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February 9, 2009

Anthony Hood, Chair
DC Zoning Commission
441 4th St, NW
Washington, DC 20001
Fax: 202-727-6072

Dear Mr. Hood:

We are writing to explain some of our concerns about the Giant PUD, Case 08-15. We live at 3315 Idaho Ave, within 100 feet of the Giant property line. We support the goal of a redeveloped Giant grocery store and revitalized neighborhood-serving retail stores, consistent with the intentions of the Comprehensive Plan. This PUD goes in the right direction but far exceeds the guidelines of the Comprehensive Plan in terms of scale and density. In addition, there are several specific problematic features which we urge you and the Zoning Commission to address.

Adverse impacts of zoning changes and grocery store loading plan

- The PUD proposes to rezone a large area near our home from residential (R-5-A) to commercial (C-2-A). The PUD requests relief from residential zoning to locate a commercial driveway (truck entrance) and truck turnaround on Idaho avenue, between the planned townhouses and the existing residences. These changes will remove the buffer that exists between our neighborhood and the commercial activity of the Giant grocery store, which today is substantial because the size of the current R-5-A parcel creates a large distance (and also open space, light, and air) between our home and the current loading operations. The PUD will remove all this.
- The location of the truck entrance/loading dock is simply incompatible with the residential character of Idaho avenue. Bisecting a residential street with a truck entrance/loading dock is not a sensible transition between commercial and residential uses, and sets a poor planning precedent. The PUD loading plan will denigrate the use, quiet enjoyment, and resale value of our property.

The PUD makes no projection about the number of trucks which will use the new facility. In public meetings and in an Aug. 5, 2008 email from David Avitabile, the applicant asserted that the *current* Giant is served by "5-6 tractor trailer trucks and 25-30 single-unit vendor trucks per day", and that the *new* Giant, although nearly three times the size, will be served by the same number of trucks. This is subject to

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debate, but already the numbers represent an unacceptable amount of truck traffic on a residentially zoned street.

- The PUD proposes a Truck Management Plan and noise mitigation measures to mitigate the above adverse impacts. They made a minor revision in the location of the truck entrance on Idaho. These measures do not go far enough, and the adverse impacts remain. In particular the noise mitigation measures are very narrowly addressed to the sound of trucks as they use the turn-around and loading facility, not to the sound and sight of trucks on the street. Also, there is no way to mitigate the physical incongruity of a truck loading operation bisecting a residential neighborhood.

Adverse impacts for the residents of 3300 Idaho avenue have been recognized in public meetings with ANC, DDOT, and Streetworks. The Oct. 24, 2008 minor revision of the applicant's initial loading plan and their later revision ¹ do not remove the adverse impacts.

Some alternatives to grocery loading configuration

Therefore, we ask the ANC 3C to urge the Zoning Commission to require the applicant to relocate the grocery store loading operation, closer to the Idaho/Newark intersection. The truck entrance should be moved off Idaho Ave and back to Newark (where it was in an early version of the PUD). The applicant has not made a convincing case that this is impossible or impractical. There *are* alternatives to the current location which should be seriously considered (see below for descriptions). At the very least, the applicant should not be allowed to bisect the residences on Idaho (separating established from planned) with a heavily trafficked commercial curb-cut; the townhouses should be put next to existing residences, and the truck entrance should be north of the townhouses.

The purpose of the following is not to put forth finished plans that could replace existing ones without further examination. It is merely to suggest that alternatives do exist, and that alternatives deserve serious consideration. See attached drawings.

The loading dock could be decoupled from the grocery store and made into a separate covered structure closer to the corner of Newark/Idaho but having its rear near to the northwest corner of the grocery store. Since it would be separate, it would not need to be at the low elevation of 346' where it is currently proposed; it could be at 360' or higher, effectively removing any issues related to grades which trucks would need to negotiate in using Newark as the truck entrance point. Elevators could take wares to any floor of the grocery store. This would create some additional room for parking under the grocery store.

Once the loading dock is repositioned thus, new possibilities for the truck entrance/egress emerge (please see attached drawings):

¹Memorandum from David Avitabile dated Jan. 16, 2009.

Plan A. The truck entrance/egress could be on Newark, slightly northwest of the proposed car entrance. Tractor-trailer trucks could back straight into the dock off Newark street (as they often do today; the applicant estimates ² that the number of tractor-trailer trucks using the new facility will be 5-6 a day). Single-unit vendor trucks ³, being smaller, could enter off Newark head-first, then turn around using a Y-shaped turn-around pattern, and then back into the docks.

Plan B. A one-way system could be designed where all trucks would enter from Idaho a little bit south of Newark, and exit off Newark, making a loop. To enter the dock, trucks would pull into the loop and approach Newark and straighten-out, and then back into the dock; to exit they would pull straight onto Newark, and then right on Idaho toward Wisconsin.

