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4 April 2003

Zoning Commission of the District of Columbia  
441 Fourth Street, NW, Suite 210S  
Washington, DC 20001

Re: Z.C. Case No. 02-17C – 5401 Western Avenue, NW, PUD

By hand

Dear Members of the Commission:

Consistent with the schedule set at your meeting on 10 March 2002, I submit the following post-hearing submission on behalf of Friendship Heights Organization for Responsible Development (“FhORD”), consisting of:

– FhORD’s Response to the questions posed by the Commission and to the filings from the applicants and District agencies; and

– a Response to the additional submissions on the proposed affordable housing amenity.

As we explain in more detail in these filings, the additional material from the applicants and District agencies underscore the weaknesses in the applicants’ case, and FhORD remains of the view that the application should be denied.

I am advised that the two affected Advisory Neighborhood Commissions also take this position and will be filing additional statements opposing the application.

Thank you for your consideration of these matters.

Very truly yours,



Cornish F. Hitchcock

cc: All parties

**ZONING COMMISSION**  
**District of Columbia**  
Case 02-17C  
Exhibit 226

ZONING COMMISSION  
District of Columbia  
CASE NO.02-17  
EXHIBIT NO.226

D.C. OFFICE OF ZONING  
2003 APR -4 PM 1:37

CERTIFICATE OF SERVICE

I hereby certify this 4<sup>th</sup> day of April, 2002 that the attached documents were served by first-class mail, except as otherwise indicated, upon:

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Cornish F. Hitchcock  
Cornish F. Hitchcock

BEFORE THE ZONING COMMISSION OF THE DISTRICT OF COLUMBIA

Case No. 02-17C, Proposed Planned Unit Development  
5401 Western Avenue, N.W.

FhORD Response to Applicants' and DDOT's  
Supplemental Post-Hearing Submissions

At its public meeting held on February 24, 2003, the Zoning Commission requested certain information from the Applicants and DDOT. On March 21, DDOT responded with a two-page memorandum dated March 20, 2003. On March 24, 2003, the Applicants filed a six-page response captioned Applicants' Supplemental Post-Hearing Submission.<sup>1</sup> For the reasons outlined below, the Applicants' responses to the Zoning Commission are entirely inadequate as to the FlexCar service, structure and enforcement of the proposed affordable housing program, and deficiencies in the proposed Construction Management Plan. Worse yet, DDOT's responses to the seven questions it was directed in writing to answer<sup>2</sup> have no factual support and contain no rational analysis. Thus, the Zoning Commission should disregard DDOT's responses in their entirety.

FhORD's responses to these Supplemental Post-Hearing Submissions are below in two sections, the first dealing with the DDOT issues, and the second responding to the Stonebridge Supplemental Post-Hearing Submission.

\* \* \* \* \*

As to the Zoning Commission's probative questions to DDOT, DDOT provided the following unresponsive answers. Thus, the Zoning Commission should disregard DDOT's prior and current written and oral remarks and assumptions regarding traffic generation, traffic growth rates, traffic counts, modal splits and signal timing. Further, to the extent these DDOT remarks and assumptions — now exposed as baseless — underlie the Office of Planning's analysis and the Applicants' proposal, unfortunately there is no principled approach for the Zoning Commission except to disregard any analysis that relies on DDOT's work. Although this may seem like an extreme reaction, the exceptionally poor quality of the following DDOT responses demonstrates that DDOT's work on this project merits this response.

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<sup>1</sup> Also on March 21, 2003, the Office of Planning and the Department of Housing and Community Development submitted a two-page memorandum regarding the proposed Affordable Housing program. FhORD's response to that submission is filed concurrently with this filing.

<sup>2</sup> FhORD was not provided with a copy of the written questions that the Zoning Commission directed to DDOT On March 11, 2003, following the public hearing, and thus is relying on DDOT's March 20, 2003, memorandum to accurately reflect these questions.

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1. Does income itself affect modal split rates? Are there census tracts in areas with income levels comparable to Friendship Heights that have modal splits of fifty percent which would support the use of that figure for the subject project?

DDOT: DDOT responded that "[i]ncome is by no means the sole determining factor when analyzing modal split data." DDOT's only supporting example is Census Tract 53.01 near the Dupont Circle Metro, which has a median household income of \$103,111, a transit use of 37%, and a walk/bicycle use of 42.7%.

FhORD: There appears to be a high correlation between higher income and lower percent of transit usage. Related to this, there also appears to be a high correlation between higher income and a higher number of commuters per household that use a private car or taxi. There are no Census Tracts in DC with income levels comparable to Friendship Heights that have transit use of 50% or greater.

The best source of data is Census 2000, Census Tract 11, and specifically Block 5 which includes the Washington Clinic site. DDOT's insistence on ignoring the actual data for this location, and instead attempting to hand pick any favorable data from anywhere in the city (and still failing to make its case), is both flawed and futile.

It is unclear whether DDOT still relies for comparison on the fourteen Census Tracts it previously identified<sup>3</sup> in support of its modal split – Van Ness east of Connecticut Avenue, Mount Pleasant, Columbia Heights (2 tracts), Logan Circle, Truxton Circle, Downtown (4 tracts) (1 Downtown, and 3 actually Southwest Washington), East of the River (portions of 2 tracts), North of Union Station and St. Elizabeth Hospital. However, as set forth in detail at attached Exhibit B, none of these Census Tracts are comparable to Friendship Heights Census Tract 11.

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<sup>3</sup> DDOT identified these Census Tracts as the comparators in its December 26, 2002 memorandum.

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Tab 1 to this Response contains 9 pages of comparative bar graphs and analysis to demonstrate why none on these Census Tracts are comparable to Census Tract 11, and 8 pages of raw Census data that support the analysis. FhORD notes that these Census Tracts that DDOT selected previously are the only tracts in the District of Columbia with modal splits with over 50% transit use; all of the remaining Census Tracts have less than 50% transit use.

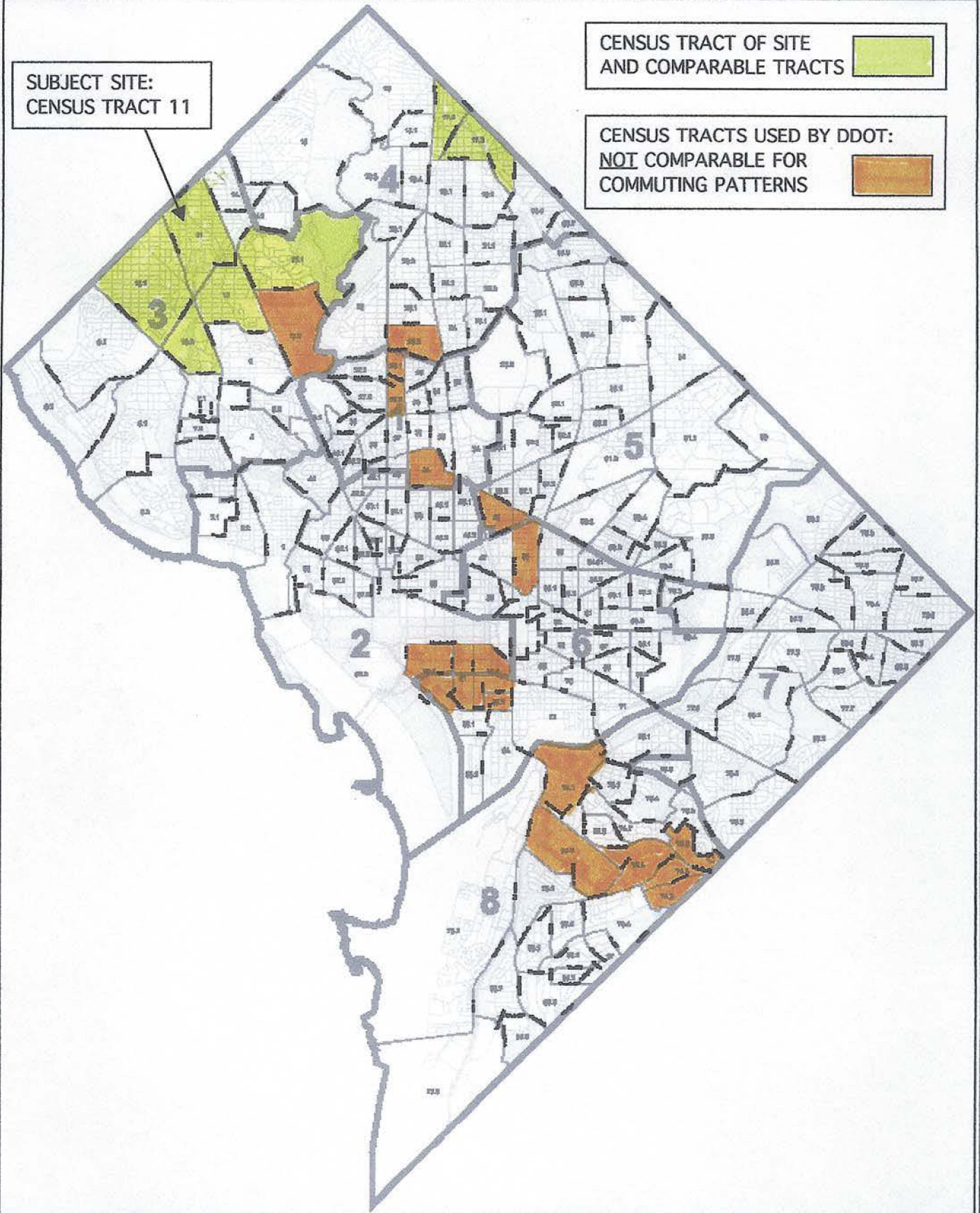
The Census Tracts that DDOT hand-picked (the only ones in DC with transit use over 50%) are indicated by the color orange on the map on the following page of the Wards and Census Tracts. The Census Tracts that FhORD uses for comparison, as described below, are indicated on that Map in yellow, and these — as well as all other Census Tracts in DC (apart from the orange ones) — have a transit use of less than 50%.

SUBJECT SITE:  
CENSUS TRACT 11

CENSUS TRACT OF SITE  
AND COMPARABLE TRACTS



CENSUS TRACTS USED BY DDOT:  
NOT COMPARABLE FOR  
COMMUTING PATTERNS



Feature Key



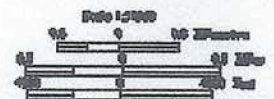
Ward/Tract



Tract

District of Columbia  
Wards and Census Tracts

DC Office of Planning  
May 14, 2002



DDOT's newly-selected Dupont Circle Census Tract 53.01 is not comparable to Friendship Heights Census Tract 11, for obvious reasons. The Dupont Circle tract is part of or close to the major employment corridors of Dupont Circle itself, Connecticut Avenue, K Street, the West End, Georgetown and much of the northern part of downtown. This accounts for the high rate of commuters who walk to work.

In contrast, Friendship Heights Census Tract 11 has a 5.7% rate of commuters who walk to work (as compared to Dupont Circle's 42.7%), which reflects the fact that Friendship Heights is not presently a major employment center or within walking distance of one.

Further, there appears to be a very high correlation between income and transit use, with lower incomes correlated generally with higher transit uses. With two exceptions, we compared each and every Census Tract chosen by DDOT as a high transit use tract with Friendship Heights to demonstrate this correlation.<sup>4</sup>

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<sup>4</sup> The two exceptions are Census Tracts 86 and 98.01. Census Tract 86, North of Union Station, has only 14 households so no valid inferences can be drawn from that data. For Census Tract 98.01, St. Elizabeth's Hospital, the data do not show any occupied housing units [Variable H1, housing units], but do show a population of 723 [Variable P3, 100% count of the population]. Of those 723 individuals, 722 live in group housing: 651 individuals are classified as institutionalized, in "Mental (Psychiatric) hospitals or wards," and 71 individuals are classified as non-institutionalized, living in group quarters other than college dormitories or military quarters. [Variable P37, Group quarters population by group quarters type.] Even if one ignores this unique characteristic of Census Tract 98.01, then it is worth noting that the income is very low and the transit use is quite low, unless taxis are included. Per capita income for Census Tract 98.06 was \$6,625, as compared with a per capita income for Census Tract 11 of \$62,717. [Variable P82, Per capita income in 1999 Dollars]. Census Tract 98.01 has 125 workers with 76 of those using public transit (modal split of 60.8% as claimed by DDOT in its December 26 memorandum); however, if taxis are excluded (47 workers) then only the modal split for mass transportation is 23.2% (29 workers using busses). Of the remaining 49 workers, 24 worked at home and 25 walked to work.

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- Logan Circle (Census Tract 44), Truxton Circle (46) and Downtown (60.01) have 57-69% of the households with incomes of \$50,000 or less. Friendship Heights has 21-23% of the households with incomes of \$50,000 or less. This is demonstrated by the bar graphs at Tab 1, page 3.
- Mount Pleasant (25.02) and Columbia Heights (28.01, 28.02) have 70-81% of the households with incomes of \$50,000 or less. Friendship Heights has 21-23% of the households with incomes of \$50,000 or less. This is demonstrated by the bar graphs at Tab 1, page 4.
- Southwest Washington (60.02, 61, 62.01) has 42-93% of the households with incomes of \$50,000 or less. Friendship Heights has 21-23% of the households with incomes of \$50,000 or less. This is demonstrated by the bar graphs at Tab 1, page 5.
- East of the River (74.01, 74.03, 74.04, 74.08, 74.09, 75.04) has 85-87% of the households with incomes of \$50,000 or less. Friendship Heights has 21-23% of the households with incomes of \$50,000 or less. This is demonstrated by the bar graphs at Tab 1, page 6.
- Van Ness (13.02) is the only Census Tract chosen by DDOT in Ward 3 and on the Red Line. However, the income characteristic of this tract is quite different than in Friendship Heights, Census Tract 11, and quite different than the expected Stonebridge demographic. Census Tract 13.02 has 21.01% of household with incomes over \$100,000; Friendship Heights (Census Tract 11) has 52.19% with incomes over \$100,000. Census Tract 13.02 has 42.18% with incomes under \$50,000; Friendship Heights (Census Tract 11) has 23.27% with incomes under \$50,000.



In contrast to DDOT's comparisons,<sup>5</sup> none of which hold up, there are Census Tracts that share key characteristics with Friendship Heights and thus provide for excellent comparisons: Tenleytown, Van Ness North (Census Tract 13.01) and Bethesda, Maryland. In addition, Takoma DC has some characteristics similar to Friendship Heights. Each of these Census Tracts have red line Metrorail stations, relatively high household incomes, and some local employment but are not within a major employment center.

Thus, as set forth in FhORD's January 27, 2003, submission, we reiterate that Census Tracts 11 and 10.1 which include the site and the immediate Friendship Heights area show that 33.9 percent and 29.9 percent of commuters, respectively, used transit.

Further, each household in Census Tract 11 generates, on average, 0.71 commuter trips by car or taxis. These numbers are significantly below the 50% transit usage (equivalent to 0.25 commuter trips by car after applying a 0.5 total trip generation rate) assumed by DDOT and Stonebridge. Thus, by a straight application of Census Tract 11 data, the bottom line is that Stonebridge will generate 0.71 commuter trips per unit, not DDOT's artificial 0.25 trips per unit.<sup>6</sup>

In an inexplicable stretch to support its desired conclusion, DDOT provides transit usage data for other communities in the District with approximately 50% transit usage. These communities have characteristics that are different from the Friendship Heights area and the transit usage can not be assumed to be the same. DDOT's Post-Hearing Submission dated March 20, 2003, has not provided any new valid information that can support its modal split analysis.

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<sup>5</sup> This includes the 14 Census Tracts DDOT relied on in its December 26, 2002, memorandum, and the Dupont Circle Census Tract it relies on it is March 21, 2003, submission.

<sup>6</sup> This would result in 89 automobiles during each rush hour according to the census data, as opposed to 31 cars each rush according to Stonebridge and DDOT. As shown below in response to question 3, when we use even more site-specific Census Tract 11, Block 5, data, the 89 trips generated changes to 83 trips generated, still 268% of the Stonebridge/DDOT number.

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2. Please provide a copy of the analysis conducted by the Metropolitan Council of Governments for another residential project in the Friendship Heights area to the Commission so that it may compare the residential developments proposed.

DDOT: DDOT's response, in its entirety, is that "[w]e have not been able to locate a copy of that report, however, we will continue to search for it. It is the recollection of DDOT staff that this study, completed in the 1980's, was comparable to the current study and therefore DDOT feels comfortable with using a 50% modal split" for the Stonebridge application.

FhORD: This report (along with Census Tract analysis) is the entire basis for DDOT's estimate of a 50% transit use that was cited in DDOT's December 26, 2002, memorandum to the Zoning Commission.<sup>7</sup> There is no indication of what report is being referenced, when it was done, what project was involved, what data was used, what assumptions were made, what methods were used, what conclusions were reached or whether those conclusions were challenged by the District of Columbia (which strongly opposed the overdevelopment of Friendship Heights, Maryland) or anyone else at the time.

DDOT demonstrates unresponsiveness to the Zoning Commission, and indifference to neighborhood concerns, by relying initially on a report that it did not have, refusing to provide a copy to FhORD (which we now know would have been impossible) or admit to FhORD it did not exist, then admitting to the Zoning Commission that this report does not exist but continuing to rely on some "recollection" by someone (unnamed) of the report.

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<sup>7</sup> DDOT states in the memorandum that "[t]his estimate [of 50% transit use] is based upon a transit use analysis conducted by the Metropolitan Council of Governments for another residential development project in the Friendship Heights area."

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3. Is fifty percent a realistic expectation for the modal split for this project?

DDOT: DDOT's response is "[y]es, DDOT continues to firmly believe a fifty percent modal split is a realistic expectation for this project."

FhoRD: Stonebridge and DDOT present and endorse an analysis with two fundamental flaws – trip generation and modal split – that result in a gross underestimation of the automobile traffic to be generated by the proposed project. As shown on the summary chart below (previously submitted in full FhORD's January 27, 2003 response), Stonebridge estimates that the project will generate 31 automobile trips each morning and each evening. Using the actual commuter transit uses of the neighborhood (Census Tract 11, Block 5), the project will generate 83 automobile trips each morning and each evening, or 268% of the Applicants' estimate. DDOT's attempt to use non-comparable Census Tracts to support its conclusions is unsound and, even if applied, unconvincing.

