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8 April 2003

By Hand Delivery

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

Dear Members of the Commission:

At a meeting last month the Commission directed Stonebridge (the applicant) and District agencies to file responses to certain questions by March 24, 2003, with replies to be submitted by April 4, 2003.

On April 4, 2003, Stonebridge filed a statement in addition to the filing it made on March 24, 2003. It would appear that this additional filing is untimely and should be stricken because it does not really reply to what was said earlier; in addition it deals with points that could have been raised in Stonebridge's March 24th filing.

Should the Commission decide to accept Stonebridge's latest filing, however, FhORD seeks leave to file the attached 8-page response, which relates directly to the "modal split" issue raised by the Commission.

FhORD's quick review of Stonebridge's Ward 3 Red Line Metrorail Census Tract shows that Stonebridge made many serious errors in its analysis, which makes the results of that analysis inapplicable to support the transit usage assumptions that are essential to its application.

ZONING COMMISSION
District of Columbia
Case 02-17C
Exhibit 227

ZONING COMMISSION
District of Columbia
CASE NO.02-17
EXHIBIT NO.227

D.C. COURT REPORTERS
2003 APR -3 PM 1:05

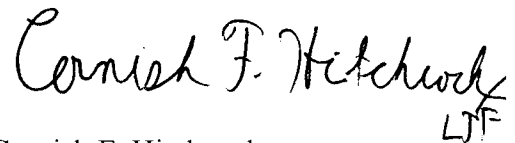
Specifically, as the attachment details:

- Stonebridge did not include some Ward 3 Census Tracts that are near the Red Line.
- Stonebridge included part of a Census Tract that is not in Ward 3, and this block group had the highest public transit usage included in its analysis.
- Stonebridge included taxicab trips as commuters using public transit, when taxis in fact generate two trips per commute.
- Stonebridge ignored critical differences between Census Tract 11 and the Census Tracts it included in its analysis, such as the percentage of families, the size of the household, and the percentage of owner-occupiers.

For these reasons, the Stonebridge analysis is flawed and misleading. As FhORD has stressed consistently, the best data for predicting the likely commuting patterns and transit use for residents who will be owner-occupants at the Washington Clinic site is the actual, and recent, Census Data for Census Tract 11. On the other hand, there is no support in the record for any conclusion that these owner-occupants will have any different transit use than the existing residents of Census Tract 11, including Block Group 5 which is a very small area that includes the Washington Clinic site.

Thank you for your consideration of these matters.

Very truly yours,

A handwritten signature in black ink that reads "Cornish F. Hitchcock". The signature is written in a cursive style. To the right of the signature, there are the initials "LJF" written in a smaller, blocky font.

Cornish F. Hitchcock

cc: All parties

CERTIFICATE OF SERVICE

I hereby certify this 8th day of April, 2003, that the attached documents were served by first class mail upon:

Whayne S. Quin, Esq.
Christine Moseley Shiker, Esq.
Holland and Knight
2099 Pennsylvania Avenue, N.W. Suite 100
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ANC3E
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Washington, D.C. 20015

