

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION



MEMORANDUM

TO: Lloyd Jordan
Chairperson
Board of Zoning Adjustment

FROM: Samuel Zimbabwe 
Associate Director

DATE: October 21, 2014

SUBJECT: **BZA Case No. 18845** - Latham Hotel, 3000 M Street NW

APPLICATION

Latham Owner SPE LLC (the "Applicant"), pursuant to 11 DCMR §§ 3104.1, and 3103.2, seeks variance relief from the rear yard (section 933), parking (subsection 2101.1), and loading (subsection 2201.1) requirements and special exception approval to locate 42 parking spaces in an off-site parking facility (subsection 2116.5) to permit the conversion of an existing hotel with accessory retail into a mixed-use residential and retail building in the C-2-A and W-1 Districts at premises 3000 M Street, N.W. (Square 1197, Lot 70). The Applicant proposes 140 furnished studio apartments, 10,000 square feet of retail, 42 off-site vehicle parking spaces in lieu of the 94 required spaces, 30-foot and 20-foot loading facilities, and no 55-foot loading berth.

RECOMMENDATIONS IN BRIEF

The purpose of DDOT's review is to assess the impact of the proposed action on the District's transportation network and, as necessary, propose appropriate mitigations. After an extensive, multi-administration review of the case materials submitted by the Applicant, DDOT finds:

- A robust network of pedestrian, bicycle, and transit infrastructure exists in close proximity to the proposed development;
- The site is not currently in the District's Residential Permit Parking (RPP) system nor is its location consistent with the program's eligibility criteria;
- On-street parking in the vicinity is either limited to RPP permit holders or metered, and is therefore unsuitable for long-term parking by the proposed project's future residents;
- The Applicant proposes to offer 42 vehicle parking spaces in off-site parking facilities, if requested by Applicants. Given the residential unit type and the availability of non-auto modes, these parking spaces are not anticipated to be highly utilized by residents;

- The proposed development will generate minimal new vehicle trips;
- Residents are likely to heavily utilize non-automobile modes of travel;
- The Applicant proposes a Transportation Demand Management (TDM) plan intended to further promote the use of non-auto travel options;
- The small, furnished residential units are unlikely to generate significant loading activities, and DDOT finds that the proposed loading facilities are adequate to meet the anticipated residential and retail loading needs;
- The Applicant proposes to re-use the existing loading area requiring back-in truck movements, which are contrary to the DDOT Design and Engineering Manual. Given that the loading facility is existing and substantial renovations to the building footprint are not proposed, the Applicant may receive approval for a curb cut if the back-in impacts are properly mitigated. The Applicant's proposed Loading Management Plan serves as a good basis for mitigating impacts, but additional analysis and/or mitigations may be required as part of the public space permitting process.

The site's access to excellent bus and rail transit, proximity to Capital Bikeshare stations, quality of pedestrian and bicycle infrastructure in the subject area, along with the commitment to a strong TDM program will lead to low levels of auto ownership and use. As such, DDOT has no objection to the requested relief with the following conditions:

- Remove from the TDM plan any reference to proposed curbside management. While DDOT is supportive of the Applicant's proposal to close existing curb cuts thereby making new curbside space available, the use of the new curbside space will need to be determined during public space permitting process. Additionally, these three measures do not qualify as TDM strategies because they are not specifically designed to discourage auto use and/or encourage non-auto transportation modes.
- Offer the Capital Bikeshare membership to all tenants rather than only tenants that do not own personal bicycles.
- Offer *annual* bikeshare and car share memberships rather than memberships of another time duration (e.g. daily, monthly, etc.). If the lease duration is shorter than one year, the memberships in the bikeshare and car share program may be reduced to match the duration of the lease.

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 that impacts from new developments are manageable within, and take advantage of, the District's multimodal transportation network and ultimately discourage single occupancy vehicle trips.

Accordingly, an Applicant is expected to show the existing conditions for each transportation mode affected, the proposed impact on the respective network and any proposed mitigations, along with the effects of the mitigations on other travel modes. A Comprehensive Transportation Review (CTR) should be performed according to DDOT direction. The Applicant and DDOT coordinated on an agreed-upon scope for the CTR that is consistent with the scale of the action.

