

**Wisconsin/Newark Neighborhood Coalition**  
**Zoning Commission Case 08-15**  
**TESTIMONY ON TRAFFIC ISSUES**  
**May 4, 2009**

The Wisconsin/Newark Neighborhood Coalition submits this testimony on the significant traffic problems raised by the PUD, which will make an existing traffic situation in our area materially worse.

**Point 1: The PUD Area Is Already Impacted by Significant Traffic**

The neighborhoods surrounding the PUD – Maclean Gardens on the north and west, Cathedral Heights and the Macomb-Woodley area to the west and south and the Cleveland Park Historic District immediately east -- are characterized by some of the highest cut-through traffic on residential streets in Northwest Washington because we are impacted by major arterial corridors connecting downtown with the suburbs. Significant commuter traffic uses our intersecting residential streets to travel between or avoid these clogged arterials. In the District of Columbia, only freeways, bridges, and New York Avenue carry more traffic than Connecticut, Massachusetts and Connecticut Avenues on an average weekday. Our low density neighborhoods are the only ones in the District that cope with 3 major arterial corridors cutting through that each carry 30-60,000 vehicles per weekday. Most other low density neighborhoods may have one such arterial but not three.<sup>1</sup> Reno Road/34<sup>th</sup> Street, the minor arterial that bisects the Cleveland Park Historic District, carries more vehicles per lane mile than Connecticut Avenue.

Additionally, many institutional uses in the area surrounding the PUD draw traffic onto residential streets. Most of the 5000 or so students and staff come in cars to the 13 public and independent schools nearby. The Washington National Cathedral, a major religious, civic and tourist site, is located three blocks from the PUD site. The vast majority, particularly at the independent schools, do not live in the immediate area. At National Cathedral School, for example, 53 percent of the students live outside the District of Columbia, and only 6 percent live within walking distance. Even in the local D.C. public schools, approximately 65% of the students at John Eaton and an even greater percentage of students at Hearst live outside those schools' respective boundary areas. It is reasonable to assume that a majority of students and faculty who do not live within walking distance arrive by car. Other large entities in the vicinity, like Fannie Mae's headquarters on the north side of Maclean Gardens, also generate substantial

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<sup>1</sup> Source: D.C. Comprehensive Plan, Transportation Element, Existing District Traffic Volumes, 2003.

traffic on our residential streets.<sup>2</sup> Neither the Applicant nor OP and DDOT considered these well-known realities.

**Point 2: The PUD will generate increased traffic on already burdened neighborhood streets.**

The PUD will make our existing traffic predicament materially worse. As the largest development project proposed in Ward 3, the PUD will generate significant new traffic if approved in its present form. This is not surprising – Giant proposes to replace a modest, neighborhood grocery of approximately 18,000 sq. ft. with a “SuperCenter,” Giant’s largest store category, of over 56,000 sq. ft., plus 64,594 sq. ft. of restaurants and other high-performing (i.e., intensively used) retail space, 146 new residences and over 17,000 sq. ft. of other commercial space, which could be offices or more retail. (In addition, 100 other residences not part of the PUD, are being developed across the street from the PUD site.)

Other issues with the PUD will also impact traffic, including:

- Giant’s proposed elimination of the neighborhood commercial overlay at the PUD site, which will allow more high-traffic generating food and drink establishments;
- the increased volume of delivery trucks, coupled with inadequate loading, will result in trucks circling, idling or loading on the adjacent streets;
- The insufficient number of parking spaces overall, and especially on the North Block, will result in PUD commercial patrons circling the local residential streets in search of convenient parking.

By Giant’s own estimate, the PUD will add an *additional* 539 (or 119 percent) more weekday PM peak hour trips, and 550 (or 118 percent) more on Saturday mid-day peak hours. The independent peer review of Applicant’s traffic study concluded that the PUD will generate approximately **4050** additional vehicle trips on neighborhood streets.<sup>3</sup>

Applicant’s traffic consultant has stated publicly that traffic generated by the grocery store will more than double over that existing today. And this is not surprising, given that the existing store and pharmacy occupy about 23,000 sq. ft. altogether. The proposed new Giant SuperCenter, including the pharmacy, would be more than double

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<sup>2</sup> The D.C. Comprehensive Plan, Transportation Element, stated that 77% of inbound trips to the Rock Creek West area, where the PUD site and these various institutions are located, are by private vehicle (including trips originating in the suburbs as well as the District). D.C. Comprehensive Plan, Ch. 4, Table 4.3.

<sup>3</sup> Precision Systems, Inc.: Friendship Heights Traffic Study Peer Review (March 2009) (“PSI Study”), at 14.

the space dedicated to the two existing stores. Thus, the store related traffic would be, at an absolute minimum, twice what it is now if the vehicle and foot *traffic per square foot* stayed exactly the same. But this is unlikely, given that the current store condition means that the store is underutilized and underperforming. Add the fact that currently shuttered retail space at the present site will be replaced with high performing retail space, and that 146 residences will be built, and it is much more likely that the vehicular traffic to and from the proposed complex will increase more than twice current levels.

### **Point Three: Applicant's Traffic Submission Is Undercut by Other Traffic Data**

The significant disparity between Applicant's reported traffic counts and those of independent professional traffic counts and publicly-reported DDOT data raise serious questions about the accuracy of Applicant's traffic studies, including Giant's position that consideration of traffic calming and other mitigation should wait until after the PUD is approved and built. Applicant uses other questionable assumptions to minimize the traffic impact.

Let me illustrate the problem with Giant's submission, using Newark Street directly east of the PUD site as an example. Newark is functionally classified as a "local" street within a national register historic district, is residential in character and already has an existing cut-through traffic problem. It is also the continuation of the central axis of the PUD and intended by Applicant as an access to it.

Applicant's traffic study, by Wells & Associates, reported traffic counts for "Newark St. west of 34<sup>th</sup>", but is not clear exactly where measurements were made.<sup>4</sup> In Applicant's study, the daily vehicle volume data for Newark Street ranged between 1279 and 1319 over three days during a week in September, 2009 when schools were in session.

Data recorded by two independent traffic surveys on Newark Street, however, significantly exceeds the traffic counts reported by Applicant. Roadway Data Systems Corporation of Columbia, Maryland counted traffic on three blocks of Newark between 34<sup>th</sup> St and Wisconsin Ave over three weekdays in December, 2009 when schools were

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<sup>4</sup> It is unclear where on Newark Street Giant's traffic consultant measured volume. Giant's study states "Newark...west of 34<sup>th</sup> Street," but manual counting was observed at the 36<sup>th</sup> block, where the Roadway Data Systems-measured volumes are highest. Both Giant's and the independent RDS counts were recorded during weeks when the DC Public and area independent schools were in session. If anything, the RDS count in December may reflect somewhat lower traffic than may be typical in other non-summer months, as some commuters may start using remaining vacation time before year-end. The PSI count also was conducted when schools were in session in February 2009 but immediately before the long Presidents' Day weekend, which may have depressed normal vehicle counts somewhat. In any event, Applicant's traffic counts are substantially below the RDS and PSI traffic data.

in session.<sup>5</sup> RDS recorded volume in three locations to more accurately reflect the traffic patterns, as vehicles may enter or exit Newark Street at 35<sup>th</sup> and 36<sup>th</sup> Streets, not just at 34<sup>th</sup> St. and Wisconsin Avenue. On no day in any of the three Newark St blocks was RDS's vehicular count less than 1729, and in the 3600 block closest to the PUD it was at least 2467 and as high as 2842.

