

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

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d. Policy Planning and Sustainability Administration

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

FROM: Sam Zimbabwe *sz*
Associate Director

DATE: November 19, 2012

SUBJECT: ZC Case No. 12-15 – Gallaudet University 2022 Campus Plan and Further Processing

APPLICATION

Gallaudet University (the "Applicant") proposes to increase their student population between 1-3% annually during the next ten years, reduce parking from 1,588 to 1,381 spaces, and increase the Kellogg Conference Center guest rooms from 93 to 135 rooms. In addition, the Applicant is proposing a further processing application to convert two administrative buildings into residence halls.

RECOMMENDATION IN BRIEF

The District Department of Transportation (DDOT) reviewed the Applicant's Traffic Impact Study (TIS) along with an updated TIS responding to initial DDOT inquiries. DDOT expects minimal impacts to traffic conditions resulting from the approval of the proposed Campus Plan. However, DDOT has concerns with the level of documentation of assumptions in the transportation analysis, completeness of the pedestrian evaluation, and access. Specifically:

- Trip generation assumptions and assumptions underlying the traffic analysis are not documented. As such, the reliability of the traffic analysis cannot be verified. DDOT believes the projected trip generation and analysis is reasonable, however robust documentation must be provided. The analysis should be revised to include separate pedestrian and bicycling mode splits and counts to better understand how students and staff arrive to the campus;
- Requested pedestrian analysis was not provided. The Applicant should complete a full pedestrian access analysis that proposes appropriate mitigation measures;

- The Applicant has not clearly indicated their intention for the access point at 7th St on Florida Avenue currently closed to vehicles. The TIS does not discuss any changes to the existing access points, but this is not noted in other campus plan documentation. DDOT does not support the opening of this access point to vehicle use.
- Large trucks are shown encroaching on existing curbs and opposing traffic lanes when exiting the 8th Street and Florida Avenue gate. The Applicant should provide truck turning templates for all campus access points and a supporting loading plan requiring large vehicle access at appropriate locations.

Upon completion of these efforts, DDOT can provide further comment and may identify additional mitigations. DDOT would prefer to receive this information in an updated TIS document, rather than supplemental technical memoranda.

DDOT is also initiating a pedestrian improvement planning effort for Florida Avenue in the vicinity of the campus at the request of ANCs 6A and 6C and Gallaudet University. This effort will begin in January 2013 and will last six to nine months. As part of this effort, DDOT expects to identify a variety of pedestrian improvements that link the Gallaudet Campus area to the Florida Market and NoMA. These improvements could potentially mitigate the current pedestrian and transit access issues facing campus visitors, and DDOT looks forward to working with Gallaudet to identify and implement necessary facilities in the area.

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 of transportation are adequate to accommodate new travel demand while discouraging single occupancy vehicle trips. The following analysis evaluates the Applicant's TIS to determine its accuracy and consistency with the District's vision and goals for its transportation network.

Roadway Network, Capacity, and Operations

Trip generation is the basis of any traffic analysis. The process of projecting trip generation usually relies integrating information from multiple sources to produce a reasonable estimate. Often Applicant's review reference manuals, assess similar facilities, and study relevant research in the process of assessing trip generation. These efforts are documented for DDOT to confirm that the estimate is reasonable. The Applicant did not adequately document their efforts. It appears that the estimate is reasonable but this cannot be determined unless the process is explained. Since trip generation is the basis of any traffic analysis and its reliability cannot be confirmed, DDOT cannot evaluate the Applicant's analysis.

Further, DDOT provided the Applicant with source files from our 2010 NoMA: North Massachusetts Avenue Neighborhood Access Study and Transportation Management Plan to be included in their TIS as input for their analysis. The TIS failed to thoroughly document how and what data/information was used. Additionally, the TIS lacked proper documentation, citation, and analysis regarding the background traffic, regional growth rate, and trip generation rates. Without proper documentation, it cannot be known if the analysis produced by the Applicant is reliable.

The Applicant should revise and resubmit the analysis with proper explanation and documentation. DDOT requests the ability to evaluate the updated submission and comment appropriately.

Safety

DDOT's policy is to require that applicants conduct safety analyses to demonstrate that specific land developments will not create or exacerbate new or existing safety issues for all modes of travel. The TIS reviewed crash data and accident rates. According to the analysis, the crash ratios did not meet the threshold for further study.

Bicycle and Pedestrian Facilities

Per the Applicant, there are 251 bike racks and a Capital Bikeshare station within the campus. According to the TIS, the Applicant proposes to add bicycle racks to underserved areas and phase out the existing racks that are not currently recommended by DDOT with recommended inverted U-racks. DDOT recommends that these additional racks be located at the main entrance of each building in order to facilitate ridership and access. These secured bicycle parking spaces should be easily accessible and visible to users.

DDOT requested an evaluation of all sidewalks and curb ramps within the study area and along routes to the NoMA – Gallaudet U Metro Station. The evaluation would determine if the facilities meet ADA and DDOT standards and if the facilities are adequate to accommodate future pedestrian demand to be generated by the campus. This analysis was not provided.