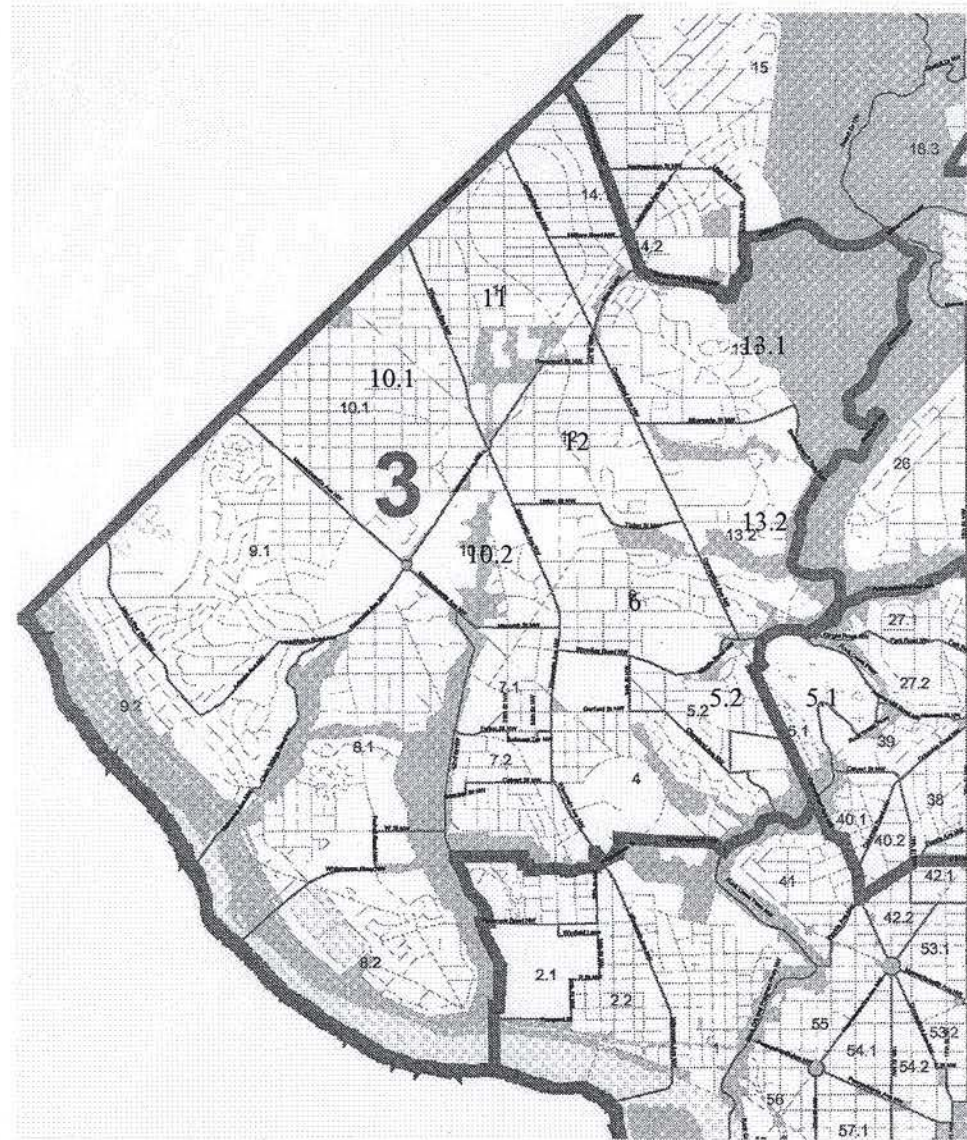
A handwritten signature in cursive script, reading "Lawrence J. Freed", is written over a horizontal line.

Review of Stonebridge Ward 3 Red Line Metrorail Census Tract Modal Split Data
Stonebridge made many serious errors in their analysis.

- Stonebridge's analysis is misleading.
- Stonebridge did not include two Ward 3 Census Tracts near the Red Line, both of which have fewer than 50% of the commuters using public transportation:
 - Census Tract 10.2, Tenleytown; and
 - Census Tract 13.01, Van Ness
- Stonebridge included Census Tract 5.1 in its Ward 3 analysis.
 - Census Tract 5.1/Block Group 1 is in Ward 1.
 - Only Block Group 2 is in Ward 3.
 - Public transit usage in Census Tract 5.1/Block Group 1 is 70.53%, the largest share measured by Stonebridge.
- Stonebridge counted 171 commuters using taxicabs as commuters using public transportation. Each taxi generates 2 trips.
- Correcting these errors would reduce the measured modal split.