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<b>Comparison of Stonebridge Theoretical Traffic Generation versus Actual Traffic Generation          Based on Census 2000 Data (Census Tract 11, Block Group 5)</b>
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	Actual Census Data	Stonebridge Estimate (using Census-derived trip generation rate and modal split rate)	Stonebridge Theory  (O.R. George Method)
Housing Units	517	125	125

Trip Generation Rate (Total Trips)	1.543/unit	1.543/unit	0.5/unit
Total Trips Generated	798	193	62

Car/Truck/Van Trip Generation Rate	0.663/unit	0.663/unit	0.25/unit
<b>Car, Truck Or Van Trips</b>	<b>343</b>	<b>83</b>	<b>31</b>

Stonebridge uses, and DDOT endorses, the use of a 0.5 total trip generation rate, which is inexplicable. Such a rate assumes that there is only 1 person per household, that 50% of these persons do not commute to work (or even work at home),<sup>8</sup> and that of the

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<sup>8</sup> Alternatively, Stonebridge and DDOT's analysis, to reach the same result, might assume 2 persons per household, with only 25% of them commuting to work or working at home. Either way, these assumptions are demonstrably wrong and entirely unsupported by the record in this contested matter.

remaining 50% who commute to work, half of that group will use private automobiles. In fact, Census Data refutes each of these assumptions; in Tract 11, there are about 1.5 workers per household, and .663 automobile trips generated per household after all modal deductions. Thus, Stonebridge and DDOT, by using a flawed combination of trip generation rates and modal splits, grossly underestimates the traffic that will be generated by the proposed project.

4. The Zoning Commission would like confirmation that DDOT has reviewed the impact of changes in signal timing and would endorse such a change.

DDOT: DDOT responded in relevant part that "DDOT's Traffic Services Administration always reviews the impact of changes in signal timing, as it did in this case."

FhORD: This response by DDOT is inadequate to satisfy the concerns of the Zoning Commission and the community. Specifically, DDOT did not confirm what signal changes it actually reviewed, what analysis it used (traffic flow, safety, coordination with Maryland, other), what the review concluded or, most critically, whether it endorsed the signal changes proposed by Stonebridge – the specific question asked by the Zoning Commission.

FhORD is concerned that DDOT's response evidences a lack of concern for valid community safety concerns about increasing traffic flow by shortening the yellow and all-red cycles of signals. FhORD is also concerned that DDOT did not evaluate the overall impact on area traffic flow that would result from any re-signalization, e.g. whether better flow in one direction (e.g. to and from Washington Clinic site) would be at the direct expense of worse flow by cross-traffic (Wisconsin Avenue, north/south on Reno Road at Military Road intersection, etc.).

5. The Zoning Commission would like to know whether a more refined estimate of future levels of service and the impact of proposed development can be obtained using these different assumptions for the rate of growth of background traffic.

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DDOT: DDOT's response, in its entirety, is that "DDOT uses a 1-2% growth increase as standard natural growth pattern."

FhoRD: DDOT's assumption is clearly erroneous for this proposal. The "standard natural growth pattern" does not provide an accurate projection where, as DDOT conceded, the growth on Wisconsin Avenue north of Western Avenue is currently 3.4%. By using a 2% growth rate instead of 3.4% growth rate, DDOT/Stonebridge underestimate the average daily traffic volume by 1500 cars.

Further, within extremely close proximity to the Washington Clinic site there are four major planned projects – the WMATA Bus Garage site, Chevy Chase Center (fully approved by Montgomery County), Wisconsin Place (Hecht's site), and GEICO – that, if built as planned, will create over 2 million square feet of retail and office space (or 1.2 million new square feet), plus 1175 new housing units, as shown on the chart below (a direct excerpt from Office of Planning, corrected Preliminary Report, June 17, 2003, Table 1). Thus, it is extremely unlikely that a rate as low as 3.4% annual traffic growth rate is an appropriate assumption for the core of Friendship Heights.

<b>DEVELOPMENT OR PROJECT</b>	<b>DC OR MD</b>	<b>EXIST. SF ( OR # APTS.)</b>	<b>PROPOSED SF (# APTS.)</b>
<i>WMATA Bus Garage</i>	<i>DC</i>	<i>N/a</i>	<i>60,000 sf retail plus 400 apts</i>
<i>Chevy Chase Ctr.</i>	<i>MD</i>	<i>98,000 SF</i>	<i>300,000 SF office; 112,000 retail</i>
<i>Wisconsin Place (Hecht's)</i>	<i>MD</i>	<i>176,188</i>	<i>450,000 SF office; 300,000 retail; 300,000 SF apts (275 units) [ 1.05 M SF total]</i>
<i>GEICO</i>	<i>MD</i>	<i>514, 257 SF</i>	<i>810,000 SF commercial; 500 apt. and townhouse units</i>

*From the Office of Planning, (Revised) Preliminary Report, June 17, 2003*

Given this level of planned development, it is unreasonable to rely on the "standard" annual traffic growth rate of 1-2%, when the actual growth rate is certain to be higher, as the Office of Planning and DDOT are well aware.

6. FhORD asserts that 328 additional trips are created by the Chase Tower and that those trips were not included in the Applicant's traffic study. If these trips were not included and now are, would this change DDOT's conclusion?

DDOT: DDOT claims that these trips were included in the study as Chase Towers (sic) was partially occupied at the time that the traffic counts were completed. Construction was completed in November of 2001.

FhORD: The traffic studies conducted in January and February of 2002 by DDOT could not have included the actual traffic generated by the new Chase Tower building (4445 Willard Avenue).

In March 2003, the receptionist for the Chase Tower stated to two representatives of FhORD that as of October 2002, there had been approximately 160 people working in the building, out of an estimated full occupancy of 95 people per floor, with a total of 12 floors. This was only 14 per cent of the 1,140 total employees expected at full occupancy. Considering that this occupant count was eight months after the traffic studies were completed, it is reasonable to assume that there were even fewer occupants at that time.

Even now, in March 2003, the Chase Tower is mostly unoccupied. Washington Radiology Associates is currently one of the largest tenants in the building, and generates considerable traffic. However, they opened in this location in September 2002, after the traffic study was completed. Likewise, no retail tenants were open yet at the time of the traffic counts: the first retail tenant moved in during the third quarter of 2002.

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Below are all tenants as of March 25, 2003, listed on the building directory with their suite numbers, illustrating that most (possibly all) floors are still vacant or only partially occupied:

AX Technology 1010  
CapitalSource, CapitalSource Mortgage Finance LLC 1200  
Cambridge Systematics 300  
Chain Bridge Advisors LLC 1100  
Lehrman LLC 1030  
Medical Office Properties 1100  
Salmon PCS, Crowley Group 1050  
TAP Pharmaceuticals Inc. 710  
Washington Radiology Associates PC 200

The fact that Chase Tower is presently largely unoccupied is shown visually by the photograph, taken in March 2003, on the following page.



**MARCH 2003: CHASE TOWER IS STILL MOSTLY UNOCCUPIED.  
TRAFFIC IMPACT COULD NOT HAVE BEEN INCLUDED IN DDOT  
TRAFFIC COUNTS CONDUCTED IN JANUARY AND FEBRUARY OF 2002.**



**This photograph of Chase Tower was taken March 25, 2003. The building remains mostly vacant. A sign advertising space for lease is visible at the top.**

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7. In summary, does DDOT continue to find that the project, if approved, would not have objectionable traffic impacts?

DDOT: DDOT's response, in its entirety, is that "DDOT continues to find that the proposed project will have a negligible impact on traffic conditions."

FhORD: DDOT's conclusions is premised on many major errors and is not supported by any Census Data, any studies, any specific consideration of traffic factors at the core of Friendship Heights or any other principled analysis. Thus, DDOT's conclusions should be disregarded by the Zoning Commission. Likewise, DDOT's endorsement of Stonebridge's traffic analysis should be disregarded for the same reasons.

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For the reasons outlined below, the Applicants' responses to the Zoning Commission in its March 24, 2003, submission are entirely inadequate as to the FlexCar service, structure and enforcement of the proposed affordable housing program, and deficiencies in the proposed Construction Management Plan.

A. The Zoning Commission asked whether Stonebridge will actively promote in its marketing materials the availability of FlexCar.

Stonebridge: Stonebridge responded in relevant part by stating that it will agree to a Condition that "[t]he Applicant shall include in its promotional and marketing materials a summary of the elements of the Transportation Management Plan, including the availability of car sharing services such as FlexCar."

FhORD: The Zoning Commission may have a mistaken impression that Stonebridge has committed to providing FlexCar service (or the equivalent) to residents over and above what is commercially available today, to providing such a service on-site, or providing financial incentives to enroll in such a service, such as paying enrollment fees. In fact, this

aspect of the Applicants' Transportation Management Plan, though in concept a laudable way to help reduce car dependency, is meaningless as set forth by the Applicant in this proposal.

In fact, Stonebridge has not committed to locating a FlexCar service at the core of Friendship Heights; even if it had done so (or does so today), such a promise would be meaningless without a commitment by FlexCar. There is no indication in the record that Stonebridge has ever contacted FlexCar, much less obtained a commitment for it to locate at the core of Friendship Heights.

Stonebridge has not committed to providing FlexCar service on-site, or creating such a service on-site. Stonebridge has not committed to providing parking space for a FlexCar service in the proposed underground garage. In fact, Stonebridge's promises regarding the number of parking spaces for residents, day care employees and visitors accounts for all the available parking spaces, and thus allows no flexibility for an on-site FlexCar service.

In addition, even if a FlexCar service existed at Friendship Heights, there is no commitment that residents of the project would have any access to or assistance with enrolling with a FlexCar service that would be any different than the general public's access. Stonebridge has declined to agree to provide on-site or very nearby access, arrange and pay for pre-enrollment for residents, or any other measure that might make this concept meaningful as part of a Transportation Management Plan.

When the words are parsed carefully, Stonebridge only promises the promotion of the "availability of car sharing services such as FlexCar," which is as meaningless as an individual homeowner in Friendship Heights, when advertising a home for sale, promoting the "availability of car sharing services" at the closest commercial locations and commercial rates. Thus, Stonebridge's response is vacuous, if not misleading for suggesting that Stonebridge has committed to secure such a service at the core of Friendship Heights, and the Zoning Commission should discount entirely the purported value of FlexCar services as part of the proposed Transportation Management Plan.

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- B. The Zoning Commission asked whether Stonebridge will agree to sell the parking spaces separately from the residential units.

Stonebridge: Stonebridge will agree to sell to the parking spaces separately from the residential units as a Condition, and suggests adding to Condition No. 6 the language “[parking spaces shall be offered for sale separately from dwelling units and no purchaser of a dwelling unit shall be required to purchase a parking space.]”

FhORD: FhORD understands and endorses the apparent interest by the Zoning Commission in not penalizing residents who do not own cars, or at least not providing financial disincentives for being car-free. However, FhORD urges the Zoning Commission to balance this interest with the reality that residents will have a certain level of car ownership, and that the neighborhood has a strong interest in ensuring that residents who do own cars do not have a financial incentive to park on neighborhood streets.

Using Census 2000 data (Tract 11, Block 5), it is fair to estimate that Stonebridge residents will own between 155 cars (assuming 110 units) and 176 cars (125 units).<sup>9</sup> The existing residents of this neighborhood are very transit oriented, and there is no reason to believe that Stonebridge residents will be any more, or any less, car dependant than current residents. The Metrorail system is a commuter system, not a full-service regional transportation system. Residents use cars for many purposes that are not serviceable by Metrorail, e.g. transportation to schools, trips to visit friends and family, various shopping and recreational interests. The proposed approach will not work as desired because there is no assurance that residents who do not purchase spaces are those residents who do not own cars.

For Stonebridge residents who will own cars, disconnecting ownership of units from ownership of parking spaces will encourage residents with cars not to buy spaces, but instead to park on the local streets with a residential parking permit. This will be especially true of units occupied by renters (with investor owners), units occupied by student-renters (up to four

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<sup>9</sup> The Applicants estimate vehicle ownership averaging 0.7 vehicles per unit, but provide absolutely no supporting evidence.

students in a two-bedroom unit), the affordable housing units (the affordable sales price would reflect the most a qualified buyer could pay, but would not include a space), and others who – like most residents of that neighborhood – do own a car but use it as little as possible, often largely on nights and weekends.<sup>10</sup> Stonebridge's own traffic expert observed that the local neighborhood has virtually no available street parking much of the time due in part to retail customers and people from other parts of Ward 3 (with permits) driving to use Metrorail and parking on local streets.

For these reasons, recent Zoning Commission orders for PUD's at comparable sites have required at least one space per unit that must convey with the unit.<sup>11</sup> FhORD urges that the Zoning Commission to use the same approach it has used in these other PUD's. This approach does not encourage car ownership (or penalize car-free residents), but simply

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<sup>10</sup> This group of residents – those who own cars but use them mostly on nights and weekends – perhaps are most likely not to purchase a parking space, but instead to become "permanent parkers" in on-street spaces, i.e. parkers who park in one space from Monday through Friday, if not for weeks on end, without moving. This phenomena is quite observable in the Dupont Circle area.

<sup>11</sup> Tenley Park PUD. The Zoning Commission required significant off-street parking by requiring a two-car garage plus an additional off-street space for each unit. [Z.C. Order No. 921, Case No. 00-03C, November 16, 2001, Decision ¶6.]

Tenley Hill PUD, near the Tenleytown Metrorail Station. The Zoning Commission required at least one space per unit with a provision for additional guest parking. [Z.C. Order No. 904, Case No. 98-21C, September 13, 1999.]

Miller PUD, also in Square 1661. The Zoning Commission required at least one fully accessible space per unit for the exclusive use of the owner or occupant. [Z.C. Order No. 528, Case No. 86-21F/85-8P, April 13, 1987.] The Miller PUD was not developed, and in November 1996, McCaffery Interest, Inc. and Eakin Youngentob Associates, Inc. applied for a modification of the Miller PUD. The Zoning Commission approved it and required either a two car garage or a one car garage and tandem space for each townhouse. [Z.C. Order No. 824.]

Abrams PUD, in Square 1661. The Zoning Commission required at least 1:1 parking ratio, and further required that the spaces be fully accessible, not available for commercial use and prohibited rental or separate conveyance. [Z.C. Order No. 519, Case No. 85-20C, February 9, 1987.]

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reflects the car ownership that is most likely and the need to mitigate parking impacts.

- C. The Zoning Commission asked if Stonebridge would agree to restrict loading at the proposed loading dock to off-peak hours for the day care center.

Stonebridge: Stonebridge has already proposed that “[n]o deliveries to the Project shall be made during the Day Care Center’s morning drop off period (7:30 a.m. to 9:30 a.m.) or the Day Care Center’s afternoon pick up period (4:00 p.m. through 6:00 p.m.), so as not to interfere with the egress and ingress of parents dropping off children at the Day Care Center or with rush hour traffic.

FhORD: Notwithstanding this Condition, it still appears that there would be serious safety concerns from the combined loading dock/day care parking lot entrance, such as trucks making three-point turns in the day care lot when children are outside and during off-peak drop-off and pick-up of children.

- D. The Zoning Commission asked Sonebridge to address the deficiencies in enforcement of the proposed Affordable Housing program.

Stonebridge: Stonebridge submitted a revised version of the Applicants’ proposed affordable housing program.

FhORD: FhORD is submitting separately a detailed response to the Applicants revised proposed Affordable Housing program. As we explain more fully in that separate response, Stonebridge's response and the additional Office of Planning Submission do not meaningfully address the fundamental problems of eligibility, enforcement and successful attainment of affordable housing. They have not rebutted FhORD's principle points on this subject. Given that Stonebridge's has made an inadequate showing, as well as the fact that any decision approving affordable housing in this context will likely create a template for future cases, we urge the Commission to disallow this proffered amenity as not adequately developed or supported by the Applicants.

In addition to the points made in the separate response about enforcement and inefficiency, FhORD also notes that the proposed Affordable Housing

program is a profit-center for the developer and does not involve the sale of units for below market prices that otherwise could be sold at market prices.<sup>12</sup>

FhORD also notes that the proposed affordable housing is approximately 2.8% of the proposed GSF, which is enormously less than the Office of Planning's "Inclusionary Housing Primer" (Oct. 2002) and the Comprehensive Plan for Ward 3 suggest might be appropriate. As a cornerstone of the proposed amenities package, this proffered amenity pales in comparison to the private gain involved at this site and the large requested increase in height and GSF if this PUD is granted.<sup>13</sup>

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<sup>12</sup> The proposed Affordable Housing program is explicitly a *quid pro quo* for request of 5% additional density (plus 5% additional height), on the basis that the additional density is "essential" to provide the affordable housing. However, Stonebridge requests 5% additional density of the 4.0 FAR allowed in an R-5-C zone (0.2 FAR), which is approximately 9668 GSF. In exchange, Stonebridge offers to provide approximately 5100 GSF for affordable housing (5% of the GSF over matter of right development). Thus, under the guise of the Affordable Housing program, Stonebridge would use 4568 GSF for market rate units that it otherwise would not be allowed, and 5100 GSF for affordable housing units that will be profitable themselves to the extent that the prices for the affordable units will likely exceed the marginal cost of building this space.

<sup>13</sup> Consistent with the analysis and conclusions in the separate FhORD response to the revised Affordable Housing program, if the affordable housing program is enlarged, the actual affordable housing component should be converted into a cash contribution to the Housing Trust Fund so that affordable housing can be provided efficiently instead of grossly inefficiently. Specifically, the amount of the cash contribution must be, at a minimum, \$2.127 million. Stonebridge claims that space in its building has a market value of \$400 per square foot, and that the price at which affordable housing in the building would be sold is \$180 per square foot. Thus, if the 5% additional density is granted, the cash contribution to the affordable housing fund (market value minus affordable price), should be \$220 per square foot, for a total of \$2.127 million.

