



DONOHUE & STEARNS, PLC

October 24, 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

Chairman Hood:

On behalf of my client, Citizens for Responsible Development (“CRD”), I am submitting the attached document into the record for Zoning Commission Case No. 19-10. It includes, as directed by the Commission at the October 10, 2019 hearing:

- I. One-Page Response on Affordable Housing
- II. Contested Issues of Fact
- III. Evaluation of the Requested Special Exception Relief
- IV. Evaluation of the Proposed PUD under the Standards of Subtitle X, Chapter 3
 - (a) Requested Flexibility v. Proffered Public Benefits and Amenities
 - (b) Identification of Adverse Impacts and their Mitigation
 - (c) Proposed PUD Is Inconsistent with the Comprehensive Plan

In addition, CRD submits its Response to the Applicant’s Proffers.

We appreciate the Commission’s consideration of these materials.

Thank you,

Edward L. Donohue
Attorney for CRD

Enclosures

ZONING COMMISSION
District of Columbia
CASE NO.19-10
EXHIBIT NO.239

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on **October 24, 2019**, a copy of the foregoing Post-hearing submission documents and Response to Applicant's Proffers 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), Jeff Kraskin (Jlkraskin@rcn.com) for Spring Valley Opponents, William Clarkson (wclarksonv@gmail.com) for Spring Valley Neighborhood Association, John H. Wheeler (johnwheeler.dc@gmail.com) for Ward 3 Vision and counsel for the Applicant, Norman M. Glasgow, Jr. (norman.glasgowjr@hklaw.com).

By:



Edward L. Donohue

Dated: October 24, 2019

Citizens for Responsible Development’s Response to Applicant’s Proffers

I. CRD’s Response to Proffered Amenities

The Applicant’s list of proposed public benefits and amenities is insufficient to justify approval by the Zoning Commission of Valor Development’s PUD application (Case No. 19-10). Almost all of Applicant’s proposed “benefits and amenities” amounts to either: (1) measures to mitigate problems arising from Applicant’s own project, (2) restoration of existing amenities (e.g. landscaping on city property), (3) public benefits for which Applicant cannot rightfully claim credit, or (4) features (such as the allegedly “superior” building design and the grocery store) that do not qualify under the PUD rules. Even Applicant’s proffer of a minimal increase in affordable housing falls short of that which would justify such a large PUD project.

Proffer	CRD Response
<p>Superior Urban Design, Architecture, and Landscaping (11-X DCMR §305.5(a) and (b) and Site Planning and Efficient Economical Land Utilization (11-X DCMR §305.5(c)).</p> <p>The proposed height and mass of the Project has been carefully designed to relate to the surrounding context through height reductions, courtyards, landscaping, façade articulation, upper-level setbacks, and high-quality, context-sensitive materials. The Project includes development of Windom Park, a new publicly accessible open space along 48th Street; the Northwest Plaza, a new landscaped plaza adjacent to the grocery store entrance along Yuma Street; and a variety of private landscaped courtyards and terraces. The Project’s site plan takes into consideration the potential for pedestrians to circulate through the public alley system through pedestrian improvements that do not currently exist, including a new three foot delineated pedestrian path along the north-south alley, a new six foot side walk along the east-west alley, and improvements at the alley intersections.</p> <p>In addition to the superior landscaping surrounding the PUD Site and within Windom Park and the Northwest Plaza, the Applicant will construct improvements specifically intended to activate these spaces</p>	<p>The building design is not a public benefit because it is significantly larger than a matter-of-right building and is disproportionate in scale and height to the surrounding community. By taking advantage of a sloping site, and transfer of density from the AU Building and MAPS site, the building looms over nearby houses and the historically designated shopping center.</p> <p>There is no showing of how the minimal setbacks, façade articulations, and “context sensitive materials,” will make the building that rises to 81.5 feet any smaller than it actually is. There is no measurable public benefit in a design that plainly reflects nothing more than Applicant’s intent to build a significantly larger building than is possible as a matter-or-right.</p> <p>Private landscaped courtyards and terraces are solely for the use of residents and are not a public benefit or amenity.</p> <p>Windom Park is one of the three courtyards facing 48th Street, the other two of which are private. It does not appear to be large enough to be a community benefit.</p> <p>Northwest Plaza is the entrance area for the</p>

