



July 16, 2014

VIA DCOZ IZIS

DC Zoning Commission
Government of the District of Columbia
441 4th Street NW Suite 200S
Washington, DC 20001

RE: Zoning Commission Case 14-09 – QC 369, LLC

The Quincy Court Condominiums (QC Condos) at 1117 10th St. NW appreciates the opportunity to comment on the proposal from QC 369, LLC regarding the construction of the “Columbia Place, Square 369” project. The proposal would add two large hotels and a condominium building, and convert an existing apartment building to condominiums, in the southeast quadrant of Square 369.

The QC Condos occupies Lot 69, which consists of a majority of the southwest corner of Square 369, and contains 134 residential condominiums and two commercial units. The QC Condos will be directly adjacent to the proposed new condominium building.

The QC Condos generally supports the Historic Preservation and Review Board report. That report negatively viewed the proposed demolition of the contributing structures located at 911 and 913 L St., and the remaining interior contributing structures, including the historic Edwin E. Ellett Tile & Marble workshop (Lot 67). However, while the QC Condos regrets the demolition of these historic structures, the QC Condos believes that, on balance, the preservation of the historic structures on 9th St, and the preservation of 919 L St. would sufficiently offset these losses so long as the concerns outlined below are addressed and the historic nature of the interior of the block is preserved.¹

More importantly, the historic Shepherd Ct. alleyway forms the southernmost portion of the historic Blagden Alley/Naylor Ct. neighborhood. This thriving alley neighborhood is now home to art galleries, restaurants, and coffee houses, and forms a central element of the revitalization of the Shaw Historic District. Shepherd Ct. provides important pedestrian access to Blagden Alley from the hotels and business districts along Massachusetts Ave. The pedestrian friendly alleys of this neighborhood should be retained.

¹ The QC Condos would also support proposals for moving the contributing structures at 911 and 913 L St. to other locations in the neighborhood. The Zoning Commission should require the developer to offer the structures to third parties at no cost, conditioned on the third party moving the structure to a new location.

The QC Condos has several specific concerns regarding the current project proposal. Primary among those concerns is that the proposal would not maintain the historic pedestrian-friendly alley nature of the block, in keeping with Naylor Ct. and Blagden Alley. The current proposal would create dark, airless “canyons” in place of the current open-air historic alleys negatively impacting the historic nature of the greater Shaw and Blagden Alley neighborhoods. The proposal would also impose significant and inappropriate traffic and noise burdens on current residents, reduce the utility of the alleys to neighboring buildings, and significantly increase commercial and private vehicle traffic in the alleys.

As detailed below, QC Condos requests that the Zoning Commissions require wide, well-lighted, brick-paved, pedestrian-friendly alleys; require below-grade loading bays accessed via the Convention Center loading docks; and require parking for the both the hotel and residential portions of the development to be accessed via a shared entrance directly from either 9th St. or L St.

The Development Must Preserve the Historic Alley Nature of the Block

The QC Condos does not, in principle, oppose the conversion of under-utilized public alleys to private use – including relocating historic Shepherd Ct. from the eastern side of Lot 859 to the western side of Lot 859. However, the current proposal would inappropriately convert public lands to private use – providing the developer with significant private profit – without proper and commensurate benefit to the city, neighborhood and residents.

The developer should be required to return at least an equal amount of square footage of currently private land to public use within Square 369. According to the Applicant’s diagrams, the developer would convert 5,825 sq. ft. of currently public alleys to private use, and return far less to public use via a small private alley easement extension of an existing service alley. Further, the proposed easement is inappropriate because historic Shepherd Ct. should remain a named alley running from L St. to M. St, and private land returned to public use should be permanently deeded to the city to ensure the continued protection of the neighborhood’s character.

QC Condos requests that the Zoning Commission require the developer to return 5,824 sq. ft. of land from Lots 859, 805, 804 and 40 to public use specifically to widen the remaining interior alleys. This would help ensure the continued historic nature of the Shepherd Ct. alley by retaining 40 ft. wide alleys, as were common for access to stables, and as exist in Naylor Ct. Furthermore, the air space above each alley must remain open, with a view to the sky, to avoid the creation of dark, canyon-like alleyways devoid of sunlight and air. The Zoning Commission should reject the proposed covered alley entrance from L St. These changes to the developer’s proposed alleys would also help retain the sun-filled nature of the community’s crown jewel, the 10th St. Park, which occupies Lots 874 and 877. The current proposal would eliminate direct sunlight from the playground and picnic areas in that park.

Also missing from the current application is a proposal to return the interior alleys to brick paving to match Blagden Alley and Naylor Ct. and to provide alley lighting features and green spaces to encourage pedestrian access. These elements were among the critical elements agreed upon by the developer and local residents when the project was first under discussion. Brick paved and well-lighted alleys would help to integrate Shepherd Ct. with the Naylor Ct. and

Blagden Alley communities, and would emphasize the pedestrian utility of those alleys. Further, the developer previously agreed that the new hotels would have well-lighted, designated pedestrian entrances on the alley to encourage tourism and pedestrian traffic to the Blagden Alley shops and restaurants. These entrances do not appear in the proposal, and should be required.

The Development Must Allow Continued Commercial Vehicle Access to Existing Businesses in the Block

The QC Condos is concerned about the proposed service alley extension from Lots 72 and 859 to L St. Any changes to the block's alley layout must ensure that service access and ingress/egress routes to all current and future buildings in Square 369 are not negatively impacted.

