

January 11, 2018

Mr. Anthony Hood, Chairman  
DC Zoning Commission  
441 4<sup>th</sup> Street, NW  
Washington, DC 20002 via [zcsubmissions@dc.gov](mailto:zcsubmissions@dc.gov)

RE: **Support** for Zoning Case No. 16-23, Voluntary Design Review for Valor Development, LLC

Dear Chairman Hood and Members of the DC Zoning Commission:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, DC region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We are pleased to express our support for Voluntary Design Review Zoning Commission case number 16-23. The project is known as the Ladybird project at the former Superfresh grocery store site at the Spring Valley Shopping Center. We support the proposed mixed-use development that will include 219 rental apartments, a small grocery store, and a number pedestrian enhancements for this neighborhood commercial node. The project is sensitively designed to respect its single-family home neighbors and contributes to a more vibrant neighborhood shopping node. In addition to increasing the supply of housing with 219 new rental apartments, we recognize that a majority of the units are larger -- 2 and 3 bedroom units. This is an additional benefit as DC's household size is growing. Further, 22 of the new apartments, or 10%, will be affordable at 60% median family income.

The Ladybird project offers to enhance the amenities of the Spring Valley Shopping Center with new retail and improved connectivity and walking conditions. These are all good benefits for the neighborhood, and help make this part of the city more sustainable with an increased walkability. While not a transit hub, the site is a 15-20-minute walk to the Tenleytown Metro station, in addition to being served by local bus service. All this adds up as a good place to offer multifamily housing opportunities.

### **Project addresses DC's need for more housing**

We support this project and encourage its advancement because it will deliver more than 200 new homes to an area that has seen little increase in housing opportunities, even as the city has grown rapidly. DC has returned to 1970 population levels and added 110,000 more people since 2006. The city is projected to continue to grow by another 57,000 people by 2020.<sup>1</sup> This means we need to build more housing.

Ward 3 and the Rock Creek West planning area, where the project is located, substantially lag behind the rest of the city in terms of accommodating new housing, adding only 3% of the city's growth since 2006. While we don't expect Rock Creek West to absorb the level of growth of more central parts of DC, we should expect Rock Creek West to do more than 3%. This part of the District hosts many affluent and desirable neighborhoods.

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<sup>1</sup> Source: DC Office of Planning Comprehensive Plan Framework Draft Amendments, 9/8/17.

**Project delivers substantial amount of new affordable housing, especially for area**

This project addresses a great concern: the availability and distribution of affordable housing opportunities. This project offers improvements on the lagging performance of Rock Creek West by providing a commendable 10% of the 219 units as IZ units, all affordable at 60% median family income.

This project will be one of a few offering new housing, and new affordable housing opportunities in Rock Creek West. Since 2015, only 0.6% of the city’s new affordable housing units (53 units) have been built in in Rock Creek West or Ward 3 (see attached map), and all of these units are IZ units in market rate developments. By comparison, Ward 4, though similar to Ward 3 in land use, has produced 13% of the city’s affordable housing since 2015. The 22 affordable IZ units from the Ladybird project offers compared to recent affordable housing production would represent 42% of all affordable homes built West of Rock Creek Park. Clearly, without more market rate residential developments like this one, there will not be opportunities to utilize IZ and bonus densities to create greater access to these sought-after neighborhoods.

**Project oversupplies parking**

We are disappointed that so much parking is being proposed as a part of this project. We understand that a large share of it is due to an easement with American University (AU). However, it still makes no sense since AU is already over-parked, and not fully utilizing its existing parking supply. By supplying so much parking, we will encourage higher rates of car ownership and driving. For the cost of a few parking spaces, this project could install and operate a Capital Bikeshare station which could better connect residents to the Tenelytown Metro station and other destinations.

It’s good that the applicant has agreed to offer the parking separately and at market rate, but by creating such a large supply of parking, the market price will necessarily fall below the cost to build and maintain it. Thus, everyone ends up helping to pay for parking, regardless of who rents a space.

We do appreciate the Capital Bikeshare memberships but recommend that the membership benefit be extended to at least three years for tenants.

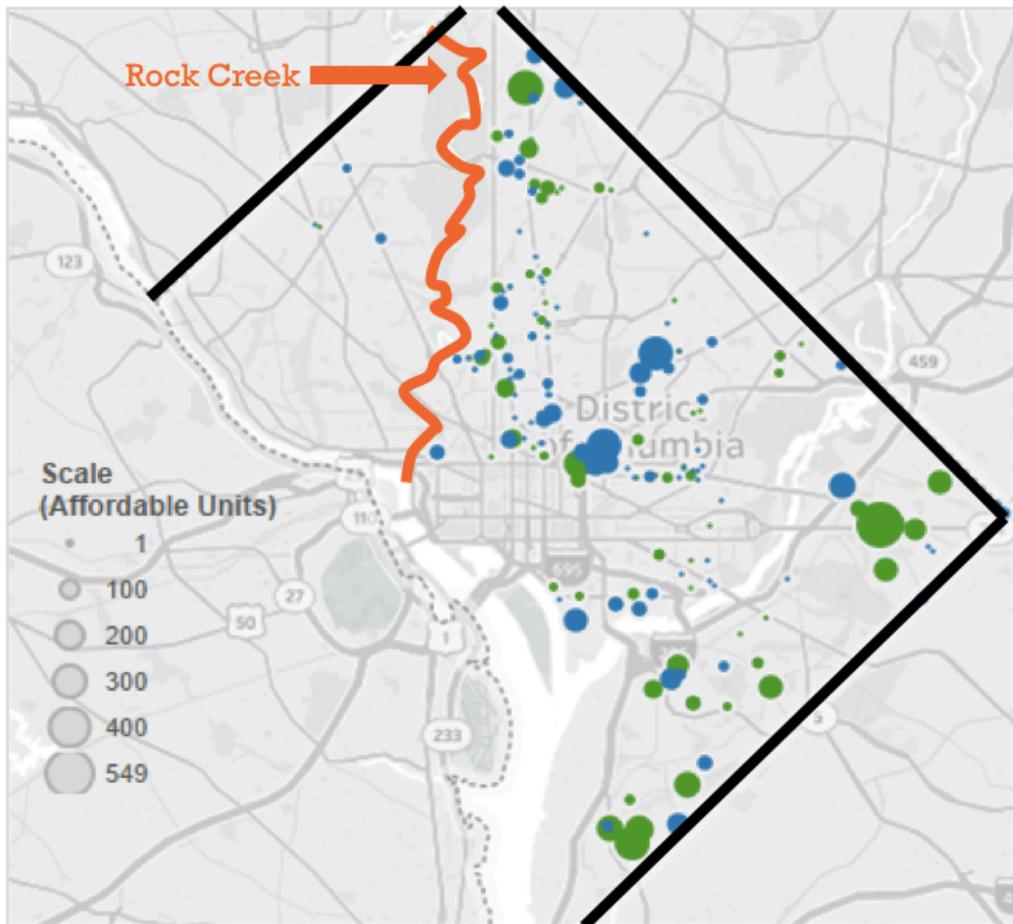
Thank you for your consideration.

Sincerely,



Cheryl Cort  
Policy Director

### Affordable Housing Completed & Under Construction Through May 2017



#### Project Status

- Completed 2015 to Date
- Under Construction

Source: DC DMPED Economic Intelligence Dashboard (Red Line Added)