



DONOHUE & STEARNS, PLC

April 23, 2018

VIA IZIS

Chairman Anthony Hood
D.C. Zoning Commission
441 4th Street, N.W., Suite 200S
Washington, D.C. 20001

Re: ZC Case 16-23 – Valor Development, LLC – Voluntary Design Review
CRD’s Response to Valor’s Second Deferral Request

Chairman Hood:

On behalf of my client, Citizens for Responsible Development (CRD), I am responding to Valor Development’s (the “Applicant” or “Valor”) April 16th second request for a deferral of the Zoning Commission’s (the “Commission”) deliberation. This request follows their February 22nd deferral request and three previous requests for postponement.

In response to Valor’s first request for deferral of the Commission’s deliberation on this matter from the scheduled date of February 26, 2018, CRD had requested at least three weeks’ time to prepare its responsive submissions. At that time, CRD anticipated any Applicant submissions to be merely supplemental in nature. Valor now proposes to submit an entire redesign of the Ladybird project and so CRD is requesting, at a minimum, 30 days to prepare its responses. We also ask that the record be reopened.

It must be noted that CRD has not objected to the February 22nd deferral request nor did CRD object to any of the Applicant’s requests to defer the original hearing dates. CRD likewise does not object to the current request, but respectfully requests that the Commission afford it sufficient time to adequately respond to the new design and figures Valor plans to submit by June 18, 2018.

ZONING COMMISSION
District of Columbia
CASE NO.16-23
EXHIBIT NO.235

On April 20, 2018, CRD consulted Spring Valley Opponents, the other Party in Opposition, and they support the above requests.

We appreciate the Commission's consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "E. L. Donohue". The signature is fluid and cursive, with a large initial "E" and a long horizontal stroke at the end.

Edward L. Donohue

Cc:

Norman M. Glasgow, Jr. (via email)
Advisory Neighborhood Commission 3E (via email)
Advisory Neighborhood Commission 3D (via email)
Jeff Kraskin, Spring Valley Opponents (via email)
William Clarkson, Spring Valley Neighborhood Association (via email)
John H. Wheeler, Ward 3 Vision (via email)

DISTRICT OF COLUMBIA ZONING COMMISSION

SUPPLEMENTAL FILING

Z.C. Case 16-23

CERTIFICATE OF SERVICE

I certify that on April 23, 2018, I emailed a true copy of the foregoing Response to Deferral Request to Advisory Neighborhood Commissions 3E and 3D (3E@anc.dc.gov; 3D@anc.dc.gov), Jeff Kraskin (Jkraskin@rcn.com) for Spring Valley Opponents, William Clarkson (wclarksonv@gmail.com) for Spring Valley Neighborhood Association, John H. Wheeler (johnwheeler.dc@gmail.com) for Ward 3 Vision and counsel for the Applicant, Norman M. Glasgow, Jr. (norman.glasgowjr@hklaw.com).



Edward L. Donohue
Attorney for
Citizens for Responsible Development

Dated: April 23, 2018

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