- E. The Zoning Commission asked how Stonebridge would ensure that the open space in the proposed project would be accessible to the public and whether Stonebridge would ensure that no part of the open space could ever be used for exclusive private use, such as a private playground for the proposed day care center.

Stonebridge: Stonebridge proposed to add to Condition No. 6 the language that “[t]he open space shown on the plans shall not be fenced in or enclosed. No playground for the exclusive use of the day care center shall be permitted on the site. Prohibitions on (1) enclosing the open space and (2) a playground for the exclusive use of the day care center shall be included in the declaration of condominium.

FhORD: This additional language in Condition No. 6 provides some assurance that the open space will not be physically converted into private space. However, FhORD still has concerns that, unlike an actual public park or pocket park (such as the one across Military Road from the proposed Stonebridge project), there are still no assurances that the public will be aware that the space is open to the public, no assurances that there will be no unreasonable limitations on use by the public and no assurance that the public will not assume instead that the open space is private space for the Stonebridge residents. For these reasons, FhORD again requests the Zoning Commission to require, if this project is approved, some signage indicating that the open space is available to the public.

- F. The Zoning Commission asked if Stonebridge would remedy the deficiencies in the proposed Construction Management Plan, and if Stonebridge agreed that truck traffic not use Military Road or Western Avenue.

Stonebridge: Stonebridge has offered no changes in response to the Zoning Commission's question above, other than to present a map of the construction truck routing.

Stonebridge noted that its proposed Construction Management Plan was initially modeled from two of the most recent projects in ANC 3E (including a project in Square 1661), neither of which was reported to have any construction management problems. Its Plan, as now presented,



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contains more restrictions, resulting in additional costs borne by the Applicant, than in either of the other two projects. Under a matter-of-right development, there would be no Construction Management Plan to benefit and protect the neighborhood.

FhORD: The map of the construction truck routing provides a partial response to point 9 in the 10 points previously listed as Exhibit E of the Rebuttal Submission from FhORD dated January 27, 2003. Otherwise, Stonebridge's response does nothing to satisfy FhORD's concerns as set forth previously. These concerns are enumerated at Tab 2 to this submission, which is Exhibit E to FhORD's January 27, 2003 submission.

In addition, as to the truck routing, the truck routing westbound on Western Avenue and northbound on Wisconsin Avenue or River Road does not adequately address the enforcement aspect of this issue. First, as to enforcement, Stonebridge should be required to have all trucks entering and leaving its site to have visible identification that identifies the project and "project truck number" or some other unique identifier; otherwise, given the number of nearby projects that will be under construction concurrently, there would be no effective way to match violating trucks with projects. Second, Stonebridge does not indicate whether violations would subject Stonebridge to any fines, especially as to repeat offenders.

FhORD clarifies that it does not request a Construction Management Plan as a benefit for the neighborhood and does not view it as such. We oppose the requested zoning change and PUD, and we view any Plan as only an attempt to mitigate the negative effects that may result. A matter-of-right development would involve so much less construction activity than what is planned by Stonebridge, that the neighbors likely would have little need for a Construction Management Plan in that event.

Applicants refer to two previous developments that were completed without serious problems for the neighbors, including one on Square 1661. However, they omit reference to another project on Square 1661 [Donohoe PUD] that was very damaging to a number of houses nearby. It is this experience that informs much of the neighborhood position regarding the Construction Management Plan, and it particularly informs our request that all blasting should be prohibited.

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Regarding the Applicants' claim to have already provided "significant remedies related to payment for damage caused by Developer," we note that their Plan does no more than state the Applicants' responsibility under the law. Their legal responsibility for any damage they cause was never in question, and the rights of the neighbors are not enhanced in this regard by the Construction Management Plan proffered by the Applicants.

- G. The Zoning Commission asked if Stonebridge, if approved, would create danger to pedestrians from traffic leaving the residential building.

Stonebridge: Stonebridge states that the factors and improvements it describes "should insure that pedestrians are not threatened by traffic leaving either the principal building or the day care center."

FhORD: FhORD has no further comment, except that to the extent that Stonebridge proposes to increase traffic flow by reducing the yellow and all-red cycles of signals, Stonebridge will be creating a safety problem. This would be especially acute at the crossings of Military Road and Western Avenue which would experience greatly increased pedestrian traffic, according to the Stonebridge analysis.

- H. The Zoning Commission asked if Stonebridge would consider a monetary donation to the local park as opposed to construction of improvements.

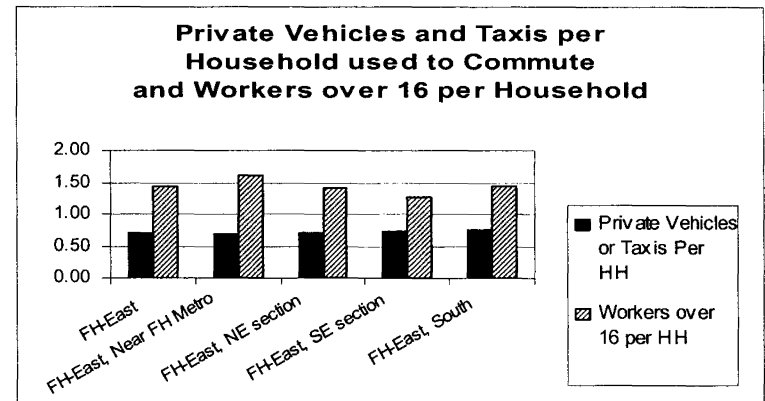
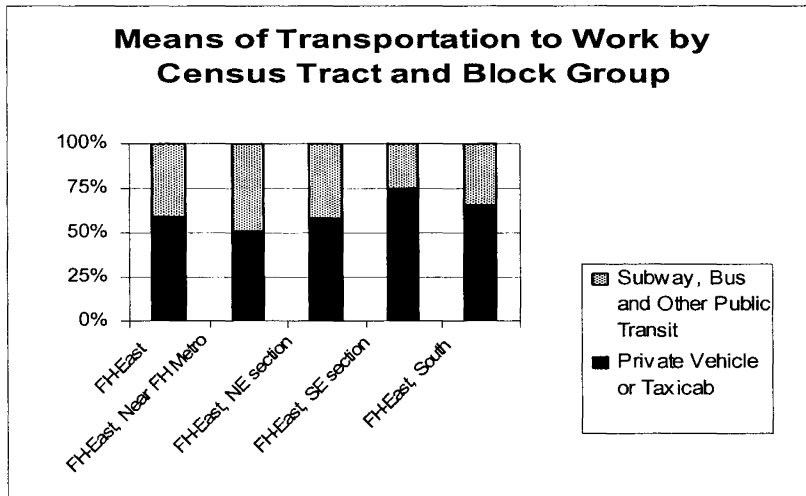
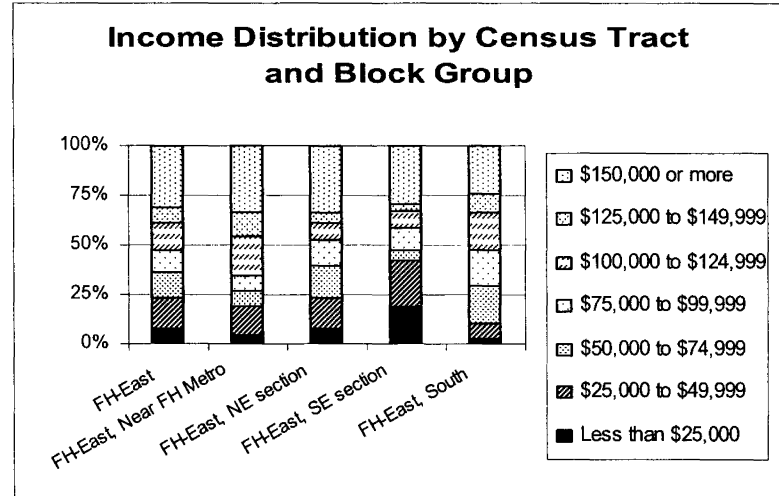
Stonebridge: Stonebridge would agree to do so.

FhORD: FhORD endorses this revision.

# The Best Source of Data is Census 2000, Census Tract 11

The Washington Clinic is in Census Tract 11, Block Group 5

- According to Census 2000, each household in Census Tract 11, Block Group 5 generates 0.66 trips by private vehicle in each rush hour
- According to Census 2000, each household in Census Tract 11 generates 0.71 trips by private vehicle in each rush hour
- There are on average 1.44 workers per household in Census Tract 11, and in that block group, 40.47% of commuters use mass transit



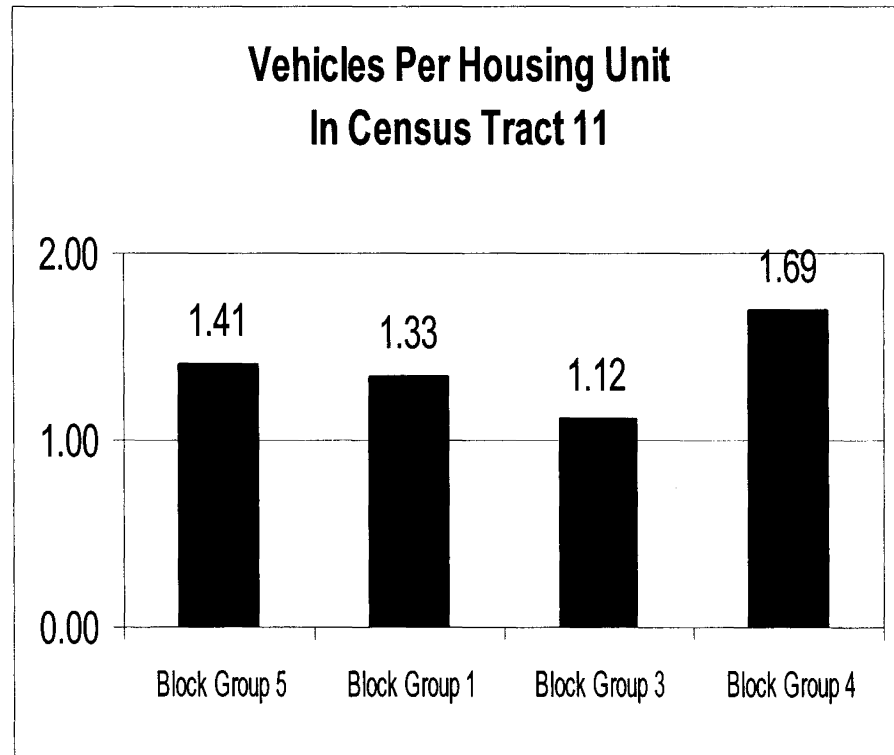
Census Tract 11: FH-East  
 Block Group 5: FH-East, Near FH Metro  
 Block Group 1: FH-East, NE Section

Block Group 3: FH-East, SE Section  
 Block Group 4: FH-East, South

# The Best Source of Data is Census 2000, Census Tract 11

The Washington Clinic is in Census Tract 11, Block Group 5

- According to Census 2000, average vehicle ownership in Census Tract 11, Block Group 5 is 1.41 vehicles



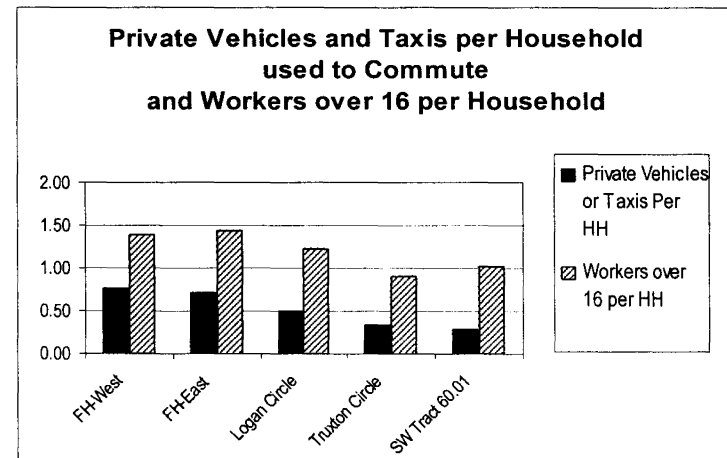
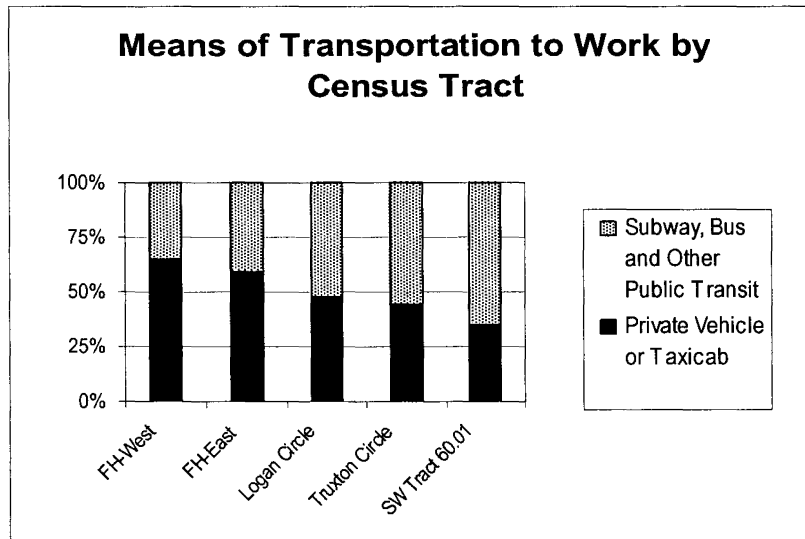
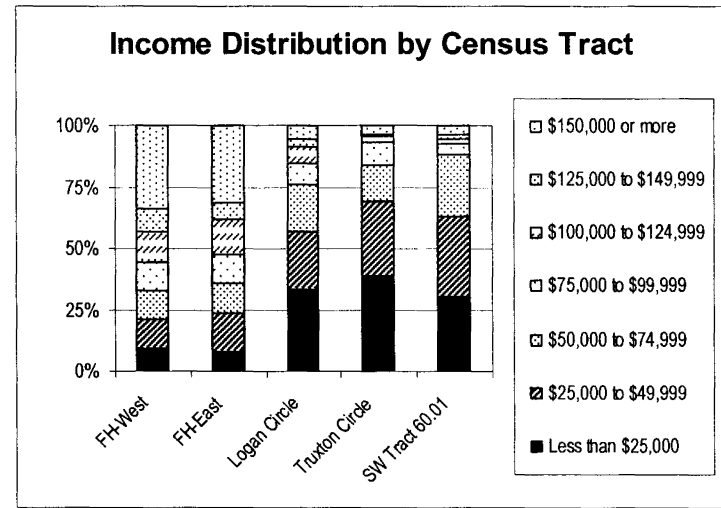
Census Tract 11: FH-East  
Block Group 5: FH-East, Near FH Metro  
Block Group 1: FH-East, NE Section

Block Group 3: FH-East, SE Section  
Block Group 4: FH-East, South

# DDOT Comparables are Not Comparable

Comparison of Friendship Heights with DDOT Comparables: Logan Circle, Truxton Circle & SW DC Census Tracts 44, 46 and 60.01

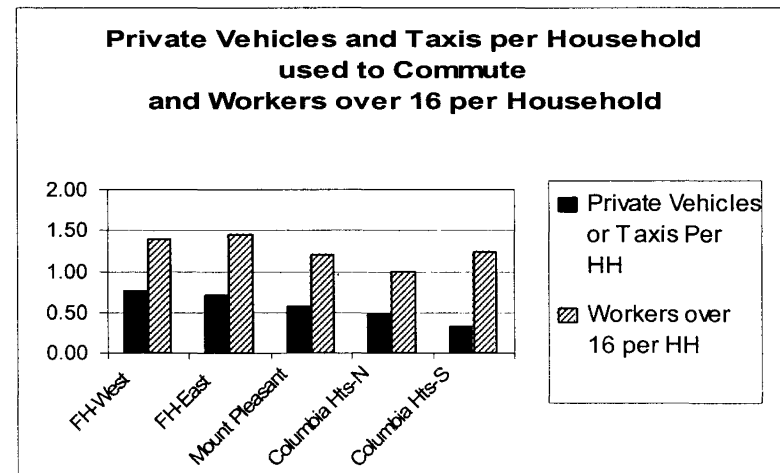
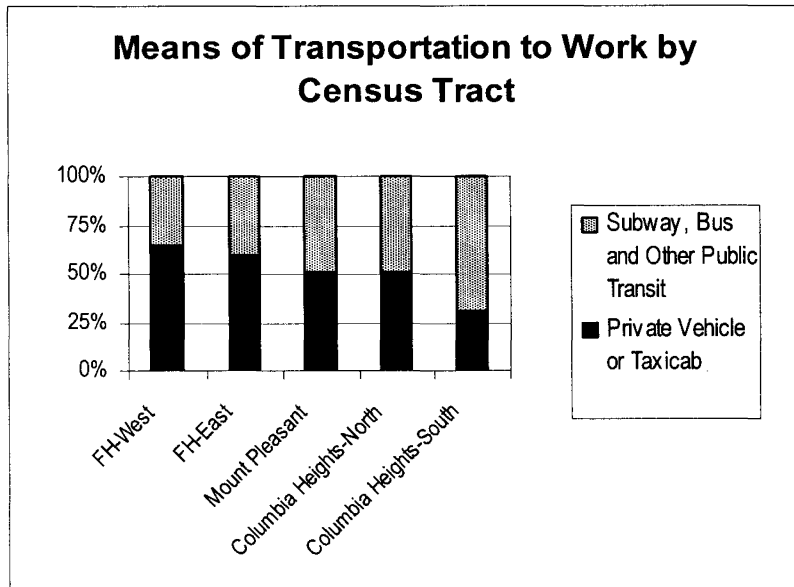
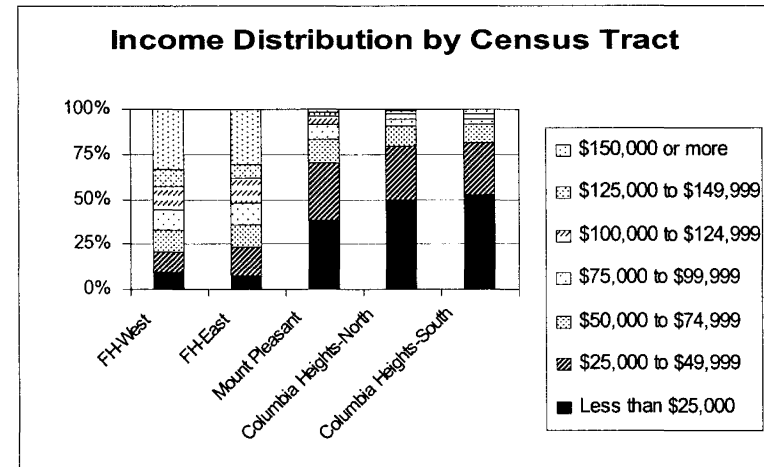
- 21-23% of Households in Friendship Heights have incomes of \$50,000 or less.
- 57-69% of households in Census tracts 44, 46 and 60.01 have incomes of \$50,000 or less.
- Households in Census Tract 11 use 0.71 private vehicles or taxis to commute per occupied dwelling unit.
- There are on average 1.44 workers per household
- In Census Tract 11, 40.47% of commuters use mass transit



