DONOHUE & STEARNS, PLC

October 3, 2019

**VIA IZIS**

Chairman Anthony Hood
D.C. Zoning Commission
441 4th Street, N.W., Suite 200S
Washington, D.C. 20001

**Re:** ZC Case 19-10/ Valor Development, LLC/ Square 1499
Hearing Date: October 7, 2019

Chairman Hood:

On behalf of my client, Citizens for Responsible Development ("CRD"), I am submitting the attached two documents into the record for Zoning Commission Case No. 19-10:

1. CRD's Response to the Gorove/Slade Comprehensive Transportation Report; and
2. Joe Mehra's Transportation Analysis.

We appreciate the Commission's consideration of these materials.

Thank you,

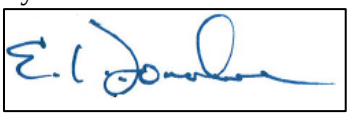
Edward L. Donohue
Attorney for CRD

**Enclosures**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on **October 3, 2019**, a copy of the foregoing Response to the Gorove/Slade Comprehensive Transportation Report and Transportation Analysis in ZC Case No. 19-10 was served via email, on Advisory Neighborhood Commissions 3E and 3D (3E@anc.dc.gov; 3D@anc.dc.gov) and counsel for the Applicant, Norman M. Glasgow, Jr. (norman.glasgowjr@hklaw.com).

By:



Edward L. Donohue

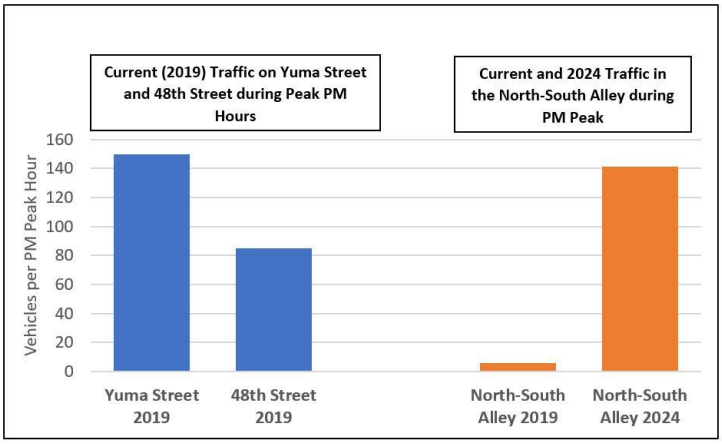
Dated: October 3, 2019

**Response of Citizens for Responsible Development**
**to Comprehensive Transportation Review**
**Zoning Case 19-10 Valor Development LLC**

Citizens for Responsible Development (CRD) will demonstrate that the Valor Project (the "Project") will create conditions, both within the Project site and in the surrounding area, that will adversely affect traffic and endanger the safety of pedestrians, drivers, and bicyclists.

## I. The Project Increases Traffic Congestion

The Project will result in an additional **3,003** to **3,437 daily vehicle trips** (depending on the final size of the grocery store and the final number of residential units), thus significantly increasing the volume of traffic in and around the site. Traffic in the N/S alley and the E/W alley, both 20 feet wide, will be comparable to the current volume of traffic on the surrounding streets, namely Yuma and 48th Streets, both 30 feet wide. (see chart)




According to the Gorove/Slade (G/S) CTR, the Project will generate:

- 131 additional vehicle trips per hour during the morning rush hours
- 283 additional vehicle trips per hour during afternoon peak times
- 260 additional vehicle trips per hour during peak weekend times

## II. The Project Threatens Pedestrian Safety

All of the increased traffic will enter and exit the site through the alleys, thus creating more pedestrian-vehicle conflict points within the alleyway system for residents of the new buildings and customers of the new grocery store, as well as for neighborhood residents. Due to the increase in vehicular traffic in the alleyways, these alleys will serve as internal roads; yet, these roadways will provide no protective measures for pedestrians or bicyclists, including sidewalks that comply with ADA guidelines. There is no safe pedestrian pathway through the site since the "delineated pedestrian pathways," in some cases only 3 feet wide, that are proposed for the alleys will have no protective buffers between pedestrians and the drive lanes of the alleys that will also carry large trucks. Pedestrians in the E/W alley will be required to cross three vehicular entrances used by cars entering the townhouse garages and the underground parking garage and by delivery trucks accessing the loading docks.