The highest daily volume recorded by RDS is more than **117%** higher than Applicant's highest reported count. Even the lowest volume recorded by RDS on any date at any location is more than 32% greater than the highest count that Applicant's study reported. The average RDS reported count (averaging all three blocks) is **69%** higher than Applicant's reported average.

PSI also conducted an independent traffic count in February 2009 in the 3600 block of Newark. The highest daily volume recorded by PSI is more than 62% greater than Applicant's highest count. Applicant's volume counts are also substantially below DDOT's public data for the 3400 block of Newark, which appear to be based on a DDOT count from 10 years ago. PSI's average daily traffic volume is 58% greater than Applicant's average volume.

|                                                  | Thurs,<br>Sept<br>25 | Fri.,<br>Sept.<br>26 | Sat.,<br>Sept.<br>27 | Average |
|--------------------------------------------------|----------------------|----------------------|----------------------|---------|
| <b>Wells &amp; Assoc. ADT<sup>6</sup> - 2008</b> |                      |                      |                      |         |
| "Newark Street, west of 34 <sup>th</sup> Street" | 1308                 | 1319                 | 1279                 | 1302    |

**Roadway Data Systems Corporation ADT - 2008**

| Newark Street     | Tues., Dec.<br>16 | Wed., Dec.<br>17 | Thurs, Dec.<br>18 | Average |
|-------------------|-------------------|------------------|-------------------|---------|
| <b>3400 block</b> | 1729              | 1866             | 2155              | 1917    |
| <b>3500 block</b> | 1950              | 1997             | 2177              | 2041    |
| <b>3600 block</b> | 2467              | 2586             | 2842              | 2632    |

|                                                  | Thurs,<br>Feb<br>12 | Fri.,<br>Feb<br>13 | Average |
|--------------------------------------------------|---------------------|--------------------|---------|
| <b>Precision Systems Inc. ADT - 2009</b>         |                     |                    |         |
| "Newark Street, west of 34 <sup>th</sup> Street" | 2141                | 1961               | 2051    |

<sup>5</sup> Roadway Data Systems Corporation Traffic Count Data, Newark Street, 3400-3600 Blocks, December 16-18, 2008, attached as Exhibit A.

<sup>6</sup> ADT is average daily traffic

Applicant's counts are also substantially below DDOT's public data for the 3400 block of Newark, which appear to be based on a DDOT count 10 years ago, as adjusted (see chart below). Other disparities between the applicant's submission and DDOT public data are also noted in the following chart:

| Location                                        | Wells<br>ADT | DDOT<br>ADT | % Diff.<br>(DDOT % >) |
|-------------------------------------------------|--------------|-------------|-----------------------|
| 34 <sup>th</sup> btw<br>Newark<br>and<br>Macomb | 13174        | 17200       | 31%                   |
| Newark w<br>of 34 <sup>th</sup>                 | 1302         | 1700        | 31%                   |
| Wisconsin<br>Avenue                             | 29500        | 36000       | 25% <sup>7</sup>      |

Applicant's future traffic forecasts are also questionable. The Metropolitan Washington Council of Governments traffic model forecasts annual traffic growth during this decade (2000-2010) for Northwest Washington, D.C. at 0.7 percent annually.<sup>8</sup> PSI in its independent review states that 1 percent is a standard estimate for the Washington area. Yet Applicant uses a much lower estimate than these, only 0.25 percent, for all intersections except one in Applicant's traffic study area. In fact, PSI concludes that Applicant's estimate is "not reasonable."<sup>9</sup> Why did Applicant use such low estimates at intersections located mostly along busy arterial corridors that are some of the heaviest traveled in the city?

Moreover, Applicant's Level of Service predictions for local street intersections are belied by DDOT's own Upper Wisconsin Corridor Study, which found that traffic from future development along Wisconsin Avenue is expected to rise to almost intolerable D, E and even F levels of service. What is remarkable is that none of the development scenarios reviewed in that study envisioned denser development and upzoning at Applicant's PUD site. Applicant's predictions are also called into question by its changing its earlier traffic slide showing that the Newark and 34<sup>th</sup> Street intersection would operate at LOS F after the PUD is built, to LOS C without any explanation whatsoever. Instead, we have Applicant's assumptions that LOS levels can be improved simply by retiming traffic signals in the general vicinity, without regard to the impact of

<sup>7</sup> DDOT Wisconsin Avenue Corridor Study Final Report (October 2005) at p. 1. The DDOT traffic volume map available on the DDOT website shows ADT of 33,700 vehicles on Wisconsin near Macomb Street, or 14% greater than Giant's count.

<sup>8</sup> For DDOT's reliance on the MWCOG forecast model, see DDOT, Military Road/Missouri Avenue Traffic Study, Sect. 3.1 at p. 42 (April 2004).

<sup>9</sup> PSI Study at p. 6.

traffic flow on the major corridors. And if signal retiming were so simple, wouldn't DDOT have done it already to address traffic congestion?

In short, where the applicant has not assumed traffic problems away on the basis of low estimates of current traffic, unsupported low growth rates, and the magical pixie dust effects of signal retiming, it has simply changed data.

Applicant's traffic submission, in fact, indicates that existing Levels of Service (LOS) at various intersections near the PUD are already poor, if not failing. For example, currently Porter Street westbound at Wisconsin is LOS F in the AM and LOS E in the PM peak hours; Newark eastbound at Wisconsin is LOS E in the AM peak hour; Idaho northbound at Massachusetts Avenue is LOS F in AM peak hour. In projecting future peak hour LOS, Applicant states that the LOS E and F intersections will not get worse and none of other intersections would worsen to E or F. What would Applicant's LOS projections show if Applicant had used the Council of Governments growth percentage levels were applied to calculate future background traffic increases?

