

CITIZENS FOR RESPONSIBLE DEVELOPMENT

Response to Valor Development's PUD
Application 19-10
Before the Zoning Commission of the
District of Columbia
October 10, 2019

Background

- Valor Development is proposing to construct a multi-use project in a residential neighborhood in AU Park.
- The Project will consist of a 4 to 6 story, 214 to 235 unit apartment building, plus 5 townhomes.
- The apartment building will rise to 81.5 feet in height.
- The Project has almost 50,000 more SF in GFA than allowed as a matter-of-right plus an additional 57,341 SF in residential in the cellar, penthouse, and projections.
- The Project is just too big for the neighborhood.

The Project Fails to Satisfy PUD Requirements

This evening, CRD will demonstrate that:

- The Applicant has failed to show that the project is not inconsistent with the Comprehensive Plan.
- The project results in unacceptable impacts on the surrounding area.
- The project fails to offer benefits to justify the development relief requested over MOR.

WHAT WILL THE VALOR PROJECT
LOOK LIKE IN THE AU PARK
NEIGHBORHOOD?

People living on Yuma Street would see this.



The Project Is Inconsistent with the Comprehensive Plan

- Infill development “should complement the established character of the area and not create sharp changes in the physical development pattern.”
The Project fails.
- New commercial development adjacent to low density residential areas should provide effective physical buffers. **No buffers are provided.**
- Height, mass, and scale of development should respect the integrity and character of surrounding areas. **The Project fails.**
- RCW Element states that development should be centered around Metrorail stations. **The Project is a mile from the Tenleytown Metro.**

Future Land Use MAP

- The FLUM designates the site as low-density commercial.
- A common feature of these zones is that they are comprised primarily of 1 to 3 story commercial buildings (not 4 to 6 story buildings).

Future Land Use Map Square 1499, Lots 802, 803, 806 and 807



**The Project Will Have Adverse Impacts on the
Surrounding Area**

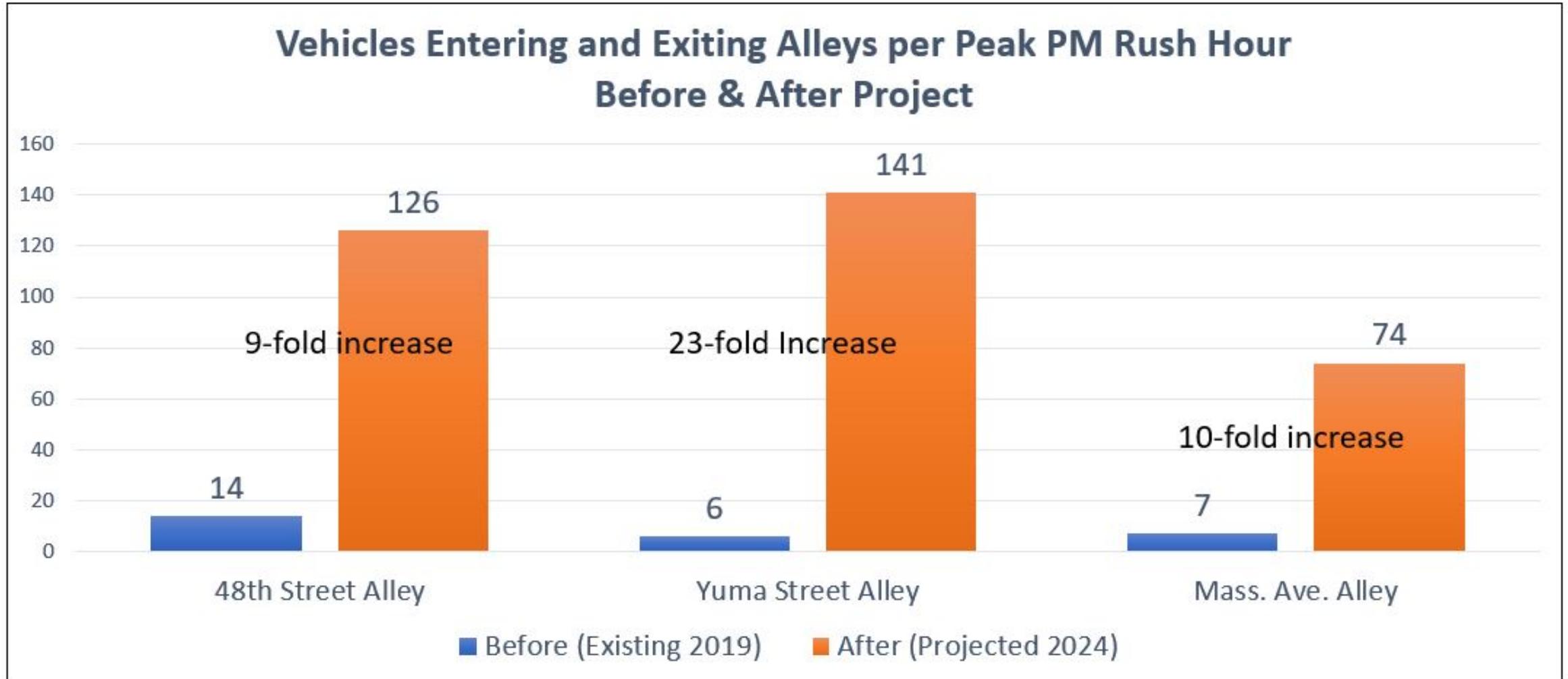
Adverse Traffic Impacts of Project Include

