

Philip Montalto
3321 Idaho Ave., NW
Washington, DC 20016

District of Columbia Zoning Commission
Washington, DC
FAX: 202-727-6072

Re: ZC #08-15 (Friendship Shopping Center, 3336 Wisconsin Avenue, NW)

May 4, 2009

Chairman Hood:

The 3300 Idaho party wishes to bring the following information to the attention of the Zoning Commission.

DDOT continues to misunderstand and or misrepresent the reports on truck volumes for this PUD. Their February 11, 2009 report and their supplemental comments of April 22, 2009 cause us deep concern that an appropriate evaluation is not being conducted. DDOT has so far in their reports and cross shown to be unable to provide a recommendation to the Zoning Commission due to their misunderstanding of the most basic impacts of this development caused by the volumes of trucks.

The devastating adverse impact this development proposes to bring in terms of truck traffic and loading operations to this neighborhood is misunderstood by the very agency that has the responsibility to assess these risks and to provide you their professional recommendation. Their efforts show a disconnect with the basic facts of the project that is alarming.

At the April 6th meeting the Zoning Commission requested clarification and indeed DDOT acknowledged a degree of confusion with the truck estimates and agreed to review and provide their assessment on the number of trucks that would be serving the development. Their April 22 Supplementary Comments distorts and misrepresents the facts as provided by the Applicant and by the PSI Peer Review Study perhaps in an effort to stand by their earlier assessment of approval.

The most egregious misunderstanding and misrepresentations in the April 22 supplementary comments are:

1) DDOT has said: The Traffic Impact Study Addendum, Oct. 22, 2008; p15 " shows the number of daily truck deliveries to the proposed site."

Correction: That study provides a count of trucks observed serving the current Giant and presumably other businesses on their property in the current state, not the "proposed site".

Background: Today the South block is empty with the exception of the 18K sf Giant store. The applicant has never provided the estimates DDOT is claiming applicant has provided, yet DDOT arrives to this stunning conclusion. Despite repeated requests to the Applicant for an estimate trucks to their proposed 2 loading docks in the South block and the North loading dock, this information has not been provided. The paradox is that DDOT seems content and unconcerned that no estimates for the large South block have been provided by the Applicant up until PSI provides these estimates. Once these estimates emerge they do not question the Applicant on their estimates (or lack of them), no, they lecture PSI on how ITE data should be applied creating an impression that they disagree with that report but do not actually dispute it.

2009 MAY 11 10:11 AM
ZONING COMMISSION
DISTRICT OF COLUMBIA

ZONING COMMISSION
DISTRICT OF COLUMBIA

CASE NO. 08-15
EXHIBIT NO. 214

2) DDOT has said: The PSI Traffic Peer Review study of 83 comings and goings, are not actual trucks which they then conclude "is consistent with the estimated 40 daily deliveries the Applicant has proposed..."

Correction: PSI estimates are 68-83 trucks and not comings and goings per weekday for the Macomb dock. These are 136-166 comings and goings on this dock alone.

Background: Please see the attached memo from PSI clarifying trucks vs comings and goings. Obviously, massive overflow is predicted. We are not aware of any communication that has occurred between DDOT and PSI to review or clarify any part of their report.

DDOT has said: The PSI Traffic Peer Review study "is consistent with the estimated 40 daily deliveries the Applicant has proposed to the South block"

Correction: PSI does not state these volumes are for the South Block.

Background: The table is labeled. How does DDOT arrive to this conclusion? These estimates are for the uses the Applicant has planned for the Macomb alley dock alone. These volumes do not include the Giant Grocery Idaho Loading dock on the South block where an additional 35-40 trucks a day are estimated.

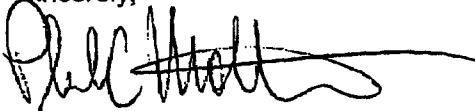
Missing in DDOT's report is any reference to the massive overflow that is predicted on the Macomb Alley dock. DDOT lacks any appreciation for the current use and demand of that Macomb alley today and how the proposed and current demands will coexist. DDOT continues to cite 2 tractor trailers per day will be serving the Giant grocery store even after this information was superseded by the Applicants own submission on January 30th where they estimate 5-6 semi tractor trailers in addition to 25-30 single unit vendor trucks per day.