In addition to dangers in the alleys, new pedestrian-vehicle conflict points will be created at all three alley entrances on Massachusetts Avenue, Yuma Street, and 48th Street. At these points, pedestrians using the existing sidewalks that surround the site will be forced to cross these busy alley entrances, which will carry two-way traffic, with no pedestrian safeguards in place.

## III. The Project Fails to Provide Adequate Facilities to Serve the New Buildings and the Retail.

As specified in the CTR, all car and truck traffic for the Project must use the alley system. The existing infrastructure around the site (two narrow alleys) does not support the increased volume of two-way traffic and the simultaneous activity of trucks entering and unloading in the same alleys, while adhering to the "Front in, front out" requirement for alley use. Proposed "entrance zones" or loading areas on 48th and Yuma Streets that will allow additional deliveries and pick-up/drop-off zones will overburden these residential streets. Further, the alleys are not designed to carry an increase in pedestrian traffic along with cars and trucks. The construction of "delineated pedestrian pathways" along the alleys as described in the CTR acknowledges that more pedestrians will use the alleys to get from the neighborhood and the new buildings to the shops along both sides of Massachusetts Avenue. The alleys will carry many more pedestrians and significantly more traffic compared to current use of these alleys.

## IV. The Project Is Inconsistent with the Transportation Element of the DC Comprehensive Plan.

"The overarching goal for transportation in the District is: Create a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents." (Transportation Element, p. 4-4)
The Transportation Element also states that, "Improvements to pedestrian facilities can enhance the quality of the walking and public transit environments and foster greater use of both modes. Improvements should focus on reductions in the number and severity of pedestrian-vehicle conflict points, clarified pedestrian routing, widened sidewalks, and improved aesthetic features such as landscaping." (Transportation Element, p. 4-28).

**Table 31-1 | Minimum Sidewalk Widths**

| | Curb Walk* | Tree/Furnishing Zone*** | Sidewalk Unobstructed Clear Width (min) | Public Parking/ Café Zone | Total Minimum Sidewalk Width |
|---|---|---|---|---|---|
| **Low- to Moderate-Density Residential**** | None | 4-6 feet | 6 feet | Varies | 10 feet |
| **High-Density Residential** | 1 foot | 4–8 feet | 8 feet | Varies | 13 feet |
| **Central DC and Commercial Areas****** | 1–2 feet | 4–10 feet | 10 feet | Varies | 16 feet |

***NOTE: All widths depend on sidewalk space within the ROW Designated Street Distribution Cards; for all projects, refer to streetscape standards for historic zones and the DDOT Green Infrastructure Standards.***
*Curb walks must be provided where permitted by DDOT and if accessible parking spaces are provided in accordance with the proportions set forth in the Federal PROWAG.
**Single-family detached houses and row houses.
***Reference soil volume minimums and identify utility locations when establishing this zone.
****Curb walk and tree furnishing zones must total at least 6 feet.

By increasing the number of pedestrian-vehicle conflict points, the Project fails to meet the "access and mobility needs of District residents," as called for in the Comprehensive Plan. In addition, the Project does not meet the minimum standards for sidewalk width, as noted in Table 31-1 above (January 2019 DDOT Design and Engineering manual, p. 31-3).

In the CTR, G/S assumes that 90 per cent of grocery store customers and new residents will use cars (p. 34). These customers and residents will encounter constrained driving conditions in the narrow alleyways.