In both of these arrangements, trucks would still enter the area by turning onto Idaho from Wisconsin and they would leave the area the same way. Also, the planned townhouses would be moved down Idaho, next to established residences. The applicant would have to sacrifice the number of townhouses (perhaps only 4 instead of 8), but such an arrangement would also make those townhouses more valuable (they would not have 30+ trucks passing in front of them every day).

Residents of 3300 Idaho would welcome an appropriate number of townhouses adjacent to our homes, provided they are architecturally consistent with our homes and not too imposing. If done right they would enhance the character of our street and provide a genuine buffer between 3300 Idaho and the commercial activity of the development.

Ramifications of intensity of PUD

The PUD creates issues related to parking, traffic, use/overlay, density, and loading. The above illustrates that the proposed loading design will negatively impact residential areas and create new traffic and street-parking problems, unless resolved. Resolution is possible, but solutions are much more difficult to find **because of the intensity of the development**. If the applicant were more flexible, willing to give up some intensity, then the loading and other issues would be much easier to resolve.

We hope that the problematic features of the PUD can be resolved to the satisfaction of the developer and the neighbors alike. We rely on the Zoning Commission to ensure that the development works, and that the PUD does not end up harming the people who are supposed to benefit from it.

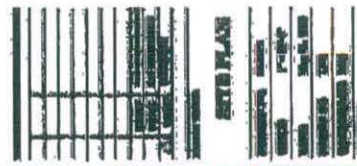
Sincerely,

²Aug. 5, 2008 email from David Avitabile.

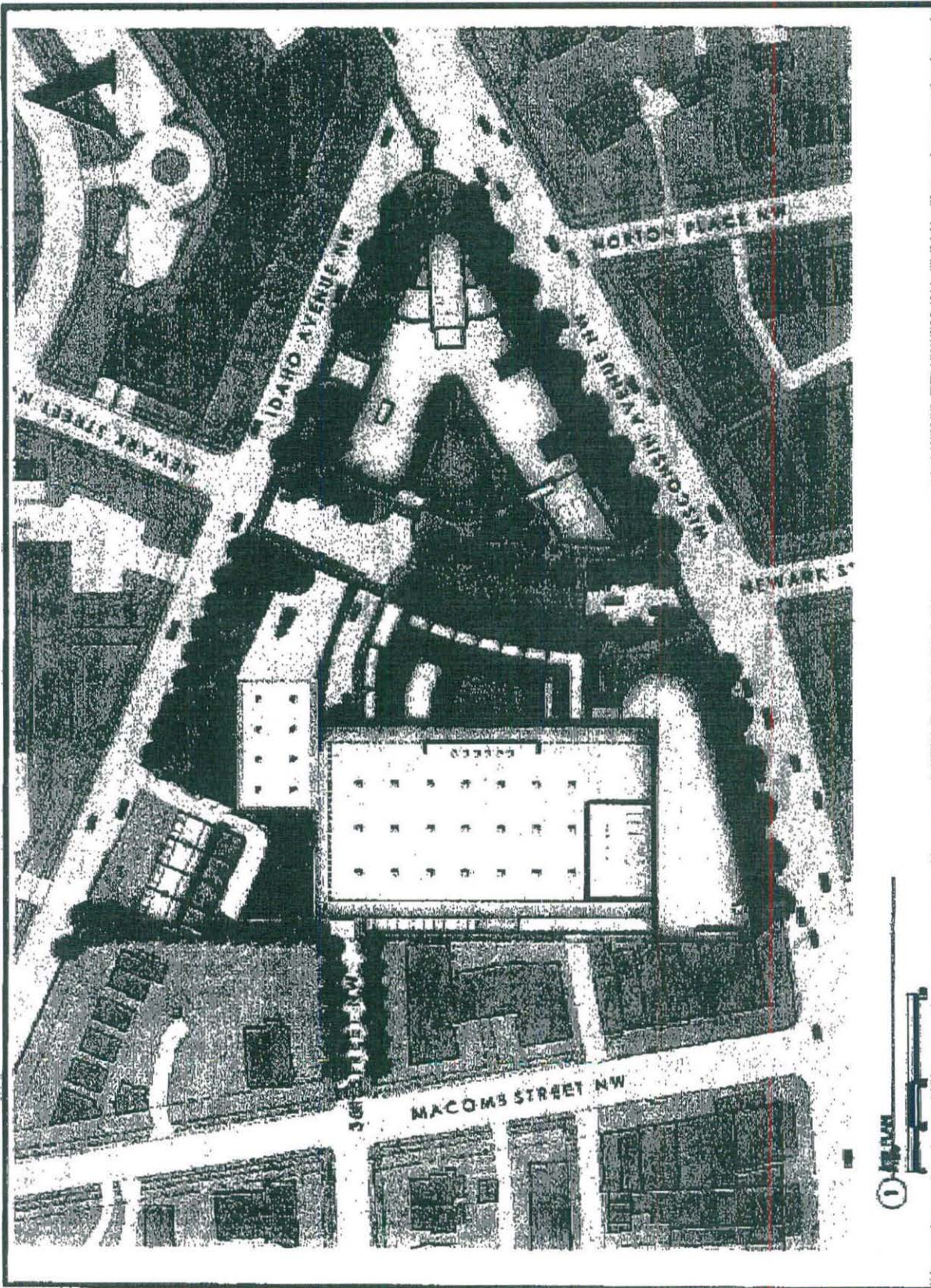
³Expected (cf. email from Avitabile) to be 25-30 per day.