<p>and the surrounding streetscape. To demonstrate this commitment, the Applicant will dedicate \$15,000 toward such improvements, the design of which will be developed based on input from ANC 3E, and will be subject to review and approval by District public space permitting authorities, as necessary. As part of this effort, the Applicant will also consider incorporating playable and interactive elements into the design of these spaces. The Project also exhibits efficient and economical land utilization through (i) the provision of multiple residential building types (multi-family and townhomes) within a designated neighborhood commercial center in close walking proximity to numerous amenities, such as retail, services, parks, high-quality schools, and convenient bus service; and (ii) the utilization of unused density from the historic Massachusetts Avenue Parking Shops (“MAPS”) site, which will facilitate additional housing, restore a full-service grocery store to the neighborhood, and permanently reduce the amount of density that could potentially be constructed on the historic MAPS site in the future.</p>	<p>grocery store and similarly does not offer a significant benefit to the neighborhood.</p> <p>The public alley system will convert a one-way alley to the equivalent of a two-way street, to be shared by trucks, cars, and pedestrians. A three-foot delineated pathway along the north-south alley and a six-foot sidewalk along the east-west alley do not constitute a public benefit, but rather a safety issue requiring mitigation.</p> <p>The characterization of landscaping as “superior” does not make it a public benefit. There is no discussion of how the construction will affect the existing heritage tree, other trees, and public sidewalks. Moreover, all the landscaping that is possible will be on city property (the 90’ right-of-way of 48th and Yuma Streets) which is already landscaped.</p> <p>The provision of multiple building types does not offer the public any sort of tangible benefit, especially since the bulk of the project is one large building, and that is connected to the five townhomes.</p> <p>Proximity to public amenities such as shops and schools is not an amenity for which the Applicant is responsible and can claim credit.</p> <p>The utilization of unused density from the Massachusetts Avenue Parking Shops (“MAPS”) offers no measurable public benefit.</p> <p>The design is almost identical to that proposed in ZC Case 16-23. If the “superior urban design” is actually a public amenity, why was it offered in Design Review?</p>
<p>Historic preservation of private or public structures, places, or parks. (11-X DCMR §305.5(e)).</p>	<p>The MAPS site is under no threat of having its historic designation revoked and being razed to the ground. It appears to be in</p>

<p>The Project will assist in protecting the historic MAPS site by permanently reducing the amount of density that could potentially be constructed on the MAPS site in the future.</p>	<p>excellent condition and does not need the funds generated by sale of its development rights in order to avoid demolition. In any case, the sale proceeds are not being set aside to restore the landmark in the future. No public benefit can be realized through the construction of a building on the SuperFresh site that is so out of scale to the landmark.</p>
<p>Housing, including housing that provides units with three or more bedrooms; and Affordable Housing in an amount that exceeds what would have been required through matter-of-right development (11-X DCMR § 305.5(f) and (g)).</p> <p>The Project results in the creation of new housing consistent with the objectives and policies of the Comprehensive Plan and the Mayor’s Housing Initiative. Overall, the Project will replace a long vacant and underutilized site with approximately 219 new residential units in approximately 214,094 square feet of residential gross floor area (“GFA”). The Project’s unit mix includes studio, one-, two-, and three-bedroom units, including three-bedroom IZ units.</p> <p>The Applicant will set aside a minimum of 12% of the residential GFA to IZ units devoted to households earning up to 60% of the median family income (“MFI”), and 12% of the non-communal penthouse habitable space to IZ units devoted to households earning up to 50% of the MFI. The Applicant will also set aside 12% of cellar floor area dedicated to residential dwelling units, and projection floor area dedicated to residential use, to</p> <p>IZ units devoted to households earning up to 60% of the MFI. The Applicant’s affordable housing proffer exceeds the amount of affordable GFA that would have otherwise been required through matter-of-right development on the PUD Site by 20%. Further, the Applicant will provide a minimum of four, three-bedroom IZ units in</p>	<p>The project would create more housing, and the Applicant seems to say that any housing wherever and at what cost, is a public benefit. But most of the housing in this project would be at market rate. We do not know the exact schedule of rents, but in general rents in the District of Columbia are very high. Accordingly, most of these units would only be affordable by persons of means. The D.C. Department of Housing and Community Development has suggested that at least 15% of the project be devoted to affordable housing. At 12% this project falls short of that goal, especially as the Applicant seeks to preserve flexibility that would allow it to build up to 240 units.</p> <p>In ZC Cases 16-23, which was Design Review and not a PUD, the same applicant offered 11% IZ. Accordingly, the public amenity here is only the increase to 12%.</p>

