



MEMO

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From: Ross Tilghman

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Subject: Loading Design for 1903-5th Avenue, MUP #3018037

My comments on the applicant's response to Transportation Correction Notice 1 follow.

This project continues to face serious deficiencies in its loading design, partly because it seeks many waivers from code requirements, and has so far offered only to limit the size of vehicles making deliveries to improve loading operations. Limiting vehicle size remains of very dubious credibility and the ability to accommodate residential moving trucks remains unsolved, as discussed below:

1. **Truck Size** – the applicant indicates that it will only allow trucks up to 26 feet in length to service the project. The intent of limiting truck size is easily understood: the large scale of the land use program on this small site means that the project lacks sufficient depth to comply with code-required dimensions for its three loading bays. But making that limit a reality charts new territory in downtown freight loading practice, and raises many questions:
 - a. Where is there a proven, working example that such limits are effective?
 - b. What type of agreement will the hotel, the restaurants, bars and residents have to limit truck length?
 - c. How will such an agreement be enforced? If a vendor needs to send a larger truck, what actions will be taken to prevent it from blocking the alley? Would time-sensitive deliveries such as perishables for the restaurants really be diverted?
 - d. How will deliveries from suppliers who are not regular vendors to the hotel, restaurants and bars be managed? Specifically, what happens if a delivery arrives in a larger truck as could occur when a resident orders a piece of furniture? Will the delivery be

prevented? It seems unreasonable to expect that a single delivery would be required to get a street loading permit.

- e. Will the hotel, restaurants and bars all engage the same vendors with 26' long trucks? Who will monitor their agreements with vendors and when they change vendors to assure that trucks will never exceed the length limit?
- f. Will the beverage trucks all be 26' or less in length? Except for some wine distributors, soft-drink and beer distributors typically operate longer trucks downtown (SU-30).

2. **Truck Maneuvers** – The applicant's turning movement diagrams show that extensive backing will occur in the alley to facilitate truck use of the bays. This backing poses safety risks:
- a. Trucks will back up as much as 70 feet to enter loading bays. That is, trucks will travel approximately one-third the length of the alley, then reverse most of the way back towards Stewart Street. That change of direction will cause confusion to motorists entering the alley behind trucks and may cause multiple vehicles to reverse to make way for the trucks.
 - b. Trucks will drive forward past the project's garage entrance, stop and then reverse past the entrance. This poses awkward conflicts with the project's own garage traffic given the extremely limited sight-distance due to the adjacent corner of the Avis Building. How will adequate sight-distance be provided?
 - c. The turning diagrams fail to show the Centennial Building's garage entrance that will also be affected by the project's truck movements. That entrance is immediately opposite Bays 1 and 2. Sight-distance is very limited for this driveway. How will sight-distance be obtained here?
 - d. The turning diagrams show conflicts with the project's exit stair door and with the corner of the Avis Building for Bay 3.
 - e. Trucks positioned in the alley to reverse to the loading bays conflict with deployment of the fire-escape on the Avis Building, located at its southwest corner.
3. **Adequacy of loading space** – The loading design continues to fall short of accommodating trucks entirely within the loading bays, as requested in the Correction Notice.
- a. Bay 2 is shown with a 25' truck equipped with a 30-inch "unload gate" leaving a scant 1-foot 8-inches between the gate and the wall. Gates that shallow are not typical of delivery vehicles (except for those that deliver gas bottles used by welders and laboratories). Rather, normal lift-gates range from 37" to 55" in depth leaving little to no useable space between the gate and wall. Consequently, a 25' truck cannot fit wholly within the loading bay and deploy a lift-gate.
 - b. Bay 1 has similar constraints on space behind the vehicle.
 - c. Neither Bay 1 nor Bay 2 have sufficient length to accommodate a residential moving truck such as a 15' U-Haul box truck (22.5' overall length) using its ramp (8' 9"). Residential moving trucks typically use ramps rather than lift-gates. Bay 1 shows a total length of 27'-11.5" and Bay 2 shows 28'-5". Both bays fall well short of the 33'

necessary to contain the truck, its ramp and modest moving space beyond. Needless to say, U-Haul rents longer trucks than the 15' box truck.

- d. The drawings showing trucks in Bays 1 and 2 have each truck right at the edge of the alley's right-of-way. Obviously, as noted above in paragraphs "a" through "c", the trucks will extend into the right-of-way to get adequate loading space at the rear, violating a key requirement of acceptable loading design. That intrusion in the alley will also prevent independent operation of Bays 1 and 2, violating another key requirement of loading design. The drawings and design demonstrate that the applicant has not fully and adequately responded to points 2 and 3 in the Correction Notice.
 - e. Bay 3 works only for trucks with a maximum length of 26' and not for a legal SU-30.
4. **Dock Management Plan** – This preliminary draft mainly states objectives and a few means of communicating them. It leaves much work to be done, including:
- a. Indicating how the plan would enforce compliance among regular vendors in using 26' long trucks. What incentives and/or penalties would be applied? After how many infractions would penalties be levied?
 - b. Identifying other entities within the project that would contract with vendors, such as the restaurants, bars and retailer. It is not yet clear how many separate operators will be involved in the project, all of whom need to be included in the plan.
 - c. Defining how the plan would address unexpected arrivals of larger but still legal trucks from other sources than regular vendors.
 - d. Modifying the standards for allowed moving trucks unless the loading design is revised to accommodate typical residential moving trucks. As currently designed, even the shortest moving trucks, such as a 10' box truck (19'-11" long + 8'-9" ramp = 28'-8") would not fully fit in Bay 1 or Bay 2. Only a van or pick-up would fit in the proposed design. The dock management plan needs to reflect a realistic condition for moving trucks.
 - e. How will the plan deal with vehicle conflicts in the alley? For instance, when a delivery truck departs the project but is blocked from proceeding north to Virginia Street by trucks serving other buildings, how will the Dock Master manage the alley? And when another delivery truck arrives from Stewart Street but cannot move ahead, what will the Dock Master do?
 - f. Far from being fictional scenarios, the above circumstances reflect predictable, recurring conflicts in this narrow alley that warrant close scrutiny and much more responsive solutions than provided to date in the very preliminary Dock Management Plan, a plan that cannot successfully compensate for a wholly inadequate loading design.