*Thomas J. Haines**Sophia Vassiliadou*

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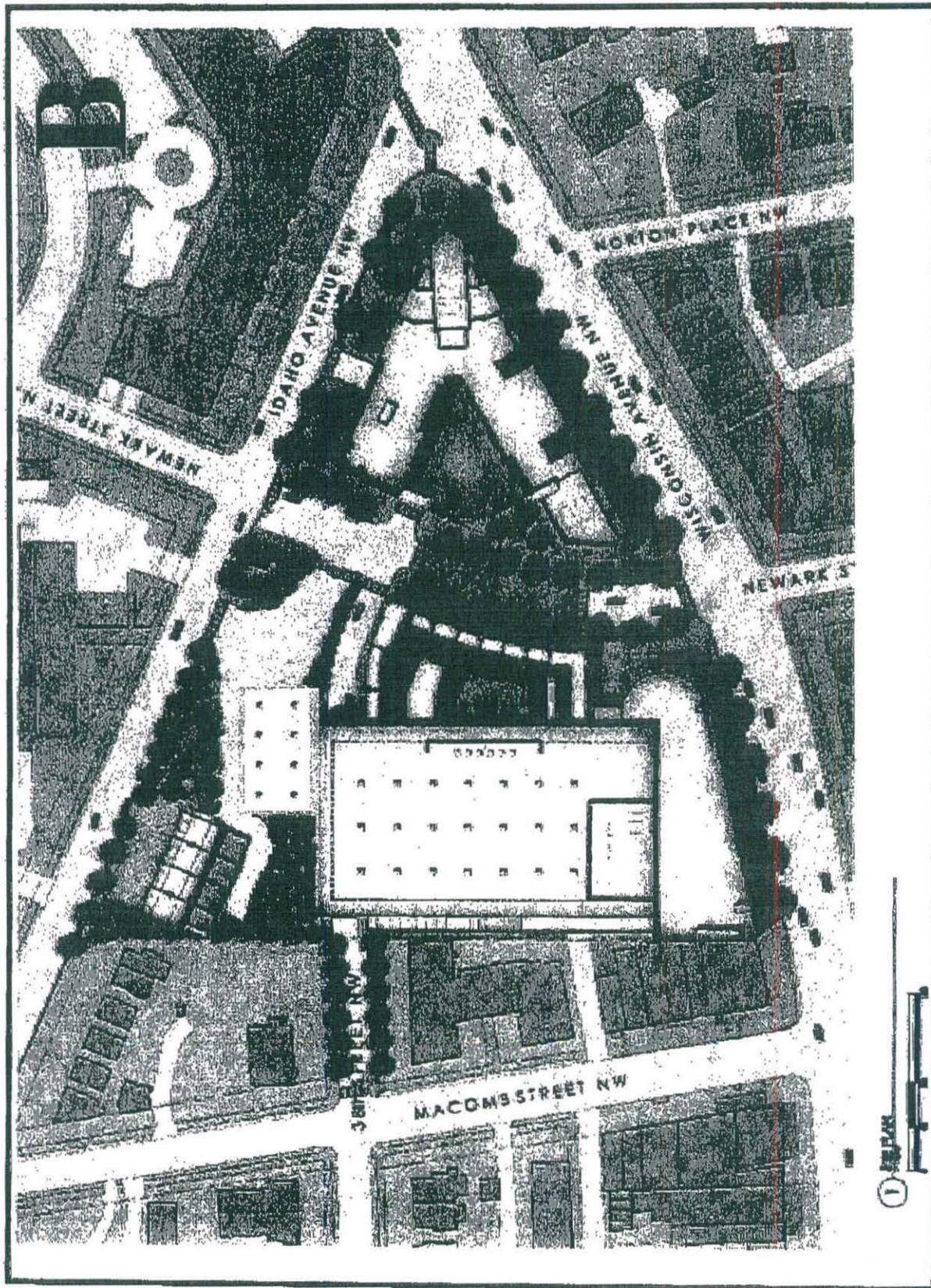


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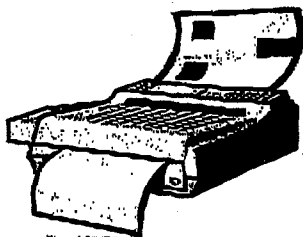




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**FAX COVER SHEET**

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FROM: Thomas J. Haines

DATE: 02/09/09

Number of pages including cover

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MESSAGE:

Case 08-15

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