Currently, the neighborhood around the Project site enjoys a high level of "walkability," according to walkscore.com (see table below). Indeed, according to the G/S CTR, "most facilities meet DDOT standards and provide a quality walking experience." (Gorove/Slade August 23, 2019 CTR, p. 71) Access to transit, however, is limited in this area, particularly during off-peak hours. The N4 and N6 bus route serves this neighborhood. The N4 bus runs Mondays through Fridays during the day; the N6 bus traverses the **same route** in the evenings from Monday through Friday (when N4 service ends) and on Saturdays and Sundays. The site is 1.0 mile from the Tenleytown Metro station. The Transit score (shown in the table below) for this neighborhood is 41, indicating only "**Some Transit**."

| | | |
|---|---|---|
| Walk Score | 75 | Very Walkable |
| Transit Score | 41 | Some Transit |
| Bike Score | 65 | Bikeable |

As stated above, most residents of the new buildings will have cars. The allocation of parking spaces is of concern, especially considering the parking easement required with

American University. Some residents with cars may not wish to lease a monthly parking space in the proposed underground garage. Parking, on the part of new residents, along with shoppers and visitors, will overflow into the neighborhood. The Applicant is proposing to offer some type of shuttle service to the Metro during certain times of the day for a duration of one year. What will happen when this time period elapses remains unclear. The Project will result in air, noise, and light pollution in the neighborhood. The amount of green public space offered in the proposal is inadequate. Park-like areas and landscaped buffers between the buildings and the streets/alleys need to be incorporated into the plans.

The Project, therefore, also fails to meet the Transportation Element goal of enhancing the "quality of life for District Residents." The increase in traffic; the increase in noise and air pollution from cars and trucks; the unsafe conditions for pedestrians and bicyclists; the unsafe driving constraints for drivers; the lack of easy access to rapid transit; the lack of attractive green public space; and overflow parking in the neighborhood will result in a lower quality of life for all residents of the neighborhood.

## V. The Infrastructure around the Site Is Inadequate to Support the Project.

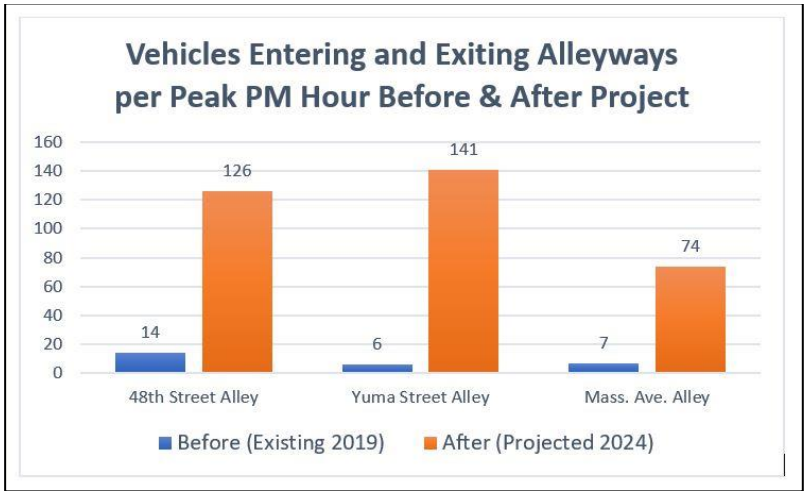
The Transportation Element further states that, "Assessing and measuring the transportation impacts of land use decisions is also an important part of integrated land use and transportation planning. New development generates new trips - be they auto trips, transit trips, or pedestrian and bicycle trips. Major land use changes such as the development of large housing complexes or office buildings must be evaluated for their impacts on existing and planned transportation infrastructure to ensure that the network can function adequately when the projects are completed." (Transportation Element p. 4-5).

The width of both the E/W alley and the N/S alley will be 20 feet. While the Applicant claims that the N/S alley will be widened, in fact this alley will be moved to allow 12 feet of space for trash receptacles. After construction, this alley will be 20 feet wide. Currently, the width of the N/S alley extends up to 50 feet in certain sections.


