



DONOHUE & STEARNS, PLC

February 21, 2019

**VIA IZIS**

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

**Re:** ZC Case 16-23/ Valor Development, LLC/ Square 1499 – Response to Applicant’s Sims  
Decision Date: March 11, 2019

Chairman Hood:

The Applicant has been asked several times to produce photographs and photo-simulations to demonstrate to the Commission and the parties how the proposed project will look as seen from the neighboring properties. Back in January 2018, again on January 24, 2019, and most recently at the close of the February 6<sup>th</sup> hearing, the Applicant was specifically asked to produce “before” and “after” views, as accurately as possible, and again the applicant has failed to produce what was asked.

Valor has used selective renderings and “friendly” sub-orientations to attempt to soften the impacts. For example, the views from Yuma Street show a building washed in afternoon sun, somehow coming out of the north. With this technique, the shadowing of the homes on Yuma Street, which will occur when the sun moves east to west, is not in play. Curiously, in View 5, the orientation of the sun does appear to be correctly shown, meaning the façade as seen from Massachusetts Avenue is also brightly lit. Note the shadow lines on View 5 and imagine the impact those shadows will have on many of the homes on the north side of Yuma Street.

As DDIS explains in Attachment A, the images submitted by the Applicant were captured using a 50mm lens on an 18mp DSLR with a cropped (APS-C) sensor. When using a cropped sensor, a 50mm lens will be multiplied by 1.5x or 1.6x, depending on the camera. This means that the Applicant effectively used an 80mm lens. The result is that much of the neighborhood and surrounding context in each simulation is omitted.

Below is a specific summary of the errors and omissions in the photo-simulations provided by the Applicant:

1. View 1 – 4700 Block of Windom Place

This view attempts to show the Valor buildings further away than they actually would be. This view also shows the very small piece of land that the Heritage tree would occupy. This tree seems to be standing very close to one of the townhouses along 48th Street, and it is difficult to believe that the tree would survive on such a small piece of earth.

In addition, this view provides a glimpse as to how close the Valor buildings will be to the curb along 48th Street. Indeed, the existing houses (not shown in this view) that are opposite the Valor buildings along this street are actually set back 30-35 feet from the curb. The design of the Valor buildings does not reflect or respect the setback distance that has been established in this neighborhood.

The flowering trees seen in this view (and also in views 2, 3, and 4) do not exist and should be disregarded as a marketing technique.

2. View 2 – 48<sup>th</sup> Street near Yuma Street

As shown in this view, the height of the Valor building is in stark contrast to the partially-shown house that is on the corner of Yuma and 48th Streets. And, once again, it is clear that the Valor buildings shown along both Yuma and 48th Streets are situated very close to the curb. Together with their excessive height, these buildings loom arrogantly over neighboring houses and are an affront to the two-story homes that are well set back from the curb.

3. Views 3 and 4 – the Project as seen from the 4800 block of Yuma Street

No “before” photos have been submitted to the record, and the photo-simulations do not accurately show the relationship between the houses on Yuma Street and the Project. This view seems to provide a distorted view of the Valor complex because, according to this image, the proposed building is squeezed into the space and is depicted as abutting the rear of the Spring Valley Shopping Center building. In reality, there is an alley between the Spring Valley Shopping Center and DeCarlo’s restaurant. In addition, View 3 completely omits any homes from the frame and obscures the actual height of the Valor building.

View 4 contains a great deal of visual clutter to suggest that views of the project will be obscured. This view includes only a partial view of two houses on Yuma Street and clearly shows the stark contrast in scale between the Valor building and these

2-story homes. This view also depicts how the large “wall,” which is the Valor building, will block the light and views of the residents who live in the homes across the street from the Valor Project.

We asked our visual specialists from DDIS to attempt to correctly replicate Valor’s View 4; please see Attachment A. Note the height of the Project is far greater in the more accurate depiction from DDIS. In addition, the DDIS image accurately portrays the sunlight that will be blocked by the project and the resulting shadow on the houses across Yuma.

4. View 5 – the Project as seen from Massachusetts Avenue

This view is what pedestrians and drivers would first see as they enter the District of Columbia from Montgomery County traveling along this portal toward the downtown area. This view demonstrates, in an alarming way, just how out of scale the Valor building would be in comparison to the surrounding neighborhoods on both sides of Massachusetts Avenue. The Valor building simply overwhelms and detracts from the historically designated Spring Valley Shopping Center. A project of such size and scale is clearly out of place, out of compliance with the Comprehensive Plan, and not worthy of consideration under Design Review.

