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To: [PRC](#)
Subject: Project 3020338
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Below are my comments on the revised EDG proposal, Project 3020338.

Overall, the applicant's revised plan is not sufficiently responsive to the majority of public concern and comment in EDG 1, regarding the insensitive transition to the residential zone and loss of trees..

1. Grade measurement and dependent height calculation:

The applicant attempts to justify the insensitive height on the Dewey side by use of the following Director's Rule:

"Subsection 23.86.006.A.2.b provides an acceptable option for determining the average grade level to allow structures to better respond to the topography of sloping sites."

When the applicant applies this, they calculate the average height of the slope by averaging the midpoints of the two opposite ends of the slope at the extreme ends of the smallest conceptual rectangle that can contain the building. They place the building so the points at which the measurements are thus made are both very near the top of the slope, which extends further east in a little area at each end than it does at the middle. Consequently, the resulting calculated average grade of "the slope" is only 3.3 ft less than the average height of the rest of the lot. This allows them to measure the building height at Dewey from 3.3 ft below the flat top of the lot rather than from the actual height at a point midway down the slope. So they get a much taller building when they use this on the northern part of the proposed building. The problem is, the stated reason this option exists is "to better respond to the topography of sloping sites". The applicant is using it to ignore the topography and rationalize a building that is less sensitive to the topography. This seems like a clear error in applying the Director's Rule, which would ordinarily magnify the effect of the slope on the height of the building, not minimize it.

2. A green wall is no substitute or adequate mitigation for the ecological, aesthetic and psychological benefits currently provided by the trees.

3. The proposed 4-6 ft max height stepped wall along Dewey will not make for a pleasant pedestrian experience, as the green space will be too separate from the sidewalk.

4. The Code-compliant option retaining some trees is presented with as many negative attributes as possible, it seems, without adequate justification for them.

Andrew Kirsh