

Dear Ms. Wilson,

In anticipation of your submission to the Zoning Commission on May 26, 2022, this is an attempt to capture the discussions we have since had with your development team on Case 21-27, and the issues that remain.

From the perspective of ANC 6D, there are two overriding issues that we have continued to discuss with your team: the aesthetic design of the façade; and traffic management on N St. SW.

On the first and as we all understand, the project sits on a prominent corner and important crossroads between the Capitol Gateway and the entrance to Old Southwest, and the design needs to reflect both aspects of Old Southwest and do justice to its place on the Capitol Gateway.

The design has improved greatly as we have continued our discussions and the architectural options have been reconsidered. In response to critical comments, we now see balconies are back in the plan, but we need to discuss their placement and size in order that they both serve the residents and are well integrated into the overall profile of the building. We also see that the small “porthole” windows have been removed and a lighter and more appealing combination of brick and glass is being proposed, which minimizes potential conflict with the surrounding 1319 project while maintaining an appropriately distinguished design befitting the Capital Gateway. Greenspace around the site in the public space has been enhanced and coordinated with the rowhouses, which will provide more attention to and respect for the rowhouses.

We continue to press for specificity on color and characteristics of the façade materials, both brick and other, to reflect the relation of this project to Old Southwest, just as 1319 picked up the color of the Syphax brickwork. We also continue to press for small details that would resonate with the rowhouses that surround the site. In that regard, we have pressed to continue the plane and selected design features of the lower two stories, with the uncomplicated glass façade above. That could create a continual corner surround or apron of the historic rowhouses and a distinctive contribution to both Old Southwest and the Gateway without mimicking or clashing with neighboring 1319.

On the second, traffic management, the proposed PUDO and loading space on N St. will create inevitable and constant double parking and havoc on narrow N St. Whether the project is not required and will not provide underground on-site parking, the project sits in the midst of the Nationals and Audi stadia and massive developments on both sides of So. Capitol St. Visitors will constantly compete with Southwest residents for parking and, as we have witnessed in other new development, any curbside space whatever its designation becomes an easy target.

If there will be no underground parking in the building, there need to be agreements in place with neighboring garages prior to project approval, not 4 months prior to opening as currently proposed; if it is too early to get an agreement, it is also too early to get an approval from the ANC or ZC without these arrangements assured. Those agreements should be based on realistic estimates of the needs of staff and retail customers as well as residential tenants. We have pointed out that the threshold for required on-site parking is 50 units, and this project is just one shy but compounds that with two stories of commercial tenants.

The plan to rely on a loading manager to schedule deliveries is not practical, based on recent experience. Many deliveries arrive on their own and cannot be pre-arranged and scheduled by the

building. No-parking signage for both the reserved truck loading space and the PUDO space will be unenforceable, as we have seen in other residential areas near Nats stadium and the Wharf.

We appreciate the drawings provided to indicate that underground entry for parking or truck loading/unloading is severely limited to non-practicable. None of the alternatives we have contemplated would involve truck turnaround inside the building. But In order to understand other alternatives for truck loading and PUDO, we need drawings showing a loading dock at the far west corner of the building or within the now covered rear alley.

Based on available options, we would urge a new curb cut on N St., despite DDOT's preference for no new curb cuts. Now that current plans call for closing in the rear yard, any issue of disturbance to the near neighbors is moot. Justification for keeping the façade of the remaining rowhome within the Applicant's property on N St. will depend on the use of the rear yard. The front façade will neither accommodate exit of trash guernies through the existing door nor, obviously, truck passage

On a minor related issue, we would like to see comparables for commercial and residential properties to understand whether 4X/week trash pickup will be adequate for two retail spaces, a full floor of offices and 49 residential units.

In addition to these two principal issues, the May 10th memo mentioned a number of community benefits that the Applicant is proffering. This is a design review, and as such the IZ requirements will be recognized. A substantial benefit to the community, which should be included in the Final Order, would be to specify at least one of the five IZ units at 30% MFI, since the project is being built in the heart of Old Southwest with a substantial number of very low-income residents who are fast being excluded from new units in redevelopment projects. The distribution and buildout specifications of the IZ units also need to ensure that they are scattered and are appointed at a similar level to the market rate units; this too should be included in the Final Order. The IZ commitment does not belong in Good Neighbor Agreement as the memo indicates.

On a related point, and something Chair Hood referenced in the April 21st hearing, the longstanding month to month lease of the current tenants of the N St. rowhouse does not but should include the opportunity to move into one of the IZ units.

On other issues that the Applicant has suggested as community benefits, ANC 6D will look for a commitment for any one of a number of options for the commercial space, and that it not include an eatery unless the specifications are demonstrably neighborhood-serving. The proposal for commercial space should also include some indication that the liquor store will return after a probable two-year hiatus, or to see some other use of that commercial space that would be neighborhood-serving.