1. Increase in volume of traffic from both cars and trucks;
2. Increase in danger to pedestrians due to increased volume of traffic and inadequate conditions in narrow alleys;
3. Creation of dangerous traffic patterns in the alleys for both cars and trucks;
4. Trucks cannot fit in alleys and will be forced to unload on neighborhood streets.

Unacceptable Traffic Impacts

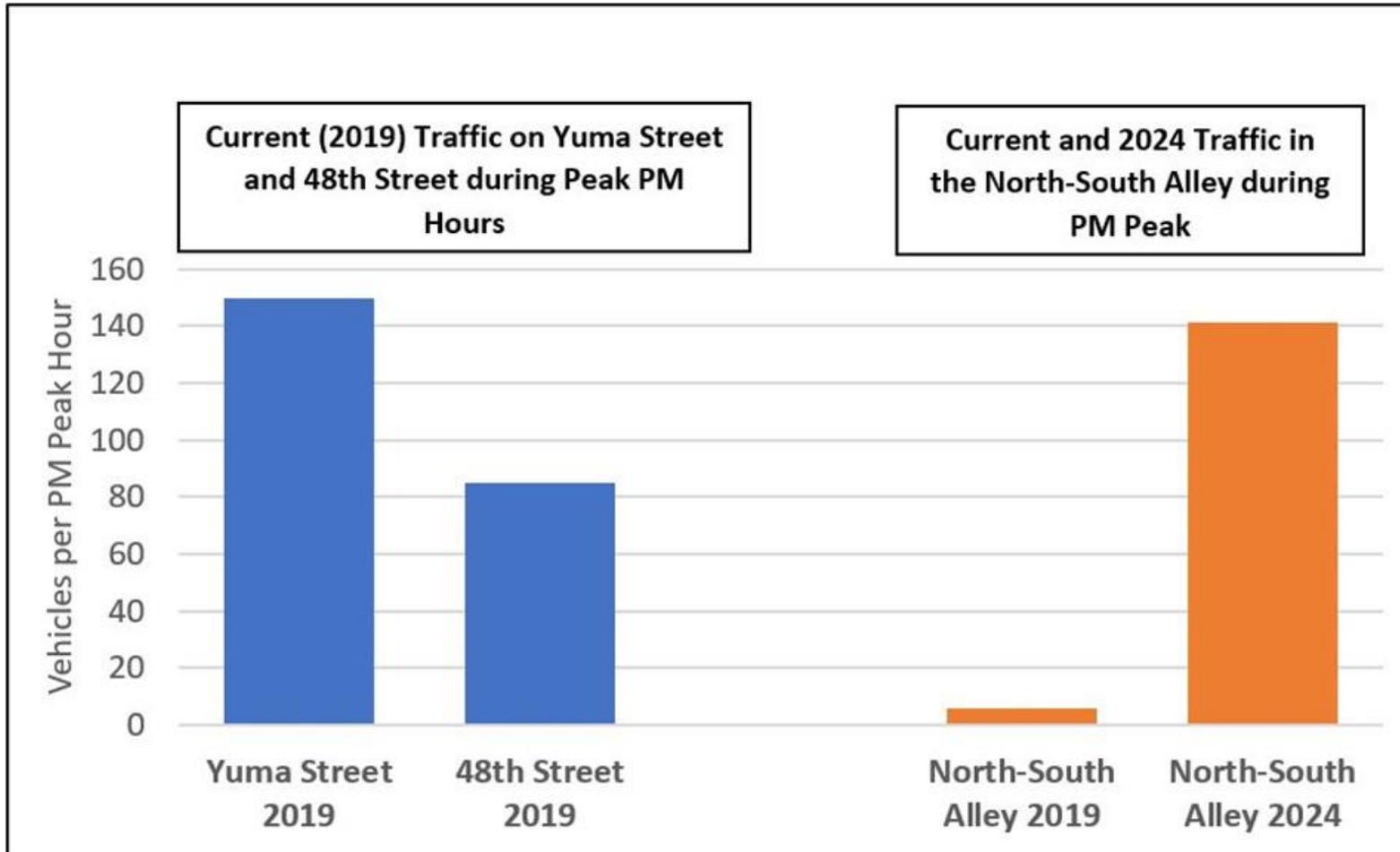
- Valor estimates that the Project will generate **341** additional trips per hour during afternoon peak hours.
- Using the same authority, CRD's traffic expert estimates that the Project will generate from **3003** to **3437** additional trips each weekday.