Existing conditions in N/S alley

Proposed changes to N/S alley with Valor building in red
D. Barnes

- These narrow alleys within the project boundaries are not designed to handle increased pedestrian traffic along with the cars and trucks. Obstructions will occur when trucks fail to maneuver safely in the alleys and are forced to stop and unload, blocking clear passage for other vehicles as well as pedestrians.
- As discussed above, the proposed delineated pedestrian pathways in the alleys are either too narrow or are interrupted for lengthy stretches and are not protected from vehicular traffic.
- The N/S alley is currently busy with daily delivery and trash trucks for the Spring Valley Shopping Center (see attached photos). Substantially more cars and trucks will be using this alley after the project is finished.
- American University's loading and service bays are located along the E/W alley; two entry and exit doors for the large AU building are also located along this alley. These loading bays are not shown in the CTR.
- There is currently daily activity in this alley, with trucks and vans parked in the alley outside the AU loading bays. (see attached photos)
- Traffic using the E/W alley entrance on 48th Street will have to navigate around the AU shuttle buses (up to 10 per hour) that currently park on 48th Street, about 15 feet from the alley entrance. The buses use one of three lanes of traffic and sometimes block the alley entrance on 48th Street (see attached photos). If the shuttle bus stop is not relocated, the buses will continue to obstruct drivers' line-of-sight as cars exit this alley. Backups, and unfortunately, accidents, are inevitable.
- The entrance to the underground parking garage is along the E/W alley. All vehicles, therefore, intending to use this garage will need to use the E/W alley.
- The E/W alley, the primary entry way for cars and trucks for the grocery store and apartment building, will experience an increase in traffic of 900 per cent over existing conditions (see chart below).




Gorove/Slade August 23, 2019 data D. Barnes

- Garages for five new townhouses are accessed from the E/W alley.

- **The truck turning radius diagrams in the CTR require serious examination.** Large trucks entering the E/W alley from 48th Street will encroach on the sidewalk by three feet.
- Large trucks will impinge on the PNC Bank property when backing into the loading dock.
- Large trucks cannot make the turn into the N/S alley near the PNC Bank.
- Permitting two-way traffic (near the PNC Bank) in the N/S alley where there is now a "**Do Not Enter**" sign will create back-ups on both Massachusetts Avenue and in the alley.
- Vehicles, including trucks, that enter and exit this alley will have to defer to pedestrians
- walking along Massachusetts Avenue at this point, between the PNC Bank and the Wells
- Fargo Bank, thus contributing to the back-ups.

CRD respectfully requests clarification of the following:

1. What is the distance from the Valor project to the Tenleytown Metro stop? G/S CTR uses 0.8 miles for this distance; DDOT uses 1.0 miles; Google Maps indicates the distance is 1.0 miles or more.
2. Where in the CTR is there a depiction of the routes that trucks will take to reach the site? That is, how will trucks get to Massachusetts Avenue and then to the Project site? Trucks are restricted from using certain neighborhood streets for "thru-traffic." The CTR should include a map that shows streets that are restricted from truck use.
3. Does the G/S CTR accurately show the ability of a 50-foot wheelbase truck to fit into the loading dock?
4. Will a typical moving van fit into the loading dock or will moving vans be forced to park and unload in the alley or along 48th Street or Yuma Street?
5. Where is the G/S data showing "**sight distance evaluation** for all proposed alley/driveways per **DDOT** Design and Engineering Manual requirements "? Attached on page 9 of this document is a copy of page 58 of the G/S August 23, 2019 CTR, Technical Attachments, that shows DDOT's request for sight distance evaluation. Also attached on page 9 is Section 31.4.1 of the January 2019 DEM that lists DDOT requirements for alleys (p. 380).
6. Where is information on lighting in the alleys?
7. Where will FedEx, UPS, Peapod, spring water, and Amazon vehicles park while making deliveries?
8. How will "entrance zones" (where curb cuts will be removed) on Yuma and 48th Streets be used? Will these zones then eliminate one lane of traffic for normal traffic use on these two neighborhood streets?
9. G/S acknowledges (CTR, p. 9), that 50-foot tractor trailers park and unload on Yuma, but says that, "The Applicant has agreed to continue coordination with DDOT and Spring Valley Shopping Center (Lot 802 and 803) regarding loading operations for the Spring Valley Shopping Center." What does this coordination look like?
10. "Trucks traveling to the Massachusetts Avenue Parking Shops **will be directed not to pick-up or drop-off on Yuma Street NW and will be directed to use the rear alley network."** (G/S CTR, pp. 23-24) **How will this policy be enforced? CVS uses 55 foot**

