

Email to: zcsubmissions@dc.gov

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 am writing to object strenuously to the proposal by Valor Development and others to develop a 219+-unit building at 48th and Yuma Streets NW.

First, the proposed building undermines neighborhood diversity--one of the most positive characteristics of Washington, DC. There are two issues here:

- The building is far too large and too tall in relationship to the surrounding neighborhood. It doesn't provide an appropriate transition between commercial/university buildings on the one side and detached homes on the other. Both visually and in terms of building and population density, it would overpower the residences it would face on 48th and Yuma Streets NW. It would significantly change the character of the neighborhood.
- The project displaces three existing locally-owned businesses in favor of a multi-state chain grocery store. It also undermines a fourth locally-owned business, the long-established Wagshal's grocery, which, in recent years, has expanded its service to the neighborhood and now includes a restaurant and a store offering a wide variety of food products. The fact that Valor did not even offer its proposed grocery space to Wagshal's is deeply troubling.

Second, this proposal continues Valor's history of submitting misleading and incorrect diagrams. Here are some examples:

- Valor diagram CL01 (*Figure 1*) supposedly indicates pedestrian routes around the building. (Pedestrian access shown in yellow arrows.)

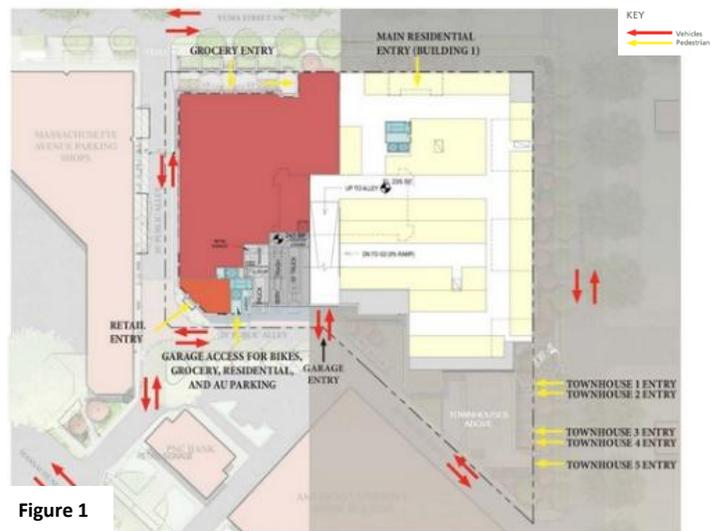


Figure 1

In fact, major pedestrian routes have been omitted from this diagram. I have added several (Figure 2) in blue.

The result of Valor's omission is that the viewer may fail to realize the severe pedestrian/vehicle conflicts I have indicated by black ovals. Both of these locations have pedestrians crossing not merely two-way traffic, as they would on a street, but diagonally across two-way traffic in which vehicles are moving both forward and backward (to access loading docks). These safety hazards are not consistent with the Mayor's Vision Zero program or, in fact, with common sense.

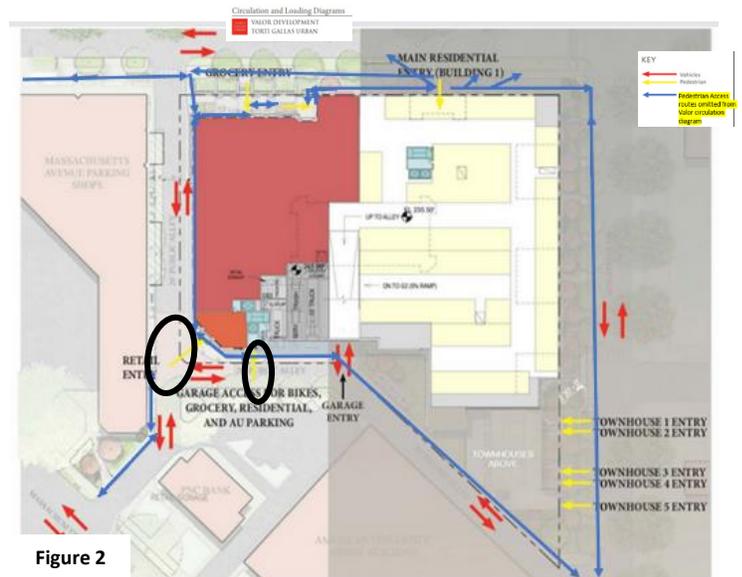


Figure 2

- Also contrary to common sense is the proposal to use a 20-foot alley as a two-way passage for trucks servicing the commercial buildings to the west of the proposed new building.

