

September 28, 2019

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

**Re: Case number 19-10 Valor Development, LLC  
Consolidated PUD Square 1499, Lots 802, 803, 806, and 807  
Letter in Opposition**

Dear Chairman Hood:

I reside at 4817 Butterworth Place N.W. and I am writing to express my opposition to the proposed Ladybird complex that is the subject of the PUD application submitted by Valor Development. A moderate-density building, one that fits the space, would be of more benefit to the community and would better serve its residents and neighbors. The design and scale of the case number 19-10 application is essentially the same as that which was the subject of Valor's earlier Design Review application in case number 16-23, which was withdrawn. The Commission has previously heard testimony and received numerous comments in opposition to Valor's plans in the prior case. This is my third letter to the Commission regarding Valor's plans for this site.

In its PUD application Valor has consistently stated without proof that its design is "superior" and that it is offering low density commercial space, i.e., a grocery store, in addition to open space and pedestrian walkways. The drawings show a very different picture, as follows:

- The project occupies the available space up to the lot line. It takes advantage of a sloping lot to place its height measuring point on 48th Street N.W. at the top of the lot and building up to 79 and a half feet, approximately five stories, at the low point of the slope facing two-story houses on Yuma Street. Entrances to both the apartment building and grocery store would be on Yuma Street. A commercial development such as this would be appropriate if it faced a major avenue such as Massachusetts Avenue, but not within a residential neighborhood. There are other large apartment buildings on Massachusetts Avenue below Ward Circle, but they are set back from the street. The Ladybird would occupy every bit of available space.
- The proposed walkways are located in alleyways, which would be converted from one-way to two-way traffic in order to accommodate delivery trucks as well as residential and customer parking access. Valor states that its building is set back 10 feet from the property line along the north-south alley, but that is necessary to accommodate the proposed trash compactors. These alleys would remain twenty feet wide for vehicular traffic, as they are now. It appears that the alleys would be expected to serve as thoroughfares rather than service alleys, and would be neither pleasant nor safe routes for pedestrians.

- The open spaces proffered as amenities are no more than the front courtyard of one section of Building 1 on 48th Street, the entryway to the grocery store on Yuma Street, and perhaps the sidewalk tree areas that are already in existence. The latter are within the city's 90 foot right of way that includes Yuma and 48th Streets and Valor should not claim them as their own contribution to public benefits.
- The grocery store would be of use to residents of the apartment building and neighbors who would carry home their purchases, but it should not qualify under the regulations as an amenity. There are or will be a dozen or so full-service grocery stores within a three-mile radius, many with more parking.
- A number of longstanding local businesses would be displaced by the project, together with their employees, and they would not have an opportunity to rent space in the new building. This would be a loss to the community.

Although the applicant may state that its project is sensitive to its surroundings and is compatible with the neighborhood, it would stand out as a major alteration to one of Washington's quiet, tree-lined residential neighborhoods. A grocery store and affordable housing would be welcome, but this project maximizes the size of the building and the number of market rate, i.e., high-rent residential units. It is much more than a low-density commercial development with some penthouses and smaller residences on top.

The Commission should find that the Valor project does not meet the standards for a PUD because it offers too few public benefits and does little to mitigate the adverse impacts that it will have on the community.

Sincerely,



Ann Stansbury  
4817 Butterworth Place N.W.  
Washington, DC 20016

Cc: Councilmember Mary Cheh  
1350 Pennsylvania Avenue, NW, Suite 108  
Washington, DC 20004