# DDOT Comparables are Not Comparable

Comparison of Friendship Heights with DDOT Comparables: Mount Pleasant and Columbia Heights  
Census Tracts 25.02, 28.01 and 28.01

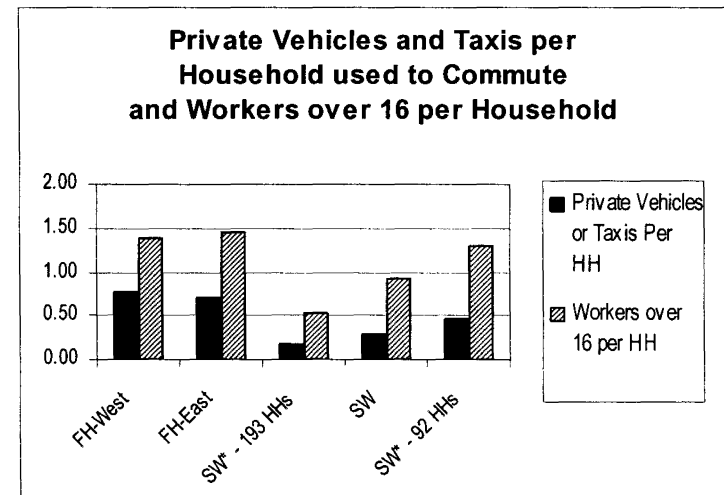
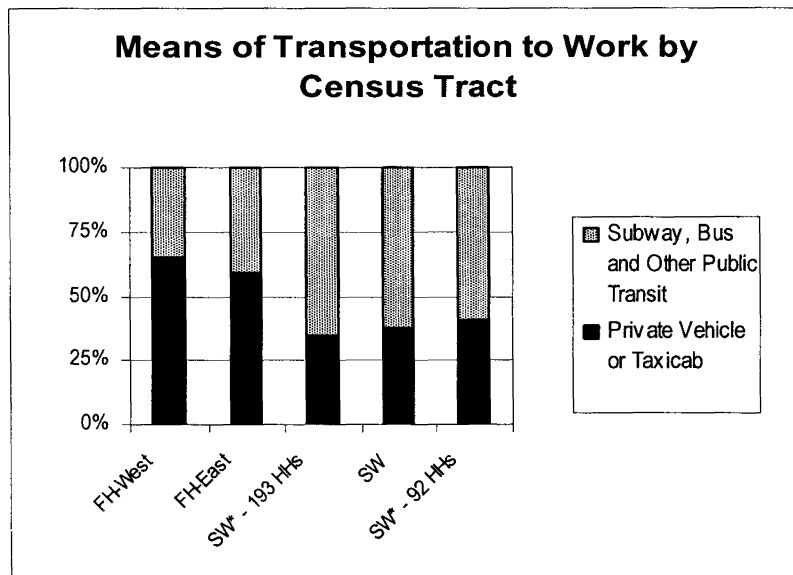
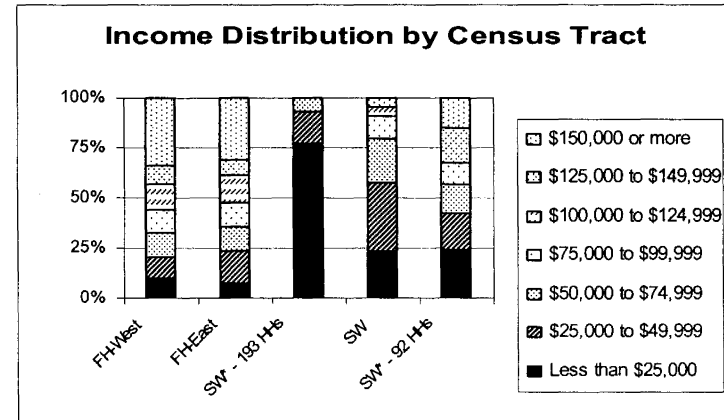
- 21-23% of Households in Friendship Heights have incomes of \$50,000 or less.
- 70-81% of households in Census tracts 25.02, 28.01 and 28.01 have incomes of \$50,000 or less.
- Households in Census Tract 11 use 0.71 private vehicles or taxis to commute per occupied dwelling unit.
- There are on average 1.44 workers per household
- In Census Tract 11, 40.47% of commuters use mass transit



# DDOT Comparables are Not Comparable

Comparison of Friendship Heights with DDOT Comparables: Southwest Washington  
 Census Tracts 60.02, 61, 62.01

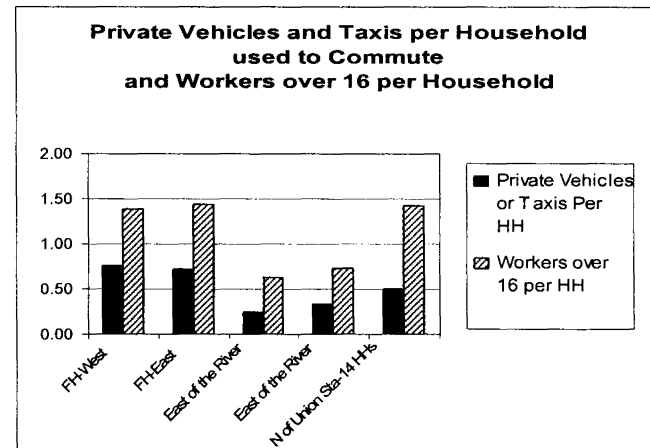
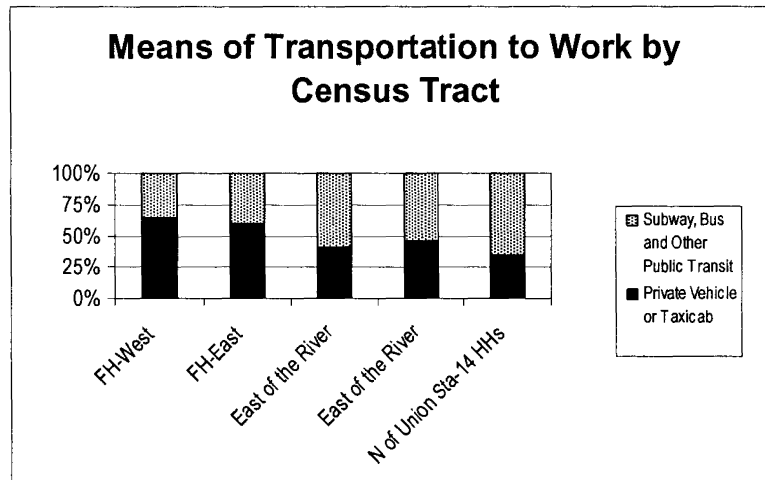
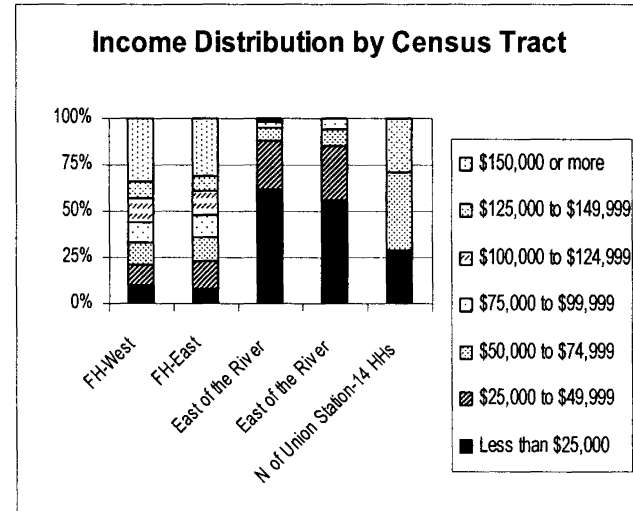
- 21-23% of Households in Friendship Heights have incomes of \$50,000 or less.
- 42-93% of households in Census tracts 60.02, 61 and 62.01 have incomes of \$50,000 or less.
- There are only 92 households in Census Tract 62.01. No valid inferences can be drawn from that data.
- There are only 193 households in Census Tract 60.02. No valid inferences can be drawn from that data.



# DDOT Comparables are Not Comparable

Comparison of Friendship Heights with DDOT Comparables: East of the River, Southwest Washington Census Tracts 74.01, 74.03, 74.04, 74.08, 74.09 and 75.04 and North of Union Station, Census Tract 86

- 21-23% of Households in Friendship Heights have incomes of \$50,000 or less.
- 85-87% of households in Census tracts 74.01, 74.03, 74.04, 74.08, 74.09 and 75.04 have incomes of \$50,000 or less.
- There are only 14 households in Census Tract 86, North of Union Station. No valid inferences can be drawn from that data.
- Census Tract 98.09, St. Elizabeth's Hospital, cited by DDOT, is discussed on page 14, below. There are no households in the tract, and thus no data on household income.

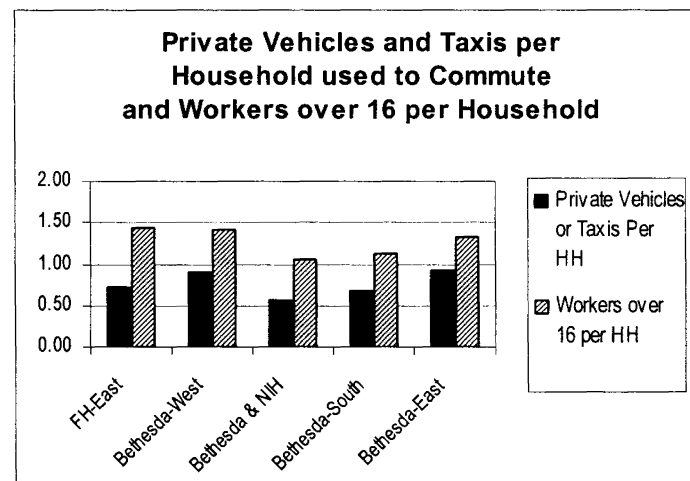
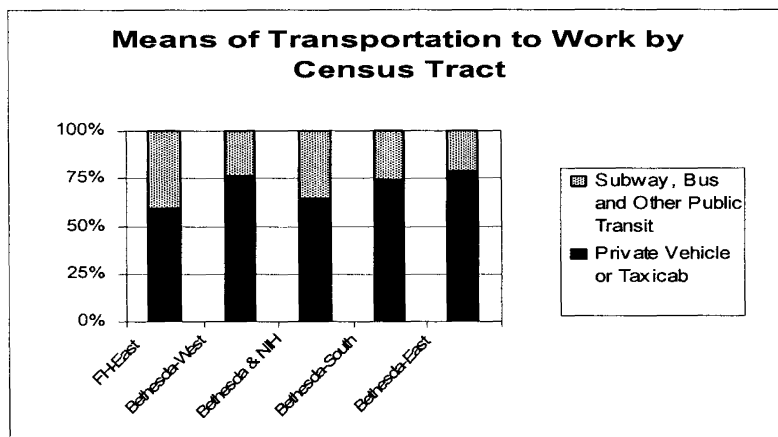
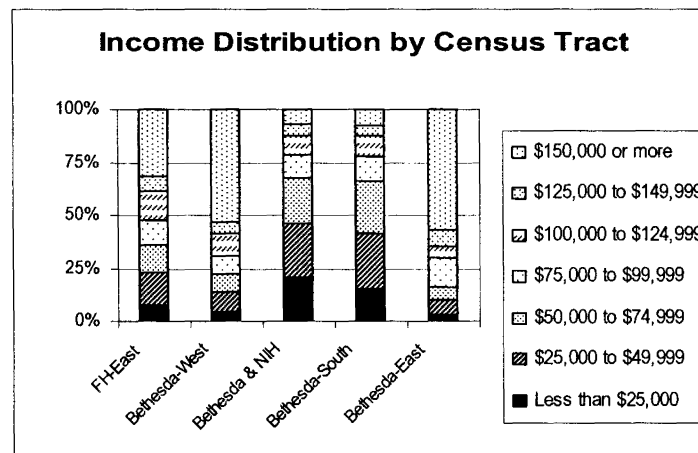




# Bethesda Commuters Less Likely to use Mass Transit

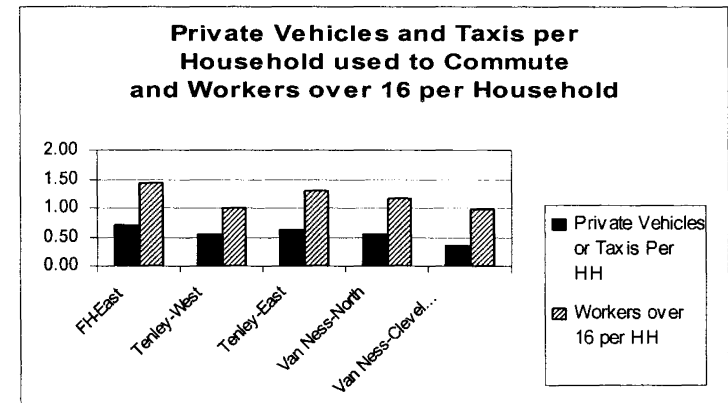
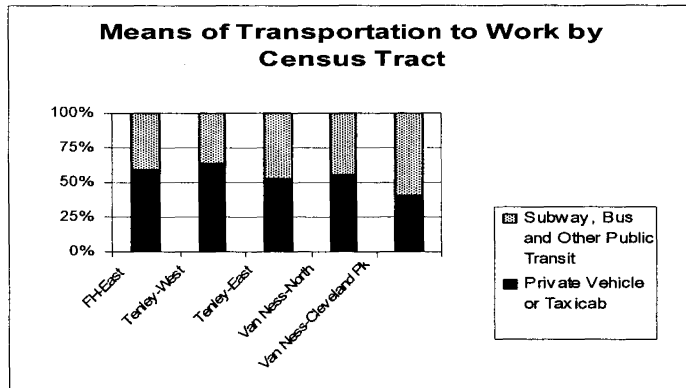
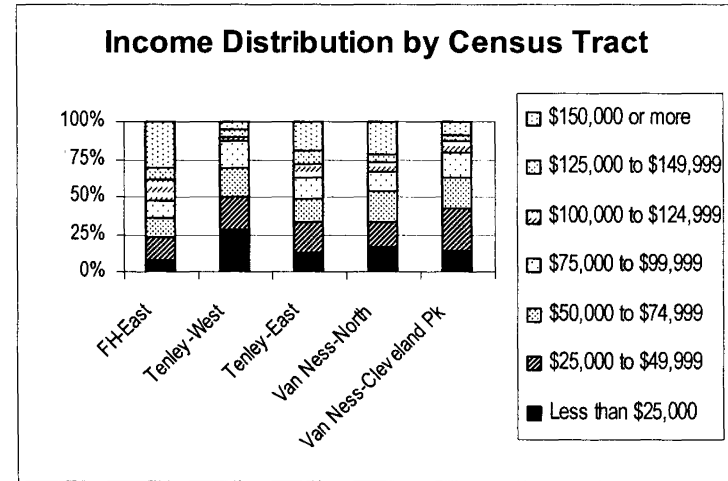
Comparison of Friendship Heights with Bethesda

- 21-23% of Households in Friendship Heights have incomes of \$50,000 or less.
- 10-46% of households in the Bethesda Census tracts 7047, 7048.01, 7048.02 and 7054 have incomes of \$50,000 or less.
- HHs in Census Tract 11 use 0.71 private vehicles or taxis to commute per occupied housing unit. HHs in the Bethesda Census Tracts use 0.56 to 0.92 private vehicles or taxis to commute.
- In Census Tract 11, 40.47% of commuters use mass transit. In the Bethesda Census Tracts, 21-36% of commuters use mass transit.