Pedestrian and Bicycle Facilities

Automobile ownership is expected to be minimal, while transit, walking, and bicycling are expected to be the predominant modes of transportation for this development. Based on the Applicant's field observations and inventory of the pedestrian and bicycle facilities (i.e., sidewalks, crosswalks, bicycle lanes), the study area intersections and roadway network provide excellent pedestrian and cycling connections to nearby land uses and transit facilities. The Applicant's analysis noted that all crosswalks and curb ramps in the immediate vicinity meet DDOT standards. A more in depth analysis may be required during public space permitting and the Applicant would be expected to address any non-standard treatments in the vicinity as part of the public space permitting process.

The site is within close proximity to multiple bicycle facilities, including off-street multiuse trails (Rock Creek Park Trail, C&O Canal Trail, and the Capital Crescent Trail) and cycle tracks (M Street and L Street). Additionally, the site is located within close proximity to several existing Capital Bikeshare station, with the closest station located approximately 800 feet to the east of the site at the intersection of Pennsylvania Avenue and M Street NW.

The Applicant is proposing at least 66 long-term bicycle parking spaces in a bicycle room to be accessed from the loading curb cut on 30th Street, which exceeds the current District regulations¹ requiring one bicycle space for every three residential units. In addition, the Applicant is proposing an on-site bicycle repair facility. The Applicant also proposes to provide at least 10 bike racks for short term bicycle parking in the public space along 30th Street. The exact location of short-term bicycle parking spaces will be determined during the public space permitting process.

Transit Services

DDOT and Washington Metropolitan Area Transportation Authority have partnered to provide extensive public transit service in the District. DDOT's vision is to leverage this investment to increase the share of non-automotive travel modes with minimal infrastructure investment.

The Applicant evaluated the proximity of the subject site to the Foggy Bottom/GWU Metro Station and the adequacy of the bus service along the routes that serve the subject area. The proposed development is approximately 3,500 feet from the Foggy Bottom/GWU Metro Station, which is approximately a fifteen minute walk, and one mile from the Dupont Circle Metro Station.

The site is currently served by six bus routes, including two Circulator lines. Short headways particularly during the peak periods offer frequent bus service to connect the site to multiple destinations, including Metro stations and major job centers. The nearest bus stop is located one block to the west at the intersection of M Street and 31st Street and serves numerous Metrobus routes and two Circulator routes.

Vehicle 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 high quality transit, frequency of transit

¹ Section 8 of the Bicycle Commuter and Parking Expansion Act of 2007, effective February 2, 2008 (D.C. Law 17-103; D.C. Official Code § 50-1641.07) (2012 Supp.) and Mayor's Order 2011-149, dated September 6, 2011.

service, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, and the demographic composition and other characteristics of the potential residents.

A minimum of 94 on-site parking spaces are required by zoning. The Applicant is seeking full relief from the on-site parking requirement and proposes to reserve 42 off-site vehicle parking spaces at parking garages in the vicinity. The spaces would be made available to residents at market rate costs.

The subject site offers excellent non-auto travel options that facilitate car-free living and the proposed development program is intended to attract a group of tenants that are unlikely to own cars. Specifically, the lease terms and the furnished units appeal to residents who are new to the District or only in town for several months. The product type will attract tenants who desire to live in neighborhoods where automobile ownership is not necessary and daily needs can be met with walking, bicycling, and transit. Accordingly, DDOT expects auto ownership rates to be low and does not anticipate that the 42 off-site parking spaces will be necessary to accommodate the long-term vehicle storage needs of residents.

The site is not currently in the District's Residential Permit Parking (RPP) system nor is its location consistent with the program's eligibility criteria. In addition, curbside parking in the vicinity is either metered or signed as RPP parking. Given these restrictions, RPP is unsuitable for long-term parking by the proposed project's future residents.

Retail shoppers and visitors are expected to utilize non-auto modes of transportation or park at an off-site parking garage. The Applicant's analysis indicates that within 600 feet of the property there are five parking facilities that contain over 1,000 parking spaces. With an average occupancy of 80%, these facilities have ample capacity to accommodate non-resident parking needs generated by the site.



