

September 22, 2017

Mr. Anthony Hood, Chairman
c/o: zcsubmissions@dc.gov
District of Columbia Zoning Commission
441 4th Street NW
Suite 210S
Washington, DC 20001

RE: Case Number 16-23, Proposal for Design Review and Development by Valor Development, LLC, Square 1499, Lots 802, 803, 807

Dear Chairman Hood:

I am writing you regarding Case Number 16-23 and ask that you **reject** the current development application of Valor Development LLC. As a longtime DC resident who has lived in the American University (AU) Park neighborhood for almost 10 years, I strongly believe the current large-scale development plans proposed by Valor Development are completely out-of-character with our neighborhood, will cause significant increased traffic congestion, strain local schools, harm the environment, and worsen already difficult neighborhood parking conditions.

Valor Development has filed an application with the DC Zoning Commission for approval of a large project on the site of the former SuperFresh grocery. The project consists of two buildings, a larger building that will contain around 200 apartments and a smaller building that will contain around 20 condominium residences. The larger building will have five floors facing 48th Street, plus a penthouse level containing residences and other amenities (including a rooftop pool). The smaller building, which will also face 48th Street, will have four floors plus a penthouse level consisting of residential amenities and mechanicals. Underlying the entire lot will be 16,000 sq. ft. of retail space. Valor hopes to fill that space with a small grocery, though Valor indicates that the grocery market is undergoing change and no major grocery chain is interested. Since the lot slopes down toward 49th Street, the lower retail level will be above grade on that side, meaning that the building will be **seven stories tall** on that side (counting the penthouse) and will tower over existing homes in the area and detract from the adjacent historic Spring Valley Shopping Center.

Valor is seeking relief from DC the Zoning Commission under the new “Design Review” authority. Under the zoning regulations, the purpose of this authority is to provide flexibility without an increase in density or a map amendment, and after a finding that there is not an adverse impact. I strongly believe Valor’s proposal fails on all points:

1. The Valor development plan is out-of-character with the surrounding neighborhood – in both resident and commercial respects. The proposed buildings will face two residential streets, 48th St. and Yuma Street NW (on which we reside). These streets and the adjoining AU Park residential area consist of

single-family, two-story homes. The 5-7 story buildings being proposed simply do not fit architecturally or aesthetically. Similarly, the commercial buildings on nearby Massachusetts Avenue NW (with one exception) are one to three stories. The one exception is 4801 Massachusetts, the building owned by American University. When built, that structure exceeded allowable density, and is located on a commercial street.

By Valor's own admission, their application calls for additional density. **The project exceeds what can be built as a matter-of-right.** Valor claims that the additional density is needed so they can include a supermarket. However, Valor's proposal calls for additional residential density over what is permitted as a matter-of-right as well.

The Future Land Use Map that is incorporated into the Comprehensive Plan calls for this site to be low density commercial (one to three stories). In *Durant v. DC Zoning Commission*, the DC Court of Appeals articulated that a zoning application must be assessed in accordance with the Comprehensive Plan. The proposed Valor plans fails under this requirement.

2. The Valor development plan will increase traffic congestion in the neighborhood, particularly along Yuma Street NW, 48th Street NW and at the intersection of Massachusetts, 49th St. and Yuma Streets. That intersection is already a bottleneck. Cars will inevitably seek to avoid this congestion by re-routing through the neighborhoods on both sides of Massachusetts, endangering both the elderly and young children. The existing alley that connects Massachusetts and Yuma Street – which is being proposed by Valor to be used for commercial truck delivery -- is already clogged with trucks servicing the CVS and Wagshals in the Spring Valley Shopping Center. As a resident living on Yuma Street NW, I can attest to the relatively heavy traffic on the street today from drivers seeking a direct route connection between Massachusetts and Wisconsin Streets NW. The large-scale Valor plan would turn Yuma Street NW into an even more heavily congested thoroughfare, which also has substantial safety implications for neighborhood children (we have two children under 10 years of age as do several residences between my home and the proposed development site).
3. The Valor development plan will strain local schools. **As a member of the Janney Elementary School PTA**, I am very knowledgeable about the school's existing capacity challenges. One can expect that many of the residents in the large-scale Valor proposal will have children, which will cause further strain on Janney Elementary, possibly requiring a change in school boundaries. **A change in school boundaries is an unacceptable outcome to the re-development of this site.**
4. The Valor development plan will harm our local environment. As a low-density, vastly residential neighborhood, AU Park is characterized by considerable foliage, a well-established tree canopy with an associated bird/wildlife/insect presence, and low noise density. This is a driving factor of why residents seek to move into AU Park. The large-scale Valor proposal would increase pollution through the presence of traffic congestion (vehicular and human), commercial truck exhaust, higher water and electricity consumption, increased dumpster/waste activity (and associated potential rodent

infestation), and markedly higher noise density. This Valor plan is a worrisome precedent that would detrimentally affect livability in a quiet neighborhood with a healthy environment.

5. Finally, the Valor development plan will significantly worsen area parking. Valor's proposed onsite parking is inadequate: approximately 85 spaces are reserved for the use of the residents – to support 220 new units? Since Metro is almost a mile away, residents can be expected to have cars. Parking on neighboring streets will be overwhelmed, including on Yuma Street, which already allows for only parking on the north side of the street.

In summary, the scale of the proposed Valor project is too large. It will have a detrimental impact on our neighborhood and its residents' quality of living. Further, it does not satisfy the requirements for Design Review. As such, we request that you reject Valor's current application. The developer should be encouraged to come up with a smaller project; until then, I am opposed to the plan and to Valor's application.

Please contact me with any questions at 202-332-3381.

Sincerely,



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