The TIS did note that sidewalks are missing along the west side of West Virginia Avenue and Corcoran Street NE adjacent to the campus leading to the West Virginia Avenue Campus gate. This gate is well used by pedestrians accommodating 80 peak hour pedestrians. DDOT recommends that the Applicant construct the missing sidewalk along their property on West Virginia Avenue and Corcoran Street NE in order to improve pedestrian safety, access, and mobility. Furthermore, DDOT requests that the Applicant complete the evaluation of pedestrian facilities and propose appropriate mitigations measures to support the potential increase in student pedestrian activity.

In addition, DDOT requests that the Applicant revise its baseline analysis of the existing site mode split to include separate pedestrian and bicycling counts to better understand how many students and staff arrive by bicycle and foot. Currently, the data provided has combined both walk and bike counts into one figure. These data points should be separated, given that the needs to support, encourage, and ultimately increase each mode are distinct from one another. This analysis will assist in developing realistic mode split goals and performance monitoring analysis in support of their Transportation Demand Management (TDM) strategies.

Transit Services

DDOT and the Washington Metropolitan Transportation Authority (WMATA) have partnered to provide extensive public transit service in the District. DDOT's vision is to leverage these investments to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

According to the survey analysis in the TIS, transit use is low given the campus' close proximity to the NoMa – Gallaudet U Metro Station and various high frequency bus routes. DDOT expects that the Applicant will establish mode split goals for increased transit usage as part of their TDM strategies and performance monitoring. DDOT expects that with increased transit usage, the current shuttle service could become obsolete, given that they were established prior to the construction and opening of the nearby Metro station.

Site Access and Loading

There are four vehicular entrances to the campus; Florida Avenue and 8th Street, 6th Street and Neal Place, West Virginia Avenue, and Brentwood Parkway. The Applicant initially proposed reopening the historic gate at 7th Street and Florida Avenue to vehicular access. Given its proximity to other signalized intersections and geometrics of area intersections, DDOT does not support this proposal. Per the submitted TIS, the Applicant has since removed this proposal however the pre-hearing submission on November 13th, 2012 includes this proposal on page 14. The Applicant should clarify their intentions.

According to the TIS, trucks primarily enter the campus from the main gate at Florida Avenue and 8th Street, but occasionally use the other three access points depending on the delivery destination. The TIS provided analysis for truck maneuvering at the Florida Avenue and 8th Street gate, but not for the other three entrances. According to the analysis, a 55-foot truck has to swing out onto the oncoming traffic lane to make a right on Florida Avenue. This is a safety concern and is unacceptable. DDOT requests that the Applicant provide truck turning analysis for all gates and provide a loading plan to ensure that large trucks are accessing the campus at appropriate locations.

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. Given the site location and existing school shuttle services, DDOT expects medium demand for parking on the site.

Currently, there are 1,588 parking spaces on the campus and the Applicant proposes to reduce parking to 1,381 spaces. According to the Applicant's parking survey, there is a 76% campus occupancy rate, demonstrating that existing parking demand is accommodated without needing the 6th Street overflow parking lot that is proposed to be eliminated. The Applicant estimated future parking demand by multiplying the growth in student population and conference center with the peak hour trip generation estimates. These estimates are not based on students who live and park on campus, but on student commuters, currently estimated at 4%. Thus parking demand might be higher than calculated in the TIS. Despite the potential discrepancy, DDOT concludes that future parking needs can be accommodated on site with the proposed parking reduction, as long as the Applicant implements appropriate TDM measures, specifically those related to parking pricing. The Applicant has proposed to analyze parking fees in order to further minimize demand and increase alternative modes of transportation. DDOT recommends that the final TDM plan include a requirement of aggressively priced parking.

Streetscape and Public Realm

In accordance 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.

As part of the campus plan, the Applicant proposes to create a new pedestrian entry to the campus at the corner of 6th Street and Florida Avenue. All impacts to the public right-of-way will need to be reviewed and approved through our permitting process.

Transportation Demand Management (TDM)

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 mass transit, bicycle and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods.

The Applicant has proposed 30 different TDM measures described in their TIS, which are appropriate for the site given the expected low trip generation rates. In addition, DDOT recommends that the Applicant designate a TDM coordinator to evaluate and oversee the implementation of all TDM measures and establish mode split goals by each mode (walk, bike, transit, and automobile) for both staff and students.

Performance Monitoring & Measuring

DDOT recognizes the continuing impact that developments can have on the transportation network and local community, and therefore requires the Applicant to compose a performance monitoring plan. This plan should consist of the establishment of benchmark goals with regard to TDM measures, along with a commitment to increase TDM efforts should the Applicant fail to reach these goals.

DDOT supports the Applicant's proposal to conduct biennial surveys, counts, and reporting regarding their transportation impacts and the success of its TDM measures. As discussed previously, DDOT recommends that the Applicant designate a TDM coordinator, who will oversee all TDM commitments, reporting, and analysis. As part of this effort, DDOT expects that mode split goals are established for each individual mode along with specific measurable strategies to support the mode increase. Given the minimal likelihood of traffic impacts resulting from implementation of the campus plan, DDOT recommends the Applicant engage in a self-monitoring program and not be subject to report submission or threshold adherence.

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