Census Tracts in Ward 3

- Census Tracts 10.1 and 11 are near the Friendship Heights Metro.
- Census Tracts 10.2 and 12 are near the Tenleytown-AU Metro.
- Census Tract 10.2 was not included by Stonebridge.
- Census Tract 12 and 13.1 are near the Van Ness-UDC Metro.
- Census Tract 13.1 was not included by Stonebridge.
- Census Tract 13.2 is near the Van Ness-UDC and Cleveland Park Metros and Census Tract 6 is near the Cleveland Park Metro.
- Census Tract 5.2 and 5.1-Block Group 2 are near the Woodley Park Zoo-Adams Morgan Metro.
- Census Tract 5.01 Block Group 1 is in Ward 1 and was included by Stonebridge.



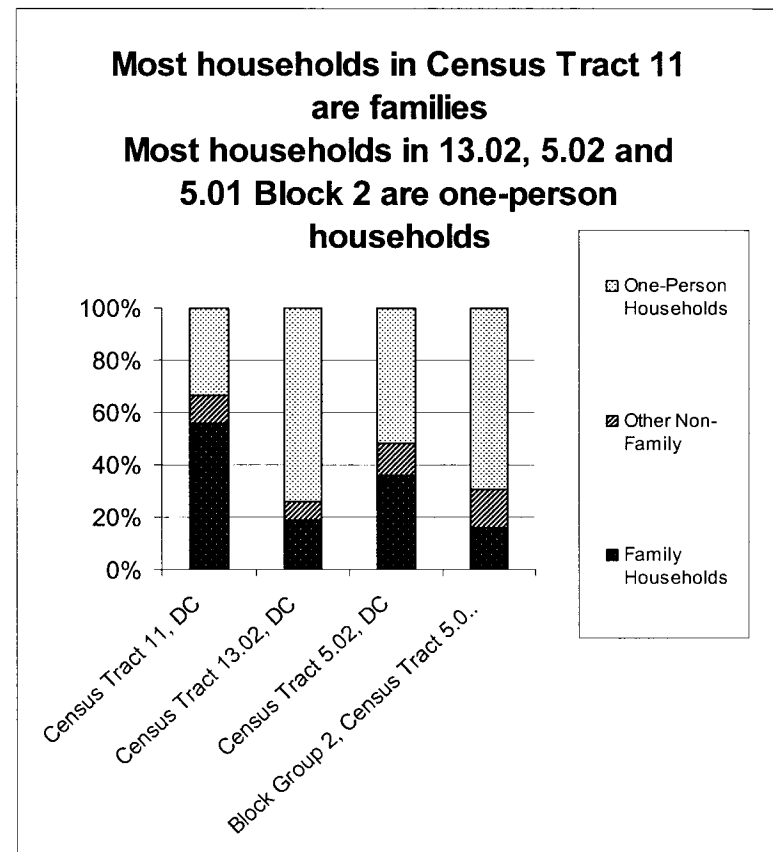
Stonebridge's analysis of Ward 3 Census Tracts is not relevant to the estimation of the likely modal split for development in Square 1663.

Each Ward 3 Neighborhood has its own characteristics.

- Each of the Ward 3 neighborhoods near Metro has its own characteristics, and prospective homeowners will look to the neighborhoods that most closely match their needs.
- Maintaining this diversity of choice is key to attracting new residents to the neighborhoods near the District Metrorail Stations.
- As demonstrated below, some of the assets of the Friendship Heights area are attractive to prospective homebuyers that have a higher likelihood that at least one worker in the household will commute by private vehicle.
- The demographic characteristics of the Census Tracts listed by Stonebridge are different from those of Census Tract 11 and the likely characteristics of the Stonebridge project, if approved.

Most households in Census Tract 11 are families, while most households in the Census tracts chosen by Stonebridge are one-person households.

- 55.7% of households in Census Tract 11 are families.
 - 14.82% of households in Census Tract 11 are two-person families
 - 33.39% of households in Census Tract 11 are one-person households
- 69.4% of households in Census Tract 5.01 Block 2 are one-person households
- 74.3% of households in Census Tract 13.02 are one-person households.
- 52% of households in Census Tract 5.02 are one-person households and another 12.3% are other non-family households.

