

Response of Citizens for Responsible Development to Valor's Supplemental Transportation Memorandum (Exhibit 244) and DDOT's Supplemental Report (Exhibit 265)

As stated in the DC Comprehensive Plan, "The overarching goal for transportation in the District is: Create a safe, sustainable, efficient multi-modal transportation system that meets the access and mobility needs of District residents, the regional workforce, and visitors; supports local and regional economic prosperity; and enhances the quality of life for District residents."

Transportation Element, p. 4-4.

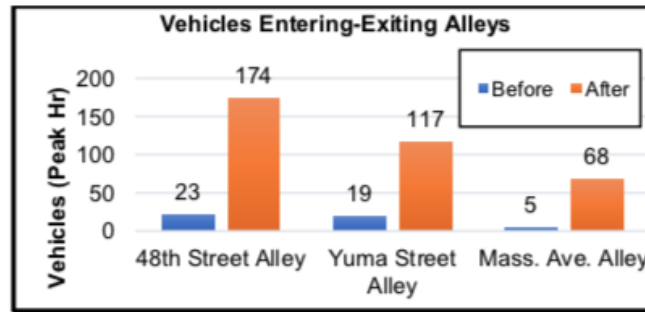
The 2018 revised application (the "Revised Application") submitted by Valor Development (the "Applicant") fails to achieve this overarching goal of meeting the needs of residents, the local workforce, and visitors. New developments should make significant mobility and safety improvements to help achieve Vision Zero goals. Unfortunately, several elements of the Valor proposal will decrease the safety of pedestrians. The Applicant's proposed plan, in fact, actually adversely affects the quality of life for residents in the community surrounding the site (4330 48th Street NW) as well as the new residents and customers of the new retail store.

The Revised Application:

- fails to provide safe, adequate, and sustainable plans to service the needs of pedestrians;
- is based on a traffic study that is more than two years outdated and ignores major changes in neighborhood traffic environment;
- does not address the impacts of increased vehicular traffic in and around the site;
- forces two 20-foot wide alleyways to handle a significant volume of car, truck, and pedestrian traffic, similar to the volume of traffic on a local street; and
- does not adequately address parking issues both within and around the site.

**Pedestrian safety is threatened.**

- The significant increase in cars and trucks entering and exiting the alleyways around the perimeter of the proposed building will create dangers for pedestrians (see Figure below).
- There is no safe pedestrian connectivity through the site.
- The sidewalk proposed for the N/S alley is only three feet wide and directly abuts the four-story high wall at the rear of the proposed building. This type of sidewalk would not meet safety or ADA standards for a low volume street.
- This sidewalk ends at the intersection of the N/S alley and the E/W alley, forcing pedestrians to walk amidst the cars and trucks in the alley leading to Massachusetts Avenue.
- The sidewalk along the E/W alley ends where there are three entrances: one entrance is for the garages for the five proposed townhouses, and the other entrances are for the underground parking garage for the 214 apartment units and for the grocery store and the building's loading docks. A stretch of about 75 feet in this two-way alley, used by both cars and large trucks, will have no sidewalk.
- Delivery trucks entering and leaving will encroach (about 3 feet) onto the sidewalk near the entrance to the E/W alley off 48th Street.



**There will be a significant increase in the volume of vehicular traffic.**

- The Gorove/Slade (G/S) traffic study from October 2016 is out of date.
- Weekend traffic needs to be counted and included in the G/S traffic study.
- Traffic from popular new restaurants with more than 500 seats (Millie’s Restaurant and Pizzeria Paradiso) and from new programs at American University (AU) need to be included in the traffic study (the large AU building with 179,302 in gross floor area was undergoing renovation in 2016, as the law school had moved to Tenley Circle in January 2016, and was largely empty when the traffic counts were taken) – it is now used for administrative offices, undergraduate classes and a non-credit, continuing education program enrolling more than 1000 older students (almost all of whom drive to classes).
- The G/S 2018 Supplemental Transportation Memorandum indicates the project will generate 155 trips during AM peak hours and 322 trips during PM peak hours. Overall, traffic entering and exiting the alleyways will increase by more than 600%.
- The additional traffic will create congestion on 48<sup>th</sup> Street and Yuma Street, both 30-foot wide local streets.
- Traffic using the main entrance on 48<sup>th</sup> St. will have to navigate around the AU shuttle buses (up to 10 per hour) that park on 48<sup>th</sup> Street, about 15 feet from the alley. The buses take one of three lanes of traffic and sometimes block the alley (see attached photo).
- Drop-offs and deliveries (taxis, Ubers, FedEx, UPS, Peapod trucks, etc.) at the main entrances to the grocery store and apartment building on Yuma will likely block traffic.
- No 2018 figures are provided by G/S for truck deliveries; in 2017, G/S indicated 21 truck deliveries per day. Since the grocery store is now larger, it can be assumed there may be more than 21 daily truck deliveries.
- A 2017 traffic critique done by MCV Associates of the G/S report indicates the project will generate 3,500 trips per weekday (Exhibit 3 to CRD Statement in Opposition (Exhibit 137)).

