## ANC 6D

## **Advisory Neighborhood Commission 6D**

Navy Yard | Capitol Riverfront | Buzzard Point | Southwest



November 14, 2022

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Mr. Anthony Hood

Chair, D.C. Zoning Commission 441 4th St. NW, Suite 200 Washington, DC 20001

Transmitted via email: dcoz-zcsubmissions@dc.gov

Re: Report on ZC Case No. 22-28 - Design Review 1100 South Capitol Street,

SE

Dear Chairperson Hood and Members of the Commission:

At a duly noticed public meeting held on November 14, 2022, with a quorum of X of 7 Commissioners present, Advisory Neighborhood Commission 6D voted 7-**0-0 to oppose** the applicant's submission in ZC Case No. 22-28, the design review of 1100 South Capitol Street, SE (Square 698, Lots 814 and 817).

ANC 6D appreciates the applicant's willingness to discuss and improve many aesthetic and practical aspects of the design. We wish to acknowledge the applicant spent significant time hearing the concerns of the ANC and ultimately came up with several creative and innovative solutions.

However, zoning regulations state that in a design review, an applicant must "prove that the proposed building...will [h]elp achieve the objectives of the subarea, as set forth in Subtitle I, Chapter 6". The noted subtitle "contains zoning regulations intended to assist in achieving goals established by the Comprehensive Plan, Small Area Plans, or prior versions of this subtitle for specific geographic locations with the area encompassed by the downtown zones."

Design reviews, therefore, are allowed (and even required) to go beyond aesthetic appeal and must assess how the project achieves the goals of established District of Columbia plans.

The applicant acknowledges as much in Exhibit C, pages 24 to 26. The applicant notes the project creates a "potential inconsistency" with policy H-1.2.1 ("the production and preservation of affording housing for low- and moderate-income households is a major civic priority").

ANC 6D agrees that affordable housing is a major civic priority. In our neighborhood it is perhaps THE major civic priority. Unfortunately, this project currently offers zero units of affordable housing.

The applicant cites several items as "outweighing policy / consideration", throwing some twenty-one options into the mix. ANC6D believes that many of these considerations, such as LEED Gold/stormwater management, or Using Landscaping and Green Roofs to Reduce Runoff pale in comparison to the importance of affordable housing.

Additionally, ANC 6D rejects the notion that these policy/considerations preclude the addition of even a single unit of affordable housing. We believe the project would still be able to fulfill policies regarding Housing Around Metrorail Stations or Capitol Bikeshare Access with a minimal amount of affordable housing.

As mentioned, ANC 6D appreciates the creativity and resourcefulness of the applicant. We urge you to direct the applicant to employ this creativity and resourcefulness in determining how this project can have more than zero units of affordable housing, and thus meet the guidelines of one of the District's most important policies.

Please feel free to contact the undersigned if you have any questions or comments regarding this letter, at <a href="mailto:edward.daniels@anc.dc.gov">edward.daniels@anc.dc.gov</a> or 202-930-3720.

Sincerely,

Edward Daniels Chairman, ANC 6D

Southwest, Navy Yard, & Buzzard Point