

Mr. Martin Parker
Deputy Associate Director, DDOT
55 M Street SE
Washington DC 20003

RE: Hine Redevelopment Project Transportation Impact Study

Dear Mr. Parker,

Thank you for meeting with members of Advisory Neighborhood Commission 6B's Subcommittee on the Hine PUD on January 13, 2012, regarding the Hine project's pending Transportation Impact Study (TIS).

At that meeting the Commission only had the Phase I TIS, which had been included in the PUD filing, and an earlier study overview presentation to the community as background information. Subsequent to this meeting with DDOT, members of the Subcommittee have met multiple times with Stanton-EastBanc (SEB), the Hine developers. At a meeting on January 16th, SEB provided ANC6B with an early draft of their TIS for review. At a meeting on February 7th, we had an opportunity to fully discuss SEB's subsequent preliminary draft Phase II TIS dated February 6, 2012 (2/6 TIS).

As a follow up to both our DDOT and SEB meetings, ANC6B has several questions to ask of DDOT:

- **Traffic volumes on streets adjacent to Hine.** The 2/6 TIS contains corridor LOS analysis of 8th Street SE and Pennsylvania Avenue SE. ANC6B appreciates having this data but fails to understand why 7th Street SE is not included (nor 9th Street SE, which we have requested previously). 7th Street SE is relatively narrow and, once Hine is built, will have commercial delivery trucks daily turning off of Pennsylvania Ave SE, onto 7th to access the Hine loading dock in the 300 block, plus the retail establishments in the North Residential building. ANC6B asks DDOT to reconsider its decision about a corridor LOS analysis for 9th Street SE and to require that a corridor LOS analysis be done in the final TIS for 7th Street.

In addition, SEB says in its PUD application that it may provide space for a below grade gym or retail establishment in the South Building. This option would add to the traffic volume, especially along 7th Street SE. ANC6B asks DDOT to make sure that this additional impact is considered in the final TIS.

- **55-foot trucks.** Under existing conditions during certain parts of the day, trucks drop off goods to various shops, restaurants, and offices in the 200 and 300 block of 7th Street. Some of these, especially beverage trucks, are 55-foot trucks. In the PUD application, the developer has asked for a waiver from the requirement to provide loading dock space

for 55-foot trucks for residence and retail deliveries. The 2/6 TIS says [page 24] two such trucks were observed in the East-West alley during a 4-hour period on a Tuesday. The document also says [page 58] that in “rare occasions” when 55-foot trucks need to be accommodated, it is possible for them to use the planned loading dock area as long as no other trucks are using the loading dock at the time. Since there certainly will be some restaurants in the South Building, ANC6B thinks that these trucks will, at times, be forced to block 7th Street SE while making their deliveries. ANC6B, therefore, asks DDOT to carefully study this issue in terms of its impact on traffic and safety in the area when it prepares its report to the Zoning Commission.

- **Parking.** This is a critical issue for many in the community. The 2/6 TIS shows that existing parking supply in the Parking Survey Area is 83-84% filled during weekdays and 95% filled on weekends. It then says, “Weekend occupancy levels, within the Hine study area, exceed the functional range of peak accumulation for urban cities.” [page 20] The proposed underground garage adds 260 overall spaces to the study area. For weekends, this results in up to 98 parking spaces available to the public in the garage [table 16, page 47] or a total of 934 spaces in the survey area when added to the existing 836 on-street spaces. Does DDOT consider this number of spaces sufficient to serve more visitors to the area attracted by additional shops and restaurants without further exacerbating the existing conditions, especially given that the public will have to pay for the 98 garage spaces?

In the PUD filing detailing the underground garage, SEB says it will provide the required 5 accessible spaces for cars and 2 for vans and cites the 2006 International Building Code. ANC6B would like clarification on the requirement and how these spaces are calculated.

- **Parking on Residential Streets.** Because of uncertainty expressed above about the availability of parking spaces and whether new residents will buy spaces in the garage, ANC6B asks DDOT to clarify whether new residents of all 3 buildings planned will be entitled to obtain Zone 6 Residential Parking Permits, enabling them to park curbside in the neighborhood. (Note: Currently, the west side of the 300 block of 8th Street, which will have a new residential building, is metered parking, as is the 300 block of 7th Street.)
- **Methodologies and Assumptions.** The analysis to date seems to result in only minor impacts as a consequence of the built and occupied Hine development. These conclusions, of course, depend on the methods and assumptions used to evaluate the data. For instance, what is the basis for a 1% background growth? How were the new trips generated by the Hine development distributed among local streets? Was a sensitivity analysis completed to verify that, if trip distribution assumptions were shifted slightly, LOS was not unreasonably affected? ANC6B requests a list of key assumptions such as these and the basis for the assumptions, as well as a detailed description of the methodology used to calculate future background conditions, so as to increase confidence in the outcomes.

- **Pedestrian Safety.** The 2/6 TIS does not appear to address issues of pedestrian safety at, for instance, intersections and the two new garage entrances. Are these issues normally part of a TIS? If so, what kind of analysis would DDOT expect?
- **East-West Alley.** The 2/6 TIS proposes a plan for this alley [p. 57] to bring order to the mix of cars and delivery vehicles that use it. The data that supports this plan was collected on a Tuesday. Neighbors have told ANC6B that they observe that Mondays and Fridays (since the 7th Street entrance to the alley is closed on weekends) are the busiest days for deliveries in that alley. ANC6B asks, therefore, that DDOT request an additional day or days of data collection—one day of which should be a Monday—and, if it proves necessary, a revision of the alley plan. ANC6B also asks for clarification as to the authority the North Residential property management would have to manage traffic flow in a public alley.

The analysis in the 2/6 TIS suggests that an additional 5-6 trucks a day [page 56] will be added to the existing volume in the alley with the addition of the North Residential Building. There is some concern that this estimate is low given the number of residential units and square footage for retail in this building (street and underground levels). In addition, 5,000 square feet of retail space in an existing building at 228 7th Street SE may add to the alley truck volume in the near future; the space has been empty for several years but is currently up for lease. ANC6B recommends that the 5-truck estimate be subject to further review and validation to assure that potential impacts and, perhaps, mitigation are properly assessed.

- **Corrective Measures Post Construction.** At our meeting with DDOT on 1/13, ANC6B was told that “corrective measures” can be taken once the development is built and occupied for those situations where the TIS did not forecast accurately. ANC6B asks if there is a special process by which such corrections are analyzed and implemented as the result of a PUD? One area where this may arise, post construction, is the intersection of 8th & C Street SE where the 2/6 TIS LOS data suggest that all-way stop signs will be sufficient for both vehicles and pedestrians. The “correction” may be to signalize the intersection and ANC6B has experienced interminable delays after signals have been promised before they are ever installed.

The Commission appreciates the several opportunities it has had to review and discuss draft versions of the Transportation Impact Study. It now looks forward to receiving the above clarifying information.

Sincerely,