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



## Letter in Support of BZA Application 20861

Chairperson Hill and members of the BZA:

This letter is on behalf of myself and not ANC 5C. The proposed building is .5 miles from the 5C07 (and 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 Special Exception from the minimum vehicle parking space requirement of Subtitle C § 701. I generally do not support forcing the construction of off-street parking as a condition of home production. In this case, I believe the exception is especially important, 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 or creating a curb cut on 12th St NE. As these are non-starters, were an exception not granted, the number of homes would have to be reduced from twelve to five. I think it would be extremely unfortunate were seven homes pre-empted during a housing shortage by not granting this zoning relief.

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 car parking (and more bike parking) will help steer future neighbors here towards more sustainable choices.

**Re: two cellar floors.** The proposed building contains homes on two "cellar" floors, which are not included in FAR calculations. While this design choice is not specifically the subject of the application, the number of homes inducing the parking requirement likely would not be possible in an MU-3A lot of this size any other way.

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. Beyond that, these homes provide unique and valuable amenities for the location, including:

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

Members of the community expressed skepticism of the desirability of these homes, citing an acute lack of light and air. Even if downsides raised by the community were founded, there are any number of prospective neighbors 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 (future) neighbors, and not just a generalized majority. And, of course, occupancy in these homes will be a market choice for anyone doing so.

All that said, I do not know that there is any precedent within DC for homes in a subcellar floor. During the 3/7 ANC 5B meeting, the applicant and their representative were asked about this, but they were not able to specify a case that had actually been constructed. I asked multiple architect contacts about precedents; all were similarly unsure, but expressed surprise this isn't tried more often.

I'm left to assume the return-on-investment has only recently become viable and this case may be the first of many employing this technique to produce additional homes under restrictive FAR limits. I support this, as I do most means to meet our housing production needs and increase the diversity of our housing options, and therefore want the record to reflect the potential positive impact of this case.

There have been other discussion points for this proposed building, including some that have resulted in late design changes to the air conditioner unit arrangement and penthouse shape. On these matters, I appreciate that feedback from the community, ANC 5B, and OP was integrated into the design to produce a stronger end product.

For all of the above reasons, I reaffirm my support for this application.

Very respectfully,

VJ Kapur  
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