

TAB G

Parking – Transit Demand Management (“TDM”) Plan

As noted, the Modified Project provides 44 parking spaces in two below-grade garage levels. As identified in the Board’s approval of the 2016 Approval, requiring additional parking spaces would be a practical difficulty due to the Property’s small size, irregular shape, and required ramping. Accordingly, in the Order, the Board granted an area variance for 76 parking spaces. That relief was supported by both OP and DDOT.

Although no parking is required under ZR16, the Modified Project will implement the TDM measures approved in the 2016 Approval, namely:

- **Transportation Management Coordinator (“TMC”)** - The TDM plan will be implemented and managed by a selected coordinator at the Project, who will be charged with the preparation and distribution of TDM information and promotional brochures to residents, hotel guests, visitors, and employees.
- **TransitScreen** - A TransitScreen will be installed in the hotel and residential lobbies to provide residents, hotel guests, visitors, and employees available transportation choices and provide real-time transportation updates.
- **Marketing Program** - The TMC will establish a TDM marketing program that provides detailed transportation information and promotes walking, cycling, and transit. With respect to hotel guests, the TDM marketing program will include a multi-level approach, as follows:
 - Prospective guests will be informed about parking and alternate modes of transportation as part of the pre-reservation and reservation process, through check-in. Detailed transportation and parking information will be prominently displayed on:
 - The hotel and restaurant websites
 - Online Travel Agency (OTA) websites
 - Other on-line booking and informational website the hotel or restaurant partners with (including rating review websites)
 - Email booking confirmations
 - Email booking reminders
 - Verbally via reservationists
 - Printed brochure available for distribution
 - Hotel confirmations will contain notice to guests that limited parking is available on-site and that the hotel encourages and emphasizes alternative modes.
- **Hotel Guest Transportation Incentives:** The TMC will coordinate, daily Capital Bikeshare passes to hotel guests as a part of Capital Bikeshare's Bulk Membership program for hotels.

- Bicycle Amenities: The Project provides 14 bike spaces on site, a rate that exceeds the requirements of ZR-58 and will be provided consistent with the requirements of ZR16 in Subtitle C § 801.
- Ride-matching/Ridesharing Program: Employees who wish to carpool will be provided detailed carpooling information as part of the TDM marketing program and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments.

TAB H

2016 Approval Relief Granted: BZA Case No. 19169

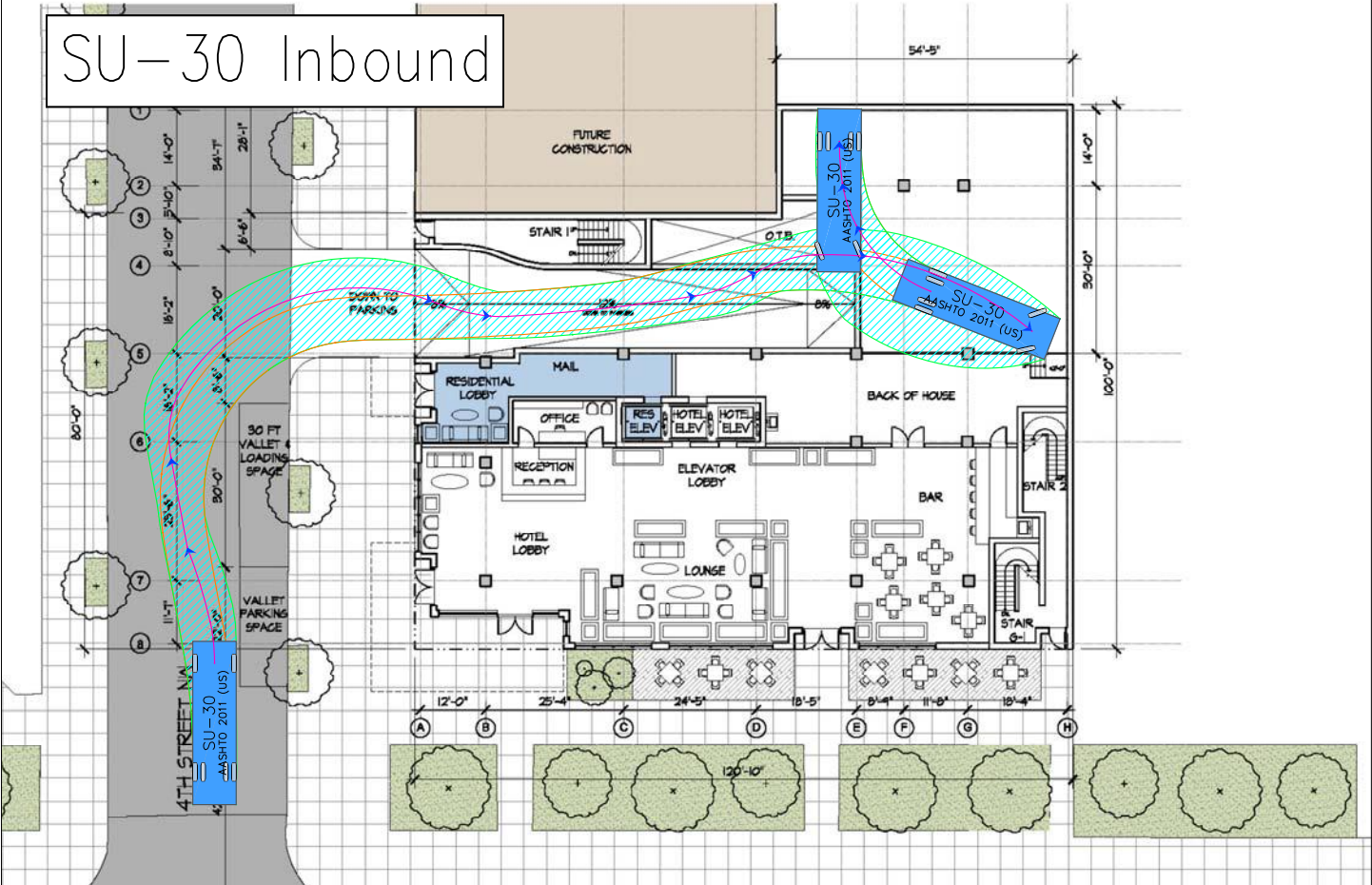
Type of Relief	Required (under ZR-58)	Provided	Relief Granted
Rear Yard § 774.1	15'	0	100% rear yard relief
Parking § 2101.1	114 spaces	46 spaces	From 76 spaces
Loading § 2201.1	One 30' - loading berth One 100'-loading platform One 20' - service space	One 20'-service space	One 30' loading berth One 100' loading platform