<p>Building 1.</p>	
<p>Environmental and sustainable benefits (11-X DCMR § 305.5(k)).</p> <p>The Project has been designed to integrate a host of sustainable features and will be designed to achieve LEED Gold v.4 certification.</p> <p>The Applicant will redevelop the PUD Site, which is presently impervious and lacks any form of sustainable storm water management, with new landscaping, trees, park space, green roof systems, and bioretention areas. The parking garage includes eight electric vehicle charging stations that will be Level 2 chargers or greater, and the Applicant will install infrastructure to permit the installation of additional electric vehicle charging stations in the future. Electrical outlets will also be provided within the long-term bicycle storage rooms for the charging of electric bikes. Locations for car-share vehicles, interior retail bike storage, showers, and interior residential bike storage that exceeds the required number of spaces will also be provided.</p>	<p>All new construction should aim to achieve LEED Gold certification. Because this project will be much larger than the current building it will be necessary, rather than a special public benefit, for it to minimize its environmental impact. Consequently, LEED Gold certification should not be considered a special public benefit.</p> <p>There is no evidence in the record that storm water is a problem that this project is uniquely qualified to address. Most of the open area that is permeable is on city property and the Applicant is not proposing to add significantly to the amount of green space at ground level.</p> <p>The total GFA for the Project is 430,853, with Lot Occupancy of 70% and FAR for Lot 807 alone at just under 3.0. New parking provided with the Project will be 370 spaces. Notwithstanding EV charging stations and bike racks, clearly the Project will have an impact on stormwater runoff.</p>
<p>Transportation infrastructure beyond that needed to mitigate any potential adverse impacts of the application, including provision of a public easement for a pedestrian walkway that would not otherwise be required (11-X DCMR §305.5(o))</p> <p>The Applicant will provide the following transportation-related benefits that are not needed to mitigate any potential adverse transportation impacts created by the Project:</p> <p>a. Fund a new high intensity activated crosswalk (“HAWK”) signal on Massachusetts Avenue, between 48th and 49th Streets, subject to DDOT public space approval;</p>	<p>a. The creation of the delineated pedestrian pathway and the sidewalk in the alley system may well create a situation where more pedestrians use the alley to access the shops and bus stops on Massachusetts Avenue. The HAWK light would be necessary to mitigate the safety issues since pedestrians would exit the alley system between 48th and 49th Streets, where there are already traffic lights and crosswalks. Under the PUD rules,</p>