In fact, if the PUD is built as proposed, the resulting additional 4000 vehicle trips per day will further strain the capacity of even the Wisconsin Avenue arterial, which is operating at or close to capacity, as DDOT has previously acknowledged. DDOT's Glover Park Transportation Study (November 2007 draft), which analyzed traffic on Wisconsin Avenue just south of the PUD site, presented in addition to intersection Level of Service (LOS), something called the volume-to-capacity ratio (v/c ratio), the ratio of current flow rate to the capacity of the intersection. DDOT's report states that "this ratio is often used to determine how sufficient capacity is on a given roadway. Generally speaking, a ratio of 1.0 indicates that the roadway is operating at capacity. A ratio of greater than 1.0 indicates that the facility is operating above capacity as the number of vehicles exceeds the roadway capacity." In parts of the study area, the v/c ratio varied from 0.9 (at Wisconsin and Massachusetts Avenues) to over 2 (at Wisconsin and Fulton). Applicant did not present v/c ratios in its studies.<sup>10</sup>

**Point Four: The Comprehensive Plan Requires Traffic Mitigation and Calming to Reduce the PUD's Impact, Which Applicant Has Not Addressed.**

The Comprehensive Plan requires assessment and mitigation of the traffic impact before the PUD is approved, but the Applicant asks DDOT and the community to ignore the impact until after the PUD is constructed.

The PUD is governed by the Rock Creek West section of the Comprehensive Plan, which proscribes the type of "destination" that Applicant proposes and requires mitigation of traffic and other impacts. Applicant's proposal disregards the goals of the

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<sup>10</sup> DDOT Glover Park Transportation Study (Existing Conditions Traffic Analysis Report – November 2007), pp. 12-13.

Comprehensive Plan, and contains virtually none of the elements required “to protect and improve the quality of life and the residential character of the area.” The Comprehensive Plan states that

- “‘Destination’ retail uses are not appropriate in smaller-scale commercial areas, especially those without Metrorail access. Regardless of scale, retail development must be planned and designed to mitigate traffic, parking, and other impacts on adjacent residential areas.” (DC Comprehensive Plan, Ch. 23, RCW 1.1.5).
- New development shall “not unreasonably degrade traffic conditions, and ... traffic calming measures are required to reduce development impacts. This policy is essential to protect and improve the quality of life and the residential character of the area.” (Id., RCW 1.1.11).
- When Planned Unit Developments are proposed, required traffic studies must identify the mitigation measures that must occur to maintain acceptable transportation service levels—and secure a commitment to implement these measures through transportation management plans.
- Traffic studies and mitigation plans shall “consider not only the impacts of the project under consideration but the cumulative impact of other projects which also may impact the community, as well as the impact of non-resident drivers using local streets.” (Id., R.C.W. 1.1.12). The impact of new development along the Wisconsin Avenue corridor on traffic “must be mitigated to the greatest extent possible.” (Ch. 23, p. 23).

Rather than acknowledging the increased traffic and its impacts on neighboring residential streets, Applicant addresses virtually none of these required elements. Applicant focuses instead on projected Levels of Service, which even the Comprehensive Plan criticizes as a poor measure of traffic impact.<sup>11</sup> Giant’s submission emphasizes vehicular traffic flow, suggesting that it is desirable to disperse PUD traffic throughout a network of neighborhood streets. Its proposed traffic calming measures are all about facilitating this flow, rather than mitigating the impact of the traffic on the neighborhood, particularly on the residential side streets.

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<sup>11</sup> The Comprehensive Plan, in fact, criticizes LOS as a measure of traffic impact, stating that “in the past, the traditional way of measuring traffic impacts was to use a series of lettered grades (A through F) based on factors such as vehicle speed, the volume of cars that pass along a street compared to the street’s capacity, or the length of time for a car to pass through an intersection. These LOS standards continue to be widely used in the suburbs, where most trips are made by car. But traditional LOS measures are not appropriate in a built out city, where widening streets to increase capacity is rarely an option (or a desired outcome).”

The few so-called “mitigation” measures that Applicant offers – such as a bicycle rack and a traffic signal that in fact will direct more traffic into local residential streets – are simply ineffectual to address traffic impact. Its other proposals, such as replacing faded street signs and re-striping crosswalks; merely repeat on-going general recommendations from the Upper Wisconsin Corridor Study – which did not envision denser development at this site.

It is also clear that DDOT did not really study the PUD and its impact. The DDOT report states that the PUD “acknowledges the nature of the neighborhood in McLean Gardens and Cleveland Park and that Applicant will “employ safeguards...to maintain the quality of life in the neighborhood,” but neither Applicant nor DDOT has said what those safeguards are. Moreover, DDOT’s few mitigation suggestions – such as one-time Metro cards for residents -- are very general and taken verbatim from DDOT’s Transportation Management Demand Memo. In fact, DDOT recommended the same measures for the Whitman-Walker development and 14<sup>th</sup> and Swan, which is considerably smaller than this PUD, does not include a 56,000 sq. ft. SuperCenter, and sits one block – not one mile – from a Metro station.

The efficacy of the supposed traffic mitigation cited by DDOT is belied by DDOT’s own studies. DDOT’s Bicycle Master Plan uses a “scientifically calibrated bicycle level of service model”, somewhat analogous to intersection LOS, classifies Wisconsin Avenue near the PUD site and Macomb south of the PUD site as having “E” LOS for bikes, meaning that such streets are not considered attractive or comfortable for bicycle users. If the closest arterial access and the closest collector access to the PUD are rated LOS E by DDOT and therefore not viewed as attractive or comfortable for bicyclists, how can Applicant and DDOT view them as mitigators of traffic and part of the Traffic Management Plan.

The Comprehensive Plan also says that when PUDs are proposed traffic studies and mitigation plans should consider not only the impacts of the project under consideration but the cumulative impact of other projects which also may impact the community.” Neither the Applicant’s Traffic Study nor OP or DDOT reports refer to the increased traffic that will result from the matter-of-right development directly across from the PUD that will soon add 100 more residential units to the neighborhood.

Applicant has also offered a \$100,000 “escrow” to fund certain unspecified traffic calming measures if the PUD is approved and constructed. Such an arrangement ignores the clear requirement of the Comprehensive Plan that mitigation be identified and agreed upon before a PUD is approved. DDOT, incredibly, proposes an even more modest escrow account, and in any case both suggestions are below the \$500,000 escrow amount that ANC 3-C resolved is one of several explicit conditions to qualified support of the PUD.

Moreover, neither the Applicant nor DDOT have offered details on how such an escrow would be managed and how and when traffic calming measures would be determined and funded by the escrow. In his testimony before the Commission on April 4, 2009, Jeff Jennings of DDOT suggested that the escrow would be used for study of post-PUD traffic effects, rather than mitigation and that DDOT would look to Applicant's traffic consultant to conduct the post-PUD traffic effects analysis and recommend mitigation measures, if any. Such an arrangement, if DDOT is serious, would present an obvious conflict, since any unused escrow funds would presumably revert to applicant. In any event, recent traffic studies by DDOT, which contain traffic calming and safety infrastructure improvements for other streets in Ward 3, demonstrate that Applicant's proposed escrow amount is insufficient to fund much traffic calming.