Modification of Consequence Relief Requested: BZA Case No. 19169C

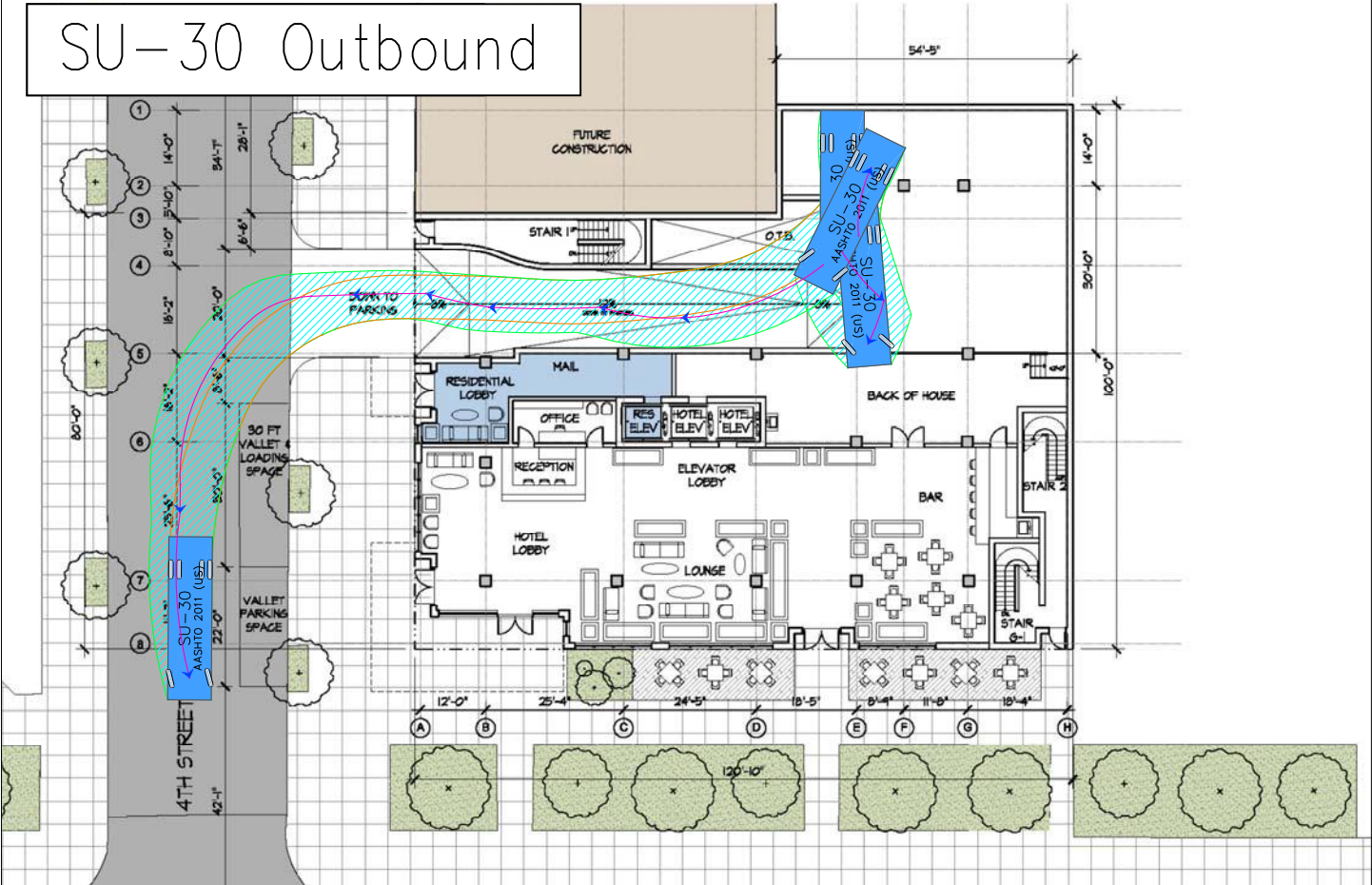
	Required (under ZR-16)	Provided	Relief Requested
<u>Loading</u> Subtitle C §§ 901.1; 904.1	Three 30' - loading berths + platforms Driveway slope of 12%	Two 20'-service spaces Driveway slope of 14% (Approval for one 30' - berth granted in 2016 Approval)	Two 30'-loading berths + platforms Driveway slope of 14%

TAB I

SU-30 Inbound



SU-30 Outbound



TAB J

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 *[Handwritten signature]*

DATE: February 16, 2016

SUBJECT: **Second Supplemental Report for BZA Case No. 19169 - 317 K Street NW**

APPLICATION

311 K Street LLC (the "Applicant"), pursuant to 11 DCMR § 3103.2, seeks variances from the rear yard requirements under § 774.1, the off-street parking requirements under § 2101.1, and loading requirements under § 2201.1 to construct a hotel and apartment building in the DD/DD-HPA/C-2-C District at premises 303-317 K Street NW (Square 526, Lots 20, 21, 804, 805, 824, 825, and 829). The Applicant proposes 30 furnished residential units, 200 hotel rooms, 46 vehicle parking spaces in lieu of the required 122 spaces, and one 20-foot service delivery space only in lieu of the required 30-foot loading berth and 20-foot service delivery space.

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;
- Residents, hotel guests, and employees are likely to heavily utilize non-automobile modes of travel, reducing the need for auto use;
- The proposed on-site parking provision of 46 spaces is 76 fewer than required by current zoning regulations, but exceeds the approved but not implemented zoning regulations by 18 spaces;
- Curbside parking availability in the vicinity is extremely limited;
- The Applicant secured Letters of Intent from several parking operators confirming that nearby private parking facilities appear sufficient to accommodate potential spillover parking;
- Due to the relative small size of the lot and the desire to avoid creating a curb cut on K Street, DDOT determined that a 30-foot loading berth could not be accommodated on-site without backing maneuvers;

- The Applicant and DDOT coordinated closely to create a functional 20-foot service/delivery space that will accommodate some on-site loading activity and lessen the demand placed on curbside loading;
- The Applicant plans to accommodate the project's loading and drop-off needs with a combined commercial loading and valet staging zone. The Applicant must apply to DDOT for the commercial loading and valet staging zone. DDOT's lack of objection to the loading variance request does not constitute approval for the curbside loading zone;
- The Applicant proposes a Transportation Demand Management (TDM) plan intended to minimize auto ownership and promote the use of non-auto travel options; and
- The Applicant proposes a Loading Management Plan intended to minimize impacts of the requested loading relief.

DDOT has no objection to the requested relief with the following conditions:

- Limit the financial incentive as part of the TDM plan to bikeshare and carshare memberships only. DDOT finds that bikeshare and car-share are more effective means to encourage long-term travel behavior change;
- Provide a minimum of 8 short-term bicycle parking spaces in public space near its entrance; and
- Strengthened the Loading Management Plan to require any delivery using a truck 20 feet in length or shorter to use the on-site service delivery space.

Continued Coordination

The Applicant is expected to continue to work with DDOT on the following matters:

- Design of the public realm, including utility vault location and treatment. If approved for the desired curbside uses, the Applicant will need to coordinate with DDOT on an appropriate streetscape that applies the Mount Vernon Triangle Streetscape Guidelines and preserves established trees while meeting the curbside use needs;
- DDOT approvals and permits for the requested commercial loading zone and valet staging area. Any proposal would need to be designed and operated in a way such that impacts to the existing curbside are minimized through time-of-day restrictions and combined spaces/areas; and
- The location of 8 short-term bicycle parking spaces in public space.

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 use is expected to be low, 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 adequate pedestrian and cycling connections to nearby land uses and transit facilities.

The Applicant's analysis found that excellent pedestrian facilities exist in the vicinity. All facilities immediately adjacent to the site and along major pedestrian routes to transit stations/stops meet current DDOT standards, providing excellent pedestrian connectivity for the site.

The site is within close proximity to several bicycle facilities, including a northbound bicycle lane on 5th Street north of New York Avenue, a westbound contraflow bicycle lane on M Street west of 9th Street, and sharrows on K Street immediately adjacent to the site. Local streets provide north-south and east-west bicycle connectivity and access to the designated bicycle facilities. Additionally, the site is located within close proximity to an existing 17-dock Capital Bikeshare station approximately 0.2 miles to the west of the site on 5th Street between K Street and L Street.

The Applicant is proposing 22 bicycle parking spaces in the parking garage. The Applicant is expected to provide at least 8 short-term bicycle parking spaces in the public space. The exact location of short-term bicycle parking spaces will be determined during the public space permitting process.

Transit Services

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

The Applicant evaluated the proximity of the subject site to the Metro and the adequacy of the bus service along the routes that serve the subject area. The proposed development is located approximately 0.5 miles from both the Gallery Place/Chinatown and Mount Vernon Square/7th Street/Convention Center Metro stations, which is approximately a 10 minute walk.

The site is well-served by high-frequency bus routes. Bus routes are summarized in Figure 1.

The routes offer frequent peak hour headways. In particular, the 79 and DC Circulator offer frequent limited-stop service and provide excellent transit connectivity.

The nearest Metrobus stop is located on K Street west of 4th Street, approximately a 2 minute walk, and serves the D4 and P6 line. The closest Circulator stop is at Massachusetts Avenue/5th Street.

Route Number	Route Name	Service Hours	Headway
70	Georgia Ave-7 th St Line	Monday - Saturday: 4:00 am – 3:30 am Sunday: 4:10 am – 3:00 am	12 – 30 min
74	Convention Center-Southwest Waterfront Line	Monday – Saturday: 6:00 am – 7:00 pm	10 to 12 min
79	Georgia Avenue Limited Line	Monday – Saturday: 6:00 am – 7:50 pm	6-15 minutes
80	North Capitol Street Line	Weekdays: 4:30 am – 2:00 am Weekends: 5:00 am – 1:00 am	10 - 30 min
D4	Ivy City-Franklin Square Line	Weekdays: 4:15 am – 1:05 am Saturdays: 4:45 am – 1:05 am Sundays: 5:15 am – 1:05 am	15 – 30 min
P6	Anacostia-Eckington Line	Weekdays: 5:00 am – 2:00 am Saturdays: 5:30 am – 2:00 am Sundays: 6:30 am – 12:30 am	15-30 min
X2	Benning Road-H Street Line	Mon – Sat: 4:15 am – 3:00 am Sunday: 4:15 am – 2:30 am	15 – 30 min
X9	Benning Road-H Street Limited	Weekdays: 6:15 am – 9:00 am 3:30 pm – 6:30 pm	15 minutes
DC Circulator	Union Station-Georgetown Line	Sunday – Thursday: 7:00 am - 12:00 am Friday and Saturday: 7:00 am - 3:30 am	10 minutes

Figure 1 Bus Service Information (Source: Gorove/Slade)

Vehicle Parking & Impacts

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 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 122 parking spaces are required by zoning, including 8 spaces for the residential component, 100 spaces for the hotel rooms, and 14 spaces for the hotel bar/lounge. The Applicant proposes to provide 46 parking spaces, which is 76 fewer than required by current zoning regulations, but exceeds the approved but not implemented zoning regulations by 18 spaces.