<p>b. Allocate \$100,000 to means for connecting Project residents to the Tenleytown Metro station through shuttle or geofence with ride hailing services.</p> <p>c. Restrict residents of Building 1 from obtaining a Residential Parking Permit (“RPP”) with penalty of lease termination;</p> <p>d. Consolidate trash receptacles currently located in the north-south alley and in public space along Yuma Street to a new enclosure along the north- south alley;</p> <p>e. Improve the existing alley system by widening the north-south public alley by seven feet onto private property to maintain a 20-foot vehicle travel way and provide a new 3-foot pedestrian path; providing a new 6-foot sidewalk on private property along the east-west alley; constructing a new 5- to 6-foot sidewalk along the western side of the public alley entrance from Massachusetts Avenue; and constructing improvements to the alley intersection to increase pedestrian safety and visibility;</p>	<p>mitigation measures cannot count as benefits or amenities.</p> <p>b. The Applicant has already stated that a shuttle or other service to the Metro would be limited, probably to just one year. What will happen thereafter?</p> <p>d. The management of trash receptacles is something that any building owner must do. To do otherwise would create a public nuisance and a health hazard. This is not something that offers a new benefit to the community, but rather the absence of a new problem.</p> <p>e. The Applicant has not described what measures it would take to improve safety and visibility at the alley intersection.</p> <p>Since the volume of traffic in the alleys will be comparable to the current volume of traffic on Yuma and 48th Streets, the alleys can be considered internal roadways or minor streets. Adverse effects will result from the increase in traffic in the alleys and from the increased danger to pedestrians who will use the alleys. Sidewalks, therefore, should be considered a requirement for public safety. It is a misrepresentation to state that the north-south public alley will be widened. While the entire alley will be shifted to the east, a drive lane, 20 feet in width, will remain 20 feet in width. The “new 3-foot pedestrian path” is not a sidewalk and will not protect pedestrians from the large trucks and cars in this alley. Twelve feet on the west side of this alley will be used for trash receptacles. Erwin Andres of G/S indicated that the space in the north-south alley will be a “shared space” for both vehicles and pedestrians. There will be no protective barrier between pedestrians and vehicles (both cars and trucks). Pedestrians can, therefore, walk in the drive lane, and cars and trucks (as seen on p. CL06 of 9/17/19 Valor plans) will share the</p>
---	---

- f. Contribute \$15,000 toward studying the potential to open the median on Massachusetts Avenue to improve porosity and turning movements at the MAPS site and/or studying the installation of a “pork chop” near Massachusetts Avenue and 49th Street;
- g. Work with ride hailing services to designate the building entrance on Yuma Street as the preferred pick-up and drop-off location;
- h. Work with DDOT to designate a section of 48th Street between Yuma Street and Warren Street as an “alternative transportation block” where transit options such as electric scooters, bikes, and mopeds; bike shares; and car shares can be co-located;
- i. Work with DDOT on installing a Capital Bikeshare station in the vicinity of the PUD Site; and
- j. Work with JUMP or other electric bike share service on its efforts to include electric bicycles and scooters in close proximity to the PUD Site.

pedestrian path. Will the “new 6-foot sidewalk on private property along the east-west alley” be a **raised sidewalk or a delineated pedestrian pathway**? There will be no protective barrier between pedestrians and vehicles in this alley which will be heavily used for truck deliveries to the loading dock area. This new “sidewalk” will be **interrupted for three vehicle entrances**: first, for the townhouse garages; second, for the underground parking garage entrance; and third, for the entrance to the loading docks. **Pedestrians will not be safe walking in this alley amidst all the unloading activity of large (up to 50-foot wheelbase) trucks.** DDOT has stated that if these large trucks cannot fit into the loading docks, the trucks are allowed to stop, park, and unload in the alley. What refuge will pedestrians have to walk around the parked truck amidst simultaneous 2-way traffic?

f., g., h., i. and j. Studies and discussions with DDOT, ride hailing services, and others are not tangible and measurable benefits.

h. A “Curbside Management Plan” in ZC 19-10 has not yet been made available (requested in Sept. 27, 2109 DDOT report, p. 4). Reviewing such a plan would not only be helpful but is actually necessary in evaluating this proposal for an “alternative transportation block” along 48th Street. This block currently has metered parking spaces along the west side. Would some of these metered parking spaces be eliminated to allow space to “co-locate” the alternative transit options? How many metered parking spaces would be removed? Have community residents been