**Alleys are not equipped to handle significant volume of vehicular and pedestrian traffic.**

- Both the N/S alley and the E/W alley will be 20 feet wide.
- As discussed above, sidewalks in the alleys are either too narrow or are interrupted for lengthy stretches.
- The N/S alley is currently busy with daily delivery and trash trucks for the Spring Valley Shopping Center (see attached photos). Even more cars and trucks will be using this alley after the project is finished.
- AU’s loading and service bays are located along the E/W alley; two entry and exit doors for AU building are also located along this alley.
- The E/W alley, the primary entry way for cars and trucks for the grocery store and apartment building will experience an increase in traffic of over 600%.
- Entrance to underground parking garage is along the E/W alley.
- Garages for five new townhouses are accessed from the E/W alley.

- Large trucks entering E/W alley from 48th Street will impinge on sidewalk.
- Large trucks will impinge on PNC Bank property when backing into loading dock.
- Large trucks cannot make turn into N/S alley near PNC Bank.
- On p. 8 of Nov. 29, 2018 G/S Supplemental Transportation Memorandum, it states that, “Trucks traveling to the Spring Valley Shopping Center will be directed not to pick-up or drop-off on Yuma Street NW and will be directed to use the rear alley network.” How will this policy be enforced? CVS uses 55 foot trucks.

### **Parking arrangements need to be addressed.**

- AU controls 236 parking spaces on the site; how will these spaces be reallocated to residents and grocery shoppers? To date, the parking agreement between Applicant and AU remains unclear.
- The site is 0.9 mile from the Tenleytown Metro; almost all residents will own cars; most retail shoppers will need onsite parking.
- The N4 and N6 bus (along one bus route) is not heavily used and provides limited service during off peak hours in the neighborhood.
- The Applicant has not provided a sufficient number of onsite parking spaces for residents and guests, and there will be overflow onto neighborhood streets.
- Will residents be prohibited from obtaining Residential Parking Permits (RPP’s)? Where will residents without parking spaces park?
- How will any RPP ban for residents be enforced?
- The 2018 Curbside Management Plan is not available.
- Will new on-street metered and Residential Parking Permit (RPP) parking spaces be added to both sides of 48th and Yuma Streets?

### **Conclusion**

As the December 27, 2018 Supplemental DDOT Report for Case 16-23 notes, there is little or no “pedestrian connectivity and porosity through the site.” Due to the size and density of the proposed complex, very little space is available for pedestrian pathways and green space that can be enjoyed by the new residents and the neighbors around the site. Furthermore, the Applicant’s plans create dangerous conditions in both alleyways for pedestrians as well as for cars and trucks that will try to maneuver in a confined space. **The mitigation proposed by the Applicant is clearly inadequate.**

### **The Applicant should be required to conduct a fresh traffic study that includes:**

- Weekday and weekend peak hour vehicle trips for nearby intersections and both alleys.
- The increased number of vehicles and pedestrians in the area due to new businesses and the re-population of the AU building.
- Turning measurements for trucks turning left from Massachusetts Avenue onto 48th Street; turning left into E/W alley; and backing up into loading docks.
- Turning measurements for trucks turning from the E/W alley into the N/S alley near the PNC Bank property.
- The impacts of the following aspect of the site ***which is not included or represented in the Application***: that is, how do the AU loading bays along the E/W alley affect the use of this alley?

- The impact of the *design change to include five townhouses, each with a garage*, off the E/W alley, which eliminates a sidewalk at this location.

DDOT should also promote pedestrian safety both through and around the site. Indeed, in DDOT’s January 2, 2018 Memorandum for case 16-23, it is stated that, “new developments must provide a safe and welcoming pedestrian experience, enhance the public realm, and serve as positive additions to the community” (p.5). The current Application from Valor Development fails to meet these criteria. A smaller, more open design for this site that is compatible with the neighborhood would be welcomed by residents.

AU shuttle buses blocking entrance to E/W alley



Daily activity in N/S alley



Trash pickup in N/S alley



DISTRICT OF COLUMBIA ZONING COMMISSION

-----  
*CRD REQUEST FOR EXPERT WITNESS QUALIFICATIONS*

Z.C. Case 16-23  
-----

**CERTIFICATE OF SERVICE**

I certify that on January 4, 2019, I emailed a true copy of the foregoing Request for Expert Witness Qualifications to Advisory Neighborhood Commissions 3E and 3D ([3E@anc.dc.gov](mailto:3E@anc.dc.gov); [3D@anc.dc.gov](mailto:3D@anc.dc.gov)), Jeff Kraskin ([Jlkraskin@rcn.com](mailto:Jlkraskin@rcn.com)) for Spring Valley Opponents, William Clarkson ([wclarksonv@gmail.com](mailto:wclarksonv@gmail.com)) for Spring Valley Neighborhood Association, John H. Wheeler ([johnwheeler.dc@gmail.com](mailto:johnwheeler.dc@gmail.com)) for Ward 3 Vision and counsel for the Applicant, Norman M. Glasgow, Jr. ([norman.glasgowjr@hklaw.com](mailto:norman.glasgowjr@hklaw.com)).



\_\_\_\_\_  
Edward L. Donohue  
Attorney for  
Citizens for Responsible Development

Dated: January 4, 2018

Donohue & Stearns, PLC  
117 Oronoco Street  
Alexandria, Virginia 22314  
Telephone: (703) 549-1123