**trucks.**

11. How will private trash pick-ups occur in the 20-foot-wide N/S alley while there is simultaneous two-way traffic in this alley?
12. How will deliveries, trash pick-ups, and mechanical maintenance outside the American University loading bays, which are used daily, affect the flow of two-way traffic and safety of pedestrians in this alley?
13. What is the plan for alley access for emergency vehicles?
14. Where are the "strategies/proposals in the CTR for how the alley clean-up/shift/widening will occur," as requested by DDOT?
15. How will curb extensions affect truck turning movements at the intersections targeted for "bulb-outs"?
16. Will DDOT conduct an engineering study for the warrant of a HAWK pedestrian beacon for the 4800 block of Massachusetts Avenue, especially considering the numerous driveways and the alley entrance along this block as well as the existing "service road" along the south side of Massachusetts Avenue? [1]
17. Does the CTR include a Curbside Management Plan that addresses metered parking spaces on Yuma (and potential loss of same), RPP spaces, curb cuts/driveways and "entrance zones" on Yuma and 48th Streets?

## Conclusion

The Project will result in 3,003 to 3,437 additional daily vehicle trips, thus creating adverse impacts on traffic in the area and endangering pedestrians, including the new residents as well as the many pedestrians and bicyclists who already enjoy the area. Construction of "delineated pedestrian pathways," as described in the CTR, acknowledges that more pedestrians will use the alleys to get from the neighborhood and the new building to the shops on both sides of Massachusetts Avenue. This is especially true given the proposal to put a HAWK light at the alley entrance located off Massachusetts Avenue near the PNC Bank. The HAWK light will encourage residents of the Project, customers of the grocery store, and neighbors to walk through the alley.

The Project relies on, and promotes, the flawed plan of using narrow, 20-foot-wide alleys that are already used by local businesses for their delivery needs. Drivers of trucks to the new buildings will be forced to deal with these narrow alleys where they may not be able to reach the loading docks. If truck drivers are forced to resort to unloading in the alleys, complete blockages will occur for other vehicles and pedestrians who wish to access the alley at the same time a truck is unloading. If trucks decide to unload on 48th Street or Yuma Street, one lane of traffic will be blocked on each of these streets. Since most of the new residents of the Project will have cars, all drivers will encounter constrained conditions in the narrow alleyways. A plan that also

[1] According to **DDOT**'s **Design and Engineering Manual (DEM, January 2019)**, such signals are "…considered appropriate if **MUTCD** warrants are satisfied and engineering judgment confirms this to be the proper form of control." (p. 546 Section 41.5.13). Also see: **Manual on Uniform Traffic Control Devices for Streets and Highways** (**MUTCD**) Chapter 4F, pp. 509-512 (Federal Highway Administration, US Department of Transportation).