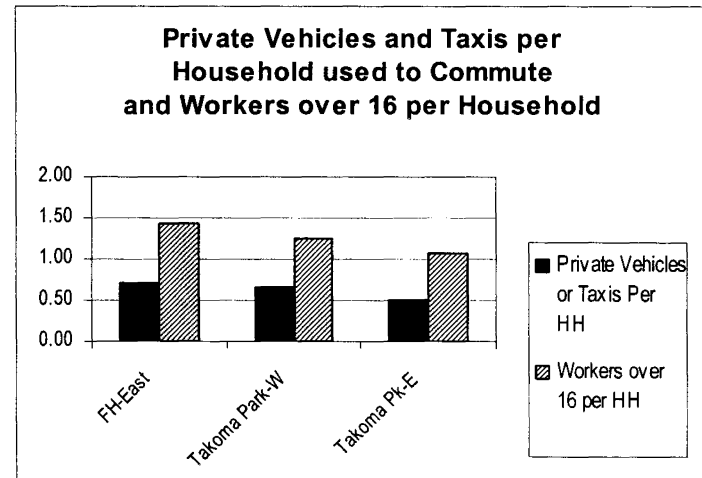
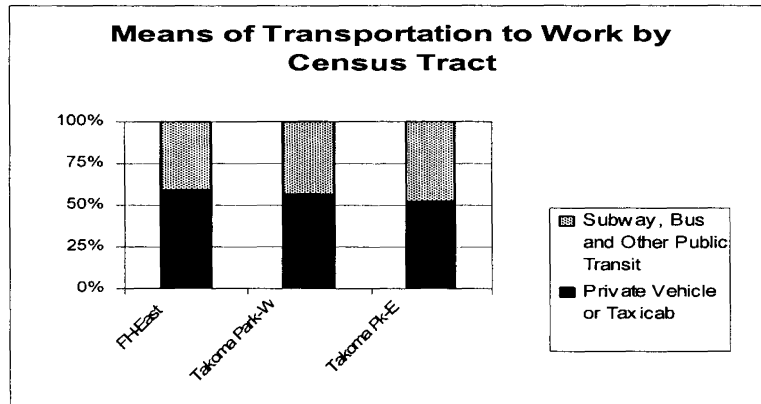
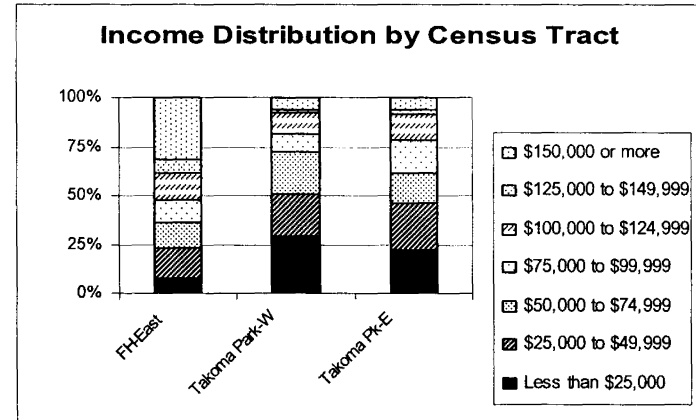
# Tenleytown, Van Ness and Cleveland Park compared with Friendship Heights

- According to Census 2000, households in Census Tract 11 use 0.71 private vehicles or taxis to commute per occupied housing unit.
- Census Tract 13.02, Van Ness/Cleveland Park, cited by DDOT, is not comparable to FH, while Census Tract 13.01, Van Ness-North is closer.
- In Census Tract 11, 40.47% of commuters use mass transit.



# Takoma Park compared with Friendship Heights

- According to Census 2000, households in Census Tract 11 use 0.71 private vehicles or taxis to commute per occupied housing unit.
- In Census Tract 11, 40.47% of commuters use mass transit.
- According to Census 2000, average vehicle ownership in Census Tract 11, Block Group 5 is 1.41 vehicles



# Census Data for Friendship Heights Census Tract 11 and Block Groups

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 11, DC	Block Group 5, Census Tract 11, DC	Block Group 1, Census Tract 11, DC	Block Group 3, Census Tract 11, DC	Block Group 4, Census Tract 11, DC
Total:	1,857	494	726	318	319
Less than \$10,000	48	16	14	18	0
\$10,000 to \$14,999	18	0	0	18	0
\$15,000 to \$19,999	14	0	0	14	0
\$20,000 to \$24,999	67	7	42	10	8
\$25,000 to \$29,999	52	16	26	0	10
\$30,000 to \$34,999	52	18	11	23	0
\$35,000 to \$39,999	67	8	35	24	0
\$40,000 to \$44,999	37	5	8	17	7
\$45,000 to \$49,999	77	25	34	11	7
\$50,000 to \$59,999	101	0	83	8	10
\$60,000 to \$74,999	133	38	36	8	51
\$75,000 to \$99,999	222	38	90	35	59
\$100,000 to \$124,999	254	96	68	29	61
\$125,000 to \$149,999	134	60	34	10	30
\$150,000 to \$199,999	300	99	110	33	58
\$200,000 or more	281	68	135	60	18

	Census Tract 11, DC	Block Group 5, Census Tract 11, DC	Block Group 1, Census Tract 11, DC	Block Group 3, Census Tract 11, DC	Block Group 4, Census Tract 11, DC
Tract Name	FH-East	FH-East, Near FH Metro	FH-East, NE section	FH-East, SE section	FH-East, South
Total:	1,857	494	726	318	319
Less than \$25000	7.92%	4.66%	7.71%	18.87%	2.51%
\$25,000-\$49,999	15.35%	14.57%	15.70%	23.58%	7.52%
\$50,000-\$74,999	12.60%	7.69%	16.39%	5.03%	19.12%
\$75,000-\$99,999	11.95%	7.69%	12.40%	11.01%	18.50%
\$100,000-\$124,999	13.68%	19.43%	9.37%	9.12%	19.12%
\$125,000-149,999	7.22%	12.15%	4.68%	3.14%	9.40%
Over \$150,000	31.29%	33.81%	33.75%	29.25%	23.82%

	Census Tract 11, DC	Block Group 5, Census Tract 11, DC	Block Group 1, Census Tract 11, DC	Block Group 3, Census Tract 11, DC	Block Group 4, Census Tract 11, DC
Total:	2,678	798	1,024	400	456
Car, truck, or van:	1,317	343	505	236	233
Drove alone	1,158	325	423	183	227
Carpooled	159	18	82	53	6
Public transportation:	907	330	367	80	130
Bus or trolley bus	88	19	56	0	13
Streetcar or trolley car (público in Puerto Rico)	14	14	0	0	0
Subway or elevated	791	297	311	80	103
Railroad	7	0	0	0	7
Ferryboat	0	0	0	0	0
Taxicab	7	0	0	0	7
Motorcycle	0	0	0	0	0
Bicycle	40	14	11	15	0
Walked	114	47	46	15	0
Other means	52	0	29	0	23
Worked at home	248	64	66	54	64

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tract 11 and Block Groups in Census Tract 11

H46. AGGREGATE NUMBER OF VEHICLES AVAILABLE BY TENURE [3] - Universe: Occupied housing units				
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data				
	Block Group 1, Census Tract 11, District of Columbia	Block Group 3, Census Tract 11, District of Columbia	Block Group 4, Census Tract 11, District of Columbia	Block Group 5, Census Tract 11, District of Columbia
Housing Units	757	306	274	517
Owner occupied:	561	186	207	455
Renter occupied:	196	120	67	62
Aggregate number of vehicles available:	1,008	342	464	727
Owner occupied	805	254	307	661
Renter occupied	203	88	157	66

U.S. Census Bureau  
Census 2000

	Census Tract 11, DC	Block Group 5, Census Tract 11, DC	Block Group 1, Census Tract 11, DC	Block Group 3, Census Tract 11, DC	Block Group 4, Census Tract 11, DC
Tract Name	FH-East	FH-East, Near FH Metro	FH-East, NE section	FH-East, SE section	FH-East, South
Total Workers Over 16	2,678	798	1,024	400	456
Total Households:	1,857	494	726	318	319
Car, truck, or van:	1,317	343	505	236	233
Taxicab	7	0	0	0	7
Private Vehicle or Taxicab	1,324	343	505	236	240
Private Vehicles or Taxis Per HH	0.71	0.69	0.70	0.74	0.75
Subway	791	297	311	80	103
Bus	88	19	56	0	13
Other NonTaxi Public	21	14	0	0	7
Subway, Bus and Other Public Transit	900	330	367	80	123
Subway, Bus, PV, Taxi	2,224	673	872	316	363
Percent Mass Transit	40.47%	49.03%	42.09%	25.32%	33.88%
Workers over 16 per HH	1.44	1.62	1.41	1.26	1.43

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tract 11 and Block Groups in Census Tract 11

# Census Data for Friendship Heights, Logan Circle, Truxton Circle and Downtown

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 44, DC	Census Tract 46, DC	Census Tract 60.01, DC
<b>Total:</b>	2,556	1,857	1,078	1,087	1,715
Less than \$10,000	78	48	176	144	184
\$10,000 to \$14,999	76	18	29	85	55
\$15,000 to \$19,999	8	14	82	69	53
\$20,000 to \$24,999	82	67	70	125	222
\$25,000 to \$29,999	53	52	68	71	116
\$30,000 to \$34,999	71	52	38	77	115
\$35,000 to \$39,999	18	67	45	59	114
\$40,000 to \$44,999	101	37	51	73	111
\$45,000 to \$49,999	45	77	52	50	115
\$50,000 to \$59,999	111	101	122	81	253
\$60,000 to \$74,999	196	133	83	78	173
\$75,000 to \$99,999	291	222	96	99	80
\$100,000 to \$124,999	329	254	73	31	34
\$125,000 to \$149,999	234	134	31	8	27
\$150,000 to \$199,999	426	300	46	20	47
\$200,000 or more	437	281	16	17	16

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 44, DC	Census Tract 46, DC	Census Tract 60.01, DC
Tract Name	FH-West	FH-East	Logan Circle	Truxton Circle	Downtown
<b>Total:</b>	2,556	1,857	1,078	1,087	1,715
Less than \$25,000	9.55%	7.92%	33.12%	38.91%	29.97%
\$25,000-\$49,999	11.27%	15.35%	23.56%	30.36%	33.29%
\$50,000-\$74,999	12.01%	12.60%	19.02%	14.63%	24.84%
\$75,000-\$99,999	11.38%	11.95%	8.91%	9.11%	4.66%
\$100,000-\$124,999	12.87%	13.68%	6.77%	2.85%	1.98%
\$125,000-149,999	9.15%	7.22%	2.88%	0.74%	1.57%
Over \$150,000	33.76%	31.29%	5.75%	3.40%	3.67%

Means of Transportation for Workers 16 Years and Over					
	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 44, DC	Census Tract 46, DC	Census Tract 60.01, DC
<b>Total:</b>	3,530	2,678	1,326	985	1,735
Car, truck, or van:	1,944	1,317	511	352	494
Drove alone	1,630	1,158	447	245	483
Carpooled	314	159	64	107	11
Public transportation:	1,054	907	630	478	927
Bus or trolley bus	75	88	130	355	78
Streetcar or trolley car (public in Puerto Rico)	0	14	0	0	23
Subway or elevated	979	791	468	107	826
Railroad	0	7	0	0	0
Ferryboat	0	0	0	0	0
Taxicab	0	7	32	16	0
Motorcycle	9	0	3	4	0
Bicycle	27	40	12	6	22
Walked	92	114	146	128	277
Other means	9	52	24	0	0
Worked at home	395	248	0	17	15

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 10.1, 11, 44, 46 and 60.01

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 44, DC	Census Tract 46, DC	Census Tract 60.01, DC
Tract Name	FH-West	FH-East	Logan Circle	Truxton Circle	Downtown
<b>Total Workers Over 16</b>	3,530	2,678	1,326	985	1,735
<b>Total Households:</b>	2,556	1,857	1,078	1,087	1,715
Car, truck, or van:	1,944	1,317	511	352	494
Taxicab	0	7	32	16	0
Private Vehicle or Taxicab	1,944	1,324	543	368	494
<b>Private Vehicles or Taxis Per HH</b>	<b>0.76</b>	<b>0.71</b>	<b>0.50</b>	<b>0.34</b>	<b>0.29</b>
Subway	979	791	468	107	826
Bus	75	88	130	355	78
Other NonTaxi Public	0	21	0	0	23
Subway, Bus and Other Public Transit	1,054	900	598	462	927
Subway, Bus, FV, Taxi	2,998	2,224	1,141	830	1,421
<b>Percent Mass Transit</b>	<b>35.16%</b>	<b>40.47%</b>	<b>52.41%</b>	<b>55.66%</b>	<b>65.24%</b>
<b>Workers over 16 per HH</b>	<b>1.38</b>	<b>1.44</b>	<b>1.23</b>	<b>0.91</b>	<b>1.01</b>

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 10.1, 11, 44, 46 and 60.01

# Census Data for Friendship Heights, Mount Pleasant and Columbia Heights

**P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households**  
**Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data**

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 25.02, DC	Census Tract 28.01, DC	Census Tract 28.02, DC
Total:	2,556	1,857	1,921	1,390	1,740
Less than \$10,000	78	48	243	383	355
\$10,000 to \$14,999	76	18	152	113	203
\$15,000 to \$19,999	8	14	74	105	190
\$20,000 to \$24,999	82	67	264	93	170
\$25,000 to \$29,999	53	52	120	121	184
\$30,000 to \$34,999	71	52	163	100	106
\$35,000 to \$39,999	18	67	61	86	70
\$40,000 to \$44,999	101	37	170	64	72
\$45,000 to \$49,999	45	77	92	45	60
\$50,000 to \$59,999	111	101	168	65	88
\$60,000 to \$74,999	196	133	86	79	102
\$75,000 to \$99,999	291	222	172	54	49
\$100,000 to \$124,999	329	254	91	42	36
\$125,000 to \$149,999	234	134	34	23	14
\$150,000 to \$199,999	426	300	13	17	19
\$200,000 or more	437	281	18	0	22

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 25.02, DC	Census Tract 28.01, DC	Census Tract 28.02, DC
Tract Name	FH-West	FH-East	Mount Pleasant	Columbia Heights-North	Columbia Heights-South
Total:	2,556	1,857	1,921	1,390	1,740
Less than \$25000	9.55%	7.92%	38.16%	49.93%	52.76%
\$25,000-\$49,999	11.27%	15.35%	31.55%	29.93%	28.28%
\$50,000-\$74,999	12.01%	12.60%	13.22%	10.36%	10.92%
\$75,000-\$99,999	11.38%	11.95%	8.95%	3.88%	2.82%
\$100,000-\$124,999	12.87%	13.68%	4.74%	3.02%	2.07%
\$125,000-149,999	9.15%	7.22%	1.77%	1.65%	0.80%
Over \$150,000	33.76%	31.29%	1.61%	1.22%	2.36%

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 25.02, DC	Census Tract 28.01, DC	Census Tract 28.02, DC
Total:	3,530	2,678	2,313	1,368	2,141
Car, truck, or van:	1,944	1,317	1,073	660	579
Drove alone	1,630	1,158	832	419	346
Carpooled	314	159	241	241	233
Public transportation:	1,054	907	1,074	651	1,324
Bus or trolley bus	75	88	806	525	1,112
Streetcar or trolley car (publico in Puerto Rico)	0	14	0	0	0
Subway or elevated	979	791	242	112	212
Railroad	0	7	0	8	0
Ferryboat	0	0	0	0	0
Taxicab	0	7	26	6	0
Motorcycle	9	0	0	0	0
Bicycle	27	40	5	5	54
Walked	92	114	132	38	121
Other means	9	52	20	11	33
Worked at home	395	248	9	3	30

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 10.1, 11, 25.02, 28.01 and 28.02

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 25.02, DC	Census Tract 28.01, DC	Census Tract 28.02, DC
Tract Name	FH-West	FH-East	Mount Pleasant	Columbia Heights-North	Columbia Heights-South
Total Workers Over 16	3,530	2,678	2,313	1,368	2,141
Total Households:	2,556	1,857	1,921	1,390	1,740
Car, truck, or van:	1,944	1,317	1,073	660	579
Taxicab	0	7	26	6	0
Private Vehicle or Taxicab	1,944	1,324	1,099	666	579
Private Vehicles or Taxicab Per HH	0.76	0.71	0.57	0.48	0.33
Subway	979	791	242	112	212
Bus	75	88	806	525	1,112
Other NonTaxi Public	0	21	0	8	0
Subway, Bus and Other Public Transit	1,054	900	1,048	645	1,324
Subway, Bus, PV, Taxi	2,998	2,224	2,147	1,311	1,903
Percent Mass Transit	35.16%	40.47%	48.81%	49.20%	69.57%
Workers over 16 per HH	1.38	1.44	1.20	0.98	1.23

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 10.1, 11, 44, 46 and 60.01

# Census Data for Friendship Heights and Southwest Washington

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 60.02, DC	Census Tract 61, DC	Census Tract 62.01, DC
Total:	2,556	1,857	193	1,490	92
Less than \$10,000	78	48	61	136	13
\$10,000 to \$14,999	76	18	37	58	0
\$15,000 to \$19,999	8	14	28	66	0
\$20,000 to \$24,999	82	67	23	92	9
\$25,000 to \$29,999	53	52	9	110	0
\$30,000 to \$34,999	71	52	6	96	0
\$35,000 to \$39,999	18	67	0	87	17
\$40,000 to \$44,999	101	37	9	115	0
\$45,000 to \$49,999	45	77	7	103	0
\$50,000 to \$59,999	111	101	0	138	0
\$60,000 to \$74,999	196	133	13	179	13
\$75,000 to \$99,999	291	222	0	172	10
\$100,000 to \$124,999	329	254	0	66	0
\$125,000 to \$149,999	234	134	0	3	16
\$150,000 to \$199,999	426	300	0	18	14
\$200,000 or more	437	281	0	51	0

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 60.02, DC	Census Tract 61, DC	Census Tract 62.01, DC
Tract Name	FH-West	FH-East	SW* - 193 HHs	SW	SW* - 92 HHs
Total:	2,556	1,857	193	1,490	92
Less than \$25000	9.55%	7.92%	77.20%	23.62%	23.91%
\$25,000-\$49,999	11.27%	15.35%	16.06%	34.30%	18.48%
\$50,000-\$74,999	12.01%	12.60%	6.74%	21.28%	14.13%
\$75,000-\$99,999	11.38%	11.95%	0.00%	11.54%	10.87%
\$100,000-\$124,999	12.87%	13.68%	0.00%	4.43%	0.00%
\$125,000-149,999	9.15%	7.22%	0.00%	0.20%	17.39%
Over \$150,000	33.76%	31.29%	0.00%	4.63%	15.22%

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 60.02, DC	Census Tract 61, DC	Census Tract 62.01, DC
Total:	3,530	2,678	103	1,383	120
Car, truck, or van:	1,944	1,317	33	411	43
Drove alone	1,630	1,158	26	389	26
Carpooled	314	159	7	22	17
Public transportation:	1,054	907	61	682	63
Bus or trolley bus	75	88	15	127	13
Streetcar or trolley car (publico in Puerto Rico)	0	14	0	19	0
Subway or elevated	979	791	46	536	50
Railroad	0	7	0	0	0
Ferryboat	0	0	0	0	0
Taxicab	0	7	0	0	0
Motorcycle	9	0	0	0	0
Bicycle	27	40	9	4	0
Walked	92	114	0	253	14
Other means	9	52	0	0	0
Worked at home	395	248	0	33	0

