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Mr. Anthony Hood, Chairman
District of Columbia Zoning Commission
441 4th Street NW
Suite 210 S
Washington, DC 20001

**Re: Letter in Opposition:
Case No. 19-10, Valor Development, LLC Consolidated PUD Square 1499, Lots 802,
803, 806, and 807**

Dear Chairman Hood and Members of the Commission:

I am writing to express my opposition to the proposed development of the former “SuperFresh” lot by Valor Development. I live on Alton Place, a block and a half from the proposed project. Valor failed on two prior occasions to obtain Commission approval of the proposed development under the Voluntary Design Review (VDR) regulations – first, because it failed to provide a sufficient amount of affordable housing pursuant to the Inclusionary Zoning requirements, and second, because the development required a density transfer from another lot, despite the fact that such a transfer was not permitted under the VDR process.

I wrote and testified in opposition to those proposals because the Valor project – a 240-unit, 4-6 story apartment building with a promised grocer on the lower level – is just too big for the neighborhood. I also opposed the project because it failed to satisfy many requirements of District of Columbia law. Valor has now filed for Commission approval of essentially the same development under the PUD provisions of the zoning regulations.

This PUD application suffers from the same defects as the prior VDR application and should be denied for the following reasons:

- The project is simply too big. It faces two residential streets and towers over the two-story, single family residential homes, as well as the surrounding commercial neighborhood. The building will jam several hundred tenants into half of a city block. Many, if not most, of them will have cars, since the project is not near a Metro station.
- The development will adversely impact the neighborhood in numerous respects. The project will endanger pedestrians, exacerbate traffic and parking congestion in the neighborhood, deprive homes of light and privacy, and force locally owned businesses to close.

- As was the case with the VDR application, the proposed project cannot be built without stripping purported density from the Spring Valley Shopping Center, a historically recognized and protected landmark. In fact, the shopping center is included in the PUD solely for the purpose of taking whatever density it may possess so as to enable Valor to erect the oversized development. The landmark will receive no benefits from the PUD and will actually be harmed by the density transfer as well as by the overwhelming scale of the proposed project.
- The proposed density transfer from the Spring Valley Shopping Center and the other adverse effects on the landmark fall within the jurisdiction of the Historic Preservation Review Board. The Zoning Commission does not have the authority to approve the proposed project without HPRB review and approval.
- The project does not advance the goals of providing affordable housing. Valor has designed the project deliberately to minimize the amount of affordable housing it would be required to provide. Most of the apartments will be rented at the prevailing market rate in the area and will, therefore, be expensive.
- The project does not comply with District zoning law in numerous respects. It does not comply with the low-density commercial standard of 1–3 stories for MU-4 zones and is not consistent with numerous provisions of the Comprehensive Plan.
- The proposed PUD provides no real benefits to the neighboring community, as required by the PUD regulations.
 - The proposed hawk light will invite pedestrians into two dangerous locations: the crowded service road on the north side of Massachusetts Ave., and the north-south alley connecting Yuma Street to Massachusetts Ave. DDOT is already studying the safety and livability of Massachusetts Ave. and has not proposed a hawk light or formulated a comprehensive proposal.
 - The proposed grocer would simply add another potential option to the more than a dozen other sources of food and household products in the area.
 - The project offers no meaningful open space to the community.

The Zoning Commission should tell Valor that it must comply with the law – and that it should do so by designing a project that is compatible with the scale and needs of the neighborhood and provides meaningful housing opportunities within Ward 3. This PUD does none of these things and should be denied.

Sincerely,

/s/ Sondra L. Mills