

October 24, 2019

Mr. Anthony Hood, Chairman
D.C. Zoning Commission
441 4th Street NW, Suite 210S
Washington, D.C. 20001

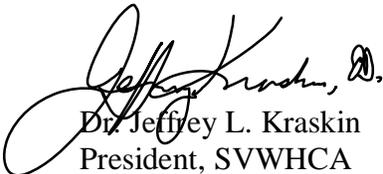
RE: Z.C. Case No. 19-10 – Valor Development, LLC Consolidated PUD @ Square 1499: Comments From the Spring Valley-Wesley Heights Citizens Association and Neighbors For A Livable Community (“Spring Valley Opponents”) On Affordable Housing Issues Raised In The Case

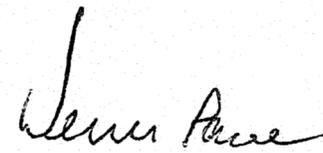
Dear Chairman Hood and Members of the Commission:

The Spring Valley-Wesley Heights Citizens Association (SVWHCA) and Neighbors For A Livable Community (NLC), referred to as “Spring Valley Opponents,” submit the following comments in the above-referenced case in response to the request by Zoning Commission Chairman Anthony Hood for a one-page response on issues related to affordable housing in this case.

Thank you for the opportunity to offer these comments.

Sincerely,


Dr. Jeffrey L. Kraskin
President, SVWHCA


Dennis Paul
President, NLC

Affordable Housing Issues (Re: Z.C. Case No. 19-10): Comments From Spring Valley Opponents

Chairman Anthony Hood has expressed concern with the limited amount of affordable housing provided through inclusionary zoning in the Rock Creek West planning area. The Spring Valley-Wesley Heights Citizens Association and Neighbors for a Livable Community (Spring Valley Opponents as a joint party) testified in the above referenced case that an adequate supply of affordable housing would be a critical benefit and should be a priority for approval of any PUD application, especially given the city's new housing initiative announced recently by Mayor Muriel Bowser. We appreciate that our testimony was the impetus for Chairman Hood to seek (one-page) comments on affordable housing issues raised within the context of this case.

As a March 2018 report from the **DC Policy Center** concluded, "there is no easy solution" to the city's affordable housing problem.

As we testified at the October 10 Zoning Commission hearing in this case, inclusionary zoning is not the only tool in the city's affordable housing toolbox and, as other cities' experiences show, it is not a silver bullet for solving the affordable housing crisis. A January 2019 report, "*Inclusionary Zoning: What Does Research Tell Us About the Effectiveness of Local Action?*" prepared by the **Urban Institute**, outlined the limits of relying on inclusionary zoning to produce sufficient affordable housing and even suggests that policies encouraging home ownership over rental housing may be a better long-term solution.

In a 2019 report, "*Local Tools to Address Housing Affordability*," the **National League of Cities (NLC)** Center for City Solutions identified five tools for addressing the affordable housing crisis: (1) inclusionary zoning; (2) rent control;(3) housing vouchers; (4) housing trust funds; and (5) state tax vouchers.

The Rock Creek West area may lag in affordable housing provided by inclusionary zoning, but it has the second highest number of rent-control units in the city. Although rent control is not specifically tied to incomes, the NLC report notes that rent control "helps existing residents to remain in their homes; stabilizes neighborhoods; and reduces gentrification." Gentrification has displaced a significant number of residents in other parts of the city; rent control in Rock Creek West has provided housing where residents can afford to live.

There are two garden-style apartment buildings in Spring Valley with 28-rent controlled 2- and 3-bedroom housing units. The size of these buildings reflects the overall density and character of the surrounding neighborhood. Although we support additional multi-unit housing at the SuperFresh site, we believe more affordable housing can be provided while at the same time reducing the density of the building to preserve the character of the surrounding neighborhood – although this may require converting planned retail to housing.

At issue in this case is whether Valor's proffer of 12 percent affordable housing – just two percent above what is mandated under the PUD regulations – constitutes an adequate and sufficient public benefit. We concur with the D.C. Department of Housing and Community Development (DHCD) that Valor should increase its affordable housing proffer to at least 15 percent.

Given the intensity of the proposed development and its location in the American University Park-Spring Valley neighborhoods, we believe a 15-20 percent affordable housing requirement is more appropriate. Mill Creek, which has been designated to develop the site, has a history of developing luxury rental apartment buildings across the country, including new luxury rental buildings in Adams Morgan and the District Wharf. According to **Smart Asset**, a financial advisory company, an individual needs to earn at least \$133,000 before taxes to afford the average rental price in Washington, D.C. Given the neighborhood location of the proposed building and the likely targeted audience, these units will almost certainly exceed the average rental in the city. Valor's proffer for only 5,000 square feet for affordable housing over the minimum requirements in the PUD rules is inadequate. Increasing the affordable housing requirements to 15 percent will provide nearly 41,000 sq. ft – probably about 37 units; increasing to 20 percent will mean 54,000 sq. ft, or approximately 49 units. **Valor can afford the increase to 20 percent in its proffer and the Zoning Commission should demand it.**

CERTIFICATE OF SERVICE

We hereby certify that copies of this filing were sent by e-mail on October 24 to the following:

Ms. Jennifer Steingasser
DC Office of Planning
Jennifer.steingasser@dc.gov

Norman M. Glasgow, Jr.
Holland & Knight (on behalf of Valor Development)
Norman.glasgow@hklaw.com

Advisory Neighborhood Commission 3E
sherryacohen@gmail.com

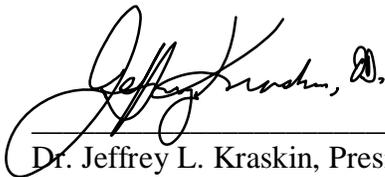
Advisory Neighborhood Commission 3D
3D@anc.dc.gov

Edward L. Donohue
Donohue & Stearns, PLC
edonohue@donohuestearns.com

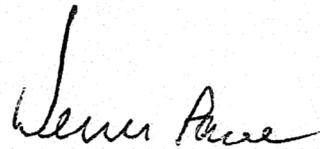
Citizens For Responsible Development
Repper3@aol.com

Spring Valley Neighborhood Association
wclarkson@kslaw.com

Ward 3 Vision
Johnwheeler.dc@gmail.com



Dr. Jeffrey L. Kraskin, President
Spring Valley-Wesley Heights
Citizens Association



Dennis Paul, President
Neighbors For A Livable
Community