	<p>consulted on this plan? Has American University (co-applicant in ZC 19-10) been consulted on this plan that would eliminate parking spaces that are frequently used by AU students and staff? Where will these drivers park? Where will these alternative modes of transit be located? In the street (48th Street)? In the tree box area along the sidewalk? How safe is it to access a bike or scooter that is stored in the street? How will pedestrians maneuver safely around this storage area and cross 48th Street to reach Windom Place?</p>
<p>Uses of special value to the neighborhood or the District of Columbia as a whole (11-X DCMR § 305.5(q)). The Applicant will dedicate approximately 18,000 square feet of GFA to ground floor retail space, of which approximately 16,000 square feet will be dedicated to a full-service grocery store. Per the Memorandum of Understanding (“MOU”) with ANC 3E, for at least ten years from the date of the first certificate of occupancy, the Applicant shall dedicate a minimum of 13,000 square feet of the ground floor retail space to a full-service grocery store.</p>	<p>There are a dozen grocery stores within a three-mile radius of the project site and many of them offer delivery services. Hence, the provision of yet another grocery store cannot be counted as an amenity under the PUD rules. It is unclear whether there ever really will be a grocery store within the Project, as there is no signed lease with a grocer. Further, as the Proffer indicates, there is uncertainty as to the size of the grocery. Will it be 16,000 SF, or 13,000 SF? Moreover, a new MOM’s grocery store would likely be of benefit mostly to those who live in the apartment building and those who live close by and can carry home small purchases.</p>
<p>Other public benefits and project amenities and other ways in which the proposed PUD substantially advances the major themes and other policies and objectives of any of the elements of the Comprehensive Plan (11-X DCMR §305.5(r)) The Applicant will plant any missing trees within the tree-box areas located along the east side of 48th Street between Yuma Street and Massachusetts Avenue, and along north side of Yuma Street between 48th and 49th Streets</p>	<p>Replacement of trees implies that the construction of this building would result in the destruction of a considerable number of trees, notably the yews on Yuma Street, as well as elms and other trees. Accordingly, this constitutes mitigation of harm rather than substantial advancement of policies and objectives of the Comprehensive Plan. In addition, this item fails to mention the trees on the south side of Yuma Street, where Building 1 would be.</p>

II. CRD’s Comments on Applicant’s Transportation Demand Management Mitigation Measures

<u>TDM Mitigation</u>	<u>CRD Response</u>
<p>The Applicant will fund and construct pedestrian network improvements in the immediate vicinity of the PUD Site to encourage walking and mitigate the impacts of being over-parked. Specifically, the Applicant will upgrade substandard curb ramps, stripe missing crosswalks, and install curb extensions, subject to DDOT public space approval, at the following intersections:</p> <ul style="list-style-type: none"> a. 49th Street and Yuma Street NW; b. 48th Street and Yuma Street NW; c. 48th Street and Windom Place NW; d. 48th Street and Warren Street NW. 	<p>In the fall of 2018, DDOT completed a project that included upgrades to curb ramps, curb extensions, and replacement of up to 20 feet of sidewalks at three of these intersections:</p> <ul style="list-style-type: none"> a. 49th Street and Yuma Street NW; b. 48th Street and Yuma Street NW; and c. 48th Street and Warren Street NW. <p>According to the September 27, 2019 DDOT report for ZC 19-10, “In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines. This includes curb and gutters, street trees and landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site.” (p. 8)</p> <p>Therefore, the Applicant is required to provide these mitigations. Since the alleyways will be considered internal roadways or minor streets, any improvements to the alley space are also required. To date, lighting in the alleyways is not addressed by the Applicant.</p>

III. CRD’s Comments on Applicant’s Loading Management Plan Requirements

<u>Loading Management Plan Requirement</u>	<u>CRD Response</u>
--	---------------------

