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
Associate Director

DATE: April 7, 2015

SUBJECT: **BZA Case No. 18977** – 3220 Prospect Street NW

APPLICATION

Weaver Prospect, LLC, WT Weaver & Sons Inc., and McCaffery Interests, Inc. (jointly the "Applicant") request a loading variance to allow the construction of a two-story approximately 30,000 square foot retail center building in the C-2-A District of the Georgetown Historic District at premises 3220 Prospect Street NW (Square 1207, Lots 104, 838, 839, 840, 841, 843, and 906) (the "Site").

RECOMMENDATIONS

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 review of the case materials submitted by the Applicant, DDOT finds:

- Loading and trash pickup for the building can be conducted within a dedicated on-street loading zone to be designed during the public space permitting process;
- Extensive existing loading activities for other businesses in the block will result in an on-street loading zone area shortfall;
- 96 vehicular parking spaces are proposed onsite;
- Five long-term bicycle parking spaces will be provided; and
- The proposed Transportation Demand Management (TDM) plan will have minimal impact.

DDOT does not object to the Applicant's request for variance with the following conditions:

- Prohibit restaurant uses from the Site;
- Install at least eight internal long-term bicycle parking spaces;
- Install at least ten short-term bicycle parking spaces within the public space surrounding their Site;
- Designate a loading coordinator responsible for ongoing monitoring of this property's business, as well as loading activity for other businesses on the block;

- Prohibit employee- or customer-discounted vehicle parking in the garage;
- Unbundle parking costs from lease provisions; and
- The Applicant design and install a loading zone and street configuration to be approved by DDOT.

CONTINUED COORDINATION

Given the proposed development and action, the Applicant is expected to continue to work with DDOT on the following matters:

- Public space, including curb and gutter, street trees and landscaping, street lights, sidewalks and lead walks, and other features within the public rights of way, are expected to be designed and built to DDOT standards;
- Design plans showing the agreed on-street loading solution agreed to, as part of the public space permitting process;
- All utility vaults are expected to be accommodated on private property; and
- A loading management plan as well as a curbside management plan should be provided as part of the public space permitting process. DDOT expects all loading facilities to meet DDOT standards, which includes no back-in movements across public space.

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 Comprehensive Transportation Review (CTR) should be performed according to DDOT direction. The Applicant and DDOT coordinated on an agreed-upon scope for transportation documentation that is consistent with the scale of this action. An outline of this project's impacts follows below. The proposed Site plan is shown in *Figure 1*.