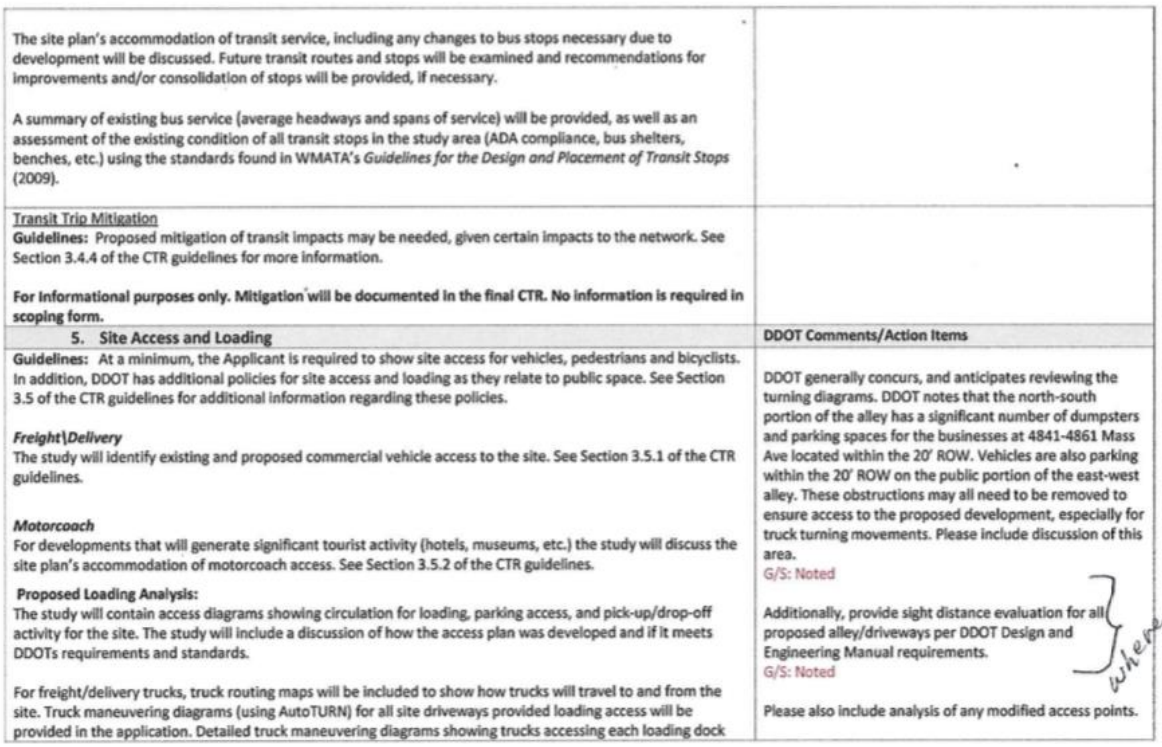
encourages pedestrians - from both the new project and the neighborhood - to put themselves at risk by walking amidst these cars and large trucks in the alleys is not only irresponsible; such a plan is gravely hazardous to the well-being of the community.

The Project fails to meet the goals of DC's transportation policies and does not enhance the quality of life for District residents as called for in the Transportation Element of the Comprehensive Plan. The Project does not support the objective of Vision Zero, which is to reach zero fatalities and serious injuries to travelers of our transportation system by the year 2024. The Project should be reworked with the goal of enhancing, not harming, the community.

**Response of Citizens for Responsible Development**
**to Comprehensive Transportation Review**
**Zoning Case 19-10 Valor Development LLC**

Attachments

1. Page 58 – G/S CTR – Technical Attachments (8/23/19)



| | |
|---|---|
| The site plan's accommodation of transit service, including any changes to bus stops necessary due to development will be discussed. Future transit routes and stops will be examined and recommendations for improvements and/or consolidation of stops will be provided, if necessary.<br><br>A summary of existing bus service (average headways and spans of service) will be provided, as well as an assessment of the existing condition of all transit stops in the study area (ADA compliance, bus shelters, benches, etc.) using the standards found in WMATA's *Guidelines for the Design and Placement of Transit Stops* (2009). | |
| Transit Trip Mitigation<br>**Guidelines:** Proposed mitigation of transit impacts may be needed, given certain impacts to the network. See Section 3.4.4 of the CTR guidelines for more information.<br><br>**For informational purposes only. Mitigation will be documented in the final CTR. No information is required in scoping form.** | |
| **5. Site Access and Loading** | **DDOT Comments/Action Items** |
| **Guidelines:** At a minimum, the Applicant is required to show site access for vehicles, pedestrians and bicyclists. In addition, DDOT has additional policies for site access and loading as they relate to public space. See Section 3.5 of the CTR guidelines for additional information regarding these policies.<br><br>***Freight\Delivery***<br>The study will identify existing and proposed commercial vehicle access to the site. See Section 3.5.1 of the CTR guidelines.<br><br>***Motorcoach***<br>For developments that will generate significant tourist activity (hotels, museums, etc.) the study will discuss the site plan's accommodation of motorcoach access. See Section 3.5.2 of the CTR guidelines.<br><br>**Proposed Loading Analysis:**<br>The study will contain access diagrams showing circulation for loading, parking access, and pick-up/drop-off activity for the site. The study will include a discussion of how the access plan was developed and if it meets DDOTs requirements and standards.<br><br>For freight/delivery trucks, truck routing maps will be included to show how trucks will travel to and from the site. Truck maneuvering diagrams (using AutoTURN) for all site driveways provided loading access will be provided in the application. Detailed truck maneuvering diagrams showing trucks accessing each loading dock | DDOT generally concurs, and anticipates reviewing the turning diagrams. DDOT notes that the north-south portion of the alley has a significant number of dumpsters and parking spaces for the businesses at 4841-4861 Mass Ave located within the 20' ROW. Vehicles are also parking within the 20' ROW on the public portion of the east-west alley. These obstructions may all need to be removed to ensure access to the proposed development, especially for truck turning movements. Please include discussion of this area.<br>G/S: Noted<br><br>Additionally, provide sight distance evaluation for all proposed alley/driveways per DDOT Design and Engineering Manual requirements.<br>G/S: Noted<br><br>Please also include analysis of any modified access points. |