**OP Has Acknowledged That in Commercial Areas Served by Multiple Bus Routes But With No Metro Station, Patrons Are More Likely to Drive, Undercutting The Notion That the PUD Could Be "Transit Oriented Development."**

The availability and quality of public transportation serving the PUD site certainly does not qualify the PUD as "transit oriented development" or establish that public transportation will significantly mitigate vehicular traffic. Unlike other parts of the upper Wisconsin corridor in Northwest Washington, the PUD area has no Metro stop. The closest Metro station is more than a one mile walk from the center of the PUD, and only two bus lines regularly stop at the PUD: the 96 and the 30 series. The latter is much maligned for its inefficiencies, including poor on-time performance and bunching of buses, and has been the subject of years of WMATA study to improve its service. The 30s series still remains slow and unreliable. The other bus lines mentioned in Applicant's transportation submission are also inadequate.<sup>12</sup>

The Office of Planning itself has recognized that in commercial areas that are not close to Metrorail stations, even when served by frequent, multiple bus routes, patrons are more likely to drive to commercial establishments. As OP concluded in its 2006 commercial district analysis of Glover Park, an area approximately one mile south of the PUD site, "[t]he Glover Park Commercial District is *served by several bus routes but not a Metrorail station, therefore making driving more likely than in some other communities.*"<sup>13</sup>

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<sup>12</sup> One line (H4) stops three blocks from the PUD and another very limited service (X3 makes last stop at 9:20AM and picks up again between 3 and 5 p.m.).

<sup>13</sup> D.C. Office of Planning, Glover Park Commercial District Analysis, Final Report (October 2006), at p. 5. At the time Glover Park was served by 5 Metrobus routes, connecting directly to 3 different Metro stops, and one Circulator bus route, compared with 4 Metrobus routes at the applicant's site. DDOT Glover Park Transportation Stud at p. 2.

### Examples of Adjacent Streets That Require Traffic Mitigation:

- Newark Street

We believe that the PUD will increase traffic throughout the neighborhood, but particular adjacent streets are likely to be affected in different ways. However, neither the Applicant nor DDOT addressed these impacts. There are several streets that require a mitigation plan for any PUD is approved, and mitigation measures should be specifically included in any PUD order.

As discussed earlier, Newark Street east of the project will be especially impacted because it is the continuation of the PUD's central spine where the primary entrances to both the north and south block garages would be located. As demonstrated, existing traffic volumes are quite high and already exceed levels for traffic calming under the city's guidelines. A majority of the households between 34<sup>th</sup> and Wisconsin have requested traffic calming on Newark, although DDOT did not refer to the petition in its report. Applicant cannot pretend that building the largest development project currently proposed in Ward 3 at the end of this narrow residential street will not have an impact. Indeed, Applicant refers presentation to the Commission refers to Newark Street as the PUD's "zipper" and highlights east-west access to the project by Newark.<sup>14</sup> Even if only 10 percent of the new traffic travels to and from the PUD on this street,<sup>15</sup> that would result in more than 400 more cars per day over existing high levels.

*As DDOT has recognized, Newark more than exceeds the city's guidelines for traffic calming, even before new development is factored in.* According to DDOT Traffic Calming Policies and Guidelines (2002), traffic calming measures should be considered if one of the following criteria is met: (1) the average daily traffic. ADT exceeds 1,500 vehicles per day or (2) if the peak hour volume is greater than 150 vehicles for the roadway; or (3) the 85th percentile speed on a street segment exceeds the posted speed limit by at least 10 mph. Newark Street at all measured locations far exceeds the ADT criterion under the Guidelines, and exceeds the peak hour criterion as well.<sup>16</sup>

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<sup>14</sup> Applicant's February 19, 2009 presentation to Zoning Commission, slide 19.

<sup>15</sup> Wells & Associates, Wisconsin Avenue Giant Transportation Impact Study (May 2008), p. 37. Applicant's study states that directional distribution of site-generated trips was derived from counts of existing traffic, previous traffic study, local knowledge, and engineering judgment." Assuming for the sake of argument that Applicant's estimates for directional distribution of traffic are correct, the PUD would generate over 400 additional vehicle trips per day on Newark Street east of Wisconsin.

<sup>16</sup> According to DDOT Traffic Calming Policies And Guidelines (2002), traffic calming measures *should* be considered if the following criteria is met: (1) the ADT exceeds 1,500 vehicles per day or if the peak hour volume is greater than 150 vehicles for the roadway; or (2) the 85th percentile speed on a street segment

According to the RDS data, the average ADT varies, depending on the 3 blocks between 34<sup>th</sup> St. and Newark, from approximately 2000 vehicles per day to 2600, with the highest daily volume over 2800 vehicles, which is quite high for a local street.<sup>17</sup>

After receiving the RDS data, DDOT recognized the severity of the existing cut-through traffic situation and installed, under an emergency work order, a series of speed humps in the 3400-3600 blocks of Newark Street. We welcome these measures, which appear to have reduced vehicle speed; however, the Guidelines suggest that speed humps are intended to address speed but not cut-through traffic volume. DDOT will need to address existing traffic volume on Newark Street and to mitigate the additional vehicle trips resulting from the proposed PUD -- to the extent that the impact of the PUD (over 4000 additional vehicle trips per day on area streets) is capable of being mitigated.

The Comprehensive Plan requires that the traffic effects of the PUD be mitigated as part of the approval process, not afterwards. Traffic calming should mitigate volume and separate high-intensity traffic uses along the Wisconsin Avenue corridor from the low-intensity residential traffic use of this local-classified street in an historic district. Addressing both existing cut-through traffic volume and future PUD impact should include, for example:

- Prohibit truck and bus access onto Newark Street.
- Discourage traffic to and from the PUD site at Wisconsin Avenue from going directly east and west across Wisconsin Avenue into Newark Street (similar to the diverter constructed at Wisconsin Avenue and Jennifer Street in Friendship Heights – east side or the light configuration and barrier at Wisconsin Avenue and Upton Street in North Cleveland Park – east side).
- Utilize other D.C. traffic calming program measures as may be necessary, including but not limited to Seattle circles, bulb-outs and raised crosswalks.

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exceeds the posted speed limit by at least 10 mph. Newark Street at all measured locations far exceeds the ADT criterion under the Guidelines, and exceeds the peak hour criterion as well. Recorded average vehicle volume data for the AM and PM peak hours is: 303, 268 (3600 block) 229, 215 (3500 block) 203, 214 (3400 block). Assuming for present purposes the validity of Giant's traffic study projections on the PUD's future impact and its assumptions about future traffic distribution, the PUD would add an additional 53 vehicles per hour to the considerable existing peak hour volume on this local street.

