

MEMORANDUM

TO: District of Columbia Zoning Commission

FROM: Matt Jesick, Development Review Specialist
MBR for Radhika Mohan, Deputy Director, Development Design and Historic Preservation

DATE: May 4, 2026

SUBJECT: ZC #21-20D, Modification Without Hearing
Steuart South Capitol Design Review

I. BACKGROUND AND RECOMMENDATION

In 2022, the Zoning Commission (ZC) approved a design review application for a residential building with ground floor retail at the intersection of South Capitol and S Streets, SW (ZC #21-20). In 2023 and 2024, the Commission also approved a modification and a two-year time extension (ZC #21-20A and #21-20B). The approved design review application spanned the entire S Street frontage between South Capitol and Half Street and is intended to be the first phase of a project that would eventually occupy the entire square. Future design review applications will be submitted for the north side of the block.

The applicant now requests a further time extension (#21-20C), and a modification without hearing (#21-20D). This memo analyzes the modification request, and a separate memo addresses the time extension and is submitted to the record of that case. The Office of Planning (OP) finds that the design modification can appropriately be considered as a modification without hearing, as further discussed below. OP also finds that the changes proposed are generally consistent with the intent of the original approval and should not have detrimental impacts to the design of the building. The overall architecture, height, massing, and vehicular circulation would not change. OP, therefore, recommends **approval** of the proposed modification with the condition that the applicant’s commitment to the murals on western façade be reflected in the Order, should it be approved.

II. APPLICATION-IN-BRIEF

Applicant	Steuart Investment Company
Location of Project	1 S Street, SW; Square 662, Lot 16; Ward 6, ANC 6D

Proposal	According to the written statement the applicant requests the following: <ol style="list-style-type: none">(1) Reducing the size of initial phase of construction;(2) Changing the use at the South Capitol ground floor frontage from retail to residential;(3) Adding three units at the penthouse level;(4) Design changes to the S Street ground floor frontage; and(5) Design changes to the alley ground floor frontage.
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III. PROPOSED MODIFICATIONS AND ANALYSIS

The subject building was approved for a height of 130 feet and 13 stories, with approximately 434 residential units and about 17,000 square feet of retail. The approved design review application spanned the entire S Street frontage between South Capitol and Half Street, with retail at both corners and along the South Capitol and Half Street frontages. The lobby and associated spaces were shown at the middle of the S Street façade, and vehicular access and loading were from the rear alley¹. This building is intended to be the first phase of a project that would eventually occupy the entire square. Future design review applications will be submitted for the north side of the block. Application 21-20A slightly modified the architecture of the building but did not fundamentally alter its functionality or uses.

The applicant now proposes changes that are intended, in part, to facilitate the procurement of financing for the project. The design changes include:

- **Reduce the size of the initial phase of construction**
The proposal is to construct only the eastern $\frac{3}{4}$ of the original building and thus reducing the unit count from approximately 434 to 335. The western $\frac{1}{4}$ of the building, at the corner of S and Half Streets, would become part of a second phase of the project, and a future design review application. However, the architecture of the building would remain the same, including the future portion at the southwest corner. See [Exhibit 2E](#), Sheet A07 for elevation drawings showing that the façade would remain the same, despite the newly proposed phasing line. The proposed design includes a concomitant change to the underground parking garage, which would be reduced in size. The plans also show a temporary lawn at the western end of the site, at the corner where the future phase 2 would be constructed. The new west façade of the building could potentially be exposed for a significant period, but in discussions with OP the applicant has committed to the installation of temporary murals, as previously approved in ZC #21-20. These murals would add a decorative face to the otherwise blank façades, until such time as the future phases are constructed. Please refer to Exhibits [30](#) and [30A](#) of case #21-20 for a discussion of the temporary façades and examples of potential murals. **The commitment to the murals should be reflected in the Order for the present case, should it be approved.**

- **Change the use at the South Capitol ground floor frontage from retail to residential**
The applicant proposes to change the ground floor use on the eastern end of the building from retail to residential. The applicant states that based on their experience in nearby