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 10.1, 11, 60.02, 61 and 62.01

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tract 60.02, DC	Census Tract 61, DC	Census Tract 62.01, DC
Tract Name	FH-West	FH-East	SW* - 193 HHs	SW	SW* - 92 HHs
Total Workers Over 16	3,530	2,678	103	1,383	120
Total Households:	2,556	1,857	193	1,490	92
Car, truck, or van:	1,944	1,317	33	411	43
Taxicab	0	7	0	0	0
Private Vehicle or Taxicab	1,944	1,324	33	411	43
<b>Private Vehicles or   Taxi Per HH</b>	<b>0.76</b>	<b>0.71</b>	<b>0.17</b>	<b>0.28</b>	<b>0.47</b>
Subway	979	791	46	536	50
Bus	75	88	15	127	13
Other NonTaxi Public Subway, Bus and Other Public Transit	0	21	0	19	0
Subway, Bus, FV, Taxi	1,054	900	61	682	63
<b>Percent Mass Transit</b>	<b>35.16%</b>	<b>40.47%</b>	<b>64.89%</b>	<b>62.40%</b>	<b>59.43%</b>
Workers over 16 per HH	1.38	1.44	0.53	0.93	1.30

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 60.02, 61 and 62.01

# Census Data for Friendship Heights and East of the River and North of Union Station

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 10.01, DC	Census Tract 11, DC	Census Tracts 74.01, 74.03, 74.04, 74.08, and 74.09	Census Tract 75.04, DC	Census Tract 86, DC
Total:	2,556	1,857	4,855	821	14
Less than \$10,000	78	48	1,745	208	0
\$10,000 to \$14,999	76	18	499	98	0
\$15,000 to \$19,999	8	14	355	61	0
\$20,000 to \$24,999	82	67	394	92	4
\$25,000 to \$29,999	53	52	313	126	0
\$30,000 to \$34,999	71	52	356	19	0
\$35,000 to \$39,999	18	67	275	55	0
\$40,000 to \$44,999	101	37	148	5	0
\$45,000 to \$49,999	45	77	169	35	0
\$50,000 to \$59,999	111	101	200	53	6
\$60,000 to \$74,999	196	133	147	19	0
\$75,000 to \$99,999	291	222	145	50	0
\$100,000 to \$124,999	329	254	45	0	0
\$125,000 to \$149,999	234	134	15	0	4
\$150,000 to \$199,999	426	300	7	0	0
\$200,000 or more	437	281	42	0	0

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tracts 74.01, 74.03, 74.04, 74.08, and 74.09	Census Tract 75.04, DC	Census Tract 86, DC
Total:	2,556	1,857	4,855	821	14
	0	0	0	0	0
\$25,000	9.55%	7.92%	61.65%	55.91%	28.57%
\$50,000	20.81%	23.26%	87.62%	85.14%	28.57%
\$75,000	32.82%	35.86%	94.77%	93.91%	71.43%
\$100,000	44.21%	47.82%	97.75%	100.00%	71.43%
\$125,000	57.08%	61.50%	98.68%	100.00%	71.43%
\$150,000	66.24%	68.71%	98.99%	100.00%	100.00%
Over \$150,000	100.00%	100.00%	100.00%	100.00%	100.00%

	Census Tract 10.01, DC	Census Tract 11, DC	Census Tracts 74.01, 74.03, 74.04, 74.08, and 74.09	Census Tract 75.04, DC	Census Tract 86, DC
Total:	3,530	2,678	3,073	605	20
Car, truck, or van:	1,944	1,317	1,194	271	7
Drove alone	1,630	1,158	799	225	7
Carpooled	314	159	395	46	0
Public transportation:	1,054	907	1,730	321	13
Bus or trolley bus	75	88	1,183	244	13
Streetcar or trolley car (público in Puerto Rico)	0	14	0	0	0
Subway or elevated	979	791	528	77	0
Railroad	0	7	9	0	0
Ferryboat	0	0	0	0	0
Taxicab	0	7	10	0	0
Motorcycle	9	0	0	0	0
Bicycle	27	40	0	0	0
Walked	92	114	118	6	0
Other means	9	52	0	0	0
Worked at home	395	248	31	7	0

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 10.1, 11, 74.01, 74.03, 74.04, 74.08, 74.09, 75.04 and 86

\*Census Tract 98.09, St. Elizabeth's Hospital is cited by DDOT, as having a modal split of 60.8%. There are no occupied housing units and thus no households in the tract, and so there is no data on household income

\*Census tract 98.09 does show a population of 723 [P3] Of those 723 individuals, 722 live in group housing: 651, classified as institutionalized, in "Mental (Psychiatric) hospitals or wards," and 71 classified as non-institutionalized, living in other group quarters. [P37]

\*Per capita income for Census Tract 98.06 was \$6,625, as compared with a per capita income for Census Tract 11 of \$62,717. [P82].

This Census Tract did show 125 workers: 47 using taxis, 29 using busses and the remainder walking or working at home.

Tract Name	Census Tract 10.01, DC	Census Tract 11, DC	Census Tracts 74.01, 74.03, 74.04, 74.08, and 74.09	Census Tract 75.04, DC	Census Tract 86, DC	N of Union Station-14
Total Workers Over 16	3,530	2,678	3,073	605	20	
Total Households:	2,556	1,857	4,855	821	14	
Car, truck, or van:	1,944	1,317	1,194	271	7	
Taxicab	0	7	10	0	0	
Private Vehicle or Taxicab	1,944	1,324	1,204	271	7	
Private Vehicles or Taxis Per HH	0.76	0.71	0.25	0.33	0.50	
Subway	979	791	528	77	0	
Bus	75	88	1,183	244	13	
Other NonTaxi Public	0	21	9	0	0	
Subway, Bus and Other Public Transit	1,054	900	1,720	321	13	
Subway, Bus, PV, Taxi	2,998	2,224	2,924	592	20	
Percent Mass Transit	35.16%	40.47%	58.82%	54.22%	65.00%	
Workers over 16 per HH	1.38	1.44	0.63	0.74	1.43	

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 10.1, 11, 74.01, 74.03, 74.04, 74.08, 74.09, 75.04 and 86



# Census Data for Friendship Heights and Bethesda

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 11, DC	Census Tract 7047, Montgomery County, Maryland	Census Tract 7048.01, Montgomery County, Maryland	Census Tract 7048.02, Montgomery County, Maryland	Census Tract 7054, Montgomery County, Maryland
Total:	1,857	1,350	2,250	2,393	978
Less than \$10,000	48	27	173	136	18
\$10,000 to \$14,999	18	13	152	61	4
\$15,000 to \$19,999	14	10	62	81	3
\$20,000 to \$24,999	67	14	74	93	4
\$25,000 to \$29,999	52	14	111	90	15
\$30,000 to \$34,999	52	42	153	215	10
\$35,000 to \$39,999	67	23	71	134	27
\$40,000 to \$44,999	37	14	128	56	12
\$45,000 to \$49,999	77	27	108	127	8
\$50,000 to \$59,999	101	69	178	227	22
\$60,000 to \$74,999	133	52	311	364	38
\$75,000 to \$99,999	222	113	248	275	134
\$100,000 to \$124,999	254	138	211	232	50
\$125,000 to \$149,999	134	77	121	120	80
\$150,000 to \$199,999	300	183	41	98	203
\$200,000 or more	281	534	108	84	350

	Census Tract 11, DC	Census Tract 7047, Montgomery County, Maryland	Census Tract 7048.01, Montgomery County, Maryland	Census Tract 7048.02, Montgomery County, Maryland	Census Tract 7054, Montgomery County, Maryland
Tract Name	FH-East	Bethesda-West	Bethesda & NIH	Bethesda-South	Bethesda-East
Total:	1,857	1,350	2,250	2,393	978
Less than \$25000	7.92%	4.74%	20.49%	15.50%	2.97%
\$25,000-\$49,999	15.35%	8.89%	25.38%	25.99%	7.36%
\$50,000-\$74,999	12.60%	8.96%	21.73%	24.70%	6.13%
\$75,000-\$99,999	11.95%	8.37%	11.02%	11.49%	13.70%
\$100,000-\$124,999	13.68%	10.22%	9.38%	9.69%	5.11%
\$125,000-149,999	7.22%	5.70%	5.38%	5.01%	8.18%
Over \$150,000	31.29%	53.11%	6.62%	7.61%	56.54%

	Census Tract 11, DC	Census Tract 7047, Montgomery County, Maryland	Census Tract 7048.01, Montgomery County, Maryland	Census Tract 7048.02, Montgomery County, Maryland	Census Tract 7054, Montgomery County, Maryland
Total:	2,678	1,911	2,374	2,680	1,306
Car, truck, or van:	1,317	1,208	1,280	1,627	898
Drove alone	1,158	1,102	1,189	1,406	774
Carpooled	159	104	71	221	124
Public transportation:	907	368	697	560	250
Bus or trolley bus	88	20	63	43	14
Streetcar or trolley car (público in Puerto Rico)	14	5	0	0	0
Subway or elevated	791	343	634	512	231
Railroad	7	0	0	0	0
Ferryboat	0	0	0	0	0
Taxicab	7	0	0	5	5
Motorcycle	0	0	0	0	0
Bicycle	40	10	34	41	7
Walked	114	92	317	381	22
Other means	52	7	10	0	8
Worked at home	248	228	56	71	121

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 11, 7047, 7048.01, 7048.02 and 7054

	Census Tract 11, DC	Census Tract 7047, Montgomery County, Maryland	Census Tract 7048.01, Montgomery County, Maryland	Census Tract 7048.02, Montgomery County, Maryland	Census Tract 7054, Montgomery County, Maryland
Tract Name	FH-East	Bethesda-West	Bethesda & NIH	Bethesda-South	Bethesda-East
Total Workers Over 16	2,678	1,911	2,374	2,680	1,306
Total Households:	1,857	1,350	2,250	2,393	978
Car, truck, or van:	1,317	1,206	1,260	1,627	898
Taxicab	7	0	0	5	5
Private Vehicle or Taxicab	1,324	1,206	1,260	1,632	903
Private Vehicles or Taxicab Per HH	0.71	0.89	0.56	0.68	0.92
Subway	791	343	634	512	231
Bus	88	20	63	43	14
Other NonTaxi Public	21	5	0	0	0
Subway, Bus and Other Public Transit	900	368	697	555	245
Subway, Bus, PV, Taxi	2,224	1,574	1,957	2,187	1,148
Percent Mass Transit	40.47%	23.38%	35.62%	25.38%	21.34%
Workers over 16 per HH	1.44	1.42	1.06	1.12	1.34

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 11, 7047, 7048.01, 7048.02 and 7054

# Census Data for Friendship Heights, Tenleytown, Van Ness and Cleveland Park

P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households					
Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data					
	Census Tract 11, DC	Census Tract 10.02, District of	Tract 12, District of Columbia,	Tract 13.01, District of Columbia,	Tract 13.02, District of Columbia,
Total:	1,857	2,275	2,576	2,058	4,653
Less than \$10,000	48	328	108	135	199
\$10,000 to \$14,999	18	184	91	44	194
\$15,000 to \$19,999	14	81	61	76	131
\$20,000 to \$24,999	67	61	66	87	142
\$25,000 to \$29,999	52	92	77	58	203
\$30,000 to \$34,999	52	178	65	77	327
\$35,000 to \$39,999	67	93	134	117	299
\$40,000 to \$44,999	37	43	141	50	275
\$45,000 to \$49,999	77	84	120	46	193
\$50,000 to \$59,999	101	146	140	162	394
\$60,000 to \$74,999	133	295	246	259	594
\$75,000 to \$99,999	222	385	353	258	724
\$100,000 to \$124,999	254	86	252	135	365
\$125,000 to \$149,999	134	92	223	105	175
\$150,000 to \$199,999	300	56	195	111	207
\$200,000 or more	281	71	304	338	231

	Census Tract 11, DC	Census Tract 10.02, DC	Census Tract 12, DC	Census Tract 13.01, DC	Census Tract 13.02, DC
Tract Name	FH-East	Tenley-West	Tenley-East	Van Ness-North	Van Ness-Cleveland Pk
Total:	1,857	2,275	2,576	2,058	4,653
Less than \$25000	7.92%	28.75%	12.66%	16.62%	14.31%
\$25,000-\$49,999	15.35%	21.54%	20.85%	16.91%	27.87%
\$50,000-\$74,999	12.60%	19.38%	14.98%	20.46%	21.23%
\$75,000-\$99,999	11.95%	16.92%	13.70%	12.54%	15.56%
\$100,000-\$124,999	13.68%	3.78%	9.78%	6.56%	7.84%
\$125,000-149,999	7.22%	4.04%	8.66%	5.10%	3.76%
Over \$150,000	31.29%	5.58%	19.37%	21.82%	9.41%

	Census Tract 11, DC	Census Tract 10.02, DC	Census Tract 12, DC	Census Tract 13.01, DC	Census Tract 13.02, DC
Total:	2,678	2,284	3,371	2,378	4,502
Car, truck, or van:	1,317	1,232	1,547	1,133	1,597
Drove alone	1,158	1,052	1,172	980	1,392
Carpooled	159	180	375	153	205
Public transportation:	907	726	1,491	903	2,434
Bus or trolley bus	88	320	124	55	48
Streetcar or trolley car (público in Puerto Rico)	14	8	0	0	8
Subway or elevated	791	387	1,304	833	2,319
Railroad	7	0	0	9	6
Ferryboat	0	0	0	0	0
Taxicab	7	11	63	6	53
Motorcycle	0	15	0	0	0
Bicycle	40	0	35	19	32
Walked	114	222	187	116	172
Other means	52	0	16	11	26
Worked at home	248	89	95	196	241

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 11, 10.02, 12, 13.01 and 13.02

	Census Tract 11, DC	Census Tract 10.02, DC	Census Tract 12, DC	Census Tract 13.01, DC	Census Tract 13.02, DC
Tract Name	FH-East	Tenley-West	Tenley-East	Van Ness-North	Van Ness-Cleveland Pk
Total Workers Over 16	2,678	2,284	3,371	2,378	4,502
Total Households:	1,857	2,275	2,576	2,058	4,653
Car, truck, or van:	1,317	1,232	1,547	1,133	1,597
Taxicab	7	11	63	6	53
Private Vehicle or Taxicab	1,324	1,243	1,610	1,139	1,650
<b>Private Vehicles or Taxis Per HH</b>	<b>0.71</b>	<b>0.55</b>	<b>0.63</b>	<b>0.55</b>	<b>0.35</b>
Subway	791	387	1,304	833	2,319
Bus	88	320	124	55	48
Other NonTaxi Public Transit	21	8	0	9	14
Subway, Bus and Other Public Transit	900	715	1,428	897	2,381
Subway, Bus, PV, Taxi	2,224	1,958	3,038	2,036	4,031
<b>Percent Mass Transit</b>	<b>40.47%</b>	<b>36.52%</b>	<b>47.00%</b>	<b>44.06%</b>	<b>59.07%</b>
<b>Workers over 16 per HH</b>	<b>1.44</b>	<b>1.00</b>	<b>1.31</b>	<b>1.16</b>	<b>0.97</b>

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 11, 10.02, 12, 13.01 and 13.02

# Census Data for Friendship Heights and Takoma Park

**P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: H**  
Data Set: Census 2000 Summary File 3 (SF 3) - Sample

	Census Tract 11, DC	Census Tract 17.01, DC	Census Tract 17.02, DC
<b>Total:</b>	<b>1,857</b>	<b>1,319</b>	<b>895</b>
Less than \$10,000	48	122	43
\$10,000 to \$14,999	18	109	60
\$15,000 to \$19,999	14	65	53
\$20,000 to \$24,999	67	87	45
\$25,000 to \$29,999	52	64	46
\$30,000 to \$34,999	52	78	43
\$35,000 to \$39,999	67	41	54
\$40,000 to \$44,999	37	70	34
\$45,000 to \$49,999	77	34	36
\$50,000 to \$59,999	101	145	66
\$60,000 to \$74,999	133	143	69
\$75,000 to \$99,999	222	122	154
\$100,000 to \$124,999	254	137	114
\$125,000 to \$149,999	134	17	21
\$150,000 to \$199,999	300	47	38
\$200,000 or more	281	38	19

	Census Tract 11, DC	Census Tract 17.01, DC	Census Tract 17.02, DC
Tract Name	FH-East	Takoma Park-W	Takoma Park-E
<b>Total:</b>	<b>1,857</b>	<b>1,319</b>	<b>895</b>
Less than \$25,000	7.92%	29.04%	22.46%
\$25,000-\$49,999	15.35%	21.76%	23.80%
\$50,000-\$74,999	12.60%	21.83%	15.08%
\$75,000-\$99,999	11.95%	9.25%	17.21%
\$100,000-\$124,999	13.68%	10.39%	12.74%
\$125,000-149,999	7.22%	1.29%	2.35%
Over \$150,000	31.29%	6.44%	6.37%

	Census Tract 11, DC	Census Tract 17.01, DC	Census Tract 17.02, DC
<b>Total:</b>	<b>2,678</b>	<b>1,652</b>	<b>965</b>
Car, truck, or van:	1,317	863	444
Drove alone	1,158	731	374
Carpooled	159	132	70
Public transportation:	907	669	400
Bus or trolley bus	88	405	19
Streetcar or trolley car (público in Puerto Rico)	14	0	0
Subway or elevated	791	257	381
Railroad	7	0	0
Ferryboat	0	0	0
Taxicab	7	7	0
Motorcycle	0	0	0
Bicycle	40	0	9
Walked	114	61	30
Other means	52	22	36
Worked at home	248	37	46

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over for Census Tracts 11, 17.01 and 17.02

	Census Tract 11, DC	Census Tract 17.01, DC	Census Tract 17.02, DC
Tract Name	FH-East	Takoma Park-W	Takoma Park-E
<b>Total Workers Over 16</b>	<b>2,678</b>	<b>1,652</b>	<b>965</b>
<b>Total Households:</b>	<b>1,857</b>	<b>1,319</b>	<b>895</b>
Car, truck, or van:	1,317	863	444
Taxicab	7	7	0
Private Vehicle or Taxicab	1,324	870	444
<b>Private Vehicles or Taxis Per HH</b>	<b>0.71</b>	<b>0.66</b>	<b>0.50</b>
Subway	791	257	381
Bus	88	405	19
Other NonTaxi Public	21	0	0
Subway, Bus and Other Public Transit	900	662	400
Subway, Bus, PV, Taxi	2,224	1,532	844
<b>Percent Mass Transit</b>	<b>40.47%</b>	<b>43.21%</b>	<b>47.39%</b>
<b>Workers over 16 per HH</b>	<b>1.44</b>	<b>1.25</b>	<b>1.08</b>

Source: Census 2000, P30: Means of Transportation to Work for Workers 16 Years and Over, and Number of Households, from P52 for Census Tracts 11, 17.01 and 17.02

## **Exhibit E**

### **CONSTRUCTION MANAGEMENT PLAN IS INADEQUATE FOR PROTECTION OF OWNERS OF NEARBY PROPERTY**

The "Proposed Elements of Construction Management Plan" submitted by Stonebridge on January 6, 2003, does not address most of the inadequacies that the neighbors have previously cited.

