

VJ Kapur  
Advisory Neighborhood Commissioner  
Single-Member District 5C07  
<https://anc5c07.com>



## Letter in Support of BZA Application 20861

Chairperson Hill and members of the BZA:

I am writing in support of application 20861, seeking a Special Exception from the minimum vehicle parking space requirement of Subtitle C § 701.

I am the Advisory Neighborhood Commissioner representing Single-Member District 5C07, writing on behalf of myself, and not ANC 5C. While the building is within Neighborhood Commission Area 5B, the proposed building is .5 miles from the 5C07/5C boundary and .75 miles from my home. The containing district, 5B03, bounds mine and lacked a sitting Commissioner for much of the time this application was under community deliberation. As a result, I've been tracking the case and offer my opinion here.

**Re: parking.** On the issue of direct relevance to the application, I support the sought exception to building any parking spaces. I am generally against forcing the construction of off-street parking as a condition of home production. In this case, I believe the exception is especially justified, as the building would be close to:

- rail transportation given proximity to the Brookland metro station
- frequent bus transportation given proximity to the G8 and H8 bus lines
- direct pedestrian access to various amenities along the 12th St retail corridor and Monroe Street Market buildings
- outstanding access to safe biking infrastructure in the form of access to the Franklin St bike lanes connecting to the Metropolitan Branch Trail

Further, adding parking at this site would involve building a whole new alley, an intensive undertaking, or creating a curb cut on 12th St NE, amounting to a new vehicle conflict zone on this pedestrian-heavy corridor. As these are non-starters, the applicant stated at the 3/7 ANC 5B meeting that, were an exception not granted, the ultimate result would be reducing the number of homes from 12 to 4 or 5. I think it would be extremely unfortunate were 7 or 8 homes pre-empted during a housing shortage by not granting this exemption.

In response to community and ANC feedback, the applicant made further accommodations on bike storage within the building and will be attempting to restrict building residents from seeking residential parking permits. I am suspect on the feasibility of the latter, or how appropriate RPP zoning is on this commercial block in the first place, but nevertheless believe less access to convenient car parking (and

more bike parking) is appropriate given the proximity these residents will have to non-car transportation.

**Re: two cellar floors.** The proposed building contains homes on two below-grade floors. As the ceiling of the higher of these floors is less than four feet above grade, they are both classified under DC zoning regulations as “cellar” floors. I do not believe the applicant did a good job communicating the gravity and relevance of this design decision or articulating the benefits of these subcellar homes, so I’ll make the case in the record here.

I do not know that there is any precedent within DC for doing a second cellar (subcellar) floor. The applicant and their representative were asked during the 3/7 5B meeting about existing buildings with occupied homes in a subcellar, and implied they likely existed, but they were not able to specify a case that had actually been constructed. I asked multiple contacts knowledgeable on these issues and all were similarly unsure, but expressed surprise this isn’t tried more often. As a result, I’m left to assume the return-on-investment has newly become viable and this case may be the first of many employing this technique to produce additional homes under restrictive FAR limits.

Many members of the community have expressed skepticism of the safety or desirability of these homes. On safety, I defer to building codes which I believe handle the issues of egress through mechanisms not dissimilar from above-grade units, through scalable areaway wells. On desirability, I’d like to take this opportunity to make several points.

The single Inclusionary Zoning home in this building will be on the first (at-grade) floor (unit 9), but the six market-rate homes across two cellar floors will likely be more affordable than typical for a brand new building in Brookland with close proximity to the metro and the vibrant 12th St retail corridor. Even then, these homes provide unique and valuable amenities for the location, including:

- insulation from 12th St street noise
- insulation from weather, decreasing heating/cooling costs
- private outdoor spaces in the area-way (access well) for subcellar units

Further, even if downsides raised by the community, such as an acute lack of light and air, were founded, there are any number of folks I can imagine preferring these conditions over broader market preferences, such as:

- those who work nights and sleep during the day
- those with attention/stimulation issues that prefer low levels outside exposure
- those with any number of medical conditions that could cause photophobia

Robust housing production should seek to meet the needs of broad and diverse neighbors, and not just a majority.

There are other issues related to this proposed building, including some that have induced late design changes to the air conditioner unit arrangement and penthouse shape. On these, I'm neutral. I appreciated that feedback from the community, ANC, and OP was integrated into the design to produce a stronger end product.

As a result of all of the above, I re-affirm my support of the proposed application.

Very respectfully,

VJ Kapur  
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