

October 18, 2017

Elizabeth and Jason Mitchell
4704 Warren St. NW
Washington, DC 20016

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

RE: Letter in Opposition: Case Number 16-23, Proposal for Design Review and Development by Valor Development, LLC, Square 1499, Lots 802, 803, 806, 807, in American University Park, District of Columbia

Dear Chairman Hood and Members of the Commission:

We live at 4704 Warren Street NW, around the corner from the proposed development of the site of the former SuperFresh grocery store at 4330 48th Street NW. We write to express our opposition to the proposal by Valor Development to construct two buildings of 5 to 7 stories in height, including 220 apartment units and a grocery store on the site.

Valor's proposed development threatens many problems that would irreparably harm our community; this letter will focus on three of them. First, it would drastically increase traffic on our residential streets, which Valor plans to use for most of the development's traffic, including all of the tractor-trailers to service the grocery store. Second, it is completely inconsistent with the Comprehensive Plan and existing neighborhood – both residential and commercial – and will cause irreparable harm to the residents of the surrounding single-family homes. Third, despite many meetings with concerned neighbors, Valor has never provided sufficient assurance that its development will have adequate parking, and likely will result on an enormous increase in on-street parking burden for our neighborhood.

While we would like to see that space put to use, Valor's proposed development is simply much too large for the neighborhood, and puts far too much strain on the residential streets of single-family homes that front it on all sides. Its application for additional density should be denied.

Extreme Traffic Impacts on Neighborhood

Valor's proposed development will rely primarily on residential streets for all traffic related to its development. While Valor's presentations may try to portray this development as being located on the commercial portion of Massachusetts Avenue, that is not the case.

All of the surrounding non-residential buildings that Valor may claim are consistent with their development have primary ingress/egress from Massachusetts Avenue. Rather than propose a development that would allow adequate access from that major, commercial road for commercial traffic, Valor seeks to funnel the majority of all traffic for both the massive

apartment building and grocery store/retail site onto the surrounding residential streets, including our block of Warren Street.

In particular, Valor plans to use a narrow alleyway off of 48th Street, near the intersection of 48th Street and Warren Street, for all of the trucks servicing the proposed grocery store (projected at 21 trucks per day). It plans to use that same alley and nearby, residential Yuma Street for ingress/egress by most of the residents of the proposed residential buildings. This will result in constant traffic on a street that is already used by cars cutting through the neighborhood during rush hour.

According to the traffic study that Valor commissioned, the proposed development would increase traffic by at least 200 additional cars per hour during peak PM times, and nearly 100 cars per hour during peak AM times. That is an additional car passing by every 20 seconds on what are already moderately busy streets, by Valor's own optimistic estimates. Valor's conclusion that such entirely new, additional traffic volume "will not have a detrimental impact on the surrounding transportation network" frankly is not credible. The surrounding residential streets simply cannot safely absorb the amount of traffic that Valor's development will generate.

Valor's proposal will exponentially increase traffic strain for our street, which consists entirely of single-family homes, as well as the similar blocks that front the proposed development on all sides. Nearly all of the traffic from the proposed development must travel through our neighborhood. Most of it will travel on 48th Street, which is just four houses down from me. Our neighborhood is full of families with small children who play outside and walk to school. Nearly everyone else is middle-aged or elderly and likely to remain in their current home as they age. Many streets – including our block of Warren Street – do not have sidewalks on both sides, requiring mid-street crossings to get to and from a sidewalk. Adding many hundreds of additional cars speeding down those roads every day is simply a recipe for disaster in terms of both traffic and safety for the existing neighborhood.

Massive Development Out of Line with Existing Neighborhood

Perhaps the most obvious problem with Valor's development is that it is completely out of character with DC's Comprehensive Plan as well as the surrounding neighborhood – both residential and commercial – in its size and scope.

There is only one building in the area anywhere close to the size of the structures Valor is proposing: the old American University Law School building at 4801 Massachusetts Avenue, which the University is currently using for a mix of administrative and classroom purposes. It is an outlier – it was permitted to exceed allowable density when it was built. Importantly, it is also located on Massachusetts Avenue, a commercial street.

Every other building within many blocks in every direction is either a single-family home or is a residential or commercial building that is consistent with the Comprehensive Plan, which calls for one-to-three story structures in the area, including commercial buildings. All of the commercial buildings on both sides of Massachusetts Avenue in the area – including the existing SuperFresh site, the historic Spring Valley Shopping Center, and the new development happening across Massachusetts Avenue – are consistent with the Comprehensive Plan.

Valor believes that the sole outlier – the American University building – should become the rule and allow its much larger development to go forward. Valor's position ignores the surrounding neighborhood and the fact that, unlike the American University building, Valor's proposed development is fronted on all sides by residential streets of single-family homes.

Allowing Valor to build structures that would dwarf even the American University building would render the Comprehensive Plan meaningless and irreparably destroy the character of the surrounding neighborhood. To provide context, the surrounding 15 blocks of the neighborhood that will be most impacted are currently home to approximately the same number of people, combined, that Valor is proposing to house within a single block in the proposed development.

Inadequate Parking and Increased Burden of Street Parking

Finally, Valor has never provided satisfactory answers to the community about how it plans to provide adequate parking for the development. Much like the traffic impacts, the surrounding neighborhood cannot absorb the increase in parking demand that Valor's proposed development would trigger.

Valor is proposing to build 220 apartment units, nearly all of the multi-bedroom variety. Valor has said that its primary target demographic are middle-aged "empty nesters," although it is likely that it would also attract families seeking to obtain in-boundary schooling at American University Park's excellent schools and University students who would be sharing apartments. All of those types of residents likely would have at least one car, yet Valor's plans include only approximately 80 parking spaces devoted to residential use for over 200 apartment units. Valor claims there are additional parking spaces that allegedly will be "shared" between the residents and the American University building next door, but Valor has no assurances that those spaces will be available for its residents, particularly if American University were to change its use for that building. The tenants that are fortunate enough to get one of the few reserved spaces will also be required to pay for parking at market rates.

The likely parking impacts are twofold, for a neighborhood that already suffers from significant illegal parking by American University students that requires constant enforcement. First, it is likely that many residents would attempt to obtain Zone 3 parking permits and simply park full time on neighborhood streets, either due to unavailability of reserved parking in the development or in an effort to avoid paying the market rate for a parking space in the building. Although Valor claims that residents will not be allowed to obtain Zone 3 parking permits, it has provided no guarantees as to how that will be prevented. Second, it is likely that many shoppers of the grocery store will also park on neighborhood streets rather than in the private lot, assuming there are even adequate spaces. That will further burden already-full neighborhood streets and surrounding community.

Conclusion

We strongly oppose Valor's current plan and respectfully urge the Zoning Commission to recommend that Valor rework their proposal to ensure consistency with the DC Comprehensive Plan for this area.

Valor's proposed development is much too large for the space it intends to occupy, and Valor should not be granted density exceptions to go forward in its present configuration, which is over double the size of what is specified in the Comprehensive Plan. The size and location of the development – on residential streets, not on the commercial Massachusetts Avenue – should weigh against granting any exception.

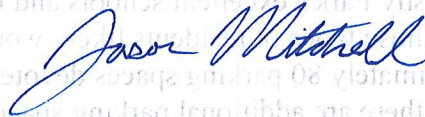
The neighborhood would benefit from a grocery store, and we would not oppose a proposal that is consistent with the Comprehensive Plan and the surrounding neighborhood. This proposal simply is not, and would irreparably harm those nearby, including my family and neighbors.

Thank you for your attention and consideration of our concerns.

Sincerely,



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