Finally, DDOT indicates that it does not have the resources to conduct a separate analysis for each zoning case. While this may be true and this may prove to be a disadvantage, it does not explain DDOT's continued lack of focus and misunderstanding of the basic facts in this case that are available in the record provided by the Applicant and PSI.

Given these circumstances, we urge you to request an independent and comprehensive evaluation of the transportation issues surrounding this PUD.

Thank you.

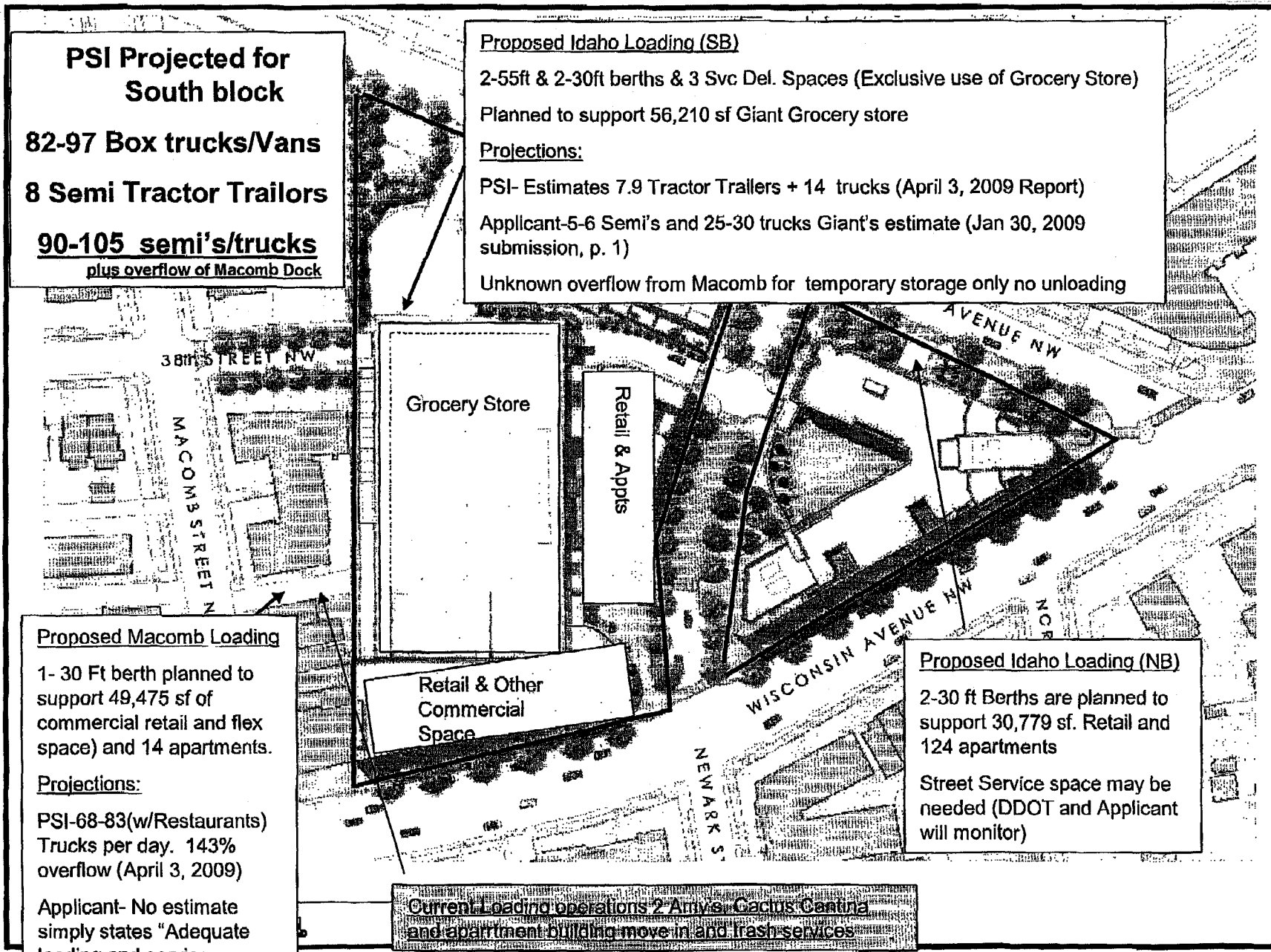
Sincerely,



Philip Montalto

Attached:

PUD Loading Docks and Trucks Estimates Illustration
PSI Clarification Letter May 1, 2009



PSI Projected for South block
82-97 Box trucks/Vans
8 Semi Tractor Trailors
90-105 semi's/trucks
 plus overflow of Macomb Dock

Proposed Idaho Loading (SB)
 2-55ft & 2-30ft berths & 3 Svc Del. Spaces (Exclusive use of Grocery Store)
 Planned to support 56,210 sf Giant Grocery store
Projections:
 PSI- Estimates 7.9 Tractor Trailers + 14 trucks (April 3, 2009 Report)
 Applicant-5-6 Semi's and 25-30 trucks Giant's estimate (Jan 30, 2009 submission, p. 1)
 Unknown overflow from Macomb for temporary storage only no unloading

Proposed Macomb Loading
 1- 30 Ft berth planned to support 49,475 sf of commercial retail and flex space) and 14 apartments.
Projections:
 PSI-68-83(w/Restaurants) Trucks per day. 143% overflow (April 3, 2009)
 Applicant- No estimate simply states "Adequate loading and service facilities will be provided for the PUD project" (Oct 24, 2008 Exh F, p.13)

Proposed Idaho Loading (NB)
 2-30 ft Berths are planned to support 30,779 sf. Retail and 124 apartments
 Street Service space may be needed (DDOT and Applicant will monitor)

Current Loading operations 2 Arrive Cactus Cantina and apartment building move in and trash services

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SHEET NO.	
