

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**DEPARTMENT OF TRANSPORTATION**



**d. Policy, Planning, and Sustainability Administration**

**MEMORANDUM**

**TO:** Lloyd Jordan  
Chairperson  
Board of Zoning Adjustment

**FROM:** Samuel Zimbabwe *fs*  
Associate Director

**DATE:** February 3, 2015

**SUBJECT:** BZA Case No. 18916 – 49<sup>th</sup> Street Developer, LLC – 4700 block of East Capitol Street, SE

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**APPLICATION**

49<sup>th</sup> Street Developer LLC (the “Applicant”) pursuant to 11 DCMR § 3104.1, for a special exception from the new residential developments requirements under § 353, to construct a new affordable multi-family residential development for seniors and 21 affordable single-family dwellings in the R-5-A District on undeveloped land at the intersection of East Capitol Street, S.E. and 47th Street, S.E. (Square 5348, Lots 1-8). The project will consist of 178 senior rental units with 120 parking spaces and 21 for-sale row houses with 22 parking spaces.

**DDOT FINDINGS 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. DDOT met with Applicant on November 5<sup>th</sup>, 2014 to discuss the project and expected scope for review, and on December 2<sup>nd</sup> 2014, a final scope was submitted. After review of the case materials submitted by the Applicant, DDOT finds:

- The Applicant submitted an insufficient transportation review two weeks late and did not complete a Comprehensive Transportation Review (CTR);
- The proposed mode split is not commensurate with the amount of parking provided or the expected senior population dependency on vehicle and shuttle use;
- Due to the incomplete analysis, the transportation impacts of this project are unknown;
- Loading provisions meet zoning requirements, but impacts regarding turning movements and backing maneuvers are unknown;

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- 60 long-term bicycle racks are proposed in the senior building, which meet regulations, even though they are exempt; and
- The senior residential building will provide 400% above the required zoning vehicle parking spaces.

## **RECOMMENDATION**

Due to the lack of information provided by the Applicant, DDOT cannot support the special exception request, until a CTR commensurate with the proposed zoning action is completed and submitted for review as had been scoped with the Applicant in December 2014. Additionally, DDOT's East Capitol Pedestrian Study identified concerns along the corridor and a CTR would identify any needed mitigations. If a CTR meeting DDOT requirements is submitted, a recommendation can be provided in 21 days.

## **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.

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 CTR should be performed according to DDOT direction. Here, however, the Applicant did not submit a CTR based on our agreed upon scope, and instead submitted a four page traffic statement two weeks late that is insufficient to determine the impacts of the proposed project on the District's transportation network. DDOT did contact the Applicant in order to address the incomplete submission, but was informed that they would not be submitting any additional information.

## **Site Design**

Site design, which includes site access, loading, and public realm design, plays a critical role in determining a proposed action's impact on the District's infrastructure. While transportation impacts can change over time, the site design will remain constant throughout the lifespan of the proposed development, making site design a critical aspect of DDOT's development review process. Accordingly, new developments must provide a safe and welcoming pedestrian experience, enhance the public realm, and serve as positive additions to the community.

### Site Access

Vehicular access will be provided via one curb cut from 47<sup>th</sup> Street south of East Capitol Street for the below grade parking garage serving the senior housing building. Two additional curb cuts from 47<sup>th</sup> Street and 49<sup>th</sup> Street will access an internal private alley that will serve the townhomes as well as the loading facilities for the senior housing building. Pedestrian access for the senior housing building will be provided from the southeast corner of the East Capitol Street/47<sup>th</sup> Street intersection and pedestrian access for the townhomes will be provided from each unit along the 47<sup>th</sup> and 49<sup>th</sup> Street frontages.



Figure 1. Proposed Site Plan (Source: Gorove/Slade)

### Loading

DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm. This often results in loading being accessed through an alley network.

The Applicant did not provide any truck turning movements as had been expected and DDOT cannot determine any impacts related to turning movements or backing maneuvers without the required analysis.

### Travel Assumptions

The purpose of the CTR is to inform DDOT's review of a proposed action's impacts on the District's transportation network. To that end, selecting reasonable and defensible travel assumptions is critical to developing a realistic analysis. DDOT does not agree with the mode split the Applicant used in order to justify that they did not trigger a CTR.

### Off-Street Vehicle Parking

According to the Applicant, the proposed senior building requires 30 off-street parking spaces and the townhouses require 21 off-street parking. The Applicant proposes 120 parking spaces for the residential building and 42 parking spaces for the townhouses. The proposal is 400% above existing zoning requirements and is expected to induce an increase in vehicular trips. Requests regarding how the

spaces would be allocated to residents, visitors, and staff went unanswered, thus impacts are not known.

#### Trip Generation

The Applicant used the following mode: 35% transit, 60% auto, 4% walk, 1% bike. This mode split is inconsistent with the level of parking being supplied to the project or with senior reliance on shuttling services. As such, DDOT had requested a mode split of 65% auto use in their analysis.

#### Study Area and Data Collection

The Applicant initially identified the following six (6) intersections where detailed vehicle, bicycle, and pedestrian counts would be conducted and a level of service analysis would be performed:

1. Benning Road and East Capitol Street
2. 47<sup>th</sup> Street SE and East Capitol Street
3. 49<sup>th</sup> Street NE and East Capitol Street
4. 49<sup>th</sup> Street SE/Sycamore Road NE and East Capitol Street
5. Central Avenue and East Capitol Street
6. 47<sup>th</sup> Street SE/Astor Place SE and 49<sup>th</sup> Street SE

During scoping, DDOT requested that the 49<sup>th</sup> St and Central Ave Central Ave and Sycamore Ave intersections be included in the review.

DDOT was expecting to see all of the above intersections in their CTR, but the Applicant without DDOT's knowledge or consent decided to retract their scope and provide a minimal traffic statement two weeks late.

#### **Analysis**

To determine the action's impacts on the transportation network, a CTR includes an extensive multi-modal analysis of the existing baseline conditions, future conditions without the proposed action, and future conditions with the proposed development. The Applicant did not complete their analysis based on the assumptions agreed to during scoping.

#### Roadway Capacity and Operations

Analysis was not provided as requested.

#### Transit Service

The site is located approximately 1,100 feet (or less than one quarter of a mile) from the Benning Road Metro Station which serves the Blue and Silver Lines. In addition, five (5) Metrobus lines serve the site directly from a bus stop adjacent to the proposed main entrance of the senior housing building on East Capitol Street (96, 97, U5, U6, and W4 lines) and one additional line (U8 line) serves Benning Road, less than 1,000 feet from the site.

It is unclear if adequate headways or pedestrian access to these facilities exist in context with the project.

### Pedestrian Facilities

Analysis was not provided as requested. It is unclear if the existing pedestrian network can support the expected pedestrian mode split.

### Loading

The Applicant did not provide any truck turning movements as had been expected and DDOT cannot determine any impacts related to turning movements or backing maneuvers without the required analysis.

### Bicycle Facilities

The Applicant did not provide any analysis in their traffic memo, but according to their pre-hearing statement, they propose 60 bicycle spaces in the senior building. Due to the lack of coordination, the Applicant is unaware that a senior building is exempt from the bicycle parking requirements, thus DDOT would not expect this high level of parking, but sufficient bicycle parking for visitors and staff will need to be accommodated.

### 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 sight distance analysis along the public space where conflicts between competing modes (e.g. crosswalks, driveway entrances, etc.) can be expected.

Analysis was not provided as expected.

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