Morse.

The applicant's presentation to the ANC (exhibits 41 to 43) showed some adjustments and concessions that might improve the light, but the studies were insufficient to ease the commission's concerns in this regard.

II. ANC 5D Expectation for Corrections and Accountability

ANC 5D cannot support a project that advances with such extensive factual inaccuracies, inadequate documentation, or inconsistent community engagement. We emphasize the need for the applicant to correct the record, update architectural documents to reflect existing conditions, provide an accurate and complete shadow study, and meaningfully address the community concerns raised over multiple meetings.

Unless and until the applicant demonstrates a willingness to significantly revise the project to align with the zoning code, neighborhood context, and community expectations, ANC 5D stands firmly in opposition.

III. Conclusion

For the reasons stated above, and supported by the attached testimony and findings, **ANC 5D respectfully requests that the Board deny the requested special exceptions in BZA Case 21361.**

Thank you for your consideration and for allowing ANC 5D to present the community's concerns.