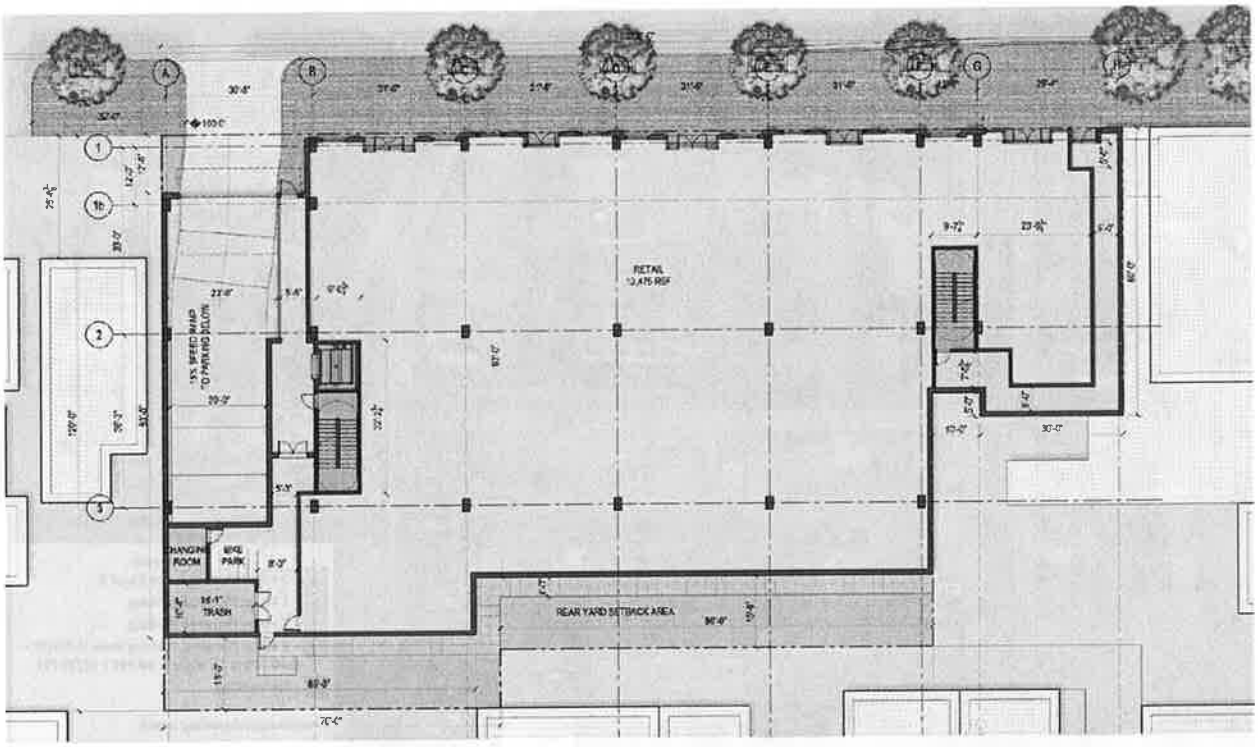

Figure 1. Proposed Site Plan (Source: Applicant)

Vehicle Parking and Roadway Operations

The development is replacing an existing surface parking lot that contained 86 spaces. The proposed building is providing 96 vehicular parking spaces, the provision of which exceeds zoning regulation to provide 90 spaces. These spaces will be provided in a subsurface parking garage accessed via a curb cut and driveway from Prospect Street.

To illustrate the parking needs in the area, a utilization survey was conducted for existing on-street parking. This block of Prospect Street transitions from commercial uses at the east end near Wisconsin Avenue to residences further west on the south side. On the south side of the street there is an existing 55 foot loading zone just west of the Wisconsin intersection, approximately five parking meters, and then residential permit parking until the Potomac Street NW intersection. On the north side of the street there is no parking anytime. In the agreed parking study area, there are 85 total available spaces, with over a 100% occupancy rate observed in the 1:00 PM peak hour. The on-street parking study area is shown on Figure 2.

