

May 10, 2009

Anthony Hood
Chair
D.C. Zoning Commission
Suite 200 South
441 4th Street, N.W.
Washington, D.C. 20001

Re: Case # 08-15

Dear Chairman Hood,

The Zoning Commission has heard detailed testimony about the potential impacts associated with the Giant PUD application and also testimony about the nature and scope of the zoning relief requested, but due to the constraints of the hearing process there has been little said about the aesthetic aspects of the PUD. I am submitting this comment so that the Zoning Commission is encouraged by at least one resident to consider these significant features of the PUD.

Two proposed new buildings covering nearly two thirds (2/3) of the Wisconsin Avenue commercial area in Cleveland Park will create a formidable presence that could blend with the existing commercial area and the distinctive adjoining neighborhoods or could be less than it should be. The Cleveland Park Historic District parallels the length of the project and continues both to the north and south of the project. The view sheds to the front of the project will be entirely from the historic district side of Wisconsin Avenue. Prior to the first PUD submission I asked the Office of Planning to involve the Historic Preservation Office (HPO) in reviewing the massing and architecture of the plans. I attended two meetings at HPO to discuss these issues. The second meeting included an architect, Stephen Muse, who has designed numerous additions in the historic district and who had offered to critique the plans on the basis of his planning and design expertise.

Mr. Muse suggested that the massing of the North Block building would overwhelm the townhouses and small apartment building across Wisconsin Avenue in the block between Newark Street and Norton Place and also the single family homes between Norton Place and Ordway Street. He proposed that the North Block structure should be broken into two structures and that the height of the Wisconsin Avenue building should be lower to complement the structures across the street, but that a separate Idaho Avenue-facing building could be taller (the proposed 5 stories) in reference to the taller PUD building known as Vaughn Place. The HPO staff responded that they concurred and had already made that recommendation to StreetWorks, but the developers did not want to change their proposal.

There is no existing building on Wisconsin Avenue within the ANC 3C boundaries that extends a city block as the proposed North Block building would. The Vaughn Place PUD has a 90' setback from Wisconsin Avenue, a one-story, set backed, retail portion at

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the corner of Wisconsin Avenue and Idaho Avenue, and a large setback on Idaho Avenue that accommodates treeboxes, sidewalk, large planting area, and another deep walkway in front of the retail. I urge you to consider asking the applicant to break up the massing as was recommended to them. An alternative would be to step back residential floors as the Historic Preservation Review Board required at the Best Buy site in Tenleytown. The scale of the Macomb-Wisconsin commercial area should be preserved despite attempts to abruptly change the scale in the north block and to effectively disconnect this block from the scale of the remainder of the commercial area. It is noteworthy that the HPRB recently denied an application to move a Wisconsin Avenue house that is located across from the southern end of the commercial area and that is bordered on one side by a large apartment building partly because they rejected the notion that Wisconsin Avenue should be homogeneous and that existing structures must give way to larger apartment buildings. I urge the Zoning Commission to use as your reference point the predominate scale in this area and not the minority of mid-rise apartment buildings.

Design

There are two design approaches presented in the PUD and I urge you to ask the applicant to apply the South Block approach to the North Block. On the South Block the low scale of the existing buildings on the block face is replicated in the proposed South Block building. The horizontal metal cornice and the horizontal windows wrap around to Newark Street where the loft residence windows present a smaller, more residential version of the Wisconsin Avenue windows. In contrast, the North Block building lacks the uniformity and simplicity of the South Block design.

The proposed North Block Wisconsin Avenue façade is 70' longer than the proposed South Block building. As mentioned above, the building would be more compatible with its setting if its mass were divided into two buildings so that there isn't the need to present so many different elevation styles and building planes to camouflage the enormous scale of the building. The resulting building form is not found in this area or in many locations in the District. The typical apartment building form in the District is a flat front or a central section, often recessed, with two adjoining wings or a repeated pattern of projections or recesses. What is consistently found in District multi-family buildings is regularity. While the changes in the design since setdown were an attempt to bring the design closer to the District form it has not gone far enough. For example, there are numerous window styles presented which is in stark contrast to the South Block building and the neighborhood norm. I urge you to ask the applicant to further simplify the form and to model the lightness of the South Block architecture. The vertical elements, which are pronounced on the North Block building, should be downplayed in favor of more horizontal features that could be achieved with brick design, light cornices and window patterns. This effort would be much easier if the building height was reduced or the additional floors were set back from the ground floor.

