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Ms. Carol Mitten, Chair
Zoning Commission
One Judiciary Square
Washington, D. C. 20001

August 20, 2003

Madam Chair:

Case 03-12 and 03-13

The Committee of 100 continues to have serious concerns about the Capper Carrollsburg Hope VI project as presently designed. The materials that were provided in the applicant's submission of August 14 are inadequate to allay these concerns, some of which are also identified in the OP report of the same date. We ask that you delay any approval of this complex project until these matters have been satisfactorily resolved.

1. Residential Density. We remain unconvinced that the intense number of units planned for the narrow residential area will result in any sense of community for the residents. The unresolved nature of access to the Marine barracks area makes this even more important, potentially meaning that the only significant open recreation area that could regularly be accessed in the Canal Blocks park at the other end of the project, lined with high-rise office buildings.

While we agree with OP that 4' rear decks are inadequate and that 6' is better, we still find this insufficient to serve as the only private outdoor space for recreation or entertaining for many townhouse residents.

2. Public School. The possible inclusion of the Van Ness Elementary School is not an issue to be resolved at the school-principal level, but with the leadership of DC Public Schools, which apparently has not been done. Nothing affects (non-senior) residential communities as much as a quality education environment, and if there are to be families with children in this complex, an impoverished neighborhood elementary school becomes a weight and not an anchor. This needs to be resolved before a PUD receives approval.

3. Financial Evaluation. The materials provided by the applicant do not make the case for the zoning relief sought. As OP indicates, the applicant has so far not provided materials "demonstrating parcel by parcel compliance ... with the zoning regulations and/or any relief needed."

Also, it is not clear how much of the responsibility for the Canal Block park is being assumed by this developer and how much by the developer of the DOT headquarters building, which also lists this as a contribution.

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District of Columbia
Case 03-13
Exhibit 57

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CASE NO.03-13
EXHIBIT NO.57

4. CSSP. The listing of "commitments" does not answer the question of how much "new" money is being brought to the project. Is the Department of Employment Services really bringing $5.6 million in new service to benefit the 420 non-senior households? Is Planned Parenthood bringing $1.3 million in new dollars to benefit the same households? Or are these the services that would otherwise also be available to the residents?

5. Employment and Contracting Benefits. The applicant has also not offered any evidence of successful implementation of First Source and MSDBE programs; an understanding of their track record would seem important to evaluating the worth of this element of the application.

6. Taking of Private Property. The materials provided offer just one explanation for the taking of the 20 parcels of private property: the applicant wants them for a particular design approach. The taking of properties, some of significance, requires more justification; the applicant offers instead a recitation of the Federal process.

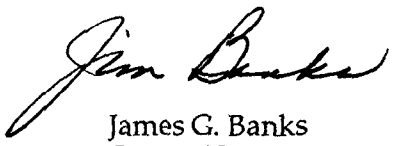
Without clearer understanding about the benefits the applicant is bringing, it is not possible to effectively measure the justification for the flexibility the Commission is being asked to grant. It is not clear what standards the applicant would have to deliver, making the leverage of second-stage review limited.

While we would wish to join with the project's advocates and boldly pursue 1645 units of housing – nearly half for public housing – the materials before you fall far short of a sound case for likely success. Before using your power to move this huge and complex project into being, we believe you should have better and more reliable information before you.

Sincerely,



Barbara Zartman
Vice Chair



James G. Banks
Former Trustee