



DONOHUE & STEARNS, PLC

January 4, 2019

VIA IZIS

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

Cc: Norman Glasgow (via email), ANC 3E (via email) and ANC 3D (via email), Jeff Kraskin (via email), William Clarkson (via email), John Wheeler

Re: ZC Case 16-23/Valor Development, LLC/Square 1499
Hearing Date: January 7, 2019

Chairman Hood:

On December 11, 2018, our clients, Citizens for Responsible Development (CRD), requested that Stephen Hansen, Curt Westergard and Ryan Shuler be recognized by the Zoning Commission as experts. In their December 18, 2018, the Applicant, objected to the Zoning Commission's qualification of CRD's three proffered experts. CRD responds as follows.

This case began in October of 2016. The Applicant has received multiple extensions of time and now, over two years later, they object to the qualification of CRD's witnesses on the basis of timing when their own expert, Emily Eig was proffered immediately before the most 'recent' hearing on January 25, 2018 to the surprise of CRD. CRD made no objection.

The Applicant also object to CRD's request for witness status for two individuals from the same firm. The Applicant presented two witnesses from both Torti Gallas and Bowman Consulting.

Finally, it must be noted that the Applicant's objection contains no criticism of any of the three witnesses' credentials. In fact, on page 3 of its response, the Applicant admits that CRD's filing (specifically the work performed by Curt Westergard, Ryan Shuler and their firm, Digital Design & Imaging Service, Inc.) prompted the project's architect to generate an entirely new set of renderings using a 50 mm lens.

CRD's goal throughout this process has been to provide the Zoning Commission with as much credible material as possible so that the Commission can make an informed decision. We would hope that the Applicant shares this goal. If the credentials of the experts offered by CRD are not in question, then their participation can only serve to insure a transparent and comprehensive result.

ZONING COMMISSION
District of Columbia
CASE NO.16-23
EXHIBIT NO.331

Thank you for your consideration.

Sincerely,



Edward L. Donohue

DISTRICT OF COLUMBIA ZONING COMMISSION

CRD REQUEST FOR EXPERT WITNESS QUALIFICATIONS

Z.C. Case 16-23

CERTIFICATE OF SERVICE

I certify that on January 4, 2019, I emailed a true copy of the foregoing Request for Expert Witness Qualifications to Advisory Neighborhood Commissions 3E and 3D (3E@anc.dc.gov; 3D@anc.dc.gov), Jeff Kraskin (Jlkraskin@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: January 4, 2018

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