Figure 1 Parking Facilities within 1,000 Feet

Trip Generation

Because auto ownership is likely to be minimal and both residents and retail customers are anticipated to heavily utilize non-auto modes of transportation, the action's impact on the District's road network is expected to be insignificant. Given the uncommon development type, the Applicant performed case study observations at a smaller but otherwise similar development in Boston, MA to determine the likely impacts of the proposed project. The case study site, selected in coordination with DDOT, offers a similar development program, proximity to transit, parking provision, and other key characteristics. The Applicant used an observation methodology developed by DDOT to determine the multi-modal travel impacts of a development. The Applicant's observations indicated the vast majority of trips were made via non-auto modes which, with only 19% of AM peak residential trips and 21% of PM peak residential trips being made by auto. Applying these percentages to the subject property, this would equate to 11 auto trips for the residential component during both the AM and PM peaks. Additionally, DDOT expects auto trips associated with a project of this type to be from taxis, ridesharing services, and carsharing vehicles.

To account for the potential impact of residents utilizing the 42 off-site vehicle parking spaces, the Applicant performed a vehicle impacts analysis utilizing the Institute of Traffic Engineers (ITE) Trip Generation Manual methodology.

	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Trip Rates						
Trips per Apt. Unit <i>[ITE Land Use Code 220]</i>	0.10	0.41	0.51	0.40	0.22	0.62
Trips per 1,000 Sq Ft Retail <i>(ITE Land Use Code 820)</i>	0.61	0.39	1.00	1.83	1.90	3.73
Trip Generation						
Trip/140 Apt. Units	14	57	71	56	31	87
Net Residential Trips						
A. With 62%/80% AM/PM non-auto factor	5	22	27	11	6	17
B. With 50% AM/PM non-auto factor	7	28	35	28	16	44
Trip/ 10,000 sf Retail	6	4	10	18	19	37
Net Retail Trips						
A. With 80% non-auto factor	1	1	2	4	4	8
B. With 50% non-auto factor	3	2	5	9	10	19
Total Vehicle Site Trips						
A. With 62%/80% AM/PM non-auto factor	6	23	29	15	10	25
B. With 50% non-auto factor	10	30	40	37	26	63
Total Non-Auto Site Trips						
A. With 62%/80% AM/PM non-auto factor	14	38	52	59	40	99
B. With 50% non-auto factor	10	30	40	37	26	63

Figure 2 Trip Generation (Source: Nelson\Nygaard)

The Applicant's analysis utilized highly conservative mode split assumptions and the number of vehicle trips predicts are unlikely to be realized during the peak periods, even if all 42 off-site vehicle parking spaces are utilized. Additionally, the new building program of residential and retail uses are likely to generate fewer trips than the previous hotel and retail uses, resulting in a net decrease in vehicle trips compared to the previous use. Accordingly, the likely transportation impacts are expected to be minimal and manageable within the District's transportation network.

Transportation Demand Management

As part of all major development review cases, DDOT requires applicants to produce a comprehensive Transportation Demand Management (TDM) plan. TDM is a set of strategies, programs, services, and physical elements that influence travel behavior by mode, frequency, time, route, or trip length in order to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of public transit, bicycle, and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods.

The Applicant proposes implementing the following TDM strategies:

- Unbundle parking costs and the cost of lease and/or purchase;
- Provide at least 66 long-term bicycle parking spaces in a bicycle room and a bicycle repair facility;
- Provide at least 10 bike racks in the public space adjacent to the site on 30th Street;
- For each new resident who does not own a personal bicycle, offer a Capital Bikeshare membership for the initial term of the lease. This provision is to be provided for the life of the project;
- For each new resident not already possessing a SmarTrip card, provide a registered card with an initial value of \$20;
- Offer each new resident a membership in both a traditional and point-to-point car share program for the initial term of the lease. This provision is to be provided for the life of the project;
- Provide a free download of a multimodal trip planning App to all residents;
- Install a transit screen in the main residential lobby showing real-time alternative transportation information; and
- Provide information and/or links to various alternative transportation providers and services;

The Applicant also proposes the following elements as part of the TDM plan:

- Provide accommodation for four parking spaces along the property frontage on 30th Street;
- Designate and 18' pick-up/drop-off area immediately in front of the property on 30th Street; and
- Create two additional metered spaces for retail parking immediately in front of the property on M Street.