¹ Importantly, the alley would also provide truck access to the square across South Capitol Street to the east, which, when built, would have limited vehicular accessibility. The proposed modification would not alter that travel path.

mixed use buildings, the retail environment, even in more heavily-trafficked locations, is extremely challenging. The proposed ground floor residential units, which would have direct entrances onto the street, should provide immediate activation of the adjacent plaza and park space within the South Capitol Street right-of-way. The presence of retail space in that location, which could sit vacant for an extended period, could tend to deaden the vitality of the public space. The design of the public space would also be modified, with landscaping and low-fenced courtyards defining semi-private entrance ways to the units. In terms of the architecture on that façade, OP encourages the applicant to continue to explore treatments that could make the units read slightly more like rowhouses, without necessarily deviating from the current material palette. While it is unclear at this time if the units would be one or two stories, in either case the two-story brick podium feature and its regular rhythm could lend itself to that type of residential expression.

- **Addition of three units at the penthouse level**

While the footprint of the penthouse structure would not significantly change, the applicant now proposes three residential units in space previously planned for amenities. See [Exhibit 2E](#), Sheet A04 for the penthouse level floor plan. OP notes that pursuant to Subtitle C §1507.2(a), the habitable penthouse will generate an IZ requirement. The applicant states that the IZ units, including the requirement generated by the penthouse, will be provided within the building.

- **Design changes at S Street and alley ground floor frontage**

The revised design proposes updates to the architecture and landscape design of the building at the front and rear façades. Much of the hardscaped seating areas in front of the building, associated with either the retail or the lobby, is proposed to be replaced with landscaped areas. The design also proposes to eliminate a canopy on S Street, shift a bay window to the east, and tweak the materials of the entrance arch, but maintain the overall materials palette and the strong two-story brick piers and plinth. See Sheets L05 and L06 for a comparison of the approved and proposed plans. On the alley side, the footprint of the building would be slightly carved back at the carport to allow increased visibility into that area, while also providing room for additional landscaping.

OP finds that the design changes, other than the change in use and design at the eastern end, are modest in scope and would not impact the overall design or intent of the original approval. The change in use from retail to residential and the resulting design changes to the building, and the public space are substantial changes to the project. However, the change has been conceived in a manner that melds with the original design, should bring activity to the South Capitol Street park and plaza area, and reflect the reality of the retail market at this time and in this location. OP has no objection to the design and use changes. Regarding the change in phasing for the project, OP understands the applicant's statements that the smaller scale of the project would more readily find financing and therefore has no objection to the revised timing of construction.

Subtitle Z of the Regulations defines a "modification without hearing" as follows:

703.6 For the purposes of this section, a "modification without hearing" is a modification in which impact may be understood without witness testimony, including, but not limited to a proposed change to a condition in the final order, a change in position on an issue discussed by the Commission that affected its decision, or a redesign or relocation of

architectural elements and open spaces from the final design approved by the Commission. Determination that a modification can be approved without witness testimony is within the Commission's discretion. A request to add or change a zoning map designation to an approved planned unit development shall not be considered without a hearing.

OP concludes that the present application is appropriately classified as a modification without hearing. While the proposed changes can be considered substantial, they can be understood without a public hearing, and are primarily related to the design of architectural elements. The change in use at the eastern end of the ground floor would not introduce a new use to the building, but instead would add residential units in a new location. The overall impact of the building on the urban design of the neighborhood would remain the same, and the building should still result in activation of the surrounding public spaces. The proposed change in use could improve the building's positive impact on adjacent streets and parks by bringing more immediate activation, versus the potential for retail spaces to sit vacant. The proposed change in phasing is a departure from the original approval, but once all phases are complete the building should be nearly identical visually to the original building as the overall architecture would not change. OP therefore recommends **approval of the proposed modification without hearing.**

IV. COMMENTS OF OTHER DISTRICT AGENCIES

As of the date of this report, the record does not contain comments from other District agencies.

V. ANC COMMENTS

The property is within ANC 6D. As of the date of this report the record does not contain comments from the ANC.

VI. VICINITY MAP