The site is currently in the District's Residential Permit Parking (RPP) system. Future residents of the project would be eligible to apply for RPP parking permits, but the RPP permits would not be available for hotel guests or employees.

The Applicant conducted a curbside parking utilization study in an area surrounding the site to determine the availability of curbside parking. Parking occupancy data was collected on Friday, March 28, 2014 every half hour from 5:00 to 8:00 PM to gather information on the parking occupancies of weekend evening conditions when residents, patrons, and visitors would most likely park on nearby streets.

The inventory noted a total of 146 curbside parking spaces in the vicinity; 18 non-metered, 22 RPP, and 106 metered spaces. The spaces located adjacent to the subject site on 4th Street and K Street are metered. The parking inventory is illustrated in Figure 2.

Within the observation period, the peak parking utilization occurred at 8:00pm when 91% of all spaces in the vicinity were occupied. Of note, the 18 non-metered spaces identified in the analysis are located

on the K Street bridge over I-395 where parking is prohibited. Therefore, the parking inventory revealed 100% utilization of legal parking spaces in the study area.

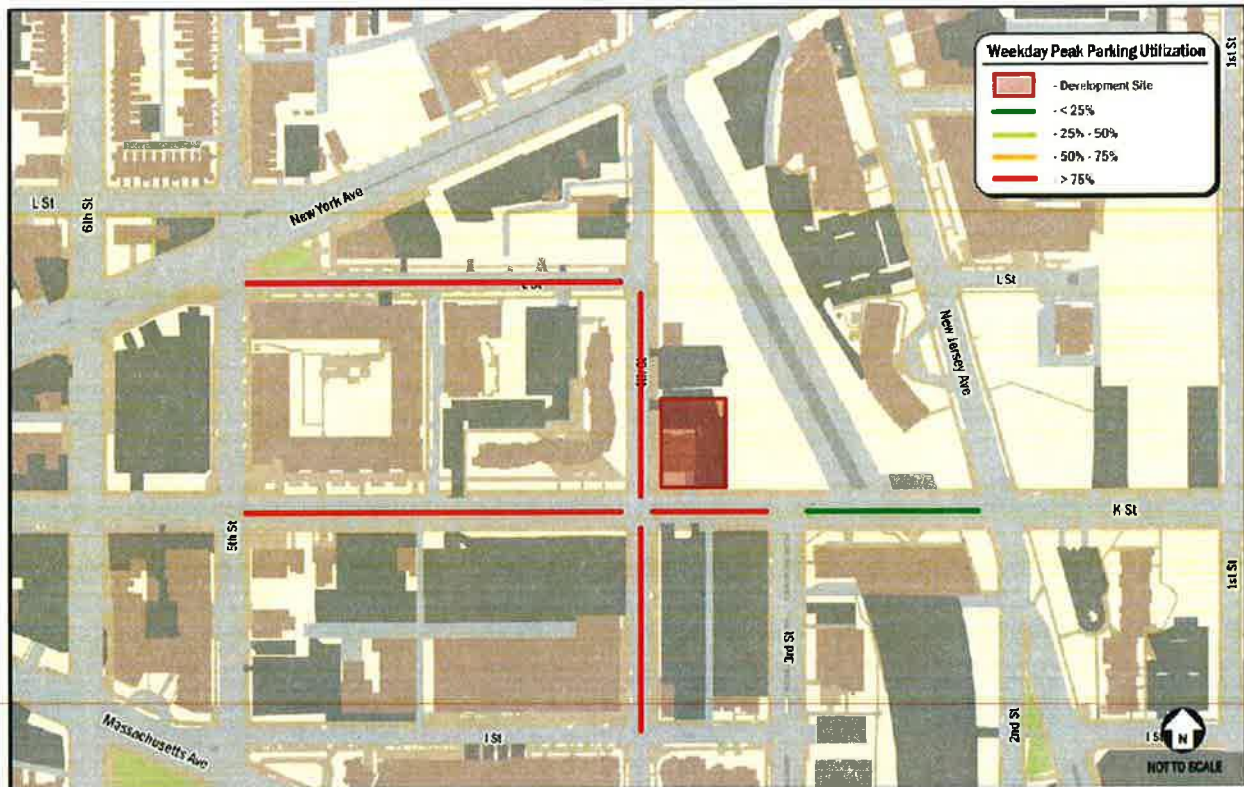


Figure 2 Parking Inventory Map (Source: Grove/Slade)

The amounts of curbside parking availability by parking space type are summarized in Figure 3:

Space Type	Occupied Spaces	# of Spaces	Utilization
RPP	22	22	100%
Metered	106	107	101%
All On-Street Spaces	128	129	101%

Figure 3 Peak Hour Inventory and Occupancy (Source: Applicant's CTR)

The results of the Applicant’s curbside inventory indicate that curbside parking availability is insufficient to accommodate any potential spillover parking from the site. Due to the high availability of excellent non-auto transportation options, it is likely that auto usage by residents and hotel guests will be low and the proposed on-site parking supply is likely to be sufficient. In the event that demand for parking is higher than anticipated, the Applicant obtained letters of intent from four nearby parking facilities that identify sufficient parking availability for potential valet service usage by the subject project. The availability of parking spaces in private parking facilities in the vicinity would provide sufficient parking if parking demand should exceed available on-site parking supply.

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:

- Assign a Transportation Management Coordinator to provide transportation information to residents, guests, and employees;
- Install a transit screen in both the residential and hotel lobbies showing real-time alternative transportation information;
- Establish a TDM marketing program to provide detailed non-auto transportation options to residents;
- Inform prospective guests about parking and alternate modes of transportation as part of the pre-reservation and reservation process through check-in;
- Offer daily Capital Bikeshare passes to hotel guests;
- Offer the first occupant of each residential unit a one-time, one-year carsharing membership and application fee, a \$100 Smartrip card, or a one-time annual Capital Bikeshare membership; and
- Provide at least 22 long-term bicycle parking spaces on-site and additional short-term bicycle parking spaces.

DDOT finds the Applicant's TDM measures are a good basis that would generally encourage use of alternative modes of transportation. However, to further discourage auto ownership and encourage non-auto travel, the following are the items that need to be addressed to strengthen the proposed program:

- DDOT finds that bikeshare and car-share are more effective means to encourage long-term travel behavior change. Accordingly, the financial incentive should be limited to bikeshare and carshare memberships; and
- Install at least 8 short-term bicycle parking spaces.

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 proposes a 20-foot service/delivery space in the parking garage and seeks relief from the required 30-foot loading berth.

DDOT's Design and Engineering Manual prohibits truck backing maneuvers through public space. The Applicant coordinated with DDOT on several site design schemes with different attempts to accommodate the loading facilities in a manner consistent with DDOT standards. Ultimately, due to the relative small size of the lot and the desire to avoid creating a curb cut on K Street, DDOT determined that a 30-foot loading berth could not be accommodated on-site without backing maneuvers. The Applicant proposes to accommodate loading via a combined curbside loading zone on 4th Street that may also be used for valet operations as shown in Figure 4. A service corridor would connect the

proposed curbside loading area to the buildings back of house area. Earlier versions of the site plan did not include this corridor, but the Applicant revised the site plan to include this facility.

Trash bins are proposed to be rolled on the parking garage ramp to the curbside from a trash room inside the underground parking garage. DDOT finds the trash operations appropriate.

The Applicant and DDOT coordinated closely to create a functional 20-foot service/delivery space. The space is located on the same level as and is in relatively close proximity to the core. Such a design results in a loading space that is likely to be utilized for deliveries and will accommodate some on-site loading activity while lessening the demand placed on curbside loading.

The Applicant must submit a formal loading zone request to DDOT and will also need a public space permit to occupy the curbside for a valet staging zone. DDOT's lack of objection to the loading variance request does not constitute approval for the curbside loading zone or valet staging zone. DDOT will evaluate the requests through the aforementioned processes to determine their validity. The Applicant must continue to coordinate with DDOT to determine appropriate design and operations of the potential combined commercial loading and valet staging proposal. Any proposal would need to be designed and operated in a way such that impacts to the existing curbside are minimized through time-of-day restrictions and combined uses that would use less space overall compared to an individual commercial loading zone adjacent to a separate valet staging zone.