<sup>17</sup> The RDS volume data is also within the range of counts recorded on Rittenhouse, Tennyson and Upton Streets, before DDOT instituted traffic calming on those streets. None of those streets, of course, was faced with the additional impact of intensive development nearby. See DDOT Transportation Audit Studies at <http://ddot.dc.gov/ddot/cwp/view,a,1257,q,564210.asp>.

If the PUD is approved and no mitigation of traffic volume is mandated, as required by the Comprehensive Plan, Newark neighbors will endure years of demolition, construction and then additional induced traffic before traffic calming is considered. This effectively puts Newark in a worse position to get traffic calming than streets that have less of an existing problem and are not faced with additional large-scale commercial and residential development.

West of Wisconsin, Newark will also be impacted by increased traffic to and from the PUD. To avoid traffic congestion on Macomb St., many drivers even now use Newark between Wisconsin and Idaho/38<sup>th</sup> as a convenient route to and from Cathedral Ave and Massachusetts Ave. on the west – and that use will only increase with the PUD.

- Macomb Street

Macomb St both east and west of Wisconsin Ave is already congested, particularly since it is the only street linking Massachusetts Ave., Wisconsin Ave., 34<sup>th</sup> St., and Connecticut Ave. This use, and attendant traffic, will increase with the PUD. Adding more traffic, both auto and truck, onto Macomb through the proposed 38<sup>th</sup> Street garage entrance and south block retail dock in the Macomb Street alley may make traffic impassable on this collector street. On or near the 3700 block of Macomb, there are five popular full-service restaurants generating a great deal of traffic from out of the area. Trucks making deliveries to these restaurants offload in Macomb Street, and the alley where the Applicant proposes to build a loading dock is currently used by trash trucks servicing a large apartment building (3725 Macomb) and at least one adjacent restaurant. As noted in the parking testimony, the Macomb alley is currently used for trash collection for a large apartment building and at least one restaurant. Although designated a collector street, Macomb is among the narrower area streets, and more vehicles will not only make the street more impassable but will encourage through traffic to use nearby local streets as cut-through routes.

- Ordway – Idaho – 38<sup>th</sup> Street

Applicant's traffic study recommends substantial changes to the Wisconsin/Idaho/Ordway Street intersection. The Ordway party will testify about the substantial, adverse impacts on Ordway just northeast of the PUD. The Idaho party about the substantial, adverse impacts of the Giant loading dock on Idaho, a local street. The Commission will hear testimony about the PUD's traffic impact on 38<sup>th</sup> Street, also a local street, which would inappropriately become a connector between the south entrance of the main garage and Massachusetts Avenue.

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In conclusion, all of the projections, even Giant's, show that the traffic connected with the PUD site doubles, at a minimum. The impact of over 4000 more vehicles per day is very substantial on a residential neighborhood already suffering from extreme cut-through traffic, and is too much.

As the Commission is aware, the Comprehensive Plan requires traffic mitigation and calming measures to reduce the PUD's impact to be adopted before the PUD can be approved. The applicant has not done so, and OP and DDOT have gone along.

The applicant may be expected to minimize these concerns. The performance of District agencies on these matters, however, has fallen short. We expect them to follow the law and their own requirements, and to advise the Commission in a manner that is consistent with these requirements. They haven't done so.

DDOT's apparent acquiescence to both Giant's low estimates and the absence of mandated traffic management and calming measures is troubling. Perhaps this arises out of a confidence that post-construction measures can address any problem. More likely, it arises out of recognition that these problems cannot be effectively mitigated for a project of this size. We urge to direct OP and DDOT to do the following:

- Undertake the kind of rigorous analysis the Commission and City residents deserve;

- Determine the size and uses for which mitigation measures would be adequate, and tell the Commission what changes in size and uses are necessary to reach this level; and

- Recommend specific mitigation measures to deal with the problems caused by the modified project.

The Comprehensive Plan requires the traffic effects of the PUD be mitigated as a condition to approval, not afterwards, and any PUD order must include them.

Thank you for your consideration.

NEWARK ST BTWN WISCONSIN AND 36TH ST  
EB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000001  
Station ID: 300000000000

Latitude: 0' 0.000 Undefined

| Start Time   | Mon<br>15-Dec-0 | Tue   | Wed        | Thu    | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|--------------|-----------------|-------|------------|--------|------|----------------|------|------|-----------------|
| 12:00 AM     | *               | 3     | 2          | 8      | *    | 4              | *    | *    | 4               |
| 01:00        | *               | 6     | 2          | 2      | *    | 3              | *    | *    | 3               |
| 02:00        | *               | 2     | 2          | 0      | *    | 1              | *    | *    | 1               |
| 03:00        | *               | 5     | 3          | 4      | *    | 4              | *    | *    | 4               |
| 04:00        | *               | 4     | 1          | 3      | *    | 3              | *    | *    | 3               |
| 05:00        | *               | 5     | 5          | 5      | *    | 5              | *    | *    | 5               |
| 06:00        | *               | 21    | 20         | 15     | *    | 19             | *    | *    | 19              |
| 07:00        | *               | 92    | 86         | 95     | *    | 91             | *    | *    | 91              |
| 08:00        | *               | 158   | 120        | 161    | *    | 146            | *    | *    | 146             |
| 09:00        | *               | 69    | 75         | 86     | *    | 77             | *    | *    | 77              |
| 10:00        | *               | 57    | 73         | 58     | *    | 63             | *    | *    | 63              |
| 11:00        | *               | 65    | 72         | 62     | *    | 66             | *    | *    | 66              |
| 12:00 PM     | *               | 68    | 86         | 62     | *    | 72             | *    | *    | 72              |
| 01:00        | *               | 73    | 66         | 92     | *    | 77             | *    | *    | 77              |
| 02:00        | *               | 68    | 76         | 127    | *    | 90             | *    | *    | 90              |
| 03:00        | *               | 96    | 122        | 131    | *    | 116            | *    | *    | 116             |
| 04:00        | *               | 86    | 92         | 101    | *    | 93             | *    | *    | 93              |
| 05:00        | *               | 69    | 73         | 95     | *    | 79             | *    | *    | 79              |
| 06:00        | *               | 66    | 63         | 73     | *    | 67             | *    | *    | 67              |
| 07:00        | *               | 57    | 67         | 81     | *    | 68             | *    | *    | 68              |
| 08:00        | *               | 44    | 40         | 56     | *    | 47             | *    | *    | 47              |
| 09:00        | *               | 22    | 40         | 53     | *    | 38             | *    | *    | 38              |
| 10:00        | *               | 24    | 25         | 28     | *    | 26             | *    | *    | 26              |
| 11:00        | *               | 10    | 8          | 21     | *    | 13             | *    | *    | 13              |
| Total        | 0               | 1170  | 1219       | 1419   | 0    | 1268           | 0    | 0    | 1268            |
| % Avg. WkDay | 0.0%            | 92.3% | 96.1%      | 111.9% | 0.0% | 100.0%         |      |      |                 |
| % Avg. Week  | 0.0%            | 92.3% | 96.1%      | 111.9% | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak      |                 | 08:00 | 08:00      | 08:00  |      | 08:00          |      |      | 08:00           |
| Vol.         |                 | 158   | 120        | 161    |      | 146            |      |      | 146             |
| PM Peak      |                 | 15:00 | 15:00      | 15:00  |      | 15:00          |      |      | 15:00           |
| Vol.         |                 | 96    | 122        | 131    |      | 116            |      |      | 116             |
| Total        | 0               | 1170  | 1219       | 1419   | 0    | 1268           | 0    | 0    | 1268            |
| ADT          | ADT 1,269       |       | AADT 1,269 |        |      |                |      |      |                 |

