

ward3vision

smart growth • vibrant neighborhoods

c/o John Wheeler
4304 Yuma St. NW
Washington, DC 20016
October 31, 2019

Zoning Commission for the
District of Columbia
441 4th St., NW
Suite 210-S
Washington, DC 20001

Re: Case No. 19-10 –Valor Development, LLC

Dear Members of the Commission:

Attached is Ward3Vision's Response to Opponents Post-hearing submissions for the referenced case.

Thank you for your attention to this matter.

Sincerely yours,



John H. Wheeler
Member of the Ward3Vision
Steering Committee

Attachments

Ward3Vision's Response to Opponents Post-hearing Submissions
USDA Plant Hardiness Zone Map

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2019, copies of Ward3Vision's Response to Opponents' Post-hearing Submissions were sent via email to the following:

Valor Development, LLC

c/o Norman M. Glasgow, Holland and Knight
norman.glasgowjr@hklaw.com

Advisory Neighborhood Commission 3D

3D@anc.dc.gov

Advisory Neighborhood Commission 3E

3E@anc.dc.gov

Jennifer Steingasser

DC Office of Planning
Jennifer.steingasser@dc.gov

Citizens for Responsible Development

c/o Edward Donahue, Donohue and Stearns, PLC
edonohue@donohuestearns.com

Citizens for Responsible Development

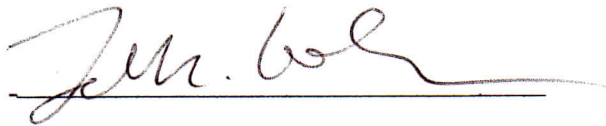
Barbara & Sheldon Repp
Repper3@aol.com

Spring Valley Neighborhood Association

William Clarkson
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Spring Valley Opponents

Jeff Kraskin
jkraskin@rcn.com



John H. Wheeler, Ward3Vision
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202-362-6009

Ward3Vision's Response to Opponents Post-hearing Submissions ZC Case No. 19-10

Affordable Housing:

Ward3Vision has long promoted developments with a diversity of housing types and income levels. We welcome others in Ward 3 to do the same. However we find the Opponents recent advocacy for more affordable housing at this site disingenuous. This is especially true for Citizens for Responsible Development (CRD)'s suggestion that the project should be one or two floors lower, but with more affordable housing.

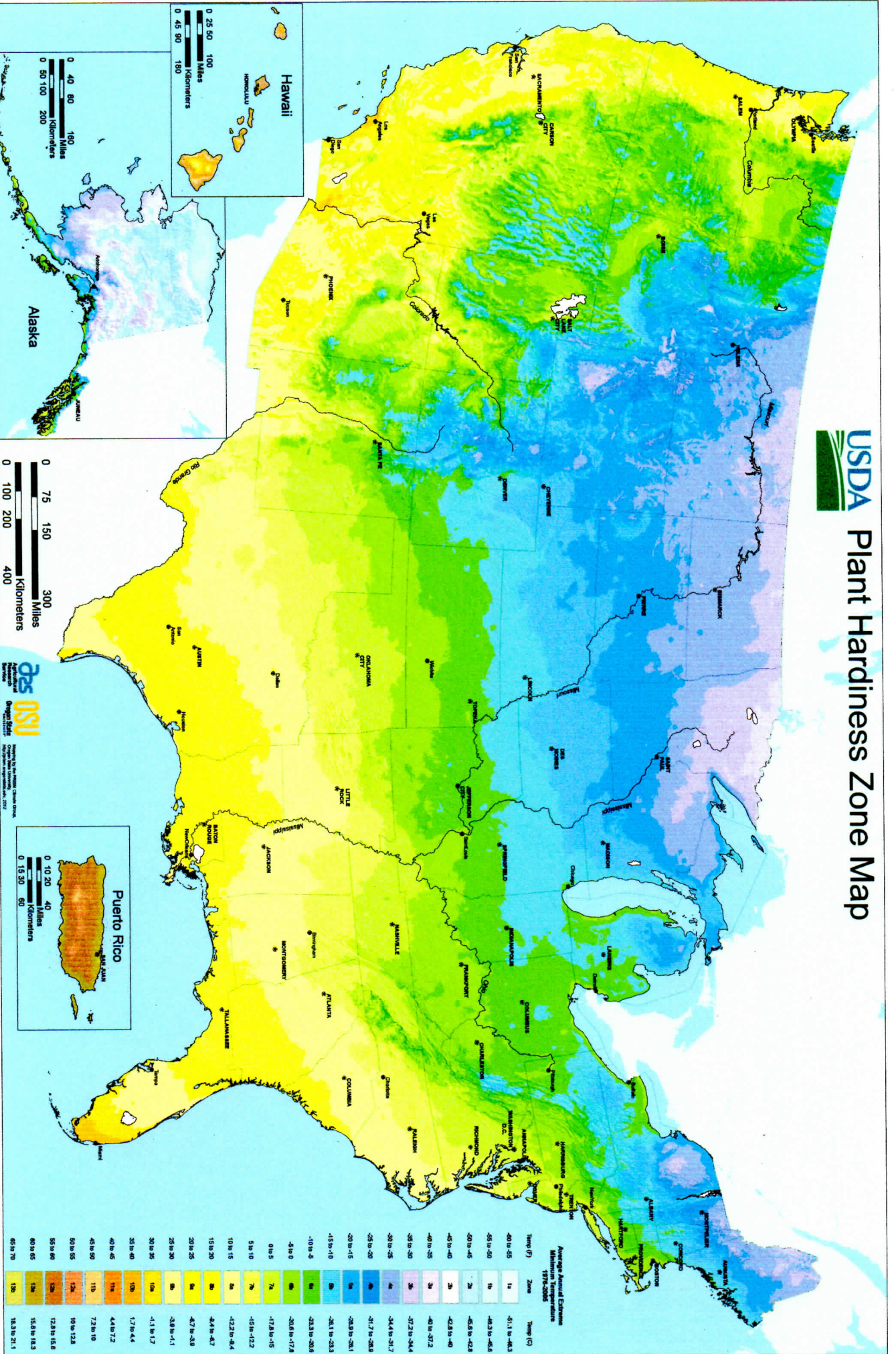
Both CRD and the Spring Valley Opponents significantly misstate the percentage increase of affordable housing offered by Valor. PUD regulations require 10 percent. Valor's offer on October 10 of 12 percent is 20 percent above what is required, not two percent as the opponents state. (Exhibit 237, p. 2, Exhibit 238, p. 3)

Environmental Concerns:

CRD, relying upon expert witness, Curt Westergard, states that the building will be detrimental to trees and other vegetation. (Exhibit 238, p. 20) But Mr. Westergard was qualified as an expert on visual impacts of structures, not an expert in horticulture or arboriculture. Furthermore, there is nothing in his resume that suggests he is knowledgeable about horticulture or arboriculture. (Exhibit 17, p. 11) When it comes to the height of trees, Mr. Westergard, on cross-examination, admits (October 10, 2019 Transcript, p. 79) that he was wrong when he stated, "You can't have a 120-foot tree. It's botanically impossible." (Transcript, p. 37). Mr. Westergard also implied that this project is in USDA Plant Hardiness Zone 6 (Transcript p. 78), but it actually is in Zone 7. See attached *USDA Plant Hardiness Zone Map* on the next page.



Plant Hardiness Zone Map



<https://planthardiness.ars.usda.gov>