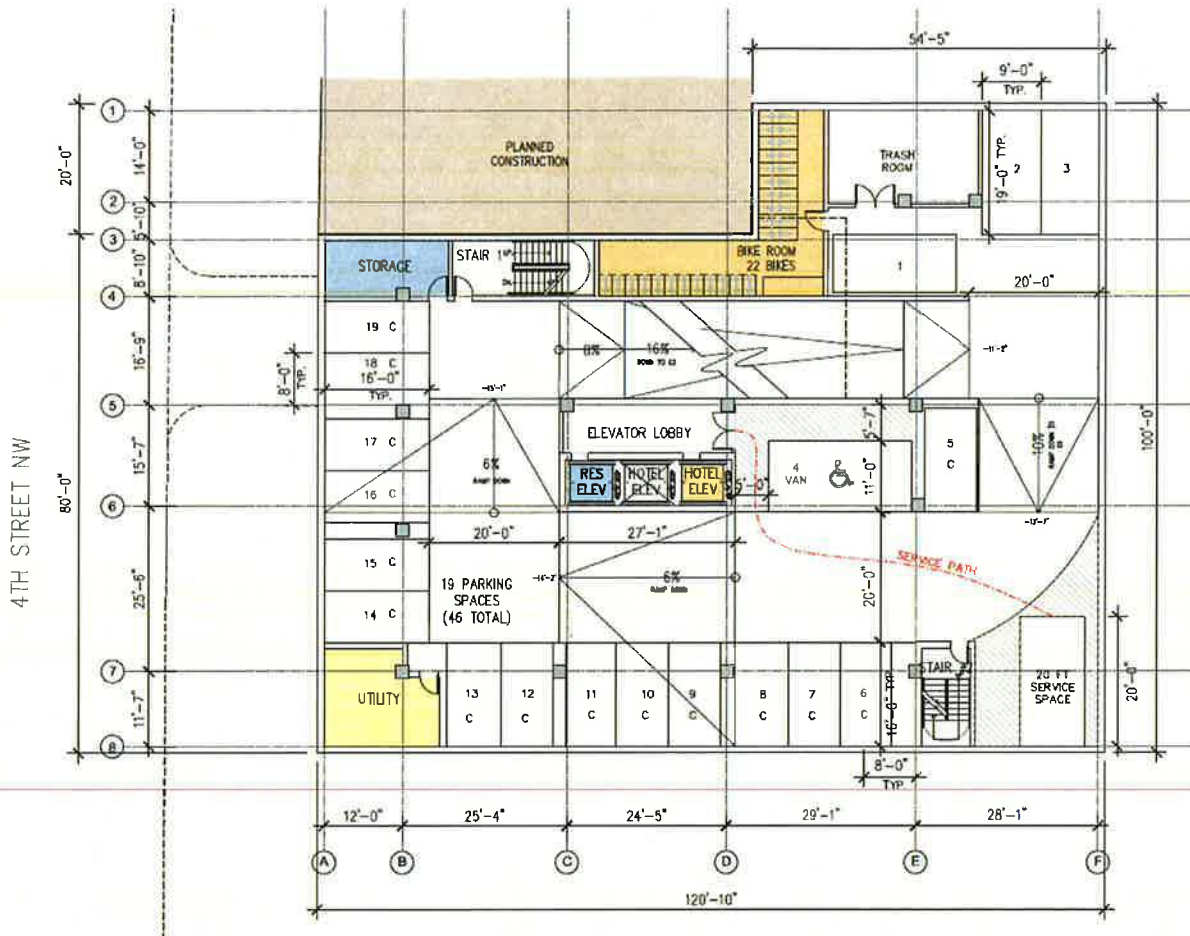


Figure 4 Site Plan (Source: PGN Architects)

The Applicant proposes a loading management plan to manage impacts caused by the project and the requested loading relief:

- Require vendors and tenants to coordinate and schedule deliveries;
- Limit trucks to a maximum of 30 feet in length;
- Assign a loading management coordinator;
- Require all tenants to schedule any loading operation using a truck greater than 20 feet in length;
- Schedule deliveries such that on-street capacity is not exceeded;
- Prohibit deliveries directly from K Street;
- Limit loading area operations to daytime hours; and
- Coordinate loading hours with valet operations so as to minimize conflicts and determine the most optimal times for loading.

DDOT finds the loading management plan to be a good basis for mitigating potential loading impacts, but the plan should be strengthened with the following measure:

- Instruct any delivery using a truck 20 feet in length or shorter to use the on-site service delivery space.

DDOT notes potential conflicts between the existing streetscape and the proposed loading and valet curbside uses, which are described in greater detail in the Streetscape and Public Realm section.

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.

The preliminary public space plans do not match the existing public space adjacent to the site. As noted in the Loading section, the proposed loading and valet curbside uses may conflict with the existing streetscape on 4th Street, which was recently installed as part of a DDOT streetscape project for the K Street NW corridor. The public space adjacent to the proposed curbside loading uses feature established trees in large tree boxes, leaving limited space for a step out zone for valet customers and staging area for loading activities. Additionally, there is street furniture in between the tree boxes, including a multi-space meter. If approved for the desired curbside uses, the Applicant will need to coordinate with DDOT on an appropriate streetscape that preserves established trees while meeting the curbside use needs. If necessary, the Applicant will be responsible for relocating the multi-space meter.

The Applicant has verbally indicated electric vaults will be proposed in the public space. DDOT's preference is that vaults be located in private space; however, if vaults are located in public space they must be surrounded on all sides by a landscape buffer, or, if located in the sidewalk, vaults will need to be covered with a solid top.

SZ:jr

TAB K

STEPHEN VARGA, AICP, LEED GREEN ASSOCIATE

Mr. Varga has experience in zoning and land use, sustainability best practice, comprehensive planning, as well as geographic information systems. He is currently Planning Services Director in Cozen O'Connor's Washington, DC office. In this role, he provides qualified expert witness land use and planning testimony before the Board of Zoning Adjustment and Zoning Commission, evaluates development proposals for zoning conformance and entitlement potential, drafts and submits text and map amendments as part of the District's 'Open Call' Comprehensive Plan update, and monitors and researches local government land use policies.



Prior to joining Cozen O'Connor, he served as director of planning services at Griffin, Murphy, Moldenhauer and Wiggins LLP after serving for nearly 10 years as an urban planner within the District of Columbia government.

From 2008-2010, he worked at the District of Columbia Office of Planning, an agency which guides development in the District while implementing preservation, revitalization, and strategic goals. As a development review specialist, he was responsible for reviewing zoning applications and presented agency recommendations at public meetings. Additionally, he served as core team member of Zoning Regulations Review project, a multi-year effort to comprehensively revise and modernize the zoning regulations of the District. He produced zoning recommendation reports and zoning regulation text, particularly for mixed use, transit-oriented development, and sustainability subject areas. This work would eventually become adopted as "ZR16," the new zoning regulations of the District, in effect since September 6, 2016.

From 2011-2016, he served at the District of Columbia Office of Zoning (DCOZ), an agency which provides administrative, professional, and technical assistance to the Zoning Commission and the Board of Zoning Adjustment in support of their oversight and adjudication of zoning matters in the District of Columbia. Upon joining DCOZ, he worked as a zoning specialist, and eventually senior zoning specialist, where he was responsible for communicating complex technical and regulatory information to a wide range of stakeholders, including applicants, BZA, Advisory Neighborhood Commissions, and the public. In addition to carrying out his explanatory duties, he analyzed and managed hundreds of zoning applications per year, ensuring each complied with applicable procedures and requirements. He also improved the BZA application processes for applicants, and clarified rights and responsibilities for stakeholders, resulting in more-timely and efficient hearings. Additionally, he adapted BZA zoning processes in the Interactive Zoning Information System to conform with ZR16.

Mr. Varga holds a Master's Degree in City & Regional Planning from the Ohio State University. He graduated with a Bachelor of Arts Degree from the Ohio State University.

He has been a member of the American Planning Association since 2003. He earned his American Institute of Certified Planners ("AICP") designation in 2007, and his LEED Green Associate designation in 2010.