NEWARK ST BTWN WISCONSIN AND 36TH ST  
WB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000001  
Station ID: 300000000000

Latitude: 0' 0.000 Undefined

| Start Time   | Mon<br>15-Dec-0 | Tue        | Wed        | Thu        | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|--------------|-----------------|------------|------------|------------|------|----------------|------|------|-----------------|
| 12:00 AM     | *               | 7          | 6          | 1          | *    | 5              | *    | *    | 5               |
| 01:00        | *               | 4          | 2          | 2          | *    | 3              | *    | *    | 3               |
| 02:00        | *               | 0          | 2          | 1          | *    | 1              | *    | *    | 1               |
| 03:00        | *               | 2          | 0          | 2          | *    | 1              | *    | *    | 1               |
| 04:00        | *               | 2          | 5          | 5          | *    | 4              | *    | *    | 4               |
| 05:00        | *               | 5          | 4          | 8          | *    | 6              | *    | *    | 6               |
| 06:00        | *               | 23         | 19         | 25         | *    | 22             | *    | *    | 22              |
| 07:00        | *               | 141        | 111        | 111        | *    | 121            | *    | *    | 121             |
| 08:00        | *               | <b>169</b> | <b>150</b> | <b>153</b> | *    | <b>157</b>     | *    | *    | <b>157</b>      |
| 09:00        | *               | 87         | 77         | 79         | *    | 81             | *    | *    | 81              |
| 10:00        | *               | 62         | 75         | 54         | *    | 64             | *    | *    | 64              |
| 11:00        | *               | 64         | 80         | 71         | *    | 72             | *    | *    | 72              |
| 12:00 PM     | *               | 80         | 94         | 82         | *    | 85             | *    | *    | 85              |
| 01:00        | *               | 72         | 73         | 94         | *    | 80             | *    | *    | 80              |
| 02:00        | *               | 67         | 73         | 91         | *    | 77             | *    | *    | 77              |
| 03:00        | *               | <b>135</b> | <b>138</b> | <b>137</b> | *    | <b>137</b>     | *    | *    | <b>137</b>      |
| 04:00        | *               | 87         | 98         | 99         | *    | 95             | *    | *    | 95              |
| 05:00        | *               | 79         | 95         | 98         | *    | 91             | *    | *    | 91              |
| 06:00        | *               | 75         | 71         | 86         | *    | 77             | *    | *    | 77              |
| 07:00        | *               | 58         | 61         | 78         | *    | 66             | *    | *    | 66              |
| 08:00        | *               | 31         | 50         | 63         | *    | 48             | *    | *    | 48              |
| 09:00        | *               | 22         | 47         | 50         | *    | 40             | *    | *    | 40              |
| 10:00        | *               | 19         | 19         | 21         | *    | 20             | *    | *    | 20              |
| 11:00        | *               | 6          | 17         | 12         | *    | 12             | *    | *    | 12              |
| Total        | 0               | 1297       | 1367       | 1423       | 0    | 1365           | 0    | 0    | 1365            |
| % Avg. WkDay | 0.0%            | 95.0%      | 100.1%     | 104.2%     | 0.0% | 100.0%         |      |      |                 |
| % Avg. Week  | 0.0%            | 95.0%      | 100.1%     | 104.2%     | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak      |                 | 08:00      | 08:00      | 08:00      |      | 08:00          |      |      | 08:00           |
| Vol.         |                 | 169        | 150        | 153        |      | 157            |      |      | 157             |
| PM Peak      |                 | 15:00      | 15:00      | 15:00      |      | 15:00          |      |      | 15:00           |
| Vol.         |                 | 135        | 138        | 137        |      | 137            |      |      | 137             |
| Total        | 0               | 1297       | 1367       | 1423       | 0    | 1365           | 0    | 0    | 1365            |

ADT ADT 1,362 AADT 1,362

NEWARK ST BTWN 36TH ST AND 35TH ST  
EB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000002  
Station ID: 300000000000

Latitude: 0' 0.000 Undefined

| Start Time      | Mon<br>15-Dec-0 | Tue        | Wed        | Thu        | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|-----------------|-----------------|------------|------------|------------|------|----------------|------|------|-----------------|
| 12:00           |                 |            |            |            |      |                |      |      |                 |
| AM              | *               | 4          | 1          | 6          | *    | 4              | *    | *    | 4               |
| 01:00           | *               | 2          | 2          | 2          | *    | 2              | *    | *    | 2               |
| 02:00           | *               | 2          | 2          | 1          | *    | 2              | *    | *    | 2               |
| 03:00           | *               | 2          | 1          | 1          | *    | 1              | *    | *    | 1               |
| 04:00           | *               | 3          | 1          | 3          | *    | 2              | *    | *    | 2               |
| 05:00           | *               | 7          | 7          | 6          | *    | 7              | *    | *    | 7               |
| 06:00           | *               | 8          | 11         | 14         | *    | 11             | *    | *    | 11              |
| 07:00           | *               | 75         | 63         | 61         | *    | 66             | *    | *    | 66              |
| 08:00           | *               | <b>139</b> | <b>124</b> | <b>141</b> | *    | <b>135</b>     | *    | *    | <b>135</b>      |
| 09:00           | *               | 56         | 57         | 65         | *    | 59             | *    | *    | 59              |
| 10:00           | *               | 44         | 56         | 49         | *    | 50             | *    | *    | 50              |
| 11:00           | *               | 52         | 56         | 51         | *    | 53             | *    | *    | 53              |
| 12:00           |                 |            |            |            |      |                |      |      |                 |
| PM              | *               | 65         | 66         | 52         | *    | 61             | *    | *    | 61              |
| 01:00           | *               | 61         | 46         | 70         | *    | 59             | *    | *    | 59              |
| 02:00           | *               | 65         | 60         | 64         | *    | 63             | *    | *    | 63              |
| 03:00           | *               | <b>80</b>  | <b>91</b>  | <b>84</b>  | *    | <b>85</b>      | *    | *    | <b>85</b>       |
| 04:00           | *               | 58         | 66         | 72         | *    | 65             | *    | *    | 65              |
| 05:00           | *               | 48         | 67         | 72         | *    | 62             | *    | *    | 62              |
| 06:00           | *               | 52         | 55         | 71         | *    | 59             | *    | *    | 59              |
| 07:00           | *               | 41         | 42         | 62         | *    | 48             | *    | *    | 48              |
| 08:00           | *               | 35         | 33         | 47         | *    | 38             | *    | *    | 38              |
| 09:00           | *               | 20         | 35         | 34         | *    | 30             | *    | *    | 30              |
| 10:00           | *               | 13         | 20         | 32         | *    | 22             | *    | *    | 22              |
| 11:00           | *               | 10         | 10         | 12         | *    | 11             | *    | *    | 11              |
| Total           | 0               | 942        | 972        | 1072       | 0    | 995            | 0    | 0    | 995             |
| % Avg.<br>WkDay | 0.0%            | 94.7%      | 97.7%      | 107.7%     | 0.0% | 100.0%         |      |      |                 |
| % Avg.<br>Week  | 0.0%            | 94.7%      | 97.7%      | 107.7%     | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak         |                 | 08:00      | 08:00      | 08:00      |      | 08:00          |      |      | 08:00           |
| Vol.            |                 | 139        | 124        | 141        |      | 135            |      |      | 135             |
| PM Peak         |                 | 15:00      | 15:00      | 15:00      |      | 15:00          |      |      | 15:00           |
| Vol.            |                 | 80         | 91         | 84         |      | 85             |      |      | 85              |
| Total           | 0               | 942        | 972        | 1072       | 0    | 995            | 0    | 0    | 995             |
| ADT             | ADT 995         |            | AADT 995   |            |      |                |      |      |                 |