On the hiring commitment for the new commercial spaces, ANC 6D will look for a commitment (not "best efforts") to hire some specified number of DC residents pre- and post-construction as other developments have done. The commitment would apply similarly to summer interns.

We appreciate the Applicant's proposed use of the communal space by ANC 6D or affiliates, which would not belong in a Good Neighbor Agreement but in a Final Order. More specifically, 6X/year for two hours is quite minimal, since the nature of the space would likely not be useful for meeting space but rather for some sort of social gathering. "Standard protocol" for securing the space needs clear meaning. We suggest specifying clear boundaries (e.g., liquor, noise, etc.).

We are very grateful for the several meetings ANC 6D negotiators have had with members of the development team since the April 21st hearing, expect that these comments will help the team formulate its response to the Zoning Commission on May 26th, and hope to have some mutually agreeable solutions before you return to the Zoning Commission on June 23rd.

We look forward to the next iteration of drawings and options.

Sincerely,

CM Rhonda Hamilton 6D06



June 13, 2022

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RE: Report on ZC Case 21-27, 1301 South Capitol Street, SW

Dear Chair Hood and Commissioners:

ANC 6D, at a duly noticed public meeting on June 13, 2021, with a quorum present, a quorum being four Commissioners, **voted 7-0-0 to oppose the Applicant's submission in ZC Case 21-27, the Design Review of 1301 South Capitol Street SW** (Sq. 653, Lots 65, 66, 827, 829 and 830), **as currently drafted in** its pre-hearing submission on May 26, 2022.

COMMISSIONERS

SMD 1 *Marjorie Lightman*
SMD 2 *Jared Weiss*
SMD 3 *Ronald Collins*
SMD 4 *Andy Litsky*
SMD 5 *Fredrica Kramer*
SMD 6 *Rhonda Hamilton*
SMD 7 *Edward Daniels*

As the accompanying letter attests, ANC 6D supports the Applicant's request for a postponement of its upcoming June 23, 2022 hearing, and its continuing work with ANC 6D to address remaining issues that have resulted in our current opposition, before the Applicant returns to the Zoning Commission in October.

To review briefly how we got here, on April 11, 2022, in preparation for the Zoning Commission's April 21st hearing on this case, ANC 6D wrote to oppose the project on several grounds, but the two principal concerns were the Applicant's plans for parking and loading and the design of the façade.

In response to Chair Hood's request at the April 21st hearing and the Applicant's resubmission on May 26th, ANC 6D has met several times with the development team to encourage improvements in the plan. As part of that process, Commissioner Hamilton, in whose SMD the project lies, also wrote to the Applicant's attorney outlining several issues that might be resolved before the Applicant's May 26th response. A copy of that April 26th email is attached.

ANC 6D is now pleased to find substantial improvements in the design as a result of the several discussions Commissioners have had with the development team. However, should the June 23rd hearing not be postponed, ANC 6D submits for the record, the concerns that underly our Commission's opposition to the plan as submitted on May 26th.

Design of the façade and related issues.

As ANC 6D reported in its April 11th letter to the Zoning Commission, the project should reference and provide an invitation into Southwest even as it conforms to the dictates of the Capitol Gateway Overlay. The design has progressively improved in order to respect aspects of the surrounding community but there is more work to be done.

Several aspects of the façade have improved: the number and distribution of balconies; elimination of the small "porthole" windows that both Zoning and ANC Commissioners found undesirable; greater attention to the relationship of the project to the rowhouses on the project's south and west flanks; and a step-down design of the bricks leading to the rowhomes and inclusion of brick colors that reflect nearby Syphax Village.

On the last feature, the brick is slightly lighter than the color used in neighboring 1319 So. Capitol St., which properly distinguishes this project from the building that surrounds it, and the brick is slightly darker in the two stories at the base, relating it to the rowhomes to which the project connects. ANC 6D still suggests that the Applicant meet with officials of the 1319 project and report on results and options considered before receiving approval.

Other aspects of the relationship of the project to its surround can be improved. Eight of the rowhomes that surround the parcel will remain, including four of the oldest houses in Southwest that are being preserved on N St as single-family homes as part of the 1319 So. Capitol St. project, and four will remain on So. Capitol, two of which are independently owned.

We are pleased that the Applicant has expanded the greenspace on N St. to reiterate and connect with the N St. rowhomes, and added some new greenscape to the public space on So. Capitol St.