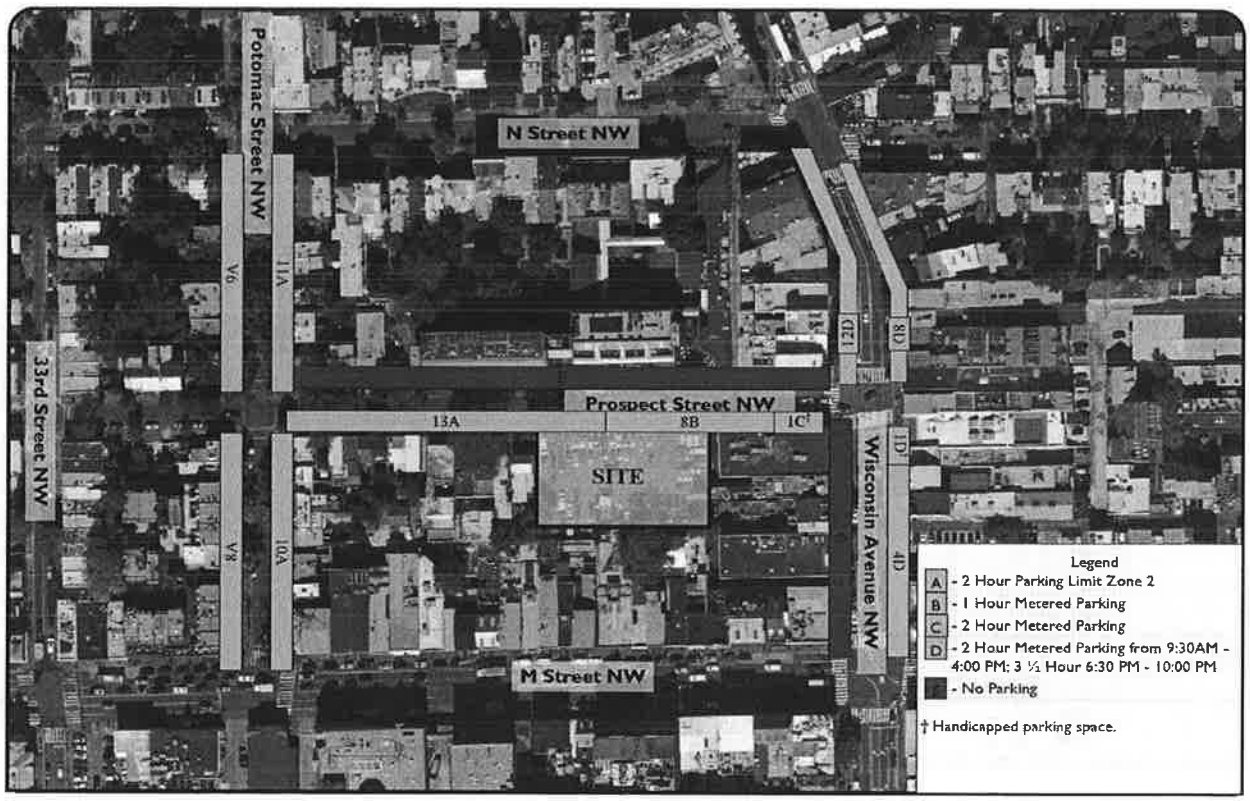

Figure 2. On-Street Parking Study Area (Source: Applicant)

The projected trip generation for the Site expects 46 auto-based trips originating in the PM peak hour, illustrating a modest amount of driving anticipated on a day-to-day basis. Users of this garage will include commuters using it to park during their workday as well as customers and employees of the retail establishments.

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods and services. As part of the evaluation of travel demand generated by the site, DDOT requests analysis of traffic conditions for the agreed upon study intersections. Here, analysis included these intersections:

- Prospect Street/Wisconsin Avenue
- Prospect Street/Potomac Street
- Prospect Street/site driveway

Analysis provided by the Applicant shows that vehicle traffic impacts from the action will minimally impact the operations of intersections in the study area as measured by Level of Service (LOS). All intersections will operate at a LOS A or B. While the queue lengths at some intersections increase as a result of the proposed development, as shown in Table 1, these changes in queue lengths are relatively minor. In addition, the Applicant has also proposed TDM measures to further alleviate vehicle operations and parking needs.

Approach	Available Storage†	Existing Conditions	Background Conditions	Total Future Conditions
1. Prospect Street/Wisconsin Avenue				
EBLR	290'/590'	92	96	109
NBLT	225'	90	93	94
SBTR	205'	90	93	93
2. Prospect Street/Potomac Street				
EBTR	185'	15	18	18
WBLT	300'/590'	38	38	43
SBLTR	245'	35	38	38
3. Site Driveway/Prospect Street				
WBLT	-	-	-	1
NBLR	-	-	-	3

† All distances measured to **nearest intersection** or end of turn lane, as appropriate. Where two storage lengths are given, the first is the distance to the driveway, the second is the distance to the nearest **intersection**.

Table 1. Synchro 95th Percentile Queue Summary (in feet) (Source: Applicant)

Pedestrian, Bicycle, and Transit Facilities

Customers or employees without autos will utilize the transit, walking, and bicycling infrastructure available to this development. The development is served via Metrobus by way of routes 38B, D5, 30N and 30S, 31 and 33, and two DC Circulator routes. The nearest Metro station is at Foggy Bottom – GWU, which is located approximately one mile southeast from the Site. All these buses provide access from near the Site to the Metrorail.

Pedestrian access throughout Georgetown is provided via the street network, and for bicyclists via on-street bicycle facilities on 33rd Street and 34th Street and the Capital Crescent Trail near, with two Capital Bikeshare stations located nearby. The Applicant is proposing provision of five long-term bicycle parking spaces within the building, and has committed to provide at least some short-term spaces within public space surrounding the building. DDOT seeks provision of at least eight long-term bicycle parking spaces, based on the Applicant planning for four tenants, which would provide two spaces per tenant. In addition, the Applicant should provide ten short-term spaces to serve customers, the equivalent of five racks.

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 mode areas and limiting any hindrance to traffic operations. For new developments, DDOT standards require 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 or an approved loading location. Here, however, the Site does not have access to an alley.

Per District code, this retail building requires a minimum of two 30' loading berths, two 100 sf loading platforms, and one 20' service/delivery space. The project as proposed provides no internal loading facilities, and proposes all loading and trash activities occur on-street. Internal loading was deemed impractical due to the impacts on vehicle parking and the high cost of going down an additional parking level due to subterranean bedrock. The Applicant anticipates their loading needs to be approximately 11 deliveries per week. This is based on existing deliveries to similar dry goods retailers in the Georgetown area, which is the anticipated use for this building. This is a relatively light loading activity compared to other uses such as restaurants. Therefore, DDOT seeks a condition that this building indeed be restricted

to non-restaurant uses, which would limit the extent of on-street loading, and match what the Applicant has assumed within their transportation analysis.