<p>1. A loading dock manager will be designated by the building management. The dock manager will coordinate with vendors and tenants to schedule deliveries and will be on duty during delivery hours;</p>	<p>1. Will the loading dock manager be responsible for activities in the east-west alley <i>and</i> the north-south alley? What responsibilities will the loading dock manager have regarding the activities in the north-south alley? What specifically is meant by “delivery hours”?</p>
<p>2. All tenants in Building 1 will be required to schedule deliveries that utilize the loading docks – defined here as any loading operation conducted using a truck 20-feet in length or larger;</p>	<p>2. How will the loading dock manager schedule deliveries and coordinate which alley entrance and exit will be used by a truck driver? For example, how will the manager ascertain if the north-south alley entrance from Massachusetts Avenue is clear for an incoming truck delivery to the east-west alley where the loading docks are located?</p>
<p>3. Commercial deliveries will be scheduled between 7 AM – 7 PM (7 days a week), and discouraged from making deliveries after 4 PM on weekdays;</p>	<p>3. How will this requirement be enforced? The word “discouraged” is too vague and needs to be clarified. Will the loading dock manager be on duty between 7 AM and 7 PM 7 days a week as stipulated in the Applicant’s Proffer?</p>
<p>4. Waste collection (both commercial and residential) is allowed 7 AM – 4 PM (7 days a week);</p>	<p>4. Waste collection will occur in both the east-west alley and in the north-south public alley for businesses in the MAPS, as shown in the daily activity scenes in the CRD alley video (Exhibit 216). Trash trucks typically use up the entire width of the north-south alley. With the larger trash receptacles proposed by the Applicant, trash trucks may need to maneuver in this alley to access the receptacles at an angle. The entire drive lane of this alley will be taken up by waste collection activities. Since the Applicant is also proposing that this alley be “shared space” with pedestrians, how will these truck maneuvers affect pedestrians and bicyclists in this alley? Since there is to be simultaneous 2-way vehicular traffic in this alley, what will happen to other cars and trucks using this alley during trash pick-up times? There will be separate private trash pick-ups for the MAPS businesses in the north-south alley; another private service for American University trash pick-ups in the east-west alley; another private service for grocery store trash pick-ups in the east-west alley; and yet another private service for residential trash pick-ups, also in the east-west alley. The Applicant offers no indication that these trash pick-ups will be coordinated.</p>

<p>5. Residential move-ins/outs are allowed 9 AM – 4 PM (7 days a week);</p>	<p>5. Where will moving vans park to unload? Will moving vans be required to use the loading dock? What size moving van can fit in the alleyways and in the loading docks? The length of some moving vans can exceed 50-foot wheelbase. A 30-foot wheelbase truck became stuck in the east-west alley and was forced to back-up (Exhibit 216). How will move-ins/outs be coordinated with the movements of large delivery trucks in the loading dock area? Will moving vans be permitted to stop and park on Yuma Street and 48th Street?</p>
--	---

<p>6. The dock manager(s) will schedule deliveries such that the dock's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver will be directed to return at a later time when a berth will be available so as to not impede the drive aisle that passes in front of the loading dock;</p>	<p>6. If a truck driver cannot access the loading dock due to lack of capacity, how will the truck driver be able to comply with DC's policy of "head in/head out" if there is no space for turning around?</p> <p>According to Sept. 27, 2019 DDOT report on ZC 19-10 (p. 6), "DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm." Additionally, this DDOT report (pp. 6-7) goes on to say, "The building is designed so that all loading activities take place in the dock area off of the rear alley. The truck turning diagrams included in the August 23, 2019 CTR demonstrate that 55-foot and 35-foot trucks can enter and exit the alley network with head-in and head-out movements, consistent with DDOT standards. Trucks are able to maneuver and turn around while in the alley network and loading dock area, so that they can exit to the designated "truck through route" of Massachusetts Avenue NW, either directly or via the short segment of 48th Street. The Applicant anticipates approximately 13 trucks per day will utilize the main building's loading dock area, including trash pick-up, mail drop-off, produce and retail deliveries, and move-ins/outs by residents." CRD disputes the Applicant's assertion that these trucks "can enter and exit the alley network with head-in and head-out movements." As discussed, a 30-foot truck became stuck in the east-west alley. G/S truck turning diagrams show encroachment and difficulty turning into the east-west alley. Turning maneuvers of larger trucks into the Massachusetts Avenue entrance of the north-south alley are not shown.</p> <p>How will all these activities be coordinated, especially considering that UPS and Amazon deliveries occur frequently throughout the day? If the loading dock is already occupied, will these additional trucks stop, park, and unload in the alleys?</p>
---	--