2. Section 31.4.1of DDOT's Design and Engineering Manual (1/19; page 380) – DDOT Requirements for Alleys

   a) When entering and exiting any private or public space alley, all traffic must head-in and head- out from any District street. Vehicles are not allowed to back into a public alley from a District street.
   b) Private and public alleys must allow safe vehicular exit via a minimum 15-foot sight-distance from the edge line of the alley on a 45-degree angle from the property line to the back-edge line of the sidewalk. If no sidewalk exists, then use the curb line of the street. No over-height fencing or vegetation over 42 inches in height at maturity is allowed within this area, excluding city trees.
   c) Curb radii for alleys must be 10 feet.
   d) All alleys must be flush with the grade of the sidewalk at the sidewalk crossing area. No step-down curbs or ramps are allowed at alley entrances.

**Response of Citizens for Responsible Development**
**to Comprehensive Transportation Review**
**Zoning Case 19-10 Valor Development LLC**

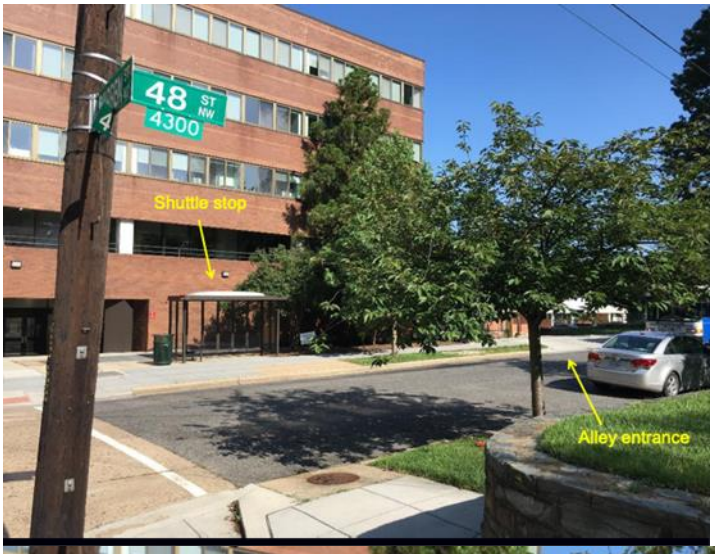
3. Photos of Current Daily Activity in N/S Alley


4. Trucks and Van Outside AU Loading Bays in E/W Alley



5. AU Shuttle Buses Idling on 48th Street and Blocking Entrance to E/W Alley

AU Shuttle Bus Stop on 48th Street





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# MEMORANDUM

**TO:** Citizens for Responsible Development

**FROM:** Joe Mehra, PE, PTOE

**SUBJECT:** ZC Case No. 19-10, The Lady Bird

**DATE:** October 1, 2019 **JOB:** J-897

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At your request we have conducted the vehicle trip generation that the proposed SuperFresh project would generate on a daily basis. The tables on the attachment show daily trip computations based off trip generation equations from the ITE Trip Generation Manual (10th Edition) [the same authority relied upon by Gorove/Slade] for the apartment building, townhouses and grocery store proposed for the SuperFresh site. All the tables assume there will be 5 townhomes.