This proposal is further complicated by the extensive existing loading activity on this block of Prospect Street. This is a busy, congested commercial area. There is an existing 55' loading zone at the east end of the block, just west of Wisconsin Avenue. The Applicant states that this zone is underutilized. However, commercial vehicles, delivery trucks, and garbage trucks frequently stop on the north side of Prospect Street in the lane of traffic to service the restaurants and offices located midblock on that side of the street. These activities restrict Prospect to one lane during times of loading use, creating a safety hazard. While not permitted, these activities are frequent, occurring throughout the day, and at times with up to five vehicles stopped at one time. An on-street loading solution would need to be reactive to this unpermitted activity occurring in close proximity to the proposed project, and help ameliorate this situation while supporting the loading activity of the proposed development. And DDOT anticipates continuing to enforce in this area to ensure loading activity is conducted properly.

As part of this zoning action, DDOT required that workable loading concepts be developed for on-street loading to support the action sought and to demonstrate this building can be later permitted as part of the public space permitting process. As such, the Applicant developed four on-street loading concepts for this block. These include:

- Option A – Existing Conditions
- Option B – 120' Proposed Loading Zone
- Option C – New 60' Loading Zone
- Option D – Loading Zones on North and South Sides

Option	Shortfall	Parking Spaces Gained/Lost
Option A – Existing Conditions	140'	+1
Option B – 120' Proposed Loading Zone	75'	-3
Option C – New 60' Loading Zone + 55' Existing Zone	80'	-2
Option D – Loading Zones on North and South Sides	45'	-7

Table 2. Options Comparison (Source: Applicant)

All proposed solutions would recognize a shortfall of loading space based on the service/delivery/trash trucks anticipated, however this is caused in part by the current loading activity occurring. The three options with modifications of on-street loading would require removal of existing on-street vehicle parking spaces.

To illustrate that the building's loading needs can be accommodated by the provided facilities, a loading management plan was developed by the Applicant. The plan as outlined by the Applicant will include:

- A dedicated loading coordinator to facilitate loading operations;
- Scheduled deliveries, with no accepted deliveries outside the posted zone hours;
- Ongoing truck activity monitoring by the loading coordinator;
- No idling during loading activities;
- Dissemination of routing maps to alert drivers that the Site must be approached in the correct direction to utilize the proposed loading zones; and
- Trash will be wheeled from the building to the trash trucks.

While these on-street loading accommodations are not optimal for accommodating the loading needs of the entire block, commitment by the Applicant to work with DDOT towards the optimal on-street solution is adequate. For loading to occur in the building, the Applicant has stated that parking would need to be removed to below the zoning parking requirement. Thus, there is a choice between less parking and on-street loading. In this circumstance—considering the high level of auto trips to the Georgetown area, existing high on-street parking utilization, the community's desire for added parking, familiarity by users of the existing parking lot, and the proposed loading management plan—pursuit of on-street loading may be better than a parking reduction.

Thus, DDOT finds that the commitment to work with DDOT towards a proposed on-street loading solution is sufficient to warrant approval of a loading variance in this instance, with the condition that no restaurant use occurs. DDOT expects the Applicant to comply with DDOT's standards for loading, the details of which will be addressed further, including selection of a preferred loading option alternative, as part of the permitting process for this property. It is possible one of the above options, or instead other alternatives (for instance, loading zones located near the existing loading zone or on the north side of the street only), may ultimately be DDOT's preference.

Transportation Demand Management (TDM)

According to the Applicant, their TDM plan includes:

- Both Employee-based and Visitor-based information dissemination of transportation options; and
- Provision of some short-term bicycle parking spaces within public space surrounding the development.

These basic TDM measures, intended to encourage the use of alternative modes of transportation, are not robust. Additional conditions have been proposed, as outlined within the recommendations of this report, to include the specific number of bicycle short-term spaces provided, additional long-term spaces, parking garage operational guidelines, and greater specificity in the role of the loading coordinator.

Streetscape and 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 gutters, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the Site. This Site will also include an in-street loading zone.

The Applicant must work closely with DDOT and the Office of Planning 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. In conjunction with the District of Columbia Municipal Regulations, DDOT's *Design and Engineering Manual* will serve as the main public realm references for the Applicant. As such, all public space shall be designed and constructed to DDOT standards.

DDOT's lack of objection or discussion of other public space elements as part of the zoning variance should not be viewed as an approval of public space elements. Final design of the public space will be determined during DDOT's public space permitting process.

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