Using federal guidelines, we can anticipate that delivery trucks will be 8.5 feet (102 inches) wide in addition to having at least a three-inch allowance on each side for mirrors. Trying to fit two of these trucks side-by-side on a 20-foot alley gives trucks only 24 inches total between each other and the two structures on either side of the alley. The result is something like Figure 3:

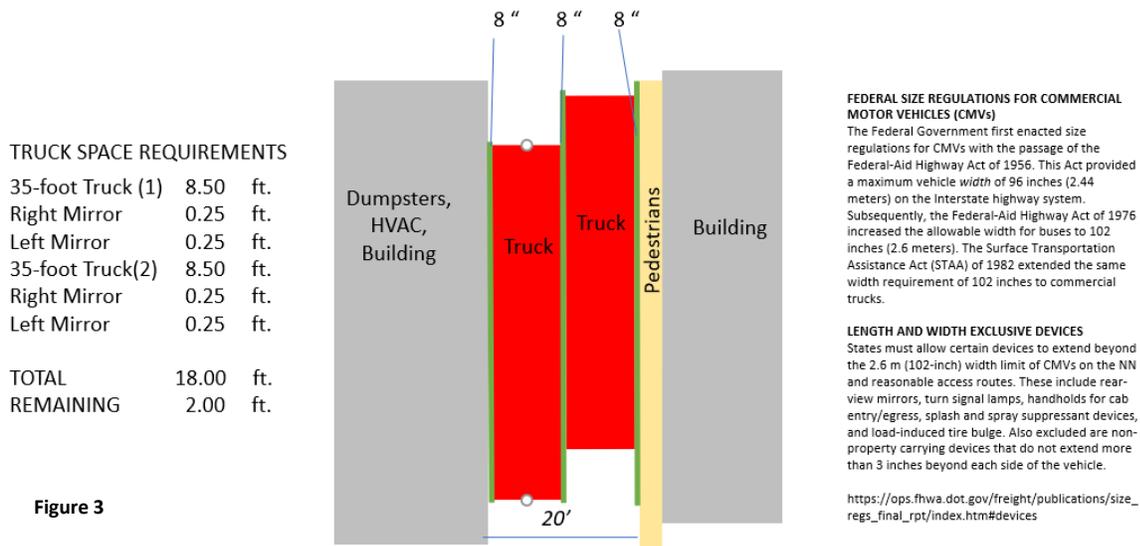
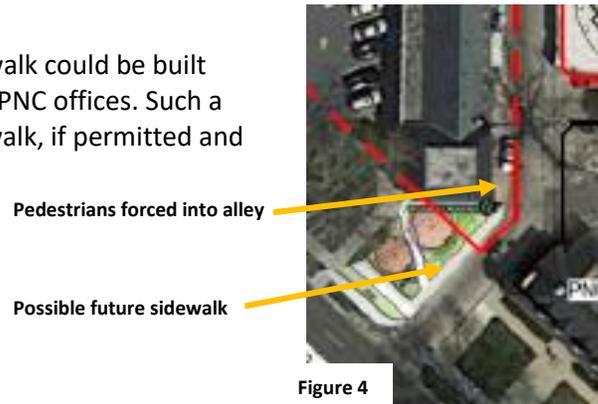


