

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



d. Policy, Planning and Sustainability Administration

MEMORANDUM

TO: District of Columbia Board of Zoning Adjustment

FROM: Samuel Zimbabwe *sz*
Associate Director, PPSA
District Department of Transportation

DATE: June 15, 2012

SUBJECT: BZA Case#18372
2321 4th Street, NE

BOARD OF ZONING ADJUSTMENT
District of Columbia

CASE NO. 18372

EXHIBIT NO. 27

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APPLICATION

The H Street Community Development Corporation (the "Applicant") pursuant to 11 DCMR § 3103.2, is seeking a variance from the lot occupancy requirements under section 772, a variance from the off-street parking requirements under subsection 2101.1, a variance from the loading requirements under subsection 2201.1, and a variance from the loading berth minimum vertical clearance height requirements under subsection 2201.6, to allow the construction of a new residential apartment building with ground floor retail and service uses in the C-3-A District at premises 2321 4th Street, N E (Square 3629, Lot 808)

RECOMMENDATION

The District Department of Transportation (DDOT) has no objection to the variance request from loading height requirements or from lot occupancy requirements. In addition, DDOT has no objection to the variance request for a 30' loading dock in lieu of zoning-required 55' loading dock.

The Applicant is seeking a parking variance to install 43 spaces instead of the 87 spaces required per Zoning. DDOT has no objection to this request for variance from parking minimums due in part to the relative proximity of the Site to nearby transit options – including several bus lines and the Rhode Island Metro Station. However, DDOT notes that while there is pedestrian access between the Site and the Metro Station, the walking environment isn't convenient and includes many narrow pinch points and non ADA-compliant areas. This typically would not corroborate the Applicant's assumed high non-vehicle mode split (and subsequent justification for a parking variance). However, because the development program comprises affordable housing, the expected tenants are less likely to have a personal vehicle, and accordingly, the need for parking is not as great as would be typical for a similarly-

sized market-rate development at this location. If the development contained market rate housing, then DDOT could not support the Applicant's proposed mode split and, by extension, their request for a parking variance, unless off-site improvements were made to the pedestrian environment that would facilitate a more convenient and ADA compliant trip.

Further, the Applicant is proposing backing delivery/trash trucks into the Site off of 4th Street. DDOT does not allow for back-in maneuvers, particularly on arterials.

Transportation Analysis

DDOT is committed to achieving an exceptional quality of life in the nation's capital by encouraging sustainable travel practices, constructing safer streets and providing outstanding access to goods and services. As one means to achieve this vision, DDOT works through the zoning process to ensure alternative modes are adequate to accommodate new travel demand while discouraging single occupancy vehicle trips.

Bike and Pedestrian Facilities

As noted by the Applicant, nearby biking facilities include a Capital Bikeshare station at the intersection of 4th and Rhode Island Avenue as well as bike lanes along 4th Street, NE and the Metropolitan Branch Trail. DDOT notes that direct access to the Trail is possible from a trail access point within the adjacent parking lot, directly to the north of the Site.

Per DDOT's request, the Applicant reviewed the pedestrian facilities in the immediate area, along 4th Street and along Rhode Island Avenue. The Applicant noted that sidewalks are provided along 4th Street and Rhode Island Avenue, stating that the minimum available sidewalk width along the latter is 11 feet. DDOT notes that the Applicant incorrectly states the pedestrian conditions, as the sidewalk narrows down to approximately 3 feet in several locations and contains non ADA-compliant portions in many places, as exemplified in Figure 1. These pedestrian conditions factor into the ability for a Site to achieve a high non-vehicle mode split.



Figure 1: Example of narrow, non ADA-compliant sidewalk along Rhode Island Avenue

In addition, as part of the overall data collection effort, the Applicant conducted peak hour pedestrian counts at all the study area intersections, including those between the Site and the Rhode Island Avenue Metro Station. These counts show a relatively low amount of peak hour pedestrian activity to and from

the Rhode Island Metro in the direction of the Applicant's Site, indicating that the presence of the Metro Station alone does not necessarily correlate to a high trip reduction factor, as asserted by the Applicant

Roadway Capacity and Operations

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods and services. In the CTR, the Applicant provided the existing vehicle counts, queue lengths, and intersection Level of Service for a previously agreed upon study area. To these existing conditions, the Applicant added approved background developments that may impact the study area as well as a regional annual growth to the existing arterials in order to forecast a future year background condition. Finally, to this background condition, the Applicant added forecasted trips generated to and from the proposed development via the local road network. DDOT is in general agreement with this approach to analyzing the effect of the Site on the local roadways.

Study Area

Per DDOT's request, the Applicant looked at relevant intersections along 4th Street and along Rhode Island Avenue that were relevant to the site's potential impact on safety and operations.

Mode Split

In the development of the Site's trip impacts, the Applicant assumed a 72% trip reduction for walking/biking/walking-to-transit for the residential portion of the development program and an 88% trip reduction for walking/biking/walking-to-transit for the retail portion. The Applicant based these assumptions on the *WMATA Ridership Survey* which attempts to correlate mode split with the distance from a Site to the nearest Metro Station. However, the pedestrian environment (safety, convenience, sidewalk conditions, pedestrian delay at signals, lack of crosswalks, etc.) is not taken into account in this *Survey*. Accordingly, DDOT believes that the Applicant's proposed mode split is high, based on the pedestrian conditions between the Site and Rhode Island Avenue Metro Station, as described previously.