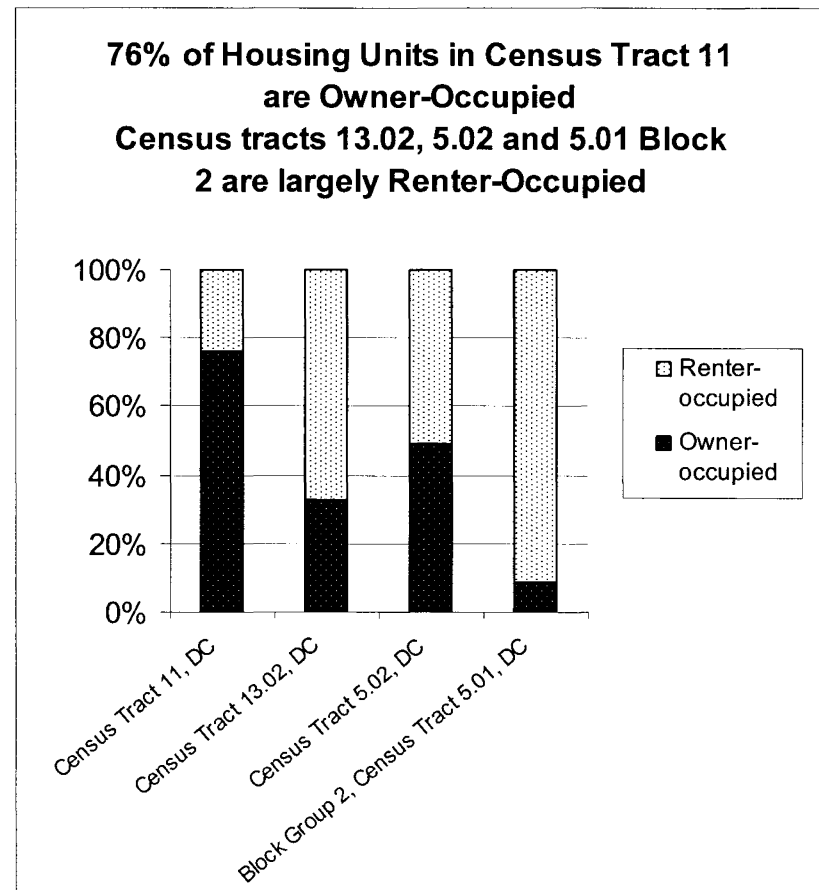


Size of Household is a Critical Factor in Determining the Modal Split.

- Most of the households in Census tracts 12, 13.02, 5.01 and 5.02 are one-person households. These are the Census Tracts that Stonebridge claims have more than 50% of the commuters using non-auto, including taxicabs as non-auto.
- Two-thirds of the households in Census Tract 11 have at least two persons.
- Given the size, 1,200 square feet, and the \$480,000 price for the the proposed Stonebridge units, it is safe to assume that many units will be occupied by more than one person.
- One-person households have only one commuting decision to make.
- Many households of two or more persons have two or more commuting decisions to make.
- Even if one member of the household chooses to use public transit, public transit is not necessarily an option for all the members of the household.
- For example, Friendship Heights would be more attractive than Van Ness, Cleveland Park and Woodley Park to households which include one person with Metro-accessible employment, and at least one other person employed at a Montgomery County location where Metro is not convenient.
- **Transit decisions near Van Ness, Cleveland Park and Woodley Park are not good predictors of transit decision in Friendship Heights, DC.**