Tables 1 and 2 assume the apartment building will have 214 units. Table 1 further assumes the size of the grocery store as being 13,000 sq. ft. while Table 2 assumes the grocery store's size is 18,198 sq. ft. Tables 3 and 4 assume that the apartment building will have 235 units. As is the case with Tables 1 and 2, Table 3 assumes the size of the grocery store as being 13,000 sq. ft. while Table 4 assumes the grocery store's size is 18,198 sq. ft.

As per your request, we also looked at the truck turning diagrams in the CTR prepared by Gorove/Slade in their report dated August 23, 2019. A WB 50 truck operating in confined areas will encroach on the sidewalk/curb-cuts because of the off-tracking of the trailer. From Figure 14, it can be seen that extra back/forth maneuvers will be needed to back in/out of the truck bay and while negotiating tight corners for the

inbound as well as the outbound maneuvers. Further, parking is permitted on 48th street and the trucks will experience difficulty in making the inbound movement and may require a back and forth to complete the inbound movement. The inbound truck is shown encroaching on the southbound 48th Street left turn lane. This means that if vehicles are making left turns on 48th Street on to Massachusetts Avenue, the inbound trucks will stop traffic on southbound Massachusetts Avenue at 48th Street. This truck will be making the left turn from the right lane of the four lane Massachusetts Avenue blocking all through traffic on Massachusetts Avenue.

Please contact me if you have any questions.

10th Edition

**Table 1**

| ITE Code | Land Use Type | Size | Equation | Daily Trips | 90% Auto Mode Share[1] |
|---|---|---|---|---|---|
| 221 | Multifamily Housing (Mid-Rise) | 214 DU | T = 5.45(X)-1.75 | 1165 | 1049 |
| 220 | Multifamily Housing (Low-Rise) | 5 DU | Avg Rate = 7.32 | 37 | 33 |
| 850 | Supermarket (grocery store) | 13,000 sq ft | T=70.89(X)+1212.64 | 2135 | 1922 |
| Total | | | | | **3003** |

[1] As assumed by Gorove/Slade

**Table 2**

| ITE Code | Land Use Type | Size | Equation | Daily Trips | 90% Auto Mode Share[1] |
|---|---|---|---|---|---|
| 221 | Multifamily Housing (Mid-Rise) | 214 DU | T = 5.45(X)-1.75 | 1165 | 1049 |
| 220 | Multifamily Housing (Low-Rise) | 5 DU | Avg Rate = 7.32 | 37 | 33 |
| 850 | Supermarket (grocery store) | 18,198 sq ft | T=70.89(X)+1212.64 | 2503 | 2253 |
| Total | | | | | **3335** |

[1] As assumed by Gorove/Slade

**Table 3**

| ITE Code | Land Use Type | Size | Equation | Daily Trips | 90% Auto Mode Share[1] |
|---|---|---|---|---|---|
| 221 | Multifamily Housing (Mid-Rise) | 235 DU | T = 5.45(X)-1.75 | 1279 | 1151 |
| 220 | Multifamily Housing (Low-Rise) | 5 DU | Avg Rate = 7.32 | 37 | 33 |
| 850 | Supermarket (grocery store) | 13,000 sq ft | T=70.89(X)+1212.64 | 2135 | 1922 |
| Total | | | | | **3106** |

[1] As assumed by Gorove/Slade

**Table 4**

| ITE Code | Land Use Type | Size | Equation | Daily Trips | 90% Auto Mode Share[1] |
|---|---|---|---|---|---|
| 221 | Multifamily Housing (Mid-Rise) | 235 DU | T = 5.45(X)-1.75 | 1279 | 1151 |
| 220 | Multifamily Housing (Low-Rise) | 5 DU | Avg Rate = 7.32 | 37 | 33 |
| 850 | Supermarket (grocery store) | 18,198 sq ft | T=70.89(X)+1212.64 | 2503 | 2253 |
| Total | | | | | **3437** |

[1] As assumed by Gorove/Slade