

October 10, 2019

## TESTIMONY OF SHELLY REPP

Good Evening Commissioners.

Thank you for the opportunity to speak on behalf of Citizens for Responsible Development (CRD). My name is Shelly Repp.

Valor Development is proposing to build a four to six story, 214 to 235-unit multi-use apartment building in a residential neighborhood in American University Park. The apartment building will rise to 81.5 feet and include around 50,000 more SF of Gross Floor Area than is allowed as a matter-of-right on the site. And this doesn't count the more than 57,000 SF in residential space in the cellar, penthouse and projections. The Project would overwhelm both the surrounding residential neighborhood of 2-story homes and the commercial neighborhood of mostly 1 to 3 story buildings.

At the outset, I want to clearly state that CRD supports the Mayor's initiative for more housing citywide, and the need for more affordable housing in Ward 3. Valor is proposing only one percent more affordable housing above its interpretation of what is minimally required, and well

below the fifteen percent, with half at 50% MFI, recommended by the Department of Housing and Community Development. We also want to remind the Commission that in 2018 Valor decided to circumvent a higher affordable housing requirement by sinking the building six feet into the ground.

CRD this evening will demonstrate that the Applicant has failed to meet its required burden of proof to show that the Project meets the PUD requirements. Specifically, that the Project is not inconsistent with the Comprehensive Plan, that the Project does not result in unacceptable impacts on the surrounding area, and that the Project includes specific benefits to justify the developmental relief requested over matter-of-right.

The fundamental flaw with the Project is that it is simply too big for the neighborhood. CRD has engaged Digital Design and Imaging to evaluate the height, massing and scale of the current design on the nearest neighbors.

Digital Design and Immaging

While our written presentation goes into more detail, the fundamental reason why the Project is inconsistent with the Comprehensive Plan is that the Project, which faces two residential streets, does not complement the character of the neighborhood. Effective buffers for a Project that sits mostly on the property line are not included. Contrary to the Comprehensive Plan, it creates an “overpowering contrast in scale, height and density with the surrounding residential and commercial neighborhood.” Simply put, the massing of this Project belongs on a major thoroughfare, not two local streets.

The Project is also inconsistent with the Future Land Use Map (“FLUM”). The FLUM designates the SuperFresh site as Low Density Commercial, which is defined as zones “comprised primarily of one to three-story commercial buildings.” With the sole exception of the American University Building, this designation accurately describes the SuperFresh site, Lots 802 and 803, and the commercial area across Massachusetts. In fact, the very existence of the oversized AU Building argues for lower density on the adjoining lot facing the neighborhood.

A major negative impact is the additional traffic the Project will generate - 283 additional trips per hour during the weekday peak afternoon hours, according to Gorove/Slade. Using metrics from the Institute of

Transportation Engineers, our traffic expert estimates that daily weekday traffic will increase by more than 3000 trips. This traffic will come from and leave through the adjoining street network. All traffic entering and leaving the site will be funneled into the alley network bordering the SuperFresh lot. As shown on this slide, traffic in the three 20-foot wide alleys leading into the site will increase by from 900 to 2300 percent. The alley traffic during the PM Peak Hour will be comparable to the current traffic on 48<sup>th</sup> and Yuma Streets.

Also, we find Gorove/Slade's conclusion that the Project will result in fewer trips than existing uses unbelievable. Except for the grocery space, the rest of the building was fully occupied in March of this year when Gorove/Slade did its traffic counts, so they have the numbers. They are extremely low. The Superfresh grocery consisted of roughly 16,000 square feet of grocery space, plus lower level dry storage and other space that did not generate many trips. It defies reason to believe that the SuperFresh grocery and the other existing retail could generate significantly more trips than the 16-18,000 SF grocery apparently being proposed plus 219 or more residential units.

Trucks for the Spring Valley Shopping Center will unload in one of the alleys. Also, American University's loading docks, which are used every

day, are in the other alley. It is interesting that the AU loading docks are not shown or discussed in the Application. How are cars and trucks for the Project going to maneuver around these trucks in the alleys? The increase in traffic creates dangers for pedestrians as well.

Barbara Repp will now explore the conflicts in the alleys in more detail.

Before turning this over to Ann Stansbury, I refer you to our written submission for a discussion of other adverse impacts and additional topics which we don't have time to address this evening.