NEWARK ST BTWN 36TH ST AND 35TH ST  
WB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000002  
Station ID: 300000000000

Latitude: 0' 0.000 Undefined

| Start Time      | Mon<br>15-Dec-0 | Tue   | Wed        | Thu    | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|-----------------|-----------------|-------|------------|--------|------|----------------|------|------|-----------------|
| 12:00           |                 |       |            |        |      |                |      |      |                 |
| AM              | *               | 6     | 4          | 1      | *    | 4              | *    | *    | 4               |
| 01:00           | *               | 4     | 2          | 1      | *    | 2              | *    | *    | 2               |
| 02:00           | *               | 0     | 2          | 1      | *    | 1              | *    | *    | 1               |
| 03:00           | *               | 2     | 2          | 1      | *    | 2              | *    | *    | 2               |
| 04:00           | *               | 2     | 3          | 4      | *    | 3              | *    | *    | 3               |
| 05:00           | *               | 5     | 4          | 6      | *    | 5              | *    | *    | 5               |
| 06:00           | *               | 11    | 11         | 16     | *    | 13             | *    | *    | 13              |
| 07:00           | *               | 85    | 85         | 81     | *    | 84             | *    | *    | 84              |
| 08:00           | *               | 104   | 95         | 82     | *    | 94             | *    | *    | 94              |
| 09:00           | *               | 60    | 48         | 70     | *    | 59             | *    | *    | 59              |
| 10:00           | *               | 43    | 49         | 40     | *    | 44             | *    | *    | 44              |
| 11:00           | *               | 46    | 57         | 63     | *    | 55             | *    | *    | 55              |
| 12:00           |                 |       |            |        |      |                |      |      |                 |
| PM              | *               | 63    | 52         | 63     | *    | 59             | *    | *    | 59              |
| 01:00           | *               | 52    | 47         | 77     | *    | 59             | *    | *    | 59              |
| 02:00           | *               | 67    | 62         | 55     | *    | 61             | *    | *    | 61              |
| 03:00           | *               | 131   | 120        | 139    | *    | 130            | *    | *    | 130             |
| 04:00           | *               | 60    | 88         | 69     | *    | 72             | *    | *    | 72              |
| 05:00           | *               | 76    | 90         | 90     | *    | 85             | *    | *    | 85              |
| 06:00           | *               | 82    | 60         | 93     | *    | 78             | *    | *    | 78              |
| 07:00           | *               | 51    | 46         | 51     | *    | 49             | *    | *    | 49              |
| 08:00           | *               | 24    | 37         | 43     | *    | 35             | *    | *    | 35              |
| 09:00           | *               | 19    | 35         | 34     | *    | 29             | *    | *    | 29              |
| 10:00           | *               | 11    | 12         | 17     | *    | 13             | *    | *    | 13              |
| 11:00           | *               | 4     | 14         | 8      | *    | 9              | *    | *    | 9               |
| Total           | 0               | 1008  | 1025       | 1105   | 0    | 1045           | 0    | 0    | 1045            |
| % Avg.<br>WkDay | 0.0%            | 96.5% | 98.1%      | 105.7% | 0.0% | 100.0%         |      |      |                 |
| % Avg.<br>Week  | 0.0%            | 96.5% | 98.1%      | 105.7% | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak         |                 | 08:00 | 08:00      | 08:00  |      | 08:00          |      |      | 08:00           |
| Vol.            |                 | 104   | 95         | 82     |      | 94             |      |      | 94              |
| PM Peak         |                 | 15:00 | 15:00      | 15:00  |      | 15:00          |      |      | 15:00           |
| Vol.            |                 | 131   | 120        | 139    |      | 130            |      |      | 130             |
| Total           | 0               | 1008  | 1025       | 1105   | 0    | 1045           | 0    | 0    | 1045            |
| ADT             | ADT 1,046       |       | AADT 1,046 |        |      |                |      |      |                 |

NEWARK ST BTWN 34TH PL AND 34TH ST  
EB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000003  
Station ID: 300000000000

