

February 20, 2019

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

Re: Z.C. Case No. 16-23: Application by Valor Development, LLC for Voluntary Design Review; Response of Spring Valley Opponents to Applicant's Post Hearing Submission on Visual Images of the Proposed Project Within the Context of the Surrounding Neighborhood

Dear Chairman Hood and Members of the Commission:

This letter is in response to the February 13, 2019 post-hearing submission by Valor Development, LLC. Spring Valley Opponents received the submission by e-mail on February 13, 2019. Valor indicated in its e-mail that the submission would be mailed to Spring Valley Opponents the following day on February 14, 2019. Spring Valley Opponents received the mailing on February 15, 2019. Because the submission consisted of visual images, the hard-copy mailing was essential to adequately review the visual images.

Valor was requested by the Zoning Commission (ZC) at multiple times throughout the hearing process to submit visual images of the proposed project *within the context of the surrounding community*. However, Valor failed to follow through on this request. Finally, on February 6, the ZC asked Valor to submit the images yet again at the conclusion of Rebuttal in a post-hearing submission. Although we have the opportunity to comment on the post-hearing submission, Valor, in effect, denied Spring Valley Opponents the opportunity to cross examine on the images by delaying submission of these images until the hearings were concluded and only after a third request by the ZC.

After reviewing the images submitted by Valor in its post-hearing submission, it appears that Valor still has not responded to the request made by the Zoning Commission for images that show the project *within the context of the existing neighborhood*. In fact, most of these images have already been presented by Valor at hearings in this case, including during its rebuttal. In effect, Valor has taken images already presented in the case – and that were determined by the ZC to be inadequate and unresponsive – and is seeking to “rebrand” them by suggesting now that they accurately depict the neighborhood context of this project, when in fact, they fall short.

1. View 1 depicts a view from the East along Windom Place. This picture fails to show any homes on Windom Place or along 48th Street (which would be visible from Windom Place). All that is shown along Windom Place are cars, trees, and utility poles. Valor's image ignored that there are actually two-story residential homes on Windom Place that contrast sharply with the multi-story building wall that would face residents of Windom Place and 48th Street NW. The image does not show the relationship with the surrounding adjacent residential homes or put the project in a neighborhood context.

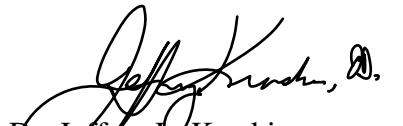
2. View 2 is a Northeast view from Yuma and 48th Street that shows only a portion of one house at the corner of 48th and Yuma Street. Again, the neighborhood context of the project is lost, but even this small residential view demonstrates that the proposed project will loom over the existing homes. The image presented by Valor might suggest a scene similar to what you might observe along upper Connecticut Avenue – albeit the image does not accurately reflect the neighborhood context of the structure proposed by Valor in this case. (Although the Comprehensive Plan encourages development along both Wisconsin and Connecticut Avenues, it does not advocate for the same level or type of development on residential streets in low density residential areas.)
3. View 3 is a Northwest view from the north side of Yuma Street. The image does not include any houses along Yuma Street. It barely shows a portion of the Spring Valley Shopping Center which is next to the proposed grocery store at the site and separated by an existing alleyway. In fact, the image does not show even a separation between the new grocery store and the SV Shopping Center for the alleyway or even the existing curb cut along the street to mark the presence of the existing alley. It is difficult to even know there is an alley at this location based on the image submitted by Valor, yet Valor selectively chooses to show the existing curb cut for the existing one story garage on Yuma Street NW.
4. View 4 further depicts a Northwest view from the north side of Yuma Street. The angle results – conveniently for Valor – in images that obscure much of the existing housing. Moreover, the images do not show what the new project is replacing along Yuma Street. This is important because the existing development is more compatible with the existing residential neighborhood; the new project is not. It is important for the ZC to appreciate what this building is actually replacing, so it can better appreciate the neighborhood context and the adverse impacts this project will create for the surrounding residential neighborhood. Unfortunately, that context is missing.
5. View 5 shows a view of the building from the Southwest along Massachusetts Avenue. The image, identical to others submitted by Valor in the case, clearly demonstrates how the new structure along Yuma and 48th Street NW will tower over and overwhelm the historically-designated Spring Valley Shopping Center along Massachusetts Avenue NW. This image demonstrates the project will impact the overall character of the historic site and obscure key architectural features of the historic site. View 5 also conveniently does not show the proposed project in relation to the existing American University's Spring Valley Building located at 4801 Massachusetts Avenue or the existing one-story PNC Bank. If such neighborhood context was shown in the image, the new building would be seen as looming over these existing structures from this point of view. We note that images presented by Valor during rebuttal showed the new structure looks down on – and appears to be taller than – the existing 4801 Massachusetts Avenue Building.

In short, Valor's images included in the post-hearing submission fall short of the accuracy that is expected of the applicant in this case. Like the other images presented by Valor in this case, these images continue to obscure the existing conditions in a low-density residential

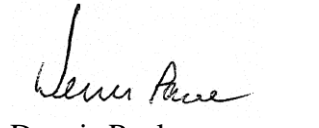
neighborhood comprised primarily of 2-story single family homes. Despite their inaccuracy, these images, as most of its other images presented in this case suggest, still demonstrate that the mass and scale of this project is inappropriate and creates adverse conditions for the surrounding residential neighborhood. If Valor presented images that accurately showed the project within the neighborhood context, the applicant would further substantiate the arguments made in this case by Opponents.

Thank you for this opportunity to comment on this submission.


Sincerely,



Dr. Jeffrey L. Kraskin
Spring Valley-Wesley Heights
Citizens Association



Dennis Paul
Neighbors for a Livable
Community



Scott Parker
Spring Valley West
Homeowners Association

Certificate of Service

We hereby certify that on February 20, 2019, copies of the attached were sent by mail or email to the following:

Ms. Jennifer Steingasser
DC Office of Planning
1100 4th Street NW, Suite E650
Washington, D.C. 20024

Valor
c/o Mr. Norman Glasgow Jr.
Holland and Knight
800 17th Street NW
Suite 1100
Washington D.C. 20006
Chris.collins@hkllaw.com

Citizens for Responsible Development
c/o Mr. Edward Donahue
Donohue and Stearns, PLC
117 Oronoco Street
Alexandria, VA 22314
edonohue@donohuestearns.com; repper3@aol.com

Advisory Neighborhood Commission 3D
P.O. Box 40846
Palisades Station
Washington, D.C. 20016

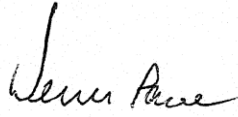
Advisory Neighborhood Commission 3E
c/o Lisner Home
5425 Western Avenue NW, Suite 219
Washington, D.C. 20015

Spring Valley Neighborhood Association
c/o William Clarkson
4805 Sedgwick Street NW
Washington, D.C. 20016

Ward 3 Vision
c/o John Wheeler
4304 Yuma Street NW
Washington, D.C. 20016



Jeffrey L. Kraskin
President, Spring Valley-
Wesley Heights Citizens Assn.
jllkraskin@rcn.com



Dennis I. Paul
President, Neighbors for a
Livable Community
dennis.paul@verizon.net



Scott L. Parker
Treasurer, Spring Valley West
Homes Corporation
scottlparker@comcast.net

February 20, 2019