TAB L

**BEFORE THE DISTRICT OF COLUMBIA
BOARD OF ZONING ADJUSTMENT**

**MODIFICATION OF SIGNIFICANCE
BIRCHINGTON, LLC**

**BZA ORDER #19169C
303-317 K STREET NW**

LOADING VARIANCE SUPPLEMENT

The Applicant meets the burden of proof for an area variance for relief from two 30'-loading berths under Subtitle X §§ 1000.1 and 1002

As determined by the Board in approving BZA Case No. 19169, the Original Project met burden of proof for variance relief for one 30'-loading berth. The Modification of Significance requests additional relief for the additional two 30'-loading berths required under ZR-16. If it is determined that a special exception is not appropriate, the requested Modification of Significance satisfies the variance requirements for much of the same rationale on which the Board granted the 2016 Approval, as discussed below.

Under D.C. Code § 6-641.07(g)(3) and 11 DCMR § X-1000.1, the Board is authorized to grant an area variance where it finds that:

- (1) The property is affected by exceptional size, shape or topography or other extraordinary or exceptional situation or condition;
- (2) The owner would encounter practical difficulties if the Zoning Regulations were strictly applied; and
- (3) The variance would not cause substantial detriment to the public good and would not substantially impair the intent, purpose and integrity of the zone plan as embodied in the Zoning Regulations and Map.

See French v. District of Columbia Bd. of Zoning Adjustment, 658 A.2d 1023, 1035 (D.C. 1995) (quoting *Roumel v. District of Columbia Bd. of Zoning Adjustment*, 417 A.2d 405, 408 (D.C. 1980)); see also, *Capitol Hill Restoration Society, Inc. v. District of Columbia Bd. of Zoning Adjustment*, 534 A.2d 939 (D.C. 1987). Applicants for an area variance must demonstrate that they will encounter “practical difficulties” in the development of the property if the variance is not granted. *See Palmer v. District of Columbia Bd. of Zoning Adjustment*, 287 A.2d 535, 540-41 (D.C. 1972) (noting, “area variances have been allowed on proof of practical difficulties only while use variances require proof of hardship, a somewhat greater burden”). An applicant experiences practical difficulties when compliance with the Zoning Regulations would be “unnecessarily burdensome.” *See Gilmartin v. District of Columbia Bd. of Zoning Adjustment*, 579 A.2d 1164, 1170 (D.C. 1990).

A. The Property is Unusual Because of its Size, Shape or Topography and is Affected by an Exceptional Situation or Condition

The phrase “exceptional situation or condition” in the variance test applies not only to

the land, but also to the property's history. *See, Clerics of St. Viator, Inc. v. District of Columbia Bd. of Zoning Adjustment*, 320 A.2d 291, 294 (D.C. 1974). Moreover, the unique or exceptional situation may arise from a confluence of factors which affect a single property. *Gilmartin v. District of Columbia Bd. of Zoning Adjustment*, 579 A.2d 1164, 1168 (D.C. 1990). the Property is unusual and affected by the following exceptional situations and conditions that individually and collectively make it practically difficult to comply with the Zoning Regulations: (1) the Property is irregularly shaped; (2) the Property is small in size and located on a corner lot; (3) lack of rear alley access; (4) the Property fronts on K Street NW, with its wide, pedestrian-friendly sidewalk area limiting curb cut usage; and (5) the Property is located in an area with a high water table, restricting that ability to construct more than two levels of below-grade garage.

1. Irregularly Shaped Property

The Property is an assemblage of seven (7) lots. Four (4) of those lots, Lots 21, 20, 824 and 825, jut out 20 feet beyond the rear lot lines of the rest of the Property (the "Dogleg Lots"). As a result, the Property forms a wide L shape that presents design and efficiency challenges.

2. Small Property Size and Corner Location

The Property is a corner lot that fronts along K and 4th Streets NW, and has a lot area of only approximately 10,767 square feet, which is small considering the intended hotel uses and permitted height and densities. Further, the Applicant is unable to assemble more land due to the other recently constructed developments on 4th and K Streets, as well as the proximity to the highway.

3. Lack of Rear Alley Access

The Property has no rear alley. Rather, it is a landlocked parcel that must obtain vehicular access through DDOT approval of curb cuts from the public rights of way. Although the Property currently has a curb cut along K Street, DDOT has informed the Applicant that it will not support continued use of that curb cut. Accordingly, all access to the Property must be from one curb cut off of 4th Street.

4. Significance of K Street

The Property's K Street frontage contributes to its exceptional situation because K Street is flanked by a broad, approximately 50'-wide public sidewalk area that is attractive to pedestrians and provides a significant viewshed for the City. Accordingly, due to the pedestrian-nature of the wide sidewalk, DDOT has stated that it would not support continued use of the curb cut from K Street. Therefore, all access to the Project and valet parking spaces must be consolidated on 4th Street.

5. High Water Table

The Property has a high water table that restricts excavation to two levels of below grade parking. Accordingly, the high water table is an exceptional condition on the Property that limits the depth of below-grade excavation.

B. Strict Application of the Zoning Regulations Would Result in Practical Difficulty

Due to the Property's exceptional conditions, strict application of the Zoning Regulations with respect to the loading requirements of Subtitle C § 901.1 would continue to result in practical difficulties for the Applicant as so noted by OP in their report for the original application.¹

As noted, the Modified Project provides two 20'-service spaces in the below-grade garage. The Property's small size/irregular shape and lack of K Street curb cut create practical difficulties because the record in the 2016 Approval established that no 30'-truck could enter the site "front-in" as required by DDOT.² Indeed, the record includes truck turning diagrams demonstrating that a 30-foot truck could not enter the site "front-in" as required (the "Truck Turning Diagram").

Accordingly, in the 2016 Approval, the Board granted an area variance for one 30'-loading berth and one 100'-loading platform. Indeed, in the February 2016 DDOT Report, DDOT found, "Due to the relative small size of the lot and desire to avoid creating a curb cut on K Street, DDOT determined that a 30' loading berth could not be accommodated on-site without backing maneuvers."

Here, the approximately 111,000 s.f. lodging use generates the need for three 30'-loading berths and associated loading platforms. As relief for one 30'-loading berth was granted in the 2016 Approval, the Modification requests additional relief for two 30'-loading berths because no 30'-truck can enter the site "front-in" due to the same site conditions. Accordingly, the modification seeks approval from the additional loading requirement over what was previously approved.

1. Small Size

The Property's small size is exacerbated by its unusual, elongated "L" shape that creates an area in the northeast corner of the site that is too wide and shallow for the efficient movements of loading vehicles within the building.

During the February 9, 2016 public hearing, Erwin Andres, the Applicant's traffic expert, testified that the Applicant had tested various designs, but no 30' internal loading area that could accommodate a "front-in" loading was possible without eliminating a significant portion of the lobby or impacting a significant amount of the back of house area. The Truck Turning Diagram

¹ "The Applicant has demonstrated that lot size and shape and corner location, as well as the absence of alley access and the presence of groundwater at elevations twenty feet below the surface are exceptional conditions that make for practical difficulties in providing both the full parking and the full loading required by the zoning regulations." See OP Report at BZA Exhibit #30, pg. 5.

² DDOT's Design and Engineering Manual requires front-in, front-out loading, and discourages back-in only loading maneuvers. Indeed, in the February 2016 DDOT Report, DDOT states, "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." Similarly, if the modification request is required to be processed under ZR-16, the Applicant would require relief from two additional 30'-loading berths. As discussed at length in the Approval, the Property's exceptional conditions would create practical difficulties to accommodate additional 30'-loading berths on the site, as any and all 30'-loading berths could not be accommodated without a back-in maneuver, and such maneuver would not be permitted by DDOT.

established that the Property's small and unusual size created a practical difficulty that would make providing the required on-site loading unduly burdensome.

2. *No Alley Access and No K Street Curb Cut Permitted*

The site has no alley access, which requires the provision of curb cuts. However, in consultation with DDOT as part of the original application, the Applicant was informed that curb cuts along K Street would not be supported due to the predominance of pedestrian movements along that street. The Applicant made subsequent design changes to relocate both the garage entry and loading curb cuts along 4th Street. However, this design was not looked favorably-upon by DDOT for the reason that two curb cuts would be located next to one another. Accordingly, the lack of a K Street curb cut was determined to be a practical difficulty for providing loading on site. See February 2016 DDOT Report: "due to the relative small size of the lot and the desire to avoid creating a curb cut on K Street, DDOT determined that a 30' loading berth could not be accommodated on-site without backing maneuvers."; See also the January 2016 OP Report: "The site does not have alley access and the District Department of Transportation does not permit curb cuts from K Street at this location."