While DDOT is supportive of the Applicant's proposal to close existing curb cuts thereby making new curbside space available, the use of the new curbside space will need to be determined during public space permitting process. Additionally, these three measures do not qualify as TDM strategies because they are not specifically designed to discourage auto use and/or encourage non-auto transportation modes. Accordingly, these three measures should not be included in the Applicant's TDM plan.

DDOT finds the Applicant's other TDM measures are an excellent basis for encouraging the use of alternative modes of transportation. However, the following enhancements and/or clarifications are needed to further strengthen the plan:

- DDOT finds that personal bicycles and bikeshare trips serve different purposes. Many Capital Bikeshare users who also own personal bicycles may elect to use Capital Bikeshare when a round trip bicycle trip may not be practical or feasible. Therefore, the Applicant should offer the Capital Bikeshare membership to all tenants rather than only tenants that do not own personal bicycles.
- DDOT finds that the success of bikeshare and car share membership incentives as trip reduction measures depend on the continuous use of the programs. Accordingly, the Applicant should offer *annual* memberships rather than memberships of another time duration (e.g. daily, monthly, etc.). If the lease duration is shorter than one year, the memberships in the bikeshare and car share program may be reduced to match the duration of the lease.

Loading

To accommodate site-related trash and loading needs, the Applicant proposes a 30-foot loading berth and a 20-foot service vehicle facility on 30th Street. The Applicant seeks relief from the 55-foot truck loading requirement. The small, furnished residential units are unlikely to generate significant loading activities, and DDOT finds that the proposed loading facilities are adequate to meet the anticipated residential and retail loading needs.

The Applicant is seeking to re-use the existing loading facilities and proposes to access the area via a curb cut on 30th Street. Trucks are proposed to back-in to the loading facilities, which is contrary to DDOT's Design and Engineering Manual (DEM) (Section 31.2.3.2). While the back-in loading does not meet DDOT standards, the Applicant may receive approval for a curb cut in this location because the loading facility is existing and the building footprint is not being substantially redesigned. To receive approval, the Applicant must enact measures to mitigate the safety and operations impacts of the back-in truck movements, including a Loading Management Plan. To mitigate loading impacts, the Applicant proposes a Loading Management Plan that includes the following elements:

- Assign a building dock manager;
- Require all tenants to schedule deliveries that utilize the loading dock. If a restaurant or food store is included as the anchor retail tenant, the tenant shall designate its own loading manager to coordinate with the building's dock manager;
- Schedule deliveries in such a way that the deliveries do not exceed the dock's capacity. In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver shall be directed to return at a later time when a berth will be available so as to not impede 30th Street operations;
- Monitor inbound and outbound truck maneuvers to ensure that trucks accessing the loading dock do not block vehicular traffic from accessing 30th Street or adjacent driveways;
- Monitor loading activities and adjacent traffic operations and employ management measures if necessary to reduce conflicts between truck, vehicular and pedestrian movements;
- Trucks using the loading dock shall not be allowed to idle and must follow all District guidelines for heavy vehicles;
- Disseminate suggested truck routing maps and other written materials to the building's tenants and to drivers from delivery services that frequently utilize the loading dock;

- Coordinate with the community quarterly to discuss any specific issues regarding the loading dock and/or loading operations; and
- Coordinate with bicycle access to the building via the access from 30th Street. The bicycle access must remain available at all times and not blocked by delivery vehicles.

The proposed loading management plan is a good basis for mitigating the back-in loading maneuvers. However, additional analysis and/or supplementary mitigation measures may be required during the public space permitting process as part of the review of the curb cut. Ultimately, the curb cut will require approval from the Public Space Committee.

Streetscape and the Public Realm

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 and gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site. As part of this process, 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 circulating around it. The Applicant may refer to the DC Municipal Regulations and DDOT's Design and Engineering Manual for specific controls of public space.

All existing curb cuts with the exception of the curb cut serving the existing loading facilities are expected to be closed as part of the project. Due to the change in the building uses, the existing loading curb cut will be considered expired and a new public space permit will be required. As noted in the Transportation Demand Management section above, the Applicant included proposed uses for the new curbside space generated from the closure of existing curb cuts in the TDM plan. While DDOT is supportive of the Applicant's proposal to close existing curb cuts thereby making new curbside space available, the use of the new curbside space will need to be determined during the public space permitting process.

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