
October 4, 2019

Mr. Anthony Hood, Chairman
DC Zoning Commission
441 4th Street, NW
Washington, DC 20002

RE: **Support** for Zoning Case No. 19-10, Consolidated PUD Lady Bird by 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 the PUD case number 19-10. We testified in support of this project in 2018 when it was proposed as a design review. We are pleased to see that the project still offers similar benefits to the community and the city, with 219 apartments in high-amenity neighborhood. We appreciate that bringing back a small grocery store is of particular value to many nearby residents, and also a feature that further reduces the carbon footprint of households who have the opportunity to live here.

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 11%, will be affordable -- most at 60% median family income (MFI), and 3 at 50% MFI.

The Lady Bird 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 and Ward 3's need for more housing

We support this project and encourage its approval 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 2020.¹ 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 desirable, high-amenity neighborhoods.

Project delivers substantial amount of new affordable housing and larger units

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 11% of the 219 units as IZ units, affordable at 60% and 50% median family income. This modestly exceeds the required 10% set aside of IZ units, and provides three valuable 50% MFI units as well. The development is commended for doing so. Office of Planning and DHCD have both suggested that the developer provide additional affordable units. We would welcome these additional benefits.

We commend DC Office of Planning for its analysis on page 20 showing that only 1% of income-restricted affordable housing occurs in Rock Creek West. This is a striking map that shows how little opportunity lower income households have to live in this amenity-rich part of the district, and enjoy its many benefits. Clearly, our land use policies are failing to deliver on our obligation to affirmatively further fair housing, and reduce economic and racial segregation. That's why we should also be enthusiastic about welcoming the Lady Bird project with its 29 affordable homes to this high-opportunity neighborhood. In fact, 29 homes would represent more than half of the existing 53 affordable units built since 2015. 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 Rock Creek West's 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 is not fully utilizing its existing parking supply. Supplying so much parking, encourages 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.

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

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 robust TDM plan. We commend the Capital Bikeshare memberships but recommend that the membership benefit be extended to at least three years for tenants.

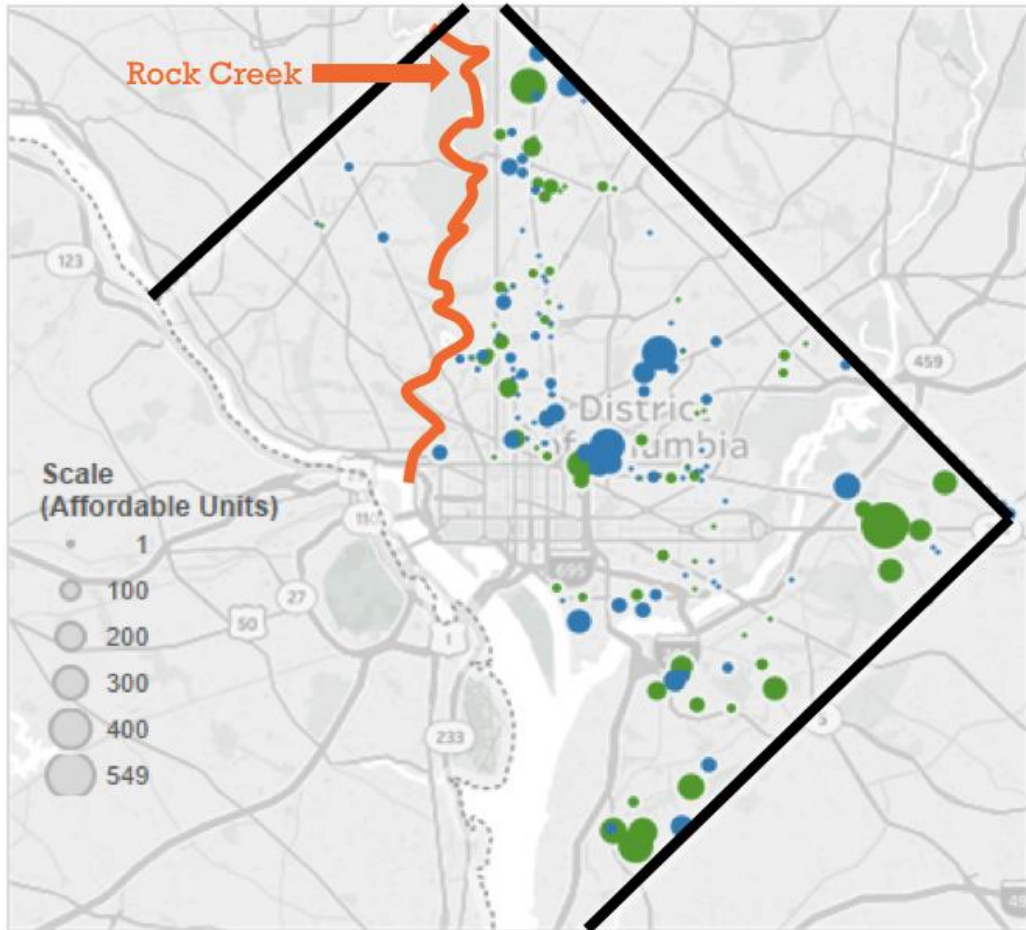
Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

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)