## Detailed Analysis - Design Review Standards Adversely Affected

Adversely affected by any increase in density over allowable by "matter-of-right":

604.5 The Zoning Commission shall find that the proposed design review development is not inconsistent with the Comprehensive Plan and with other adopted public policies and active programs related to the subject site.

The development is inconsistent with the Comprehensive Plan because it does not "protect and enhance the existing scale, function, and character of the AU Park neighborhood". The scale, function, and character of the neighborhood is 2-story, single family, detached, Colonial Revival, Tudor, Bungalow, and Farmhouse, on small lots. An extremely stable and desirable neighborhood.

## *see ILLUSTRATION #1, 2, 3, 4, 5*

604.6 The Zoning Commission shall find that the proposed design review development will not tend to affect adversely the use of neighboring property and meets the general special exception criteria of Subtitle X, Chapter 9.

This development will adversely affect almost every aspect of neighborhood life: its character, traffic patterns, pedestrian safety, light, view, privacy from overlooking 7th floor terraces, schools, noise pollution, air pollution and health concerns, schools, parking, societal concerns about the unemployment and/or dislocation of 80 employees, patterns of shopping and the threat posed by Balducci's to a Washington institution, Wagshal's,

see ILLUSTRATION # 2, 6

604.7 The Zoning Commission shall review the urban design of the site and the building for the following criteria:

(c) New development respects the historic character of Washington's neighborhoods

American University Park is 103 years old. see ILLUSTRATION #2

In the 1920's, the WC and AN Miller Company developed American University Park. In the mid-1930's, construction began on two-story Colonial Revival, Tudor, and Bungalow and Farmhouse style homes on small lots. As stated above, AU Park is recognized in the Comprehensive Plan as specifically significant. An 89' high-density condominium development would detract significantly from the historic character of the neighborhood in which it would sit.

The Spring Valley Shopping Center is Historically Designated. The proposed development would be three times as tall as this historic shopping center, dwarfing it in size from all angles.

see ILLUSTRATION # 9

ZONING COMMISSION Page 1 01-3 District of Columbia CASE NO.16-23 EXHIBIT NO.157B 604.7 (2) Infill development should respect, though need not imitate, the continuity of neighborhood architectural character.

AU Park is 2-story, single family, detached, Colonial Revival, Tudor, Farmhouse and Bungalow homes on small lots. Neighbors gather in its streets to talk and watch their children play.

*see ILLUSTRATION* # *1*, *2*, *7*.

604.7 (3) Development should respect and protect key landscape vistas and axial views of landmarks and important places;

This massive development is a 7 story "BILLBOARD", overwhelming the Historically designated Spring Valley Shopping Center and destroying the Massachusetts Avenue portal.

Tree-lined Massachusetts Avenue was included in L'Enfant's original plan; it crosses three of Washington's four quadrants, intersects every major north–south street, and passes numerous Washington landmarks. It is one of the two widest boulevards in the District at 180'. Pennsylvania Avenue is the other. The proposed development would disrespect this important gateway to our city.

see ILLUSTRATION # 9

604.7 (d) Buildings strive for attractive and inspired façade design, including:

(2) Incorporate contextual and quality building materials and fenestration;

The development is both a 4 to 5 story, Second Empire, Mansard-roofed, 20 unit condo building and a massive 5 to 7 story, 89' tall Tenement Revival apartment building of 200 residential units. These designs are antithetical to each other as well as to the neighborhood character.

There is nothing contextual about this development.

*see ILLUSTRATION* # 7, 8, 9, 11

At 89' the structure could be eight, almost nine, stories tall. The developer is counting the two story tall grocery store as one story.

The use of "quality" brick never overcomes inappropriate design.

604.7 (f) Sites are developed to promote connectivity both internally and with surrounding neighborhoods, including:

(1) Pedestrian pathways through developments increase mobility and link neighborhoods to transit

Nothing in the proposed design makes public transit more accessible or links the project to any major commuter lines.

(3) Streets, easements, and open spaces are designed to be safe and pedestrian friendly;

Three Alleys will provide access to the parking garage, loading docks, and dumpsters. Pedestrians will share those three alleys to circulate through the site and eventually get to Mass Avenue. Introducing pedestrian circulation into service alleys is irresponsible and dangerous.

There are two dangerous intersections on Massachusetts Avenue that serve this site and will operate at Level of Service D. They both have high Crash Rates. The ADDITIONAL 3,500 Vehicle Trips per day and 14 tractor trailer and delivery trucks will increase those Crash Rates and will further compromise pedestrian safety.

see ILLUSTRATION # 10

(4) Large sites are integrated into the surrounding community through street and pedestrian connections

Aside from three Alleys; two Public and one Private, the only true pedestrian access is through Windom Way, a 42-foot wide unit access walkthrough with residential patios intruding on both sides that runs from 48<sup>th</sup> Street to a system of alleys and loading docks, finally winding up on Massachusetts Avenue.

see ILLUSTRATION # 10

## SUPERIOR TO ANY MATTER-OF-RIGHT DEVELOPMENT POSSIBLE ON THE SITE

It is almost impossible to show the superiority of this development to the "matter-ofright" development unless each is presented fairly. All of the developer's drawings show "matter of right" as either thick red dotted section lines. This graphic device demonstrates no design concept, detail, materiality, functionality, neighborhood integration, etc.

This development could be less obnoxious and deleterious to the AU Park neighborhood and still be within "matter-of-right". For example 2 and ½ story Colonial, Georgian, townhouses, with English basements, centered on a mews, underground parking, and an amenity package of significance to its occupants as well to its neighbors, e.g. a daycare/early learning center staffed by AU's professors and students, an area for a weekly Farmer's Market, a tot lot, a dog walk area, shared office space for Metro and AU police, a community *shared* AU Shuttle, IZ units significantly over the number required, immediately available to some of the 80 employees and their families who will be displaced. And still incorporate a modest grocery store.

see ILLUSTRATION # 1, 2