Based on reactions from ANC 6D, the Applicant removed several curved archways that appeared in the first proposed design. But the bay windows and frontage of the first two stories have little to do with the scale and detail of the rowhouses on either N or So. Capitol streets, a missed opportunity to create a continuous surround that would evoke the historical context and create a truly outstanding streetscape. Thoughtful attention and incorporation of details of the So. Capitol St. rowhouses and Syphax Village created an attractive design in the neighboring 1319 project respectful of its place in Old Southwest.

- ANC 6D would like to see more attention to the detail of the rowhouses on N St. and on So. Capitol in the ground and second floor of the new building, including shape and scale of the windows and other design features, to create a perceptible reference to the historic structures, and a coherent wrap around of this important corner.
- The current design is unsettled as to how the two rowhomes on N St and one on So. Capitol that the Applicant owns will finally be treated. These could be incorporated into the design as noted to increase and emphasize the historic context.

We remain concerned about the way the corner column on N and So. Capitol St. protrudes from the façade. This corner bulge seems to interrupt the attractive step-down of the brick on either side of the corner, and rather than draw people in, the protrusion pushes back and disinvites would-be visitors to Southwest. Our Commission expects, as we have experienced in the discussions leading up to the current design improvements, that we can do better with further conversation.

Traffic and Parking Plans

We remain deeply concerned and **continue to oppose** the plan that relies entirely on curbside management on N St. for all pickup and dropoff in a reserved PUDO, and all commercial deliveries, move-ins/move-outs and residential and commercial trash pickup in the one truck loading zone on N St.

The unit block of N street is a very narrow one-way street—with cars parked on both sides, not even wide enough for two through-lanes. Sharing one space for all commercial deliveries and trash pickup will inevitably result in double booking, confusion, congestion and double parking on N St. Based on our experience in other buildings in Southwest, the timing of many deliveries cannot be controlled by building staff, and a loading dock manager will not be able to avoid double parking.

In addition, there is no guarantee that the building will be able to restrict other uses of the PUDO or the truck loading space because of the high volume of fans who park throughout the neighborhood during game days and other stadium events. While the PUDO spaces will be ostensibly reserved for rideshares, episodic taxi services and quick delivery of UberEats and the like, these two spaces will likely be used by visitors to events at the Nats or Audi stadia and spillover from other activity in Navy Yard, Southwest and Buzzard Point. We have witnessed exactly this result in other buildings in Southwest, particularly when the cost of a parking fine is less than or equivalent to the cost of a commercial garage space, and the likelihood of a ticket is uncertain to minimal.

As we have also seen before in ANC 6D, residents with cars move into new high-rise buildings and, without RPPs, proceed to take up street parking. Nearby residential streets will inevitably be used by residents and other tenants of 1301, increasing the competition for needed street parking for residents of Syphax Village, James Creek and nearby single family homes. This only adds to the challenges for neighboring residents who already compete with stadium patrons for parking on event days in Nationals and Audi stadia.

The Applicant recognizes the need for some garage parking as a result of its plan to eliminate all parking on site. As ANC 6D reported in April, new tenants in 1 and 2 BR apartments are likely, unlike those in smaller units, to be multi-resident households. The Applicant expects that they will satisfy the need for some off-street parking in the National's or other nearby garages, but has provided no evidence that those arrangements are forthcoming, nor how many spaces will be available at what price. ANC 6D asks again for explicit arrangements with these commercial garages, not as proposed four months before occupancy.

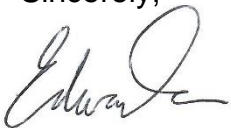
On a separate issue, the Applicant has provided no firm plans to accommodate the needs of residents with mobility issues who will require some off-street parking, or of patrons of the retail and office spaces. In a community that plans for equity and inclusion, should we be building for only the young and physically fit?

Finally, with regard to the truck loading space, ANC 6D is not in favor of losing a curb cut on N Street. We are delighted that the Applicant has now proposed to enclose the first and second floor of the rear alley, which will eliminate disturbance to the neighbors as trash is brought from the center of the building around and out to the street, as we discussed in our April 11th letter. With that improvement, using a curb cut to access the 15-foot (now enclosed) rear alley would accommodate an off-street loading dock and alleviate some of the congestion caused by the curbside loading originally proposed.

In sum, based on our several discussions since the April hearing, ANC 6D believes the project could benefit from additional clarification and revisions, and greatly appreciates the time and attention the development team has provided to date. The design has greatly improved, and with some further work might ensure that this building fulfills its role at the crossroads of the Capitol Gateway and important entrance to Old Southwest.

As by law, ANC 6D requests that its concerns be given Great Weight in your considerations of this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Daniels", written in a cursive style.

Edward Daniels,
Chair, ANC 6D

Attachment: Commissioner Hamilton (6D06) Notes to Ms. Alexandra Wilson