Conclusion

By omitting views that show the neighboring homes, the Applicant is preventing the Zoning Commission from being able to truly assess how inappropriate and out-of-scale the Project is for the neighborhood. The images reveal a lack of meaningful effort on the part of the architect to connect with the existing neighborhood. Rather than choosing to design an attractive connection with local surroundings and create a true sense of place, the architects have chosen to impose a design that protrudes above the neighborhood, as evident in the last image, and proclaims itself wildly out of place.

Thank you for the opportunity to respond in writing to these images.

Respectfully submitted,



Edward L. Donohue

Attorney for CRD

Enclosure



*Response to Valor Development's  
Post-Hearing Submissions 02/13/2019  
5 Simulations - The Ladybird*

*Inaccurate, sales-oriented renderings that the developer produced continue to deny the community the critical facts they need to judge the proposed structure's true height and solar impact. Misleading depictions portray an idealized architectural scene where the sun rises in the north and the height impacts to the nearest neighbors are deliberately cropped out. Overall, each simulation suffers from several basic errors.*

- The first is that all four scenes that were requested by the DC Zoning Commission crop-out the nearby buildings and scale clues. This was done by using a telephoto lens instead of the industry standard 50mm lens on a full-frame DSLR camera.
- One of the characteristic issues of a mid-rise building being considered in a residential neighborhood is the shade and shadows it would produce. This is most important along the tree lined Yuma Street. Oddly, the requested scientific illustration of this sensitive issue used solar angles only seen in the southern hemisphere. Additionally, they did not depict the impacts of the Ladybird during the 4 months surrounding the Winter solstice.
- An industry standard for informative renderings of proposed structures is to show both the 'existing' and the 'proposed' situation. The developers initial submission did not show the existing scene. (\*Valor complied with CRD's request, but has yet to file these with the Commission.)
- In response to the Zoning Commission's specific request for natural (realistic) scenes, the developer submitted incorrect 'cropped' fields of view, an impossible solar angle, and no depictions of the scene in winter light.

This presentation contains both Valor and DDIS renderings and imagery. Each is clearly labeled at the top of each slide.

Overall:

- The submitted Valor images were captured with a 50mm on an 18mp DSLR with a cropped (APS-C) sensor. When using a cropped sensor, a 50mm lens will be multiplied by 1.5x or 1.6x, depending on the camera. This means that Valor effectively used an 80mm lens.
  - If a 50mm lens was used on a full-frame 35mm DSLR, it would have a wider HFOV (39.6°). While the lens/ body choice is closer to human-eye magnification than Valor previously provided, it appears to be too “zoomed in” now. This telephoto lens means that there is less context captured in each photo because of the narrower field of view. If the industry standard was used, it would have an HFOV that would allow for both houses and the proposed development to be captured in one single image. This lack of neighborhood context is seen in every one of their simulations.
- The virtual sun lighting the models does not match the existing photographs in either time-of-day, time-of-year, or intensity.
  - As an example: “#3.View from the Northwest – Proposed in Existing (North side of Yuma)” uses a sun angle and orientation which would be impossible in the Northern hemisphere. The virtual sun is coming from almost due North. This wouldn’t even be possible at sunrise during the Summer solstice.
- All of the “existing scene” photographs were captured during a muted, overcast day. As such there are no strong shadows or bright colors present in the scene. To then place a bright, sunlit model, with strong shadows, and flowering trees in the scene, inherently makes the proposed development “pop” in comparison to its surroundings. This disregard in presenting either the nearby neighbors or the correct solar angle means that the solar impact of the development on the North side of Yuma St is being hidden.

## 48<sup>th</sup> Street: Valor's Existing Conditions – 80mm



The submitted Valor images were likely captured with a 50mm on an 18mp DSLR with a cropped (APS-C) sensor. When using a cropped sensor, a 50mm lens will be multiplied by 1.5x or 1.6x, depending on the camera. This means that Valor effectively used an 80mm lens. We are including Valor's "existing conditions/before" shots as a comparison to their "proposed" shots.

## 48<sup>th</sup> Street. Valor's Proposed Conditions – 80mm



Valor captured this image using the equivalent of an 80mm lens. This telephoto lens dramatically reduces the ability to show the proposed development in the context of the nearby neighbors.



## DDIS 50mm vs. Valor's 80mm Perspective



This 50mm rendering highlights the difference between Valor's "50mm" (actually an 80mm) and a true 50mm perspective on a full-frame DSLR. The reason that this matters is when a telephoto is used, the context becomes cropped, and the observer loses out on understanding that the new development will be looming over the rooftops of houses, from the perspective a block away.

## Valor's Existing Conditions – 80mm



Valor captured this image using the equivalent of an 80mm lens. This telephoto lens dramatically reduces the ability to show the proposed development in the context of the nearby neighbors. \*We are including Valor's "existing conditions/before" shots as a comparison to their "proposed" shots. Note that these were not submitted to the Commission.