Figure 3

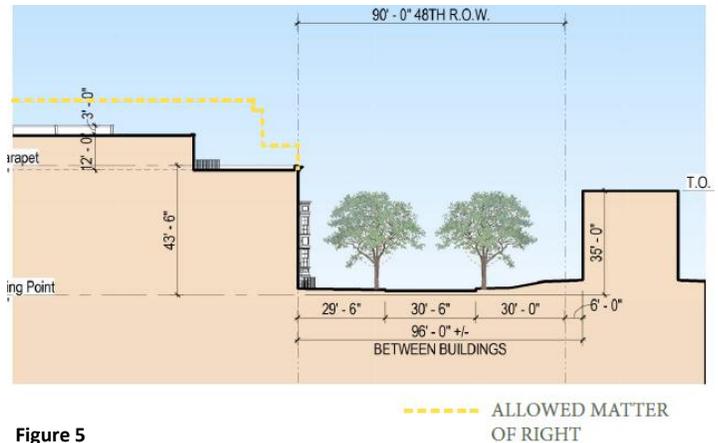
Few if any truck drivers would attempt this risky maneuver.

What are the alternatives? It's possible that two trucks might use the alley simultaneously to unload if one kindly pulled into the alley far enough to allow room for a second. But if the first truck is still unloading when the second is finished, the second is going to back up onto Yuma Street, where, in many circumstances, trucks may already be parked and waiting to unload while cars and buses attempt to pull around them and all attempt to avoid hitting parked cars. As a practical matter, truck drivers have little choice other than unloading on Yuma Street in even greater numbers than they already do, exacerbating an existing problem rather than alleviating it.

- At least two Valor exhibits (A01, L9) indicate that a sidewalk could be built beside the alley extension between the Wells Fargo and PNC offices. Such a sidewalk would increase pedestrian safety. But the sidewalk, if permitted and built, ends at the bend in the alley, and there is no space to add one moving north. Pedestrians walking between Massachusetts Avenue and the proposed building must walk in the alley drive-lanes.



- Exhibits A26 through A31 (*Figure 5 is one example*) show six comparisons between the building being proposed and a claimed “allowed matter of right.” These exhibits give the impression that, at each diagram location, the proposed building is shorter than a building that *could* be built under “matter of right.” Whether or not this “matter of right” exists for *one* of these six locations, it cannot exist for all six. Under even the most permissive interpretation of “matter of right,” a building 50 feet high on one side and 80+ feet high on the other could not cover the entire site to the extent that the proposed building does. The “matter of right” permits only 185,000 square feet, not the much larger building that Valor proposes. To put this another way, under Valor’s interpretation of “matter of right,” a residential or commercial building of the height Valor proposes could exist on only part of the site and would have to be balanced by much shorter buildings or open space on other parts.



Finally, let me draw your attention to a provision of the agreement between Valor and ANC3E that alters the traffic pattern that neighbors were previously led to expect. In earlier ANC meetings, Valor led neighbors to believe that:

- Vehicles garaged in the building would enter and exit from 48th Street.
- All trucks servicing the proposed building would be required to load and unload in the loading docks.

But the Valor/ANC3E Memorandum of Understanding states, “Plan shall include measures so that trucks or vans destined for the project after occupancy shall stop, park, load, or unload only in the alley or the Project’s loading dock.” Unloading in the alley?? The 20-foot alley with two-way traffic that is supposed to accommodate both residents trying to get out of the garage and residents trying to get in??

This makes no sense. We cannot expect cars exiting the building to wait for trucks to unload their groceries or furniture—processes that could take minutes or hours. They will not line up in a queue that extends to—and east on—Massachusetts Ave or down into the garage. They might try to pull around these trucks, risking collision with traffic coming the other way. But a more expedient maneuver would be to use the north-south alley to the west of the building, increasing traffic in the two pedestrian/vehicle conflict zones indicated in Figure 2. This traffic pattern will also reduce pedestrian safety throughout the alley and on Yuma and Massachusetts.

Commissioners, please do not to approve this application. It will saddle the neighborhood with innumerable problems for the coming decades. Neighbors expect this site to be developed. It will be. But it needs development that is suitable to the neighborhood in size, density, traffic patterns, and safety.

Sincerely,

Charlotte LeGates
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Washington, DC 20016