Latitude: 0° 0.000 Undefined

| Start Time   | Mon<br>15-Dec-0 | Tue       | Wed        | Thu        | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|--------------|-----------------|-----------|------------|------------|------|----------------|------|------|-----------------|
| 12:00 AM     | *               | 5         | 4          | 9          | *    | 6              | *    | *    | 6               |
| 01:00        | *               | 2         | 3          | 1          | *    | 2              | *    | *    | 2               |
| 02:00        | *               | 2         | 2          | 1          | *    | 2              | *    | *    | 2               |
| 03:00        | *               | 2         | 1          | 1          | *    | 1              | *    | *    | 1               |
| 04:00        | *               | 2         | 2          | 3          | *    | 2              | *    | *    | 2               |
| 05:00        | *               | 7         | 8          | 7          | *    | 7              | *    | *    | 7               |
| 06:00        | *               | 9         | 12         | 12         | *    | 11             | *    | *    | 11              |
| 07:00        | *               | 42        | 43         | 42         | *    | 42             | *    | *    | 42              |
| 08:00        | *               | <b>93</b> | <b>73</b>  | <b>97</b>  | *    | <b>88</b>      | *    | *    | <b>88</b>       |
| 09:00        | *               | 39        | 39         | 53         | *    | 44             | *    | *    | 44              |
| 10:00        | *               | 35        | 48         | 53         | *    | 45             | *    | *    | 45              |
| 11:00        | *               | 50        | 43         | 52         | *    | 48             | *    | *    | 48              |
| 12:00 PM     | *               | 64        | 73         | 61         | *    | 66             | *    | *    | 66              |
| 01:00        | *               | 41        | 41         | 71         | *    | 51             | *    | *    | 51              |
| 02:00        | *               | 53        | 42         | 79         | *    | 58             | *    | *    | 58              |
| 03:00        | *               | <b>93</b> | <b>127</b> | <b>125</b> | *    | <b>115</b>     | *    | *    | <b>115</b>      |
| 04:00        | *               | 60        | 74         | 70         | *    | 68             | *    | *    | 68              |
| 05:00        | *               | 38        | 64         | 57         | *    | 53             | *    | *    | 53              |
| 06:00        | *               | 53        | 52         | 64         | *    | 56             | *    | *    | 56              |
| 07:00        | *               | 38        | 46         | 50         | *    | 45             | *    | *    | 45              |
| 08:00        | *               | 26        | 35         | 47         | *    | 36             | *    | *    | 36              |
| 09:00        | *               | 18        | 29         | 50         | *    | 32             | *    | *    | 32              |
| 10:00        | *               | 12        | 18         | 29         | *    | 20             | *    | *    | 20              |
| 11:00        | *               | 8         | 13         | 17         | *    | 13             | *    | *    | 13              |
| Total        | 0               | 792       | 892        | 1051       | 0    | 911            | 0    | 0    | 911             |
| % Avg. WkDay | 0.0%            | 86.9%     | 97.9%      | 115.4%     | 0.0% | 100.0%         |      |      |                 |
| % Avg. Week  | 0.0%            | 86.9%     | 97.9%      | 115.4%     | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak      |                 | 08:00     | 08:00      | 08:00      |      | 08:00          |      |      | 08:00           |
| Vol.         |                 | 93        | 73         | 97         |      | 88             |      |      | 88              |
| PM Peak      |                 | 15:00     | 15:00      | 15:00      |      | 15:00          |      |      | 15:00           |
| Vol.         |                 | 93        | 127        | 125        |      | 115            |      |      | 115             |
| Total        | 0               | 792       | 892        | 1051       | 0    | 911            | 0    | 0    | 911             |

ADT

ADT 912

AADT 912

NEWARK ST BTWN 34TH PL AND 34TH ST  
WB

Roadway Data Systems, Corp.  
9160 Red Branch Road, Suite E6  
Columbia, MD, USA 21045  
410-992-1995

Page 1

Site Code: 000000000003  
Station ID: 300000000000

Latitude: 0' 0.000 Undefined

| Start Time   | Mon<br>15-Dec-0 | Tue   | Wed        | Thu    | Fri  | Average<br>Day | Sat  | Sun  | Week<br>Average |
|--------------|-----------------|-------|------------|--------|------|----------------|------|------|-----------------|
| 12:00 AM     | *               | 3     | 2          | 3      | *    | 3              | *    | *    | 3               |
| 01:00        | *               | 4     | 3          | 2      | *    | 3              | *    | *    | 3               |
| 02:00        | *               | 0     | 2          | 1      | *    | 1              | *    | *    | 1               |
| 03:00        | *               | 4     | 1          | 0      | *    | 2              | *    | *    | 2               |
| 04:00        | *               | 2     | 2          | 3      | *    | 2              | *    | *    | 2               |
| 05:00        | *               | 7     | 6          | 7      | *    | 7              | *    | *    | 7               |
| 06:00        | *               | 11    | 15         | 14     | *    | 13             | *    | *    | 13              |
| 07:00        | *               | 83    | 91         | 101    | *    | 92             | *    | *    | 92              |
| 08:00        | *               | 130   | 112        | 103    | *    | 115            | *    | *    | 115             |
| 09:00        | *               | 60    | 45         | 79     | *    | 61             | *    | *    | 61              |
| 10:00        | *               | 36    | 53         | 39     | *    | 43             | *    | *    | 43              |
| 11:00        | *               | 56    | 52         | 55     | *    | 54             | *    | *    | 54              |
| 12:00 PM     | *               | 62    | 55         | 65     | *    | 61             | *    | *    | 61              |
| 01:00        | *               | 42    | 44         | 72     | *    | 53             | *    | *    | 53              |
| 02:00        | *               | 52    | 58         | 58     | *    | 56             | *    | *    | 56              |
| 03:00        | *               | 86    | 99         | 111    | *    | 99             | *    | *    | 99              |
| 04:00        | *               | 61    | 83         | 59     | *    | 68             | *    | *    | 68              |
| 05:00        | *               | 64    | 72         | 83     | *    | 73             | *    | *    | 73              |
| 06:00        | *               | 66    | 57         | 100    | *    | 74             | *    | *    | 74              |
| 07:00        | *               | 42    | 34         | 55     | *    | 44             | *    | *    | 44              |
| 08:00        | *               | 31    | 30         | 39     | *    | 33             | *    | *    | 33              |
| 09:00        | *               | 19    | 37         | 32     | *    | 29             | *    | *    | 29              |
| 10:00        | *               | 11    | 5          | 17     | *    | 11             | *    | *    | 11              |
| 11:00        | *               | 5     | 16         | 6      | *    | 9              | *    | *    | 9               |
| Total        | 0               | 937   | 974        | 1104   | 0    | 1006           | 0    | 0    | 1006            |
| % Avg. WkDay | 0.0%            | 93.1% | 96.8%      | 109.7% | 0.0% | 100.0%         |      |      |                 |
| % Avg. Week  | 0.0%            | 93.1% | 96.8%      | 109.7% | 0.0% | 100.0%         | 0.0% | 0.0% |                 |
| AM Peak      |                 | 08:00 | 08:00      | 08:00  |      | 08:00          |      |      | 08:00           |
| Vol.         |                 | 130   | 112        | 103    |      | 115            |      |      | 115             |
| PM Peak      |                 | 15:00 | 15:00      | 15:00  |      | 15:00          |      |      | 15:00           |
| Vol.         |                 | 86    | 99         | 111    |      | 99             |      |      | 99              |
| Total        | 0               | 937   | 974        | 1104   | 0    | 1006           | 0    | 0    | 1006            |
| ADT          | ADT 1,005       |       | AADT 1,005 |        |      |                |      |      |                 |



Idaho Ave NW

Ordway St NW

Ordway St NW

34th St NW

Norton Pl NW

34th Pl NW

Highland P

Wisconsin Ave NW

36th St NW

34th St NW

Newark St NW

Newark St NW

1

2

3

35th St NW

35th St NW

Macomb St NW

2nd St NW

Microsoft  
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