

Southwest / Navy Yard / Buzzard Point Advisory Neighborhood Commission 6D

December 12, 2022

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Anthony Hood, Chairman Commissioners May, Miller, and Imamura DC Zoning Commission 441 4th St. NW, Suite 200S Washington, DC 20001

Via email: zcsubmissions@dc.gov

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 December 12, 2022, 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 ANC 6D has attested in previous submissions to the Zoning Commission, it has met multiple times with the Applicant over the past year and the project has benefited from those discussions. However, ANC 6D's September 12, 2022 letter of conditional support was conditioned foremost on remedying what remains a continuing threat to traffic management in front of the proposed building, and raised concerns as well about other aesthetic design features that also remain.

ANC 6D now finds it must **unconditionally oppose** the project.

Traffic and Parking

The proposal continues to risk major traffic problems on N St., which will endure and likely worsen as redevelopment in the area continues. All onstreet parking in front of the building are still proposed to be eliminated, using one 3-space curbside section for PUDO or rideshare and other

short-term car services, and an adjoining 50ft. length for truck loading and unloading and residential and commercial trash pickup. To recall for the Zoning Commission, the original plan for vehicular access to the building was through the alley easement behind the So. Capitol St. rowhomes. This was dropped after objections from neighboring owners, and the project then eliminated all off-street parking and has created a series of adjustments for commercial functions, which still bar any interior loading.

ANC 6D has detailed in previous submissions the problems that this design creates for the community. Sharing curb space for residential and commercial trash from 49 apartments, 3 ground-floor businesses and all second-floor offices will inevitably result in double parking on very narrow N St. In addition, DDOT continues to consider left-hand turns into N St. for northbound traffic on So. Capitol St., as part of bringing the intersection of So. Capitol and M St. to grade, a block away.

Our Commission has suggested many options to bring some loading functions to the interior of the building, which of course would require a curb cut on N St. The current design has moved the trash route to an interior space closer to the center of the building to bring trash by foot towaiting trash trucks on N St., and eliminating disturbance to the neighboring properties. A small edit to widen that new interior alley would largely remove the problem of frequent and multiple uses of the curbside truck loading space. The existing curb cut on N St. appears to be approximately aligned with what would be needed to widen the pedestrian alley to accommodate truck loading.

The Applicant, however, has repeatedly insisted that DDOT would not endorse a new or small relocation of the existing N St. curb cut. ANC 6D recognizes that this is the preferred approach of DDOT, but also recalls for the Zoning Commission that when confronted with an unworkable proposal, DDOT has permitted new curbcuts to remedy the problem (witness the latest curb cut proposal in ZC 22-06 for 9th and G St. SW). The Applicant has not presented a credible argument to ANC 6D or to DDOT to find a solution to a clearly existential problem for this building. ANC 6D offered condional support in its September report to the Zoning Commission in anticipation of a solution to off-street loading. Without a solution, ANC 6D must now oppose the project.

Aesthetics and Design

As ANC 6D has emphasized in earlier filings, the project is on a very important corner—the intersection of So. Capitol St. and N St. SW, and must reflect both the dictates of the Capitol Gateway Overlay, and serve as an entrance to Old Southwest. The project is bordered by a series of historic rowhoused on both N and So. Capitol streets, which will be preserved and integrated into the 1319 project that surrounds this proposed building on both streets. In repeated discussions over virtually the entire time 1301 designs have been reviewed, ANC 6D has requested that the ground and second floor treatments visually recognize the scale and aesthetic of the rowhouses.

Instead of reflecting the adjoining historic properties, and a visual link between the new building and the four remaining houses on either side, the design remains largely as was and offers little to create a striking entrance to Old Southwest. The elevation on p. A300 of Ex. 96 shows the coordination of line and scale that links the So. Capitol rowhouses with the new ground floor units in 1319. The Applicant has presented some color palettes that attempt to connect with neighboring Syphax School, and ANC 6D appreciates that effort. But as ANC 6D has argued for months, bay windows are not an architectural feature of Southwest old or new, the lintels and

window placements are unrelated, and the houses on either side are at best incidental, at worst just orphaned vestiges of a former moment rather than a readable echo of the history of black working-class Old Southwest.

Finally, ANC 6D asks for a commitment to building materials and brick color to ensure that the final execution reflects the aesthetic of other Southwest buildings to which it relates.

As by law, ANC 6D's position of opposition in this matter be given Great Weight in your considerations of this application.

Sincerely,

Edward Daniels, Chair, ANC 6D