First, the QC Condos is concerned that the proposed conversion of the service alley between Lots 69 and 859 to a combined service alley *and* ingress/egress route will negatively impact the utility of the service alley to the current residents and businesses that rely on that service alley. The proposal would combine the traffic burden of two service alleys and one ingress/egress alley onto a single, already fully-utilized alley without significantly widening it, and add the traffic burden of the entrance to the new residential parking garage.

The dramatic increase in traffic burden on the reduced number of alleys will immediately and negatively impact the service and private vehicle access to the existing buildings of the QC Condos, the Whitman Condominiums, and the Eldon Luxury Suites Hotel. For example, the delivery and trash collection access to the retail pharmacy on Lot 69 and the hotel located on Lot 72 will be significantly decreased or eliminated. The portion of that service alley proposed for conversion to ingress/egress is extensively used for deliveries and trash collection for several businesses.

Second, as presently designed, the extension would not allow large vehicles appropriate access from L St. This is particularly important because the QC Condos structure contains two commercial properties, a café and a retail pharmacy. The retail pharmacy in particular requires regular large vehicle access for deliveries. It is unclear from the proposal's drawings what the maximum height and width restrictions would be for the L St. entrance. The Zoning Commission should reject any alley overhang between Lots 72 and 859 and ensure a sufficiently wide alley entrance from L St. to provide sufficient clearance for commercial vehicles.

While QC Condos does not, in principle, object to the relocation of Shepherd Ct. to the proposed location, the Zoning Commission should require a full 40 foot wide alley between Lots 69/72 and Lot 859, with no overhanging structure, including at the street entrance, to ensure the continued utility of this alley.

The Development Must Not Add Significant Commercial and Private Vehicle Traffic to the Alleys, and Options Exist to Add Zero Additional Traffic

The current alley consolidation proposal would, in the first instance, dramatically increase the service and private vehicle traffic on the remaining alleys. Furthermore, the proposal's location of service and private vehicle access to the new buildings would further

burden those limited alley spaces. However, because the developers are able to start from a nearly “blank slate” for a large segment of the block, and will be constructing the new buildings simultaneously using a single excavation, a significant opportunity exists for minimizing the traffic impacts to the alleys and for improving pedestrian access and safety by co-locating vehicle entrances directly on either 9th St. or L St. – instead of the alleys – and providing below-grade loading docks.

As an initial matter, the Zoning Commission should deny the requested loading dock size variances. For example, DC Regulations require at least one 55 foot deep dock for the residential building, but the proposal has requested a variance to allow a loading dock only 30 foot deep. As a practical matter, a 30 foot deep loading dock, when fronting on an interior alley, would require most commercial sized moving or delivery trucks to completely fill the loading dock and partially block the alley.² QC Condos is a similarly sized building, and has two 55 foot loading bays. In QC Condos’ experience, these large bays are necessary to accommodate not just long-length commercial delivery vehicles, but also to allow parking for the numerous smaller vehicles of service and maintenance companies performing work or repairs within the building. For example, on any given day multiple condominium owners have plumbers, painters, flooring installers, and furniture deliveries all competing for loading bay space. Absent sufficiently large loading bays, many of these vehicles would be forced to park in the alleys, blocking traffic. These variances should be denied.

Furthermore, rather than imposing additional burdens on the limited alley spaces, the Zoning Commission should require the loading docks be located below grade and accessed via the Convention Center loading bays as was originally proposed for the L St.-spanning, 1,500 room version of the Marriott Marquis that would have occupied the same Lots. Because the residential and hotel portions of the development will share a below-grade structure, and will be constructed simultaneously, access to both buildings could be readily provided via a shared below-grade loading dock accessed via a tunnel from the Convention Center. This approach has proven highly successful for the Marriot Marquis located on the next block, and would receive *significant* community support if implemented here. Similar, below-grade loading docks for combined commercial and residential buildings were recently used in the area at the City Center and the City Market at O developments with great success. Below-grade loading docks would remove significant volumes of large vehicle traffic from the historic alleys, would further improve the pedestrian-friendly nature of those alleys, reduce noise levels, provide less pollution impact to the 10 St. Park and playground, and help preserve the historic charm of the Shaw Historic District.

Similarly, the Zoning Commission should require the hotels and residential buildings to share a single private vehicle parking entrance directly from L St. or 9th St. – not an alley – to further reduce private vehicle traffic in pedestrian-friendly alleys. Again, this approach has been very successful at the City Center and the City Market at O developments, which provide garage access to the commercial, office, and residential parking areas via a shared garage entrance. If loading dock access is impossible via a tunnel from the Convention Center, this shared entrance should also be used for below-grade loading docks.

² For example, a common “26 ft” U-Haul moving truck is in fact more than 34 feet from bumper-to-bumper. Commercial delivery vehicles are even longer.

Requiring below-grade loading dock access via the Convention Center, and a shared parking entrance ramp for the hotel and residential portions of the development would significantly reduce or eliminate the negative impacts to the historic alleys.

Thank you for your consideration,

A handwritten signature in blue ink, appearing to be 'RSM', with a long horizontal flourish extending to the right.

Board of Directors
Quincy Court Condominiums Owners Association

cc: Historic Preservation and Review Board
ANC 2F
ANC 2F - Community Development Committee