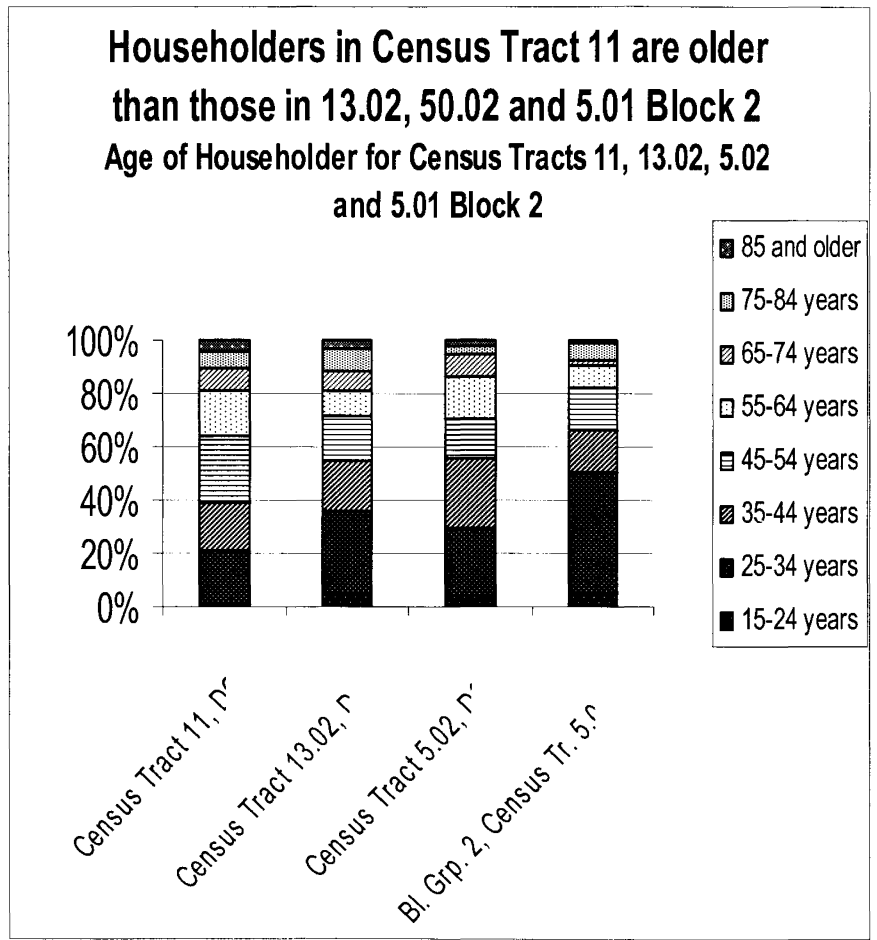
The Census Tracts Selected by Stonebridge differ demographically from the Washington Clinic area and likely new homeowners in Friendship Heights

- Stonebridge claims that the proposed project will be largely owner-occupied.
- The census tracts used for comparison are largely renter-occupied.
- 90.96% of the units in Census Tract 5.01 Block 2 are renter-occupied.
- 67.49% of the units in Census tract 13.02 are renter-occupied.
- 50.64% of the units in Census Tract 5.02 are renter-occupied.



Householders in Census Tract 11 are older than those in the Census tracts chosen by Stonebridge

- 61% of householders in Census Tract 11 are 45 or older.
 - 78.6% of householders in CT 11 are 35 or older.
- 66% of householders in Census Tract 5.01 Block 2 are under 45.
 - 50.25% of householders in CT 5.01 BG 2 are under 35.
- 55% of householders in Census Tract 13.02 are under 45.
 - 36% of householders in CT 13.02 are under 35.
- 55% of householders in Census Tract 5.02 are under 45.
 - 29% of householders in CT 5.02 are under 35.



The characteristics of the households in the tracts chosen by Stonebridge are different from those in the area of the Washington Clinic

- The census tracts with the modal split claimed by Stonebridge are not similar to the neighborhood near the Washington Clinic.
- Conclusions about likely commuting patterns should not be drawn from data from dissimilar areas.
- The best data for determining likely commuting patterns for people who will be owner-occupants at the Washington Clinic site is the Census Data for Census Tract 11.
- The data is clear: Each household in Census Tract 11 generates, on average, 0.71 trips by private vehicle or taxi in each rush hour.