I think it is a mistake to try to design the North Block as if it had an organic history when it clearly is a new building. The goal should be to make it look like it fits in Cleveland Park and not appear to be plucked from downtown and oddly inserted into a low density

neighborhood with an established, albeit small, commercial area. The combination of low scale structures or green space separating taller structures from the avenue is distinctive in this area. The proposed North Block building would interrupt the established rhythm, especially on the western edge of the avenue, and would interject an odd scale to the regularity of the existing commercial area.

Materials

Building Base:

The PUD proposes to use black granite at the base of both buildings. This is a downtown treatment that is rarely seen on Wisconsin Avenue. Typically, the wall finish -- in this case its brick -- is continued to the ground. The applicant may be trying to replicate the granite that bordered the bottom of the bay windows of the Murphy's store on the south block. Since that building will be demolished there is no reason to feature this treatment throughout the project when the result will look more downtown commercial use than neighborhood shopping use.

Balconies:

The January 30, 2009 submission is unclear where balconies are being proposed on the North Block. The exhibits appear to show extensive use of balconies, but the materials list link the metal railings to only some sections of the proposed building. More information about the detailing and location of balconies is needed. Are they all projecting concrete slab balconies or are they designed to be enclosed with the building fabric, similar to Alban Towers? Are they only on the higher levels? How many balconies would there be? Balconies can often enhance architecture if they are incorporated into the building design, but add-on slab floors surrounded by metal fencing can often be little more than uncounted square footage leading to higher rents. If exemplary architecture is a PUD goal then treatment of balconies should be a design feature that also protects the quality of life for residents of nearby buildings and adjoining neighborhoods.

Roof Structures:

The roof structure enclosure for the South Block is not shown and it should be. Also not shown are the series of roof top pop-up stairs from the individual loft apartments. These are located at the edge of the building. It is noteworthy that these apartments would share a roof garden at their first level and individual terraces at their second level. Is it necessary to also have rooftop terraces accessed from a visible series of pop-up roof structures providing access to rooftop entertainment across the street from the historic district?

On the North Block the proposed roof structure is imposing. The metal structure reads as a partial roof because it is so close to the edge of the building. This adds considerable bulk and height to the buildings and introduces a substantial use of metal. It is unclear why such large roof enclosures are necessary and why they can't comply with zoning regulations regarding setback. The roof plan exhibit included with the October 2008 submission shows only a staircase and elevator shaft that require enclosure and both are

setback from the exterior walls. If there are other roof structures they should be identified, but setback requirements should be honored. And it would be more consistent with the surrounding residential neighborhood if the enclosure is brick rather than metal.

There is a missed opportunity to add solar panels and/or green roofs (as distinct from roof gardens) on these large flat roof spaces. I urge the Zoning Commission to ask the applicant to design these spaces in order to provide a more energy efficient building.

Ground Floor Design

What is the design of the bulkhead? The scale of the elevations in the October submission is so small that important details are not displayed. This area should be designed with at least a cornice. Also, it appears (scale of elevations renders them hard to read) that the ground floor retail spaces will have significantly increased heights from the existing heights for current ground floor retail. In some cases it may be as high as 20'. Since the PUD is only part of an existing commercial area that emphasizes a low scale, neighborhood character, it would be desirable to have the PUD ground floor begin at the current heights and increase as necessary as the ground slopes. Where the heights are out of scale with the existing character of the commercial area, the new building should emphasize cornices that intersect the vertical window expanse and any approved signs and awnings should be located at this level. Interior spaces could still take advantage of taller room height and natural light, but the exterior effect would be more human scale and more appropriate to the existing scale of the neighborhood commercial area.

Signs:

Flat mounted signs should not be obstructed by awnings. Sheet 703 shows all types of signs clearing 10' which may be an excessive height. DC Construction Code allows these signs to clear 8'. Signs are important to identify a store, but they can clutter and overwhelm a small shopping area as this one is. Repetitive and redundant signs should be avoided and there should be sensitivity to the impact of signs on the adjacent historic district. Sheet 716 limits primary signs to one per building tenant, but states that additional secondary signs would be permitted. This is overkill. The style of the primary, and only, sign should be flat mounted or a flat, two-sided blade, but the use of multiple signs should not be allowed. Banners, flags, vertical signs, and sidewalk signs in public space should not be allowed or should be limited. In large, multi-story retail areas such diversity of signs may differentiate the retail and create a visual presence that attracts people to a regional shopping center, but placing large vertical banners in a small neighborhood shopping area is unnecessary. Flat mounted temporary banners advertising a sale should be allowed, but there should be restrictions on how many are allowed in the PUD area at a time.