1. The proposal does not prohibit blasting on the site.
2. An effective construction management plan should provide for clear, prompt and adequate relief with respect to damage to property caused during construction, as well as the consequences of that damage, including loss of enjoyment of one's property, expenses associated with responding to the damage and emotional distress. The proposal is deficient in that it does not provide for payment of liquidated damages to neighbors for any such losses suffered in addition to the cost of repairs.
3. Stonebridge offers to have the Community Advisory Committee choose one of three engineers from a list given to them by Stonebridge. This is inadequate because it does not require Stonebridge to reimburse, from an escrow account, all reasonable costs associated with the closest property Owners choosing and retaining their own expert engineering counsel, independent of Stonebridge, to perform the pre-construction (and possibly post-construction) surveys of their real property. (The neighbors offer to specify that they will hire Haley and Aldrich, who provided similar services during construction on Square 1661.)
4. Stonebridge offers to "contract for construction monitoring services during the course of sheeting/shoring, dewatering, excavation, installation of building foundations and below-grade walls." For these services to be meaningful, the neighbors must have confidence that the firm providing these services is independent of Stonebridge and has the mission of protecting the neighbors' property. Monitoring is only useful to the extent that data is interpreted, limits are set, and action is taken as necessary. Therefore, the neighbors request that they be the party to hire the services to be performed, with the expense being reimbursed by Stonebridge from an escrow account.
  - a. Additionally, the monitoring services should extend throughout construction, but at reducing frequency after the subsurface operations are complete.
  - b. Stonebridge offers that "the Developer will monitor vibrations during its operations and implement a program to evaluate the structural settlement of Surveyed Homes," but as stated above, it is necessary that the neighbors be the party to hire the services, with the expense being reimbursed by Stonebridge. (The neighbors offer to specify that they will hire Haley and Aldrich to perform these services also.)
5. The proposed escrow account is inadequate because it fails to provide for reimbursement by Stonebridge of the Owners' property repairs, professional fees and damages, as well as fines.

6. In prior nearby construction activities, there was severe damage to several of the close homes, and the damage was so extensive that the developer ended up buying out several of the owners. The proposal here is insufficient because there is no provision of a buy-out clause that an Owner may exercise at his option in case of extreme damage to a house.

7. The complaint process is cumbersome and time-consuming, requiring multiple meetings and several stages and with long time periods devoted to each stage.

a. The proposed Complaint Process involves 3 stages: If a complaint is made to the developers' Representative, and if it is not resolved, 14 days must elapse before the Liaison Committee meets to determine if a violation has occurred. Then another 14 days elapse before a meeting of the Liaison Committee and the Liaison Committee Advisor, who attempt to resolve the problem. Then another 14 days must elapse before another meeting of the same group to impose a fine.

b. Recognizing that complaints can be as pressing as the neighbors being kept up all night with off-hours deliveries of materials, we suggest that the middle step be eliminated, and that the timing between the remaining steps be dramatically shortened. We suggest that an unresolved complaint be followed within 48 hours by a meeting of the Liaison Committee to determine if a violation has occurred. If not then resolved, and unless all parties agree to an extension of time, the Liaison Committee and their Advisor would meet within 48 hours to take corrective action or impose a fine.

c. The "Community Advisory Committee" is poorly defined. It needs to be clarified that this Committee is entirely composed of representatives for the neighbors, not the Developers.

8. The fines structure provides for fines of between \$100. and \$1,000. to be paid by Stonebridge to an organization (yet to be determined) in the event of certain outlined Major and Minor Infractions. These amounts are too low to be effective. Amounts between \$500. and \$5,000. would be appropriate. Additionally, the \$10,000. fine that would be paid to this unnamed organization for "Failure to Provide Property Owners with Preconstruction Survey" does not adequately protect the interest of individual Owners. Fines resulting from this or any infraction that harms an individual property should be paid to that Owner, not to a third party. It should also be clarified that this payment would be made to each individual Owner who was not surveyed and not to the group of all Owners jointly.

9. The proposal lacks clarification limiting all vehicular access to and from the site to Western Avenue only, including for access to the "construction or rental offices." Also, since these units are said to be condominiums, we assume this is a mistake in the wording, and should read "sales offices" instead of "rental offices." It fails to state clearly that there will be no access to the site from Military Road, and that there will be no construction-related traffic on Military Road in either direction, including for Dumpster service. It fails to require queuing only on the site, and workers waiting early only on the site.

10. The proposed Plan fails to require keeping a lighted path open between military and Western throughout construction.

**THE REVISED STONEBRIDGE AFFORDABLE HOUSING PROGRAM IS STILL  
A POSTER CHILD FOR HOW NOT TO PROVIDE AFFORDABLE HOUSING**

- FhORD noted that the basic approach taken in the affordable housing proposal was fatally flawed, that absent significant, costly, continuous and unacceptably intrusive regulation and enforcement by the District, such a program would not succeed in providing affordable housing opportunities to a reasonable number of households in the target population. Enforcement of the conditions of the Stonebridge Affordable Housing Proposal is not feasible. This would be true for any proposal that involves selling units for significantly less than their market value. Stonebridge and the Office of Planning have not, in their March 21 submissions addressed these problems. The inadequacies of the Stonebridge and Office of Planning responses is discussed in more detail below.
  - Stonebridge proposes to sell to four to six lottery-winners, with incomes less than approximately \$54,400, four to six new, luxury 925-square foot condominiums for \$166,393. According to the information submitted by the Applicants, each unit at this location, if sold as a market rate unit, would yield \$400 a square foot. According to the Applicants, the price of a similar unit, sold as a market-rate unit would be \$370,000.
- The Stonebridge affordable housing proposal provides an opportunity to four to six lottery-winners to buy, for \$166,393, four to six new luxury condominiums valued at \$370,000. Each of the eligible lottery-winners has sufficient income to purchase existing condominiums in Ward 3 and each of the lottery-winners has sufficient income to rent any of more than 68% of the rental units in Census Tract 11, the Census Tract in which the Washington Clinic is located.
- The Stonebridge Affordable Housing Program does not add to the economic diversity of the neighborhood.
  - According to Census 2000, 23.26% of households in Census Tract 11 have incomes of less than \$50,000 and 28.70% of households in Census Tract 11 have incomes of less than \$60,000.
  - According to Census 2000, 15.12% of the owner-occupied housing units in Census Tract 11 had a value under \$175,000. According to Census 2000, 68.14% of the rental units in Census Tract 11 have a contract rent of \$1,249 or less, which would be affordable [less than 30% of income] to households with an income of \$54,400.
- The Stonebridge Affordable Housing Program does nothing to advance the availability of affordable housing for households that would not otherwise have the opportunity to live in the District or even in Ward 3. On the other hand, the \$1,200,000 value that would be awarded to the four to six lottery winners under the Stonebridge Affordable Housing Program could go a long way toward providing for real affordable housing opportunities.
  - On December 20, 2002, Mayor Williams announced District plans to award \$25 million in local and federal funds for 17 projects that will provide more than 1,850 low-priced housing units as well as a variety of community-based facilities. [“Affordable Housing Plans Chosen; \$25 Million Committed to Finance Proposal for 1,850 Units in District, Washington Post, December 21, 2002, page B03.]

- Without even reducing the amount to account for the community-based facilities, that comes to an average cost of approximately \$13,500 per affordable housing unit.
- This illustrative example shows that if a more appropriate affordable housing program were used, the District could get as many as 89 affordable housing units with a proportionate amount of community-based facilities, rather than the four to six units promised by Stonebridge for the same \$1,200,000 cost.
- In November 2002, 42 vacant properties, which were in the District's inventory, were awarded, through the Home Again Initiative, to six development teams. Those properties will be developed and become attractive low-income affordable housing, with prices ranging from \$90,000 to \$165,000. According to the Washington Post ["Home-Rehab Program Finally Gets Off Ground, But on a Modest Scale; Builders to Renew 42 Eyesore Properties," January 30, 2003, DC Extra], some of the Developers that were awarded those properties expect to close on the sale in late February or March and begin construction immediately thereafter. The Home Again Initiative seems to be an effective way to provide a significant amount of affordable housing.
- The Stonebridge Affordable Housing Program does not benefit the District and should not be considered as a significant justification for a project that requires an increase in height of over 38 feet and an increase in gross floor area of over 103,000 square feet.

**THE TERMS OF THE AFFORDABLE HOUSING PROGRAM ARE NOT ENFORCEABLE  
AND THE CHANGES PROPOSED BY THE OFFICE OF PLANNING AND STONEBRIDGE  
DO NOT ADDRESS THOSE CONCERNS**

- In its Response to Applicants' Rebuttal, FhORD pointed out that the terms of the Affordable Housing Program are not enforceable, and that enforceability of those terms is actually infeasible. The Zoning Commission asked the Applicants and the Office of Planning to respond to that concern. FhORD also pointed out that even if those terms could be enforced as written, the Affordable Housing Program does not adequately target the benefit to the desired beneficiaries.
- In its March 20 submissions, it is clear that the Office of Planning does not grasp the issues raised by FhORD. The assertion that DHCD is willing to go beyond its usual enforcement procedures does not respond to the concern, when it is apparent that OP and DHCD do not understand the basic enforcement issues. Enforcement of this proposed program is not analogous to enforcement of HPAP requirements. Physical inspections and on-site monitoring addresses only the owner-occupancy requirement, and probably not very effectively. The owner-occupancy requirement is only one of areas in which intense and costly enforcement would be required to assure even a small degree of compliance.
- The Office of Planning's main point is that a compliance survey of the District's HPAP program found a non-compliance rate of less than 2%. One of FhORD's main points is that this program differs dramatically from HPAP, as well as the Homestead Exemption, each of which offer relatively modest benefits and thus have a relatively small incentive for non-compliance.

- HPAP offers low-interest loans to moderate and low-income first-time homebuyers to assist with the downpayment and closing costs. For moderate income homebuyers, the interest rate can be no less than 3%, and the loan amount cannot exceed \$10,000. The term of the HPAP loan is equal to the term of the primary mortgage, so assuming a market interest rate of 7%, a moderate income household will reduce their monthly payment on a \$10,000 loan from \$66 to \$42, saving \$24 a month.
- Compliance with HPAP would be based only on meeting the qualifications at the time of the loan. Continuing enforcement, such as a determination that the unit is owner occupied, is not necessary. Monitoring the resale of the unit to determine that the unit was made available to all eligible applicants, and that there was no bias in the purchaser's selection is not necessary. With HPAP, it is not necessary for DHCD to audit all the contracts associated with the resale of the unit and any other contractual relationship between the seller and buyer, to determine the maximum allowable price and whether the seller is netting more than the maximum allowable price. With HPAP, the benefit terminates with the beneficiary sells the unit.
- The Stonebridge Affordable Housing Program, on the other hand, is selling a unit with a market value of \$370,000 for \$166,393, creating an enormous incentive for non-compliance. This would be evident in the first lottery, through each beneficiary's occupancy, and at each resale of the units.
- DHCD offers physical inspections and on-site monitoring. This is not sufficient. While it appears as though DHCD is proposing physical inspections and on-site monitoring to enforce the owner-occupancy requirement, these methods are not likely to be effective and the owner-occupancy requirement is only one small aspect of the Stonebridge Affordable Housing Program. The ability to make these inspections does not guarantee that the owner-occupancy condition will actually be enforced.
- Owner-occupancy is only one of the conditions of the Stonebridge Affordable Housing Program that requires enforcement. The major other areas where enforcement is both necessary and infeasible are:
  - The conduct of the initial lottery.
  - The conduct of the marketing of each unit on resale.
  - A determination that the resale of each unit is at no more than the maximum allowable price and that there are no side-arrangements that allow the seller to obtain a higher value than the contract price.

Each of these conditions are discussed in turn.

- **The conduct of the initial lottery:**

- IF THE INITIAL LOTTERY IS NOT WELL ADVERTISED, THE INITIAL ALLOCATION OF UNITS WILL BE TAINTED.
- If the initial lottery is not well advertised, the lottery entrants will be skewed towards households that had been advised of the opportunity by the Applicant and



other parties that had been following this proceeding. Four to six of those households will win the lottery and be guaranteed a windfall gain.

- If the lottery is not well publicized, many of the intended target beneficiaries will not have the opportunity to enter the lottery.
  - THE PROPOSED AFFORDABLE HOUSING AMENITY GUARANTEES A SUBSTANTIAL GAIN TO THE FOUR TO SIX INITIAL LOTTERY WINNERS.
  - Using the data on and procedures in “Summary of Affordable Housing Program Revised March 24, 2003,” initial lottery winners are guaranteed an annual resale price increase equal to the change in the CPI, which averaged 3.14% a year from 1984 to 2002.
  - Initial lottery winners will be guaranteed get a return of over 50% per year on their initial investment if they hold their unit less than five years, even if the process for resale of units is not tainted.
  - Initial lottery winners who hold their units 10 years will have a profit equal to 12 times their downpayment, even if the process for resale of units is not tainted. This represents a guaranteed annual rate of return of 29% over 10 years.
  - Initial lottery winners will get a substantially higher return if, as shown below, the conditions for resale of condominium units are unenforceable.
  - A LARGE GUARANTEED PROFIT FOR THE FOUR TO SIX LOTTERY WINNERS MEANS THAT STRONG INCENTIVES EXIST TO DISTORT THE RESULTS OF THE LOTTERY AND THE STONEBRIDGE AFFORDABLE HOUSING PROGRAM DOES NOT INCLUDE ANY SAFEGUARDS AGAINST SUCH DISTORTION.
  - GIVEN THE EXTREMELY LARGE GUARANTEED PROFIT FOR THE FOUR TO SIX LOTTERY WINNERS, EFFECTIVE SAFEGUARDS TO ENSURE THAT ALL ELEGIBLE HOUSEHOLDS HAVE THE SAME ODDS OF WINNING ARE NOT FEASIBLE.
- **Owner-Occupancy:**
    - Given the large guaranteed windfall, the right to purchase a \$370,000 condominium for \$166,393, there is a large incentive to maintain ownership of the subsidized unit even after the purchaser chooses to live elsewhere. According to the Applicants, a 925 square foot unit at this location would rent for \$2,405 [Application, March 22, 2002, at Tab G, Table 2.] The Applicants also indicate that the qualified owner of an affordable housing unit would have monthly costs of \$1,360 [March 24, 2003, Affordable Housing Analysis]. This means that an owner could earn a profit of \$1,155 a month by purchasing the unit and renting it to a non-qualifying tenant as well as a very healthy return on his investment, his portion of the downpayment.
    - Given this large incentive to rent the affordable housing unit, enforcement becomes difficult. If the owner changes a rent below the market rate, making, for example, a profit of only \$1,000 a month, the tenant is likely to cooperate in creating the appearance of owner-occupancy.

- If the owner chooses to rent the affordable housing unit to American University students, it would be possible to charge 4 students \$900 each to occupy a 2-bedroom apartment. Those are the rates that approximately 730 American University students are paying to be housed two students in each bedroom for similar units in the 11-story luxury Bethesda Park on Westbard Avenue in Bethesda, owned by American University. The owner of the affordable housing unit could charge the students up to \$3,600 and remain competitive with other offerings, for a profit of \$2,300 per month. If the owner charged only \$750 a month for each student, a total of \$3,000 a month, his profit would be “only” \$1,700 per month, and the students would likely cooperate by forwarding his mail and responding to inspectors that the owner is one of their roommates.
- In addition, as noted below, the Stonebridge Affordable Housing Proposal, as written, would allow a group of individuals to occupy the unit if the owner-occupant member of the group had a qualifying income at the time of the application. This would not be subject to an enforcement action, since it is clearly permitted by the proposal.
- **Conduct of the Marketing of Each Unit on Resale:**
  - The resale process would be tainted if the owner were not required to take all the steps required in the initial lottery and if the selection of the purchaser was to be determined by the owner. Clearly, each individual owner cannot undertake to advertise to all eligible purchasers and to have an unbiased selection process, and given the complexities associated with real estate sales, it is unlikely that the purchaser could be selected without input from the seller.
- **Determination of whether the units are actually be transferred at prices at or below the maximum allowed to qualified purchasers:**
  - Determination of the maximum allowable price and the amount that the seller has actually netted from the sale is difficult.
  - The maximum purchase price is equal to the cost of Initial Unit Price plus the cumulative change in the consumer price index and the cost of permanent improvements to the Unit. The Initial Unit Price and the cumulative change in the CPI are easy to compute. An audit would be required to determine the cost of permanent improvements to the unit. The seller would need to produce detailed information on all improvements. Would interest be applied to improvements done several years earlier? What interest rate would be used? How would special assessments from the condominium association for permanent improvements to the building be handled? Would the seller be able to include his own labor in valuing permanent improvements? Would the seller be able to include labor provided by relatives? How would the DHCD determine that all purchases of permanent improvements were done as arms-length transactions and that the information gives a fair representation of the cost of improvements? Significant audits would be necessary in some instances.
  - Determination of whether the contract price represents the true price at which the unit is being sold is more complex.