Unacceptable Traffic Impacts



All Trips Will Flow Through the Alleys

Alley traffic will be comparable to current traffic on 48th and Yuma Streets.



AU Loading Docks are already on the E/W Alley and are used every day.



WB 50 Truck Maneuvers - Inbound

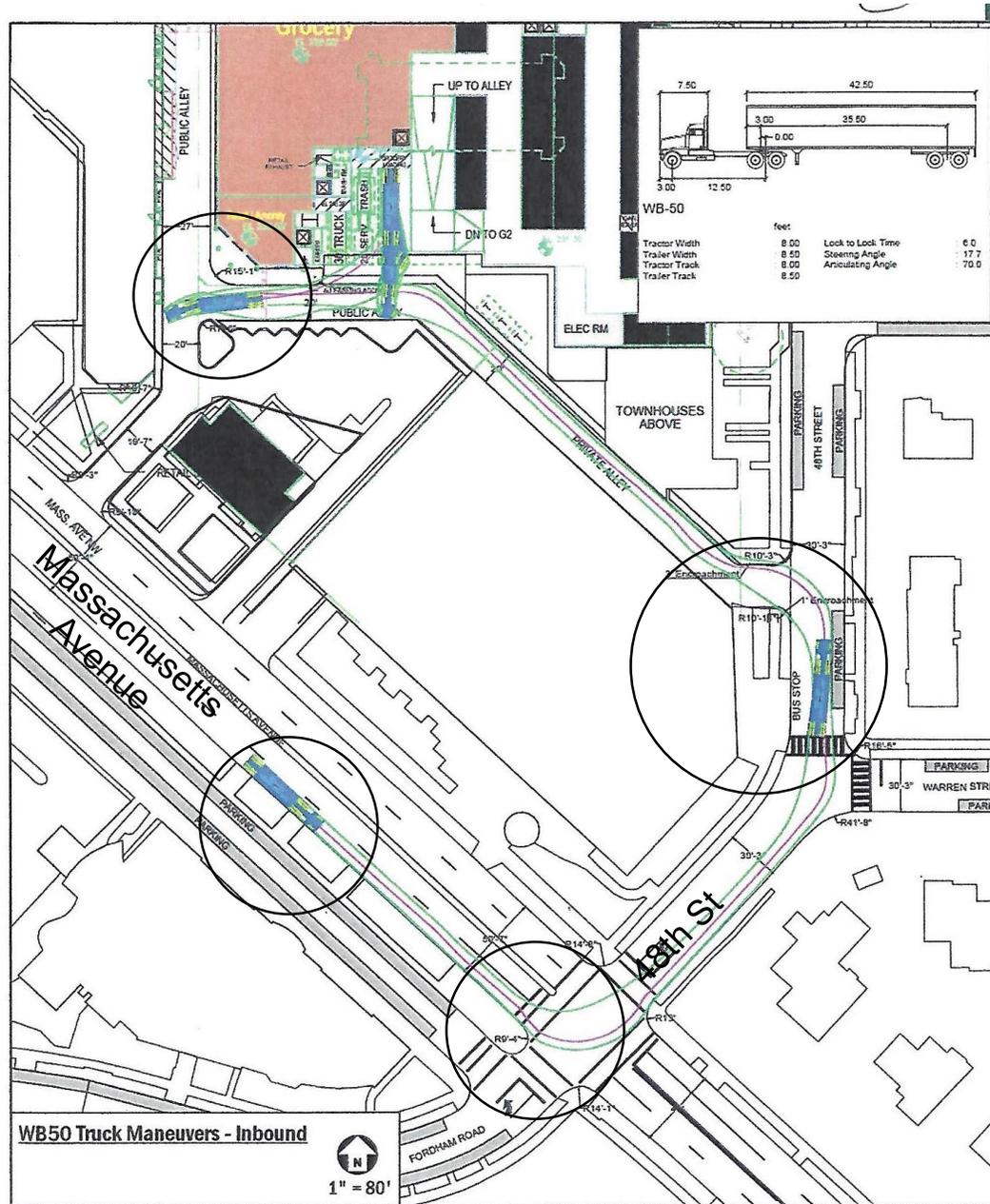


Figure 14: WB50 Truck Maneuvers - Inbound

WB 50 Truck
Maneuvers - Outbound

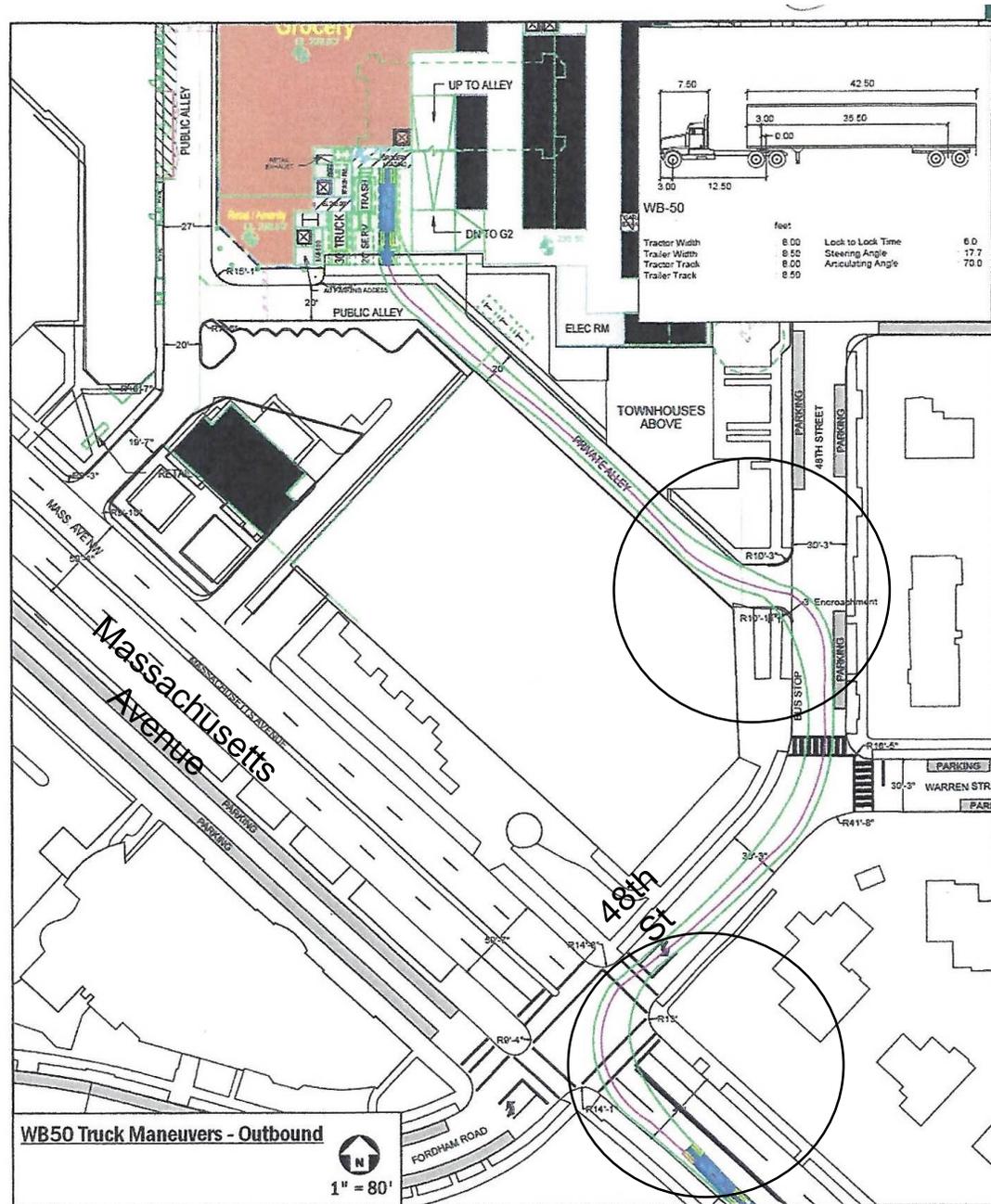


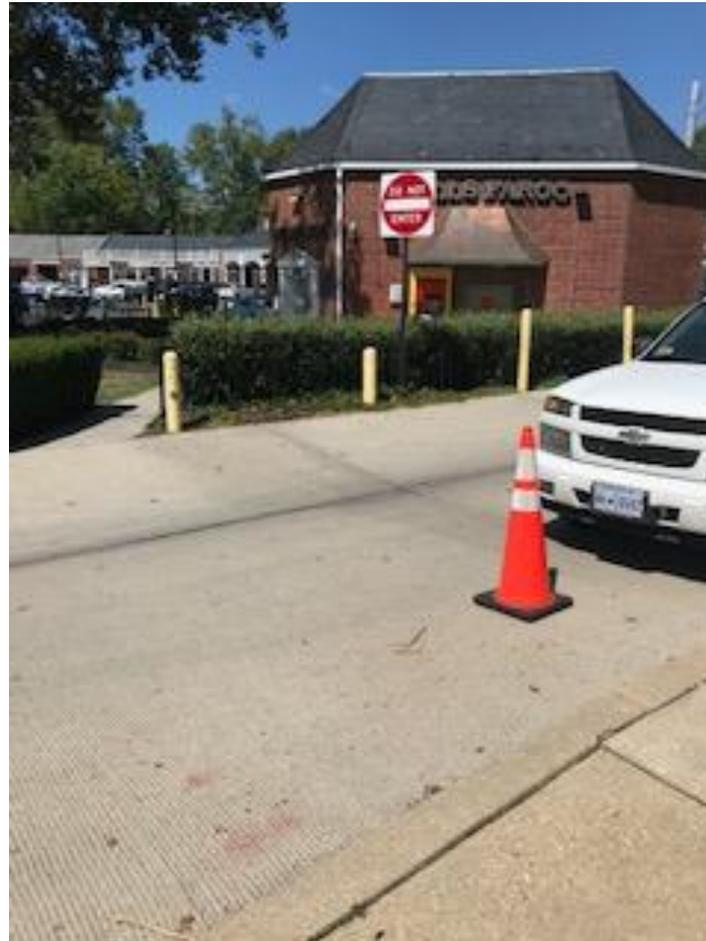
Figure 15: WB50 Truck Maneuvers - Outbound

Existing conditions in N/S alley



Proposed design of N/S alley, shifted to the east; Valor building in red; 3-ft wide sidewalk in blue

N/S Alley Exit is Currently Only One-way.



Present Alley Conditions



Other Adverse Impacts

- Parking overload
- Deprivation of sunlight
- Loss of privacy
- Loss of businesses
- Construction damage
- Environmental hazards

Height Act

Valor uses improper Base Height Measuring Point to construct an out of proportion building.

Affordable Housing

Valor continues to minimize affordable housing.