The historic Giant Food neon letters proposed for the bulkhead of the south building should be allowed. However, the additional branding of the site that has been proposed, including the sign projecting above the roof on the South Block should not be allowed. (A similar proposed vertical sign has been rejected for the new Safeway on Wisconsin Avenue north of Georgetown.) Giant has been located at the corner of Wisconsin Ave.

and Newark St. for decades so there is no need to locate the store with signage. The historic Giant sign will be significantly more prominent than any other retail sign and will be visible from a distance so the branding of the site is accomplished. The proposed rooftop Giant sign would be anticipated in a large shopping center where the store is set back from the road and patrons might have difficulty locating it --- that is not the situation here. I hope the Zoning Commission will reduce the number of Giant signs, starting with the sign on Wisconsin Avenue

Windows:

The North Block ground floor windows should include bay windows to complement the South Block design and to break up the expanse of ground floor glass. While Sheet 710 recommends that storefronts be mostly glass, the pictures on this page demonstrate the charm that is provided when windows are framed with solid materials that can provide color, architectural embellishment and interest. Balancing transparency with compelling design will attract patrons. The application also mentions that tenants will be advised to use operable windows; with the exception of a few restaurants that might have sidewalk café permits, why would ground floor retail windows need to be operable?

Storefront Materials:

Metal should not be used except for hardware. Painted or stained wood, stone, concrete, plaster, and tile are appropriate materials for a neighborhood shopping center that borders an historic district, but metal is a not. It would insert a cold, very contemporary finish that is better suited to a downtown site. The discouraged materials listed on Sheet 708 should be prohibited rather than discouraged.

Awnings:

Awnings, if used at all, should be a shed style with open sides, solid color and made of fabric. Store names should be allowed only on the valence of the awning. Graphics or logos should not be allowed on awnings. Canopies, which typically provide a covered walkway to an entrance, should not be allowed. Metal or glass awnings have not been allowed in the historic districts in this area, and they should not be allowed here. Sheet 711 notes that fixed metal and glass awnings or canopies are encouraged at corner entrances, but this treatment is not suitable for a neighborhood shopping area or an area adjacent to an historic district --- this treatment should be reserved for downtown areas.

Lighting:

Generally, a neighborhood shopping center should have a low level of illumination that is consistent with safety and security. There is also a need to design and operate commercial lighting so that it doesn't adversely affect adjacent residential areas. I urge the Zoning Commission to require compliance with the International Dark-Sky Association standards in order to reduce light pollution and reduce building energy consumption. Sheet 712 states that the applicant wants to control the lighting after store hours (this is repeated on Sheet 715) but this should be restricted by the Zoning Commission in order to prevent unnecessary light pollution, energy output, and adverse impacts on residents. This is a neighborhood shopping area that adjoins established, family neighborhoods and other residential buildings; it is not an entertainment district.

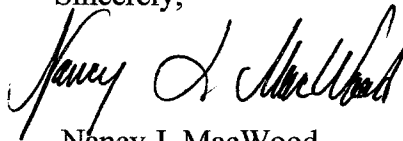
In addition, I would urge the Zoning Commission to insist that street lighting fixtures are the same as used for neighborhood shopping areas in the District on arterial and local streets. It is important that this PUD not distinguish itself by its inconsistency with what is there now. The remaining commercial area is charming, successful, and complements the neighborhoods. It would be sad if the new development strikes a stark contrast in all its elements with that area.

Tree Boxes:

I would also urge the Zoning Commission to ensure sidewalk tree boxes are adequate for tall, shade trees. Ornamental trees should not be planted in these areas; the District needs to replenish its tall, canopy trees, especially on arterials. The sidewalk surrounding the tree boxes should allow rain runoff to enter the treeboxes. It is very important that the sidewalk surface is safe for pedestrians with varying levels of mobility. I realize that this is the responsibility of DDOT, but the Zoning Commission might want to make the point to the applicant.

In conclusion, I hope the Zoning Commission will take time to explore the design issues. This is a complicated PUD application with many zoning relief requests. If it is approved even with changes the development will alter the relationship of this commercial area to its environment. It will adjoin neighborhoods with housing over 100 years old and a large proportion of housing over 75 years old. These well-established neighborhoods do not need to be defined by a new shopping center, as one of the applicant's representatives suggests. The redevelopment proposal should instead respect what is there already, and seek to enhance the community it intends to serve. Mass, scale, architecture and design features (as much as uses) will determine whether this is just another new building that could be located anywhere in the District (but most likely downtown) or whether this development is a model for creative new design reflective of and sensitive to its co-existence with distinctive neighborhoods.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy J. MacWood". The signature is fluid and cursive, with the first name "Nancy" being the most prominent.

Nancy J. MacWood
ANC 3C09