S102	
SITE PLAN	
PROJECT NO.	08-0001
SCALE	1" = 50'0"
DATE	May 14, 2009
DRAWN BY	SEA
APPROVED BY	SEA
REVIEWED BY	SEA
DESIGN NO.	

S102

Numbers represent average estimates not peak number of trucks (not coming and goings), but actual trucks per week day estimates.

7032348830



Precision Systems, Inc.

Memorandum

TO: Mr. Thomas Haines

FROM: Allen Y. Yang, P.E.
Precision Systems, Inc.

DATE: May 1, 2009

SUBJECT: Clarification of Estimate of Number of Trucks for
Giant Grocery Store, as well as Retails and Flex/Office Space at South
Parcel

In addition to the Friendship Shopping Center Traffic Study Peer Review Report, Precision Systems, Inc. (PSI) wishes to provide the following additional information regarding the estimate of number of trucks for the Giant Grocery Store, as well as south parcel retail and flex/office space.

PSI provided the following estimates for number of trucks after the PUD development:

- eight (8) tractor-trailers and 14 light rigid trucks for the Giant Grocery Store loading docks
- 68~83 total trucks for retail and flex/office space at south parcel loading dock off Macomb Street Alley

These estimates represent the NUMBERS OF TRUCKS, but not TRUCK TRIPS. In other words, a truck-entrance-and-exit is considered one truck, but not two trucks.

In addition, PSI used a table provided by Institute of Transportation Engineers (ITE) to come up with the estimate of 68~83 trucks at south parcel retail/office. This table was developed based on truck counts for 95 suburban sites in Baltimore MD. PSI believes that the characteristics of the retail and office space of suburban Baltimore are similar to those in Washington DC. In addition, considering that the Friendship Shopping Center is of an urban environment, PSI's estimate is indeed a conservative representation of the number of trucks.

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