

Newark Street Neighbors
Washington, DC 20016

May 20, 2009

Chairman Anthony Hood and Commissioners,
District of Columbia Zoning Commission
441 4th St NW # 200
Washington, DC 20001

Re: Friendship Shopping Center PUD, Zoning Commission Case No. 08-15

Dear Chairman Hood and Commissioners,

We write in connection with the above-referenced case (the "Giant PUD"). We welcome a new grocery store, but are concerned that the larger store and the additional development proposed for the Giant PUD site will have a serious, negative traffic impact in the 3400-3600 blocks of Newark Street, N.W., where existing traffic volume is already unacceptably high. Accordingly, we respectfully request that mitigation of resulting traffic volume on Newark be included in any Zoning Commission order concerning the Giant PUD.

Newark Street directly east of the Giant PUD site is a narrow, residential street in the Cleveland Park Historic District, which the D.C. Department of Transportation classifies as "local," DDOT's lowest-level functional street category. However, frequent cut-through traffic not only reduces pedestrian safety on Newark but also results in noise, vibration and pollution, further impacting our quality of life.

As the record before the Commission reflects, traffic volume in the 3400-3600 blocks of Newark is quite high today. *DDOT acknowledged that volume on Newark is considerably greater than its traffic calming guideline of 1,500 vehicles per day on a local street, even before the impact of new development is considered.* Independent data in the record shows that currently the average daily traffic volume on this section of Newark ranges from approximately 2000 to 2600 vehicles per day, with the highest daily volume over 2800 vehicles.¹

After reviewing the independent data submitted to the Commission, DDOT recognized the severity of our existing cut-through traffic situation and recently installed, under an emergency work order, a series of speed humps in the 3400-3600 blocks of Newark Street. We appreciate these measures, which appear to reduce vehicle **speed** to an extent.² However, *the considerable volume of cut-through traffic on Newark remains our basic problem.*

¹ See Zoning Commission Case No. 08-15, Wisconsin/Newark Neighborhood Coalition, Testimony on Traffic Issues (May 4, 2009) ("WNNC Traffic Testimony"), Ex. A.

² The city's traffic calming guidelines suggest that speed humps are intended to address speed but not volume. DDOT Transportation Audit Guidelines (2006), pp.12-13.

ZONING COMMISSION
District of Columbia
CASE No. 08-15
EXHIBIT No. 258 Orig

The case record shows that the Giant PUD will significantly impact future traffic levels. The independent review of Giant's traffic study concluded that that the PUD will result in over 4,000 additional vehicle trips per day on the surrounding streets,³ a finding which Giant has not disputed.⁴ Giant's own study stated that there will be more than 550 additional trips in the Saturday peak hour alone.⁵ Giant's traffic consultant, Mr. Wells, has acknowledged that PUD site traffic will double compared to current levels.⁶ While not all of these additional vehicles will travel on Newark Street, using Giant's traffic distribution assumptions,⁷ the resulting impact could be as much as 400 additional vehicle trips per day in the 3400-3600 blocks of Newark. *The annualized impact on Newark could be over 125,000 additional vehicle trips.*⁸

The traffic increase on Newark Street may be even higher than these projections indicate, given Newark's proximity to the Giant PUD and precarious location between the Wisconsin Avenue and 34th Street/Reno Road arterials. The 3400-3600 blocks are directly east of the Giant PUD's central spine where the primary entrances to both the north and south block garages would be located. The PUD application even refers to Newark as the PUD's "zipper" and highlights east-west access to the PUD site from Newark,⁹ which further underscores our concern about additional traffic impact.

As you are aware, 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 corridor from the low-intensity residential use of this local-classified street in a National Register historic district. The development of 100 new residences at the former nursing home site directly across from the PUD will generate additional Newark traffic, which the Plan requires be taken into account.

We respectfully urge that effective traffic mitigation be part of any PUD order. We have tried repeatedly, but without success, to have the applicant agree to address traffic issues consensually before the contested hearing stage. Based on applicant's non-responsiveness, we have no confidence that applicant will address these issues without the Commission requiring it to do so. First, applicant has minimized the existing problem, because its data undercounted neighborhood traffic, even compared to DDOT's data.¹⁰ Second, applicant's representative, Mr. Heapes, expressly acknowledged at a large community meeting local residents' concern that traffic mitigation should be addressed as part of the Giant PUD, rather than left to the

³ District of Columbia Zoning Commission ("ZC") Case No. 08-15, Precision Systems, Inc.: Friendship Heights Traffic Study Peer Review (March 2009), p. 14; see WNNC Traffic Testimony, p. 4.