- Is the seller providing any financing, and is that financing being done at a rate that is above the market interest rate? If so, the value to the seller is higher than the contract price.
  - Is the seller getting any other consideration from the purchaser? For example, is the seller being allowed to stay in the unit after closing and paying a below market-rate rent? Is the buyer being allowed to move into the unit prior to the closing and paying an above-market rate rent? If the answer to any of these questions is yes, the seller is paying a price above the maximum allowable price. A full audit would be necessary.
  - The District or DHCD would need to determine that there were no other dealings between these parties or their friends or relatives, or that all such dealings were conducted at fair market value.
  - For example the home-purchaser might have been required to purchase a vehicle with a value of \$5,000 for \$25,000 from the seller or any relative of the seller as a condition of being selected as the purchaser. This purchase would result in the unit being priced at \$20,000 above the maximum allowable price. Similarly, the home-purchase might have been required to agree to a service contract or job offer at more than the standard rate.
  - Given that the District could not possibly track every dealing between the seller and the purchaser and friends and relatives of those parties, there is no way in which the District can be certain that the true purchase price does not exceed the maximum allowable purchase price.
  - EFFECTIVE ENFORCEMENT OF THIS PROVISION IS NOT FEASIBLE.
- **Revised Stonebridge Affordable Housing Program:** The Applicants offer a new provision: “The District government shall retain all rights to enforce the provisions of the affordability covenants, according to the provisions of this document or such enforcement mechanisms as the District government may deem appropriate. The District government shall have the right to recapture any enforcement costs.”
    - This provision does not create the ability to enforce unenforceable conditions, especially given that the Office of Planning and DHCD do not appear to understand what provisions would need to be enforced and the associated large and continuing costs associated with even a modest level of enforcement.
    - The provision giving the District the right to recover enforcement costs is particularly puzzling inasmuch as enforcement costs are large and continuing, even if the homeowners are in compliance.
      - Would the District assess the complying “low-income” homeowners for the continuing cost of monitoring their owner-occupancy and financial dealings to determine that the homeowners are in compliance with the Stonebridge Affordable Housing Program?

- Would the District recover the cost of monitoring complying homeowners from any home-owners that are determined to be violating the conditions?
  - Would the District charge each homeowner, on resale, the cost of monitoring the conditions of resale and associated audits. The monitoring is necessary to determine: (1) that the unit was offered to all eligible homebuyers. (2) that the selection of the “winning” homebuyer, who would obtain a unit at a large discount from the market price, is unbiased. The complete audit of all financial and other agreements is necessary to determine that there were no other agreements that might allow the homeowner to receive more than the maximum allowable price.
- The Applicant proposes adding a statement about restrictive covenants and the right of the District to enforce those covenants: “Restrictive covenants shall be active until the affordable housing trust fund receives the appropriate contribution from the sale of the unit.”
  - This proposal by the Applicant does not address the concerns that FhORD raised. Those concerns are not addressed by the existence or non-existence of restrictive covenants, so a simple statement that there should be restrictive covenants in place does not address the issues about the infeasibility of enforcement of the agreement, as enumerated above.
- The Applicant also proposes adding a term about District consent being required to modify deed restrictions: “The substance of any of the above Clauses that are included in deed restriction terms may not be modified without the consent of both the unit owner(s) and the District government. Administrative, monitoring and enforcement mechanisms not included in deed restrictions may be modified at the sole discretion of the District government.”
  - This proposal by the Applicant does not address the concerns that FhORD raised. Those concerns are not related to the control of the deed restrictions, but with the poor design of the Program and with the infeasibility of enforcing even the terms offered. Though clearly, as with all the provisions of this PUD, it is essential that restrictive terms cannot be changed without the express approval of the Zoning Commission.

**THE REVISED STONEBRIDGE AFFORDABLE HOUSING PROGRAM IS POORLY DESIGNED:**

**EVEN IF THE TERMS OF THE AFFORDABLE HOUSING PROGRAM WERE ENFORCEABLE, THEY WOULD NOT APPROPRIATELY TARGET THE BENEFIT**

- The HPAP criteria is not the appropriate criteria for determining eligibility for this program. As stated above, HPAP eligibility is to determine whether a household is eligible to obtain a small benefit that makes home-ownership possible for some households that have not saved sufficient funds to cover a down-payment and closing costs. The Stonebridge Affordable Housing Program is a long term, extremely valuable benefit, and it is not appropriate to base eligibility on HPAP eligibility. Many anomalous results arise from the use of HPAP eligibility.

- One example presented at the hearing was that of a medical student, whose income, while in school was less than \$54,400. That student would be eligible for the program and would continue to receive the benefit even after graduation and entry into a well-paid position.
- Another example would be a member of a group that plans to occupy the unit. A group member might have an income of less than \$54,400, while the combined income of the individuals that plan to occupy the unit might exceed that amount. The individual could purchase the unit, and share the benefit with his or her roommates by charging below market or no rent.
- A third example would be a high income individual or family that had a temporary fall in measured income. For example, consider an individual with an income of \$100,000 who had taken a 6-month leave-without-pay. That individual would qualify under the Stonebridge Affordable Housing Program to purchase for \$166,393 a condominium with a market value of \$370,000. The following year, without a leave-without-pay, the individual's income would return to the normal \$100,000 level.
- Another example of an individual that would qualify under HPAP is an individual that just completed law school and in September started a job as an associate for \$120,000. That individual would have an income during that year of \$40,000, qualifying for HPAP, and thereby qualifying for the Stonebridge Affordable Housing Program, and eligible to buy for \$166,393 a condominium with a market value of \$370,000.
- The terms of resale guarantee the purchasers of the affordable housing units very large rates of return on their investments.
  - As noted above, purchases of the Stonebridge affordable housing units are guaranteed an annual rate of return on their investment ranging from 29% to 100%, depending on the number of years they hold the unit. The largest return, a rate of return of 100%, doubling their money, would be for a purchaser who sold the unit in one year. If the purchaser sold the unit after 10 years, that purchaser would realize a return of 29% a year on their initial investment. This does not include the value of having housing costs of \$1,360 a month to live in a unit that would have a market rent of \$2,403 a month for 10 years, which has a present value of \$99,650.
  - Purchasers of market-rate units are not guaranteed a return on their investment, and some homeowners in Friendship Heights have lost money on their investment. Some of our former neighbors, who had made relatively low downpayments, actually had to pay money at settlement when they sold their houses in Friendship Heights.

**THE DISTRICT DOES NOT BENEFIT FROM THE MODEST “AFFORDABLE HOUSING” AMENITY OFFERED HERE.**

- **PROVIDING “AFFORDABLE HOUSING” ON-SITE DOES NOT ADD ECONOMIC DIVERSITY TO THE COMMUNITY. A SUBSTANTIAL NUMBER OF HOUSEHOLDS IN CENSUS TRACT 11 HAVE INCOMES WITHIN THE TARGET INCOME RANGE FOR THE STONEBRIDGE “AFFORDABLE HOUSING” AMENITY.**
  - According to Census 2000, 23.26% of households in Census Tract 11 have incomes of less than \$50,000 and 28.70% of households in Census Tract 11 have incomes of less than \$60,000.

**P52. HOUSEHOLD INCOME IN 1999 [17] - Universe: Households**

**Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data**

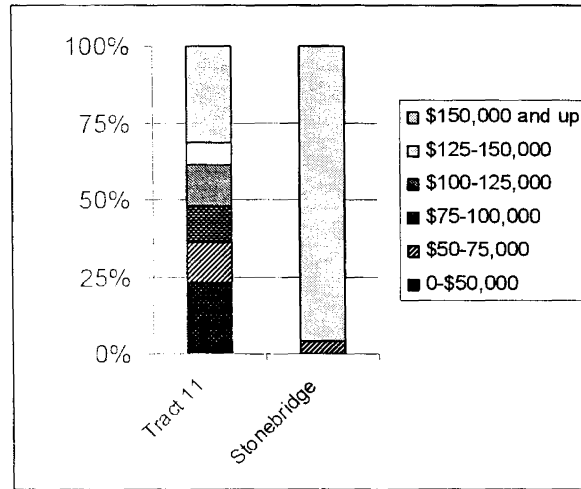
NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and definitions see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

	Census Tract 11, District of Columbia
Total:	1,857
Less than \$10,000	48
\$10,000 to \$14,999	18
\$15,000 to \$19,999	14
\$20,000 to \$24,999	67
\$25,000 to \$29,999	52
\$30,000 to \$34,999	52
\$35,000 to \$39,999	67
\$40,000 to \$44,999	37
\$45,000 to \$49,999	77
\$50,000 to \$59,999	101
\$60,000 to \$74,999	133
\$75,000 to \$99,999	222
\$100,000 to \$124,999	254
\$125,000 to \$149,999	134
\$150,000 to \$199,999	300
\$200,000 or more	281

Percentages calculated from Census Data in Table to the Left	Census Tract 11, District of Columbia
Income less than \$10,000	2.58%
Income less than \$15,000	3.55%
Income less than \$20,000	4.31%
Income less than \$25,000	7.92%
Income less than \$30,000	10.72%
Income less than \$35,000	13.52%
Income less than \$40,000	17.12%
Income less than \$45,000	19.12%
Income less than \$50,000	23.26%
Income less than \$60,000	28.70%
Income less than \$75,000	35.86%
Income less than \$100,000	47.82%
Income less than \$125,000	61.50%
Income less than \$150,000	68.71%
Income less than \$200,000	84.87%
Including \$200,000 or more	100.00%

U.S. Census Bureau  
Census 2000

The following chart compares the income distribution of the Stonebridge Project with the income distribution in Census Tract 11:



- **AFFORDABLE RENTALS FOR HOUSEHOLDS WITH INCOMES OF \$54,400 ARE READILY AVAILABLE IN CENSUS TRACTS 10.1 AND 11.**
  - A household with an income of \$54,400 spending no more than 30% of their income on rent can pay up to \$1,360 a month in rent.
  - A household with an income of \$54,400 spending no more than 30% of their income on rent can pay up to \$1,133 a month in rent.
  - According to Census 2000, 42.75% of the rental units in Census Tract 10.1 [Friendship Heights-West] have a contract rent under \$1,000 a month.
  - According to Census 2000, 51.86% of the rental units in Census Tract 11 [Friendship Heights-East] have a contract rent under \$1,000 a month.
  - According to Census 2000, 48.70% of the rental units in Census Tract 10.1 [Friendship Heights-West] have a contract rent under \$1,250 a month.
  - According to Census 2000, 68.14% of the rental units in Census Tract 11 [Friendship Heights-East] have a contract rent under \$1,250 a month.

H54. CONTRACT RENT [24] - Universe: Specified renter-occupied housing units

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and definitions see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

Percentage of Cash Units in each range calculated from Census data in Table on left.

Contract Rent		
	Census Tract 10.01, District of Columbia, District of Columbia	Census Tract 11, District of Columbia, District of Columbia
Total:	559	445
With cash rent:	538	430
Less than \$100	0	0
\$100 to \$149	10	0
\$150 to \$199	0	0
\$200 to \$249	0	0
\$250 to \$299	0	0
\$300 to \$349	9	0
\$350 to \$399	29	0
\$400 to \$449	9	0
\$450 to \$499	10	7
\$500 to \$549	9	0
\$550 to \$599	0	0
\$600 to \$649	0	24
\$650 to \$699	88	47
\$700 to \$749	9	14
\$750 to \$799	10	86
\$800 to \$899	47	22
\$900 to \$999	32	23
\$1,000 to \$1,249	28	70
\$1,250 to \$1,499	60	41
\$1,500 to \$1,999	115	27
\$2,000 or more	73	69
No cash rent	21	15

Percentage of Cash Units		
Contract Rent	Census Tract 10.01, District of Columbia, District of Columbia	Census Tract 11, District of Columbia, District of Columbia
Up to \$100	0	0
Up to \$149	1.86%	0.00%
Up to \$199	1.86%	0.00%
Up to \$249	1.86%	0.00%
Up to \$299	1.86%	0.00%
Up to \$349	3.53%	0.00%
Up to \$399	8.92%	0.00%
Up to \$449	10.59%	0.00%
Up to \$499	12.45%	1.63%
Up to \$549	14.13%	1.63%
Up to \$599	14.13%	1.63%
Up to \$649	14.13%	7.21%
Up to \$699	30.48%	18.14%
Up to \$749	32.16%	21.40%
Up to \$799	34.01%	41.40%
Up to \$899	42.75%	46.51%
Up to \$999	48.70%	51.86%
Up to \$1,249	53.90%	68.14%
Up to \$1,499	65.06%	77.67%
Up to \$1,999	86.43%	83.95%
Incl. \$2000 +	100.00%	100.00%

U.S. Census Bureau  
Census 2000

- **AFFORDABLE CONDOMINIUMS IN WARD 3 ARE ALREADY AVAILABLE TO HOUSEHOLDS WITH INCOMES OF \$54,400.**
  - A review of condominium sales listed on the District of Columbia web-site indicate that within five months, from June 2002 through November 2002, 61 condominiums in Ward 3 sold for less than the price at which Stonebridge is offering to sell these affordable units.
  - In those five months, another 18 units in Ward 3 sold between \$166,393 and \$180,000, and an additional 18 units between \$180,000 and \$190,000 sold. Many of these units were near a Metrorail station.



- According to Census 2000, 15.12% of the owner-occupied housing units in Census Tract 11 have a value of \$175,000 or less. These units are affordable to households eligible for the Stonebridge affordable housing program.

**H84. VALUE FOR ALL OWNER-OCCUPIED HOUSING UNITS [25] - Universe: Owner-occupied housing units**  
 Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

Percentages derived from data on left.

	Census Tract 10.01, DC	Census Tract 10.02, DC	Census Tract 11, DC	Census Tract 12, DC		Census Tract 10.01, DC	Census Tract 10.02, DC	Census Tract 11, DC	Census Tract 12, DC
<b>Total:</b>	<b>1,989</b>	<b>688</b>	<b>1,409</b>	<b>1,270</b>					
Less than \$10,000	0	0	0	0	Less than \$10,000	0.00%	0.00%	0.00%	0.00%
\$10,000 to \$14,999	0	0	0	0	Less than \$15,000	0.00%	0.00%	0.00%	0.00%
\$15,000 to \$19,999	0	0	0	0	Less than \$20,000	0.00%	0.00%	0.00%	0.00%
\$20,000 to \$24,999	0	0	0	0	Less than \$25,000	0.00%	0.00%	0.00%	0.00%
\$25,000 to \$29,999	0	0	0	0	Less than \$30,000	0.00%	0.00%	0.00%	0.00%
\$30,000 to \$34,999	0	0	0	0	Less than \$35,000	0.00%	0.00%	0.00%	0.00%
\$35,000 to \$39,999	0	0	0	0	Less than \$40,000	0.00%	0.00%	0.00%	0.00%
\$40,000 to \$49,999	0	9	0	0	Less than \$50,000	0.00%	1.31%	0.00%	0.00%
\$50,000 to \$59,999	0	8	8	0	Less than \$60,000	0.00%	2.47%	0.57%	0.00%
\$60,000 to \$69,999	7	10	0	10	Less than \$70,000	0.35%	3.92%	0.57%	0.79%
\$70,000 to \$79,999	0	0	16	15	Less than \$80,000	0.35%	3.92%	1.70%	1.97%
\$80,000 to \$89,999	0	25	56	0	Less than \$90,000	0.35%	7.56%	5.68%	1.97%
\$90,000 to \$99,999	0	0	43	31	Less than \$100,000	0.35%	7.56%	8.73%	4.41%
\$100,000 to \$124,999	9	69	39	22	Less than \$125,000	0.80%	17.59%	11.50%	6.14%
\$125,000 to \$149,999	0	92	30	146	Less than \$150,000	0.80%	30.96%	13.63%	17.64%
\$150,000 to \$174,999	23	160	21	51	Less than \$175,000	1.96%	54.22%	15.12%	21.65%
\$175,000 to \$199,999	16	194	8	69	Less than \$200,000	2.77%	82.41%	15.68%	27.09%
\$200,000 to \$249,999	88	69	56	34	Less than \$250,000	7.19%	92.44%	19.66%	29.76%
\$250,000 to \$299,999	199	15	153	134	Less than \$300,000	17.19%	94.62%	30.52%	40.31%
\$300,000 to \$399,999	829	0	349	356	Less than \$400,000	58.87%	94.62%	55.29%	68.35%
\$400,000 to \$499,999	554	0	224	257	Less than \$500,000	86.73%	94.62%	71.19%	88.58%
\$500,000 to \$749,999	236	25	329	119	Less than \$750,000	98.59%	98.26%	94.54%	97.95%
\$750,000 to \$999,999	19	12	61	18	Less than \$1,000,000	99.55%	100.00%	98.86%	99.37%
\$1,000,000 or more	9	0	16	8	Incl \$1MM or more	100.00%	100.00%	100.00%	100.00%

**PROVIDING “AFFORDABLE HOUSING” ON SITE SIGNIFICANTLY REDUCES THE VALUE OF THE AFFORDABLE HOUSING BENEFIT TO THE DISTRICT.**

- The Applicants have justified the proposal to provide four to six affordable housing unit on-site, rather than offer significantly more units off-site, to achieve the goal of adding to the economic diversity of the area. The Stonebridge Affordable Housing Amenity does not add to economic diversity of the area.
  - The affordable housing amenity provides four to six units to lottery winners with incomes below approximately \$54,400, with each lottery winner being given the opportunity to purchase, for \$166,393, a condominium with a market value of \$370,00, and with a large guaranteed return on their investment.
  - With other affordable housing programs, the District could realize more than 89 affordable housing units along with an appropriate amount of community-based facilities
- **THE STONEBRIDGE AFFORDABLE HOUSING PROGRAM DOES NOT BENEFIT THE DISTRICT AND SHOULD NOT BE CONSIDERED AS A SIGNIFICANT JUSTIFICATION FOR A PROJECT THAT REQUIRES AN INCREASE IN HEIGHT OF OVER 38 FEET AND AN INCREASE IN GROSS FLOOR AREA OF OVER 103,000 SQUARE FEET.**