Most Alleged Amenities Are Really Attempts to Mitigate Adverse Effects of the Oversized Project

- Design cannot mitigate actual size of the building.
- Landscaping on public space replaces existing landscaping.
- Most open spaces are not publicly accessible.
- Windom Park is not likely to be used by the community.
- Pedestrian pathways in the alleys are not safe for walkers.
- HAWK light is an attempt to mitigate hazards created by the Project.

- Trash management is necessary for any building.
- Harm comes to local businesses and their employees.
- No credit can be given for nearby shops, public schools, and a Metrobus route.
- LEED Gold certification is not a special benefit.
- Bare minimum of affordable housing is offered.
- Claim that MAPS would be preserved by stripping its density is false.
- Grocery store is not an amenity; ten grocery stores are within a three-mile radius.

GROCERY STORES WITHIN A THREE-MILE RADIUS OF THE SUPERFRESH SITE (ACCORDING TO THE SHORTEST ROUTE DISPLAYED ON GOOGLE MAPS):

- Whole Foods River Road 1.9 miles
- Whole Foods Tenleytown 1.1 miles
- Whole Foods Willard Avenue 1.7 miles
- Giant Cathedral Commons 1.7 miles
- Giant Connecticut Avenue 2.0 miles
- Giant Westbard 2.0 miles
- Magruder's Connecticut Avenue 2.3 miles
- Giant Friendship Heights 1.8 miles
- Safeway Sangamore Road 2.9 miles
- Safeway Georgetown 2.7 miles

Historic Preservation

- MAPS receives *no tangible and quantifiable* benefits from the PUD, as required by X-11 §§ 305.3.
- Prior cases where PUDs included landmarks all provided **direct** benefits to those landmarks.
- Whatever unused density MAPS may possess and how it can be utilized is not a question that ZC alone can decide.

Closing Points

Project site is designated as Low Density Commercial.

Project site is zoned for moderate density.

At 4 to 6 stories, Project in actuality is medium density.

Durant says a 4-7 story apartment building is medium density.

Durant holds that visual impact abatements have no bearing in determining whether a project is moderate or medium density.

Conclusion

The Project fails to meet the requirements for a Planned Unit Development under the Zoning Regulations.