⁴ ZC Case No. 08-15, Wells & Assoc., Memorandum to Lucy Wildrick of StreetWorks (May 4, 2009), p. 3, para. 8.

⁵ ZC Case No. 08-15, Wells & Assoc., Wisconsin Avenue Giant Transportation Impact Study (May 2008), p. 4.

⁶ "Giant Expansion Sparks Neighborhood Divisions," *Northwest Current* (June 18, 2008), pp. 1, 18.

⁷ ZC Case No. 08-15, Wells & Assoc., Wisconsin Avenue Giant Transportation Impact Study (May 2008), p. 37.

⁸ Calculation assumes that Saturday traffic is 67% and Sunday traffic is 50% of weekday estimates. This may be a conservative assumption, given Giant's projection that the Saturday PM peak hour exceeds the weekday PM peak.

⁹ ZC Case No. 08-15, Giant's February 19, 2009 presentation to Zoning Commission, slide 19.

¹⁰ ZC Case No. 08-15, WNNC Traffic Testimony, pp. 3-5.

future.¹¹ Unfortunately, applicant has not followed through. Third, applicant has rejected any suggestion to reduce the traffic impact by trimming the size of the project.

We therefore request that any PUD order include provisions requiring Giant and DDOT to address future traffic volume, similar to relief that the residents of the 3500-3600 blocks of Ordway Street have requested from the Commission, by:

- Prohibiting truck and bus access onto the 3400-3600 blocks of Newark Street.
- Discouraging traffic to and from the Giant PUD site at Wisconsin Avenue from going directly east and west across Wisconsin Avenue into Newark Street.
- Utilizing other D.C. traffic calming program measures as may be necessary to address volume, including but not limited to Seattle circles, bulb-outs and raised crosswalks.

We also request that any PUD order include a traffic calming escrow of at least \$500,000 to address *unforeseen* impacts on surrounding streets, which is one of the conditions to ANC 3-C's conditional support of the project.

Thank you for your attention to our concerns.

Sincerely,

Jonathan Abram
Eleni Constantine
3501 Newark Street, N.W.

Ross Ain
Judy Ain
3512 Newark Street, N.W.

Christopher Buckley
Lucy Buckley
3516 Newark St NW

Wendy Farrow
3602 Newark Street, N.W.

Ann Hamilton
3518 Newark Street, N.W.

¹¹ Community Meeting with applicant's representatives, June 11, 2008, Washington Hebrew Congregation, Washington, D.C.

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John Korbel
Pam Korbel
3420 Newark Street, N.W.

Wilfrid Kohl
Kay Kohl
3451 Newark Street, N.W.

John Kuhnle
Edith Kuhnle
3401 Newark Street, N.W.

Peter Espenschied
3414
Newark Street, N.W.

Karen Barker Marcou
George T. Marcou
3503 Newark Street, N.W.

Rick Nash
MaryAnn Nash
3456 Newark Street, N.W.

John O'Sullivan
Susan O'Sullivan
3410 Newark Street, N.W.

Cc: Nancy J. MacWood
Commissioner, ANC 3C-09

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Chairman Anthony Hood and Commissioners,
District of Columbia Zoning Commission
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2009 MAY 20 PM 3:26

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ZONING COMMISSION
District of Columbia
CASE NO. 08-15
EXHIBIT NO. 248 FAX

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MaryAnn Nash
3456 Newark Street, N.W.

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Susan O'Sullivan
3410 Newark Street, N.W.

Cc: Nancy J. MacWood
Commissioner, ANC 3C-09

To:
Sharon S. Schellin,
Secretary to the Zoning Commission,
District of Columbia Office of Zoning
Fax number 202-727-6072

Ms. Schellin,

Please insert the attached letter in the record of Friendship Shopping Center PUD, Zoning Commission Case No. 08-15.

Thank you for your assistance.

4 PAGE LETTER FOLLOWS.

2009.05.20 PM 3:26