3. *Two additional 30'-loading berths are Not Feasible*

The challenges of providing the one 30' internal loading area are only magnified if two additional 30'-loading berths and the internal loading area and associated platforms were also required. As shown on the Truck Turning Diagram given the Property's size, unique shape and configuration, and the inability to obtain curb cut access from K Street, the Property is not equipped to provide a front-in front-out loading for one 30'-truck, much less three.³

In summary, it would be a substantial practical difficulty to require the Applicant to provide the required additional two 30' - loading berths and platforms plus an area devoted to maneuvering space for trucks, as the building's ground floor would be significantly restrained and the Applicant would lose substantial portions of the back of house area that is necessary to support the hotel use. Further, given access is only possible from 4th Street and that the parking garage ramp is located on the northern-most portion of the Property, if the Applicant were required to have a separate loading access, it would double the size of the curb cut area. This is not supported by DDOT due to the potential negative impacts on the 4th Street pedestrian network, as well as the proximity to the approved curb cut for the project directly to the north. Such a requirement would result in a curb cut layout that could impact the building's efficiency and layout, thereby making development unduly burdensome for the Applicant.

C. No Substantial Detriment to the Public Good; No Substantial Impairment of the Zone Plan

Granting the additional relief for parking and loading now requested will not cause a substantial detriment to the public good, or substantially impair the intent, purpose or integrity of the zone plan.

³ Further, as no 30' truck can access the site "front-in", it would be a practical difficulty for the Applicant to need to provide the two 30' loading berths required under ZR-16.

1. No Substantial Detriment to the Public Good Due to Granting Relief from the Additional Loading Requirement associated with the Modified Project.

The requested loading relief will have no detrimental impact because the Applicant anticipates a minimal number of large trips per day, and the vast majority of deliveries will be accommodated in the proposed *two* internal 20' delivery areas. Indeed, DDOT acknowledged that "A well-designed service delivery space would be able to accommodate a portion of the site's loading needs, thereby reducing demand for curbside loading space." See BZA Exhibit #36.

Further, as discussed above, larger loading can be accommodated on the street in the anticipated 50' dedicated loading/valet area. Also, the removal of the residential use from the Project reduces the need for large truck loading, as there will be no residential "move-ins" or "move-outs." Finally, if additional large loading is required, it could be accommodated in the 30' loading zone in front of the Ellisdale project further north on 4th Street.

Loading Management Plan

The Modified Project will implement the approved Loading Management Plan, which includes the following:

- Vendors and on-site tenants will be required to coordinate and schedule deliveries and a loading coordinator will be on duty during delivery hours.
- Trucks accessing the on-street loading space will be limited to a maximum of 30 feet in length.
- All tenants will be required to schedule any loading conducted using a truck greater than 20 feet in length.
- Deliveries will be scheduled such that the on-street loading capacity is not exceeded and so as not to conflict with potential valet operations. In the event that an unscheduled delivery vehicle arrives while the loading space is full, that driver will be directed to return at a later time when the loading space will be available so as to not impede traffic along 4th Street.
- Deliveries from 30' trucks or 20'-service vehicles will be prohibited from being delivered directly from K Street and instead will be required to use the loading area on 4th Street.
- Trucks using the loading area will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the regulations set forth in DDOT's Freight Management and Commercial Vehicle Operations document, and the primary access routes listed in the DDOT Truck and Bus Route System.
- The loading area operation will be limited to daytime hours of operation, with signage indicating these hours posted prominently at the loading space with notification also given to tenants. The use of the on-street space for loading will be coordinated with valet operations so as to determine the most optimal times for loading.

- Any delivery using a truck 20 feet in length or shorter will be required to utilize the on-site delivery space.

2. *No Substantial Impairment to the Intent, Purpose and Integrity of the Zone Plan*

No substantial impairment of the zone plan would occur from granting the variance for the additional loading relief. The intent of the loading regulations is to provide adequate facilities for certain uses, and DDOT has determined in this instance that a 20'-service space, in conjunction with the loading management plan, will provide the necessary facilities for the efficient and orderly provision of supplies to the hotel use. Accordingly, it goes to reason that having two 20'-service spaces below grade will better meet the goals of the Zone Plan by permitting additional delivery trucks to park on-site. Additionally, the Applicant will continue to work with DDOT as required. In doing so, the Applicant demonstrates that the zone plan will not be substantially impaired by the granting of the requested relief.

TAB M

TECHNICAL MEMORANDUM

To: Habte Sequar 311 K Street, LLC

From: Jim Watson, PTP
Erwin Andres, P.E.

Date: January 20, 2016

Subject: 317 K Street NW Hotel and Residential Comprehensive Transportation Review

INTRODUCTION

This memorandum presents a Comprehensive Transportation Review (CTR) of the proposed residential and hotel development located in the northeast quadrant of the 4th Street/K Street intersection in the Mount Vernon Square neighborhood of Northwest Washington, D.C. Figure 1 identifies the regional site location within the District. The site is currently occupied by an existing surface parking lot and three commercial building, and will be redeveloped into a mixed-use development comprising 30 furnished residential units and 200 hotel rooms. The site plans include 48 below grade parking spaces accessed via a new curb cut from 4th Street. Given that Zoning Regulations would require 122 parking spaces and 48 are planned, zoning relief is being sought from the BZA for parking. In addition, while the required 20 foot service space is planned to be provided on site, the compact nature of the site will not allow for a required 30 foot loading berth or 100 square foot (sf) loading platform on-site. As such, loading for 30-foot trucks is planned to take place from 4th Street with zoning relief being sought from the BZA for the 30-foot loading berth and 100 sf platform.

The site is located approximately a quarter mile from the Gallery Place-Chinatown Metro Station which offers direct access to Union Station and Reagan National Airport and connections to Dulles International Airport and Baltimore Washington International Airport. The Mount Vernon Square-7th Street-Convention Center and Judiciary Square Stations are also located in close proximity. The presence of numerous transit and bike facilities near the site coupled with a Transportation Demand Management (TDM) plan will increase the use of non-vehicular travel modes to and from the site.

The following conclusions were made regarding the 317 K Street Hotel and Residential development:

- The site is surrounded by an extensive network of transit, bicycle, and pedestrian facilities that results in an adequate environment for safe and effective non-auto transportation;
- Based on the site location near ample transit services, the surrounding mixed-use walkable location, and a TDM plan, the proposed parking will adequately serve the needs of the development;
- Based on an estimation of 30-foot truck loading activity for the development, it was determined that the amount of 30-foot truck loading activity expected to take place at the site will be adequately served from 4th Street, where 30-foot truck loading could be possible in the area of the project's proposed valet parking spaces or in the loading space approved for the Ellisdale project on 4th Street; and
- A TDM plan for the development will include the implementation of a TDM coordinator, on-site services, a marketing program, transportation incentives, bicycle amenities, and ride-matching/ridesharing programs.

EXISTING CONDITIONS

This section provides a review of the existing transit, bicycle, and pedestrian facilities in the vicinity of the site. The site is served by several public transportation sources, including Metrorail, Metrobus, and the DC Circulator bus system. The project site is also served by a pedestrian network consisting of sidewalks and crosswalks along the streets surrounding the project site. Additionally, the site is served by an on-street bicycle network, consisting of bike lanes, cycle tracks, and signed bicycle routes.

Transit

Local transit services that provide access to the 317 K Street development site include Metrorail, Metrobus, and the DC Circulator. These services are operated by the Washington Metropolitan Area Transit Authority (WMATA) and DDOT. WMATA operates Metrorail, the nation's second largest heavy rail transit system, as well as Metrobus, the nation's fifth largest bus network. DDOT and WMATA collaborate to operate the DC Circulator, a system of five (5) bus lines that provide frequent service and low fares throughout the city.

The nearest Metrorail station is Gallery Place-Chinatown, with its northern entrance located approximately one-third of a mile from the proposed development at the corner of 7th and H Streets. Additional entrances are located at the intersections of 7th and F Streets and 9th and G Streets. The Gallery Place-Chinatown station is a multimodal transportation hub on Metrorail's Green, Yellow, and Red Lines. The Green and Yellow Lines connect the study area from the city of Greenbelt, MD to the north, extending downtown through L'Enfant Plaza, before ending in Alexandria, VA (Huntington) via Reagan National Airport and Suitland, MD (Branch Avenue) via Navy Yard to the south. The Red Line connects the study area from the city of Gaithersburg, MD (Shady Grove) to the northwest, extending through Dupont Circle and Union Station, before ending in Glenmont, MD to the north. Other nearby Metrorail stations include the Mount Vernon Square-7th Street-Convention Center Station, and the Judiciary Square Station, which are located approximately 0.4 miles and 0.3 miles, respectively, from the project site. Trains run frequently during the weekday morning and afternoon peak hours between 5:00 AM to 9:30 AM and 3:00 PM to 7:00 PM. Green, Yellow, and Red Line trains run approximately every 12 minutes during the weekday midday hours from 9:30 AM to 3:00 PM and every 12 to 20 minutes during the weekday off-peak periods and on weekends. Metrorail generally closes at approximately midnight on weekdays and 3:00 AM on weekends. The access provided from Gallery Place-Chinatown offers direct service from the site to Reagan National Airport and Union Station. Connecting access is also available to Dulles International Airport (via the soon to be completed Silver Line from nearby Metro Center to Wheile Avenue) and Baltimore Washington International Airport (via rail connections at Union Station or bus from Greenbelt).