Level of Service

The Applicant conducted a Level of Service (LOS) analysis utilizing the Highway Capacity Manual (HCM) software imbedded in Synchro, per DDOT's practice, at the study area intersections. The analysis was conducted for the weekday AM and PM peak hours. The analysis looked at existing, 2015 no-build and 2015 build-out scenarios. The analysis shows that all intersections currently operate at an LOS of D or better in all development scenarios according to HCM LOS analysis. The Applicant also looked at queue lengths along Rhode Island Ave and along 4th Street. Analysis shows that 95% queue lengths, currently are in excess of 300 feet along select approaches, but that the Site's proposed development program will contribute only a nominal increase. DDOT is in general agreement that the Applicant's proposed development will have minimal impact on the vehicle level of service and queue lengths, because the development is located near transit and because the development is providing limited parking.

Site Access

The Applicant is proposing closing an existing curb cut on 4th Street and installing a new driveway along 4th Street at the north end of the property. This driveway is located close to an existing driveway that serves the Foreman Mills shopping center directly north of the Site. These two driveways appear closely spaced in the Applicant's site plan; DDOT notes that the Applicant's proposed driveway is required to be a minimum of 32 feet from an adjacent driveway, per the Design and Engineering Manual (Sec 31.2.3).

Bike access is via the 4th Street driveway entrance which leads to accessible secure bike parking
Pedestrian access is also via 4th Street

Loading and Curbside Management

DDOT's practice is to accommodate site access and vehicle loading in a reasonable and safe manner while at the same time preserving traffic flow safety across other non-vehicle modes. For new developments, DDOT further recommends that loading take place in private space and that no back-up maneuvers take place in the public realm.

Applicant is proposing an enclosed loading dock on-site, off of 4th Street. Further, the Applicant is proposing backing delivery/trash trucks into the Site off of 4th Street. DDOT does not allow for back-in maneuvers, particularly on arterials. As the Applicant noted, 4th Street is classified as an urban arterial with on-street bike lanes. In addition, this segment of 4th Street is one lane in each direction and has an ADT of 12,000 vehicles.

Subsequent Correspondence

DDOT has learned that the Applicant is withdrawing its request for a loading zone along 4th Street in front of the Site. DDOT agrees with this request, as the proposed curbside loading zone and time restrictions contribute to sight distance limitation for driveway egress and appears to be unwarranted for the retail/residential program proposed.

Safety

DDOT requires that the Applicant conduct a safety analysis to demonstrate that the site will not create new, or exacerbate existing, safety issues for all travel modes. DDOT asks for an evaluation of crashes at study area intersections as well as a site distance analysis along the public space where there is expected to be conflicts between competing modes (e.g. crosswalks, driveway entrances, etc.).

The Applicant recorded the pedestrian, bike, and vehicle crashes in the immediate area. In their safety assessment, the Applicant did not note the multiple mid-block pedestrian crossings along Rhode Island Avenue or the locations with narrow non-ADA-compliant sidewalks. Further, no off-site improvements to the area were proposed by the Applicant, despite the increased pedestrian exposure proposed. Given that the Applicant is intending to significantly increase pedestrian exposure (as implied by the proposed high non-vehicle mode split), the proposed development will be contributing to a pedestrian environment that is not conducive to transit-oriented development.

Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, and price/supply of parking spaces. However, in urban areas, other factors contribute to the demand for parking such as the availability of nearby high-quality public transit and the condition of the pedestrian environment.

The Applicant is requesting a variance from the zoning-required 87 on-site spaces. The Applicant is proposing installing 43 spaces – 40 for residential and 3 for the employees of the proposed retail component of the development program. DDOT has no objection to the Applicant's request for the parking variance, for the reasons outlined in prior sections of this report.

The Applicant has conducted an on-street parking occupancy count and determined that the existing parking utilization in the surrounding area is about 50% of the approximately 180 spaces available. However, most of these spaces are RPP spaces with limited non-permit parking. The Applicant has

proposed that residents be ineligible for the RPP system, limiting their opportunities for off-street parking

The Applicant is proposing 53 bike parking spaces to be located in the on-site parking area DDOT agrees with the proposed bike parking location as it provides direct access through the Foreman Mills parking lot to a designated access point for the Metropolitan Branch Trail.

Streetscape

In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines This includes curb & gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site

The Applicant must work closely with DDOT and OP to ensure that the design of the public realm meets current standards and will substantially upgrade the appearance and functionality of the streetscape for public users needing to access the property or circulate around it. The DDOT Public Realm Design Manual will serve as the main public realm references for the Applicant DDOT staff will be available to provide additional guidance during the Public Space permitting process

Though no utility vaults are specifically noted in the zoning application, DDOT notes that its policy is to not recommend allowing vaults in public space, particularly in areas that are expected to see substantial pedestrian activity.

Transit

As noted by the Applicant, the Site is located 0.37 miles from the Rhode Island Avenue Metro Station and is well served by three WMATA bus lines with peak hour headways between 12-32 minutes.

DDOT notes that that most of the transit stops have substandard facilities, lacking both benches and shelters

Conclusion

DDOT has no objection to the variance request from

- Loading height requirements
- Lot occupancy requirements
- 30' loading dock in lieu of zoning-required 55' loading dock

Further, DDOT has no objection to the request for a parking minimums variance due in part to the relative proximity of the Site to nearby Transit – including several bus lines and the Rhode Island Metro Station. DDOT notes that the lack of objection is due to the fact that the proposed development comprises affordable housing, which lowers the vehicle demand at the Site If the development contained market rate housing, then DDOT could not support the Applicant's proposed mode split and, by extension, their request for a parking variance - unless off-site improvements were made to the pedestrian environment that would facilitate a more convenient and ADA compliant trip

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