<p>7. The dock manager(s) will monitor inbound and outbound truck maneuvers and will ensure that trucks accessing the loading dock do not block vehicular traffic except during those times when a truck is actively entering or exiting the alley;</p>	<p>7. This requirement needs to be clarified: What is the meaning of the words “except during those times when a truck is actively entering or exiting the alley”? There are three alley entrances and exits. It is not physically possible for the dock manager(s) to see all three alley entrances/exits at the same time and “monitor inbound and outbound truck maneuvers.” This appears to mean that that there will be times when vehicular traffic in the alleys is blocked by trucks. As the CRD alley video shows, a 30-foot truck became stuck in the east-west alley and was forced to back up. DDOT has said that trucks are allowed to stop and unload in the alleys. What happens to other vehicular and pedestrian traffic when there is a blockage in the alley?</p>
<p>8. The loading manager(s) will monitor the alley to keep the designated loading areas clear for deliveries, keep the alley from being blocked due to vehicle loading/unloading activity, and enforce the no parking restrictions;</p>	<p>8. As stated above, it is not possible to monitor activities in both alleys at the same time. For example, there will be several different trash companies servicing the businesses and building residents. Trash pick-ups account for only one type of truck among the many trucks that will make deliveries using the alley system. It is unrealistic and misleading to maintain that the alleys can be kept clear of blockages.</p>
<p>9. Trucks using the loading dock will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the regulations set forth in DDOT’s Freight Management and Commercial Vehicle Operations document, and the primary access routes listed in the DDOT Truck and Bus Route System;</p>	<p>9. Primary access routes for trucks prior to their arrival on Massachusetts Avenue have not been shown. That is, the G/S truck turning diagrams show trucks already on Massachusetts Avenue, and do not indicate their travel route to and from the site. Trucks are prohibited from using certain neighborhood streets around the site. What residential streets will be used by trucks to reach the Massachusetts Avenue or 48th Street entrances to the alleys?</p>
<p>10. The Applicant will continue to coordinate with DDOT and the owners of the MAPS site (Lots 802 and 803) regarding loading operations for the MAPS site;</p>	<p>10. What does this coordination look like, and for what period of time? How will 50-foot wheelbase CVS trucks unload in the north-south alley amidst simultaneous 2-way vehicular traffic with added pedestrians in this “shared space”?</p>

<p>11. All trash bins and dumpsters belonging to the MAPS site (Lots 802 and 803) currently located along Yuma Street NW will be relocated to the alley and placed in the proposed trash enclosures;</p>	<p>11. As discussed above, trash pick-ups in the north-south alley require truck maneuvers that will occupy the entire width of this 20-foot wide alley during the time needed to pick up the trash and exit from this alley. Can this activity occur while there is simultaneous 2-way vehicular traffic and pedestrians sharing this space?</p>
<p>12. Trucks traveling to the MAPS site will be directed not to pick-up or drop-off on Yuma Street NW and will be directed to use the alley network.</p>	<p>12. Has Regency Shopping Centers conveyed these directives to the retail businesses in MAPS? Do the MAPS businesses understand that they may have to make changes to their delivery systems? Currently, large delivery trucks stop on Yuma Street to unload because they do not fit in the north-south alley and are unable to exit through this alley onto Massachusetts Avenue.</p>