Numerous Metrobus and MetroExpress routes operate along 5th, 6th, 7th, K, and H Streets as well as Massachusetts Avenue within walking distance of the site. The nearest MetroBus and stop is located immediately adjacent the site along 5th Street north of I "Eye" Street and the nearest Circulator stop is located just south of the site at 5th Street and Massachusetts Avenue. Table 1 shows a summary of the bus route information for the lines that serve the study area, including service hours and the headways. Figure 2 illustrates the existing rail and bus service.

Due to growth of population, jobs, and retail in several neighborhoods in the District and the potential for growth in other neighborhoods, the District's transportation infrastructure is proposed to be augmented by the reestablishment of streetcar service in the District and the implementation of limited-stop bus service along major corridors in the vicinity of

January 20, 2016

the proposed development, including H, K, 7th, and 9th Streets as is outlined in the *DC's Transit Future System Plan* report published by DDOT in April 2010.

Table 1: Bus Route Information

Route Number	Route Name	Service Hours	Headway
70	Georgia Ave-7 th St Line	Monday - Saturday: 4:00 am – 3:30 am Sunday: 4:10 am – 3:00 am	12 – 30 min
74	Convention Center-Southwest Waterfront Line	Monday – Saturday: 6:00 am – 7:00 pm	10 to 12 min
79	Georgia Avenue Limited Line	Monday – Saturday: 6:00 am – 7:50 pm	6-15 minutes
80	North Capitol Street Line	Weekdays: 4:30 am – 2:00 am Weekends: 5:00 am – 1:00 am	10 - 30 min
D4	Ivy City-Franklin Square Line	Weekdays: 4:15 am – 1:05 am Saturdays: 4:45 am – 1:05 am Sundays: 5:15 am – 1:05 am	15 – 30 min
P6	Anacostia-Eckington Line	Weekdays: 5:00 am – 2:00 am Saturdays: 5:30 am – 2:00 am Sundays: 6:30 am – 12:30 am	15-30 min
X2	Benning Road-H Street Line	Mon – Sat: 4:15 am – 3:00 am Sunday: 4:15 am – 2:30 am	15 – 30 min
X9	Benning Road-H Street Limited	Weekdays: 6:15 am – 9:00 am 3:30 pm – 6:30 pm	15 minutes
DC Circulator	Union Station-Georgetown Line	Sunday – Thursday: 7:00 am - 12:00 am Friday and Saturday: 7:00 am - 3:30 am	10 minutes

Bicycle Facilities

Based on DDOT's May 2011 Bicycle Map, the bicycling conditions around the proposed development are primarily good on the nearby streets as shown in Figure 3. All of the streets in the vicinity of the site, except H Street, 4th Street, K Street, and Massachusetts Avenue, provide either on-street bike lanes or feature good or fair cycling conditions. Cycle tracks closest to the site are located on E Street (south of the site) and 7th Street (west of the site).

In addition, the Capital Bikeshare program has placed over 200 bike share stations across Washington, DC, Arlington, VA, Alexandria, VA, and Montgomery County, MD with more than 1,800 bicycles provided. Capitol Bikeshare has plans to expand the system and potential new station locations have been identified throughout the study area. Figure 3 identifies existing station locations in the study area. Capitol Bikeshare currently has four existing bike share locations with 63 available bicycle docks within close proximity to the site at the intersections of 3rd and H Street, 5th Street and Massachusetts Avenue, 1st and H Streets, and 5th Street between K Street and Massachusetts Avenue.

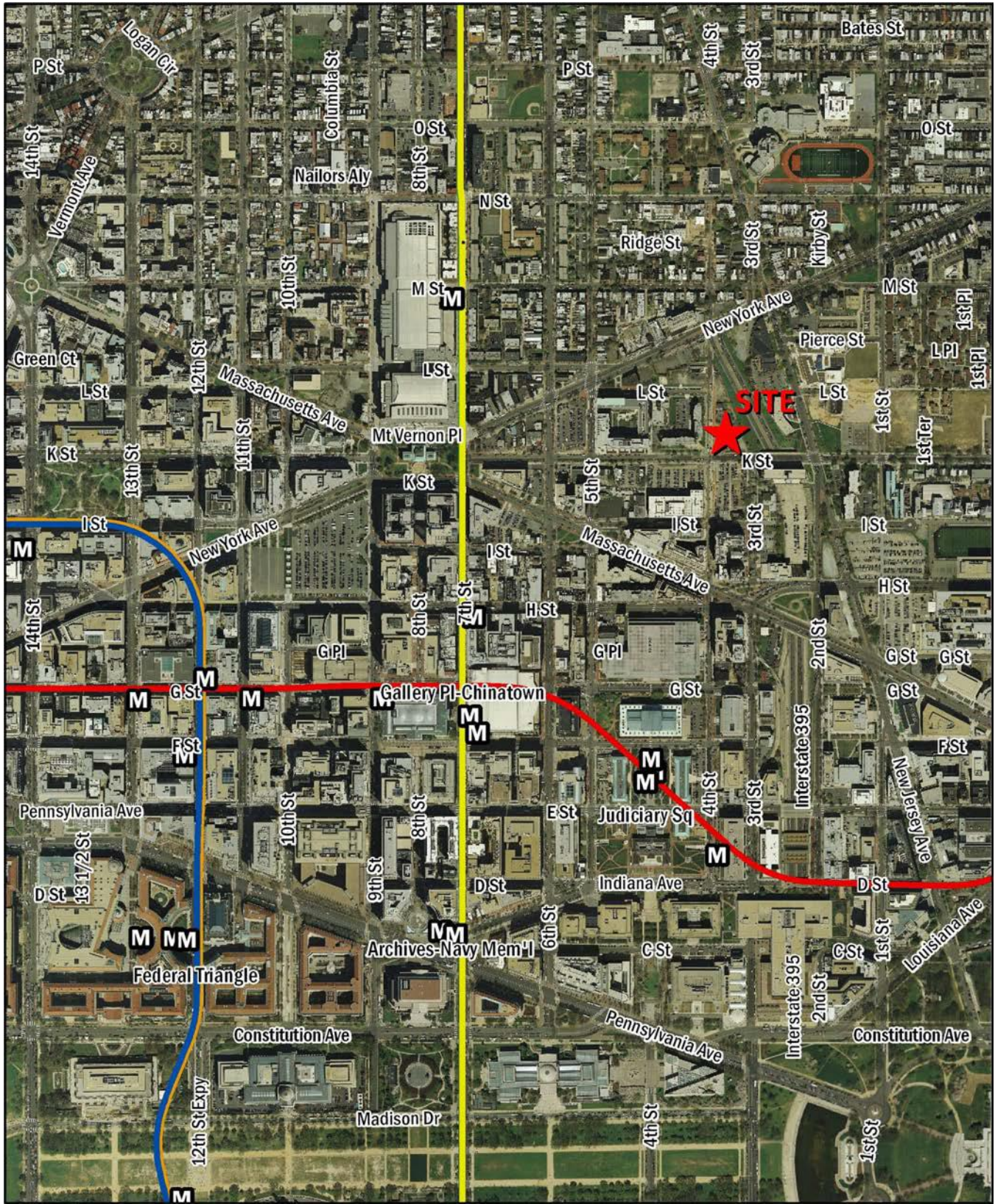


Figure 1: Site Location

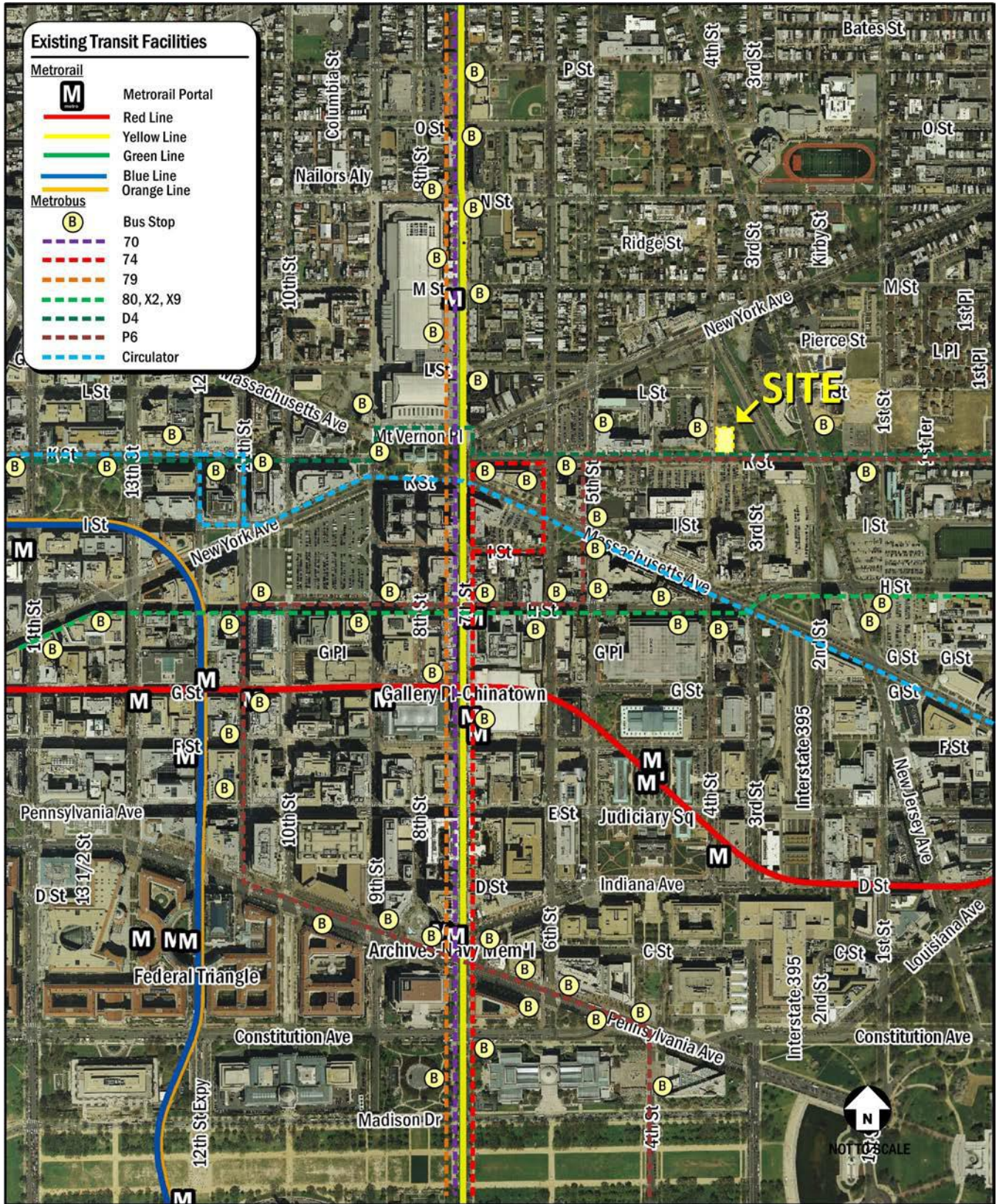


Figure 2: Existing Transit Service

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Figure 3: Existing Bicycle Facilities

Pedestrian Facilities

The roadways in the immediate vicinity of the proposed development provide satisfactory pedestrian facilities and connectivity throughout the area. Wide, continuous sidewalks line all of the study area’s roadways with crosswalks linking segments at intersections within the study area. Moreover, the presence of on-street parking along the streets within the study area acts as a barrier between the sidewalk and the traveled way.

Adequate crosswalks with ladder striping and pedestrian countdown signals are present near the site at the signalized intersection of K Street and 3rd Street for all crossing movements. The site has a walkscore of 95 out of 100 (a "walker's paradise") based on its location in a mixed-use area within close proximity of the Convention Center, Verizon Center, numerous restaurants and bars, and shopping destinations.

A review of pedestrian facilities near the site shows that nearly all facilities meet DDOT standards, and provide a quality walking environment. Only a few sidewalks do not meet the District’s width requirements, primarily located along New York Avenue and the south side of L Street north of the site. Figure 4 shows a detailed inventory of the existing pedestrian infrastructure in the vicinity of the development site and along primary walking routes. Sidewalks, crosswalks, and curb ramps are evaluated based on the guidelines set forth by DDOT’s *Public Realm Design Manual* in addition to ADA standards. Sidewalk width and buffer requirements for the District are shown below in Table 2. Within the area shown, Massachusetts Avenue, New York Avenue, K Street, and H Street are considered commercial streets with the remaining roadways considered residential with a moderate to high density. These roadways generally comply with the commercial requirements as do most of the residential side streets. ADA standards require that all curb ramps be provided wherever an accessible route crosses a curb and must have a detectable warning. Additionally, curb ramps shared between two crosswalks is not desired. As shown in the figure, under existing conditions the majority of study area intersections are adequate.

Table 2: Sidewalk Requirements

Street Type	Minimum Sidewalk Width	Minimum Buffer Width
Residential (Low to Moderate Density)	6 ft	4 ft (6 ft preferred for tree space)
Residential (High Density)	8 ft	4 ft (6 ft preferred for tree space)
Commercial (Non-downtown)	10 ft	4 ft
Downtown	16 ft	6 ft

Car Sharing

Three car-sharing companies serve the District: Zipcar, Enterprise CarShare, and Car2Go. All three services are private companies that provide registered users access to a variety of automobiles. Zipcar and Enterprise CarShare have locations near the project site. Table 3 lists the car-sharing locations in the vicinity of the project and shows that 30 carsharing vehicles are available within a short (1/4 mile) walk of the site with many others slightly farther within a half mile.

Car-sharing is also provided by Car2Go, which provides point-to-point car sharing. Unlike Zipcar, Hertz 24/7, and Enterprise CarShare, which require two-way trips, Car2Go can be used for one-way rentals. Car2Go currently has a fleet of vehicles located throughout the District. Car2Go vehicles may park in any non-restricted Metered curbside parking space or

Residential Parking Permit location in any zone throughout the defined “Home Area”. Members do not have to pay the meter or pay stations. Car2Go does not have permanent designated spaces for their vehicles; however availability is tracked through their website and mobile app, which provides an additional option for car-sharing patrons.

Table 3: Car Share Locations and Vehicles

Carshare Location	Number of Vehicles
Zipcar	
77 H Street (Wal-Mart)	5 Vehicles
458 I “Eye” Street (Lyric Apartments)	1 Vehicle
8 th & New York Avenue	8 Vehicles
466 L Street (City Vista Parking Garage)	3 Vehicles
Gallery Place Metro (Colonial Parking)	4 Vehicle
770 5 th Street (Gallery Place Metro)	1 Vehicle
425 Massachusetts Avenue	2 Vehicles
Enterprise CarShare	
5 th & F Streets	2 Vehicles
300 Massachusetts Avenue	4 Vehicles
Total Number of Car Share Vehicles in Study Area	30 Vehicles

DESIGN REVIEW

This section provides an overview of the transportation features of the proposed development. The development program consists of 30 furnished residential units and a 200-room hotel. The site plans includes 48 below grade parking spaces accessed via a new curb cut along 4th Street. Thirty-foot truck loading will take place from 4th Street since the compactness of the site will not allow for the 30-foot truck berth or 100 sf platform, and DDOT’s required head-in/head-out maneuvers for truck movements. Given the presence of numerous transit and other non-auto amenities surrounding the site, the proposed number of parking spaces will be adequate to serve the needs of the development’s tenants and guests. Figure 4 shows the proposed site plan.

Trip Generation

Vehicle trips were calculated for the site to determine whether the site would generate enough trips to warrant a full review of the traffic impacts of the development based on DDOT’s CTR guidelines. As shown in Table 4 below, the site is anticipated to generate very few vehicular trips. Trips were calculated based on ITE Trip Generation rates for Apartment (LU 220) and Hotel (LU 310).

A review of census data suggests that 74 percent of residents in the surrounding neighborhoods use non-auto modes for commuting, with 26 percent using auto modes. Based on this data and given that the residential units will be furnished in an environment with multiple non-auto transportation options, a conservative 25 percent auto modal split was assumed for trips to and from the site.

For hotel trips, the hotel planned for this site was deemed to be most similar to the Embassy Suites Chevy Chase Pavilion hotel examined in the WMATA Development Related Ridership Survey (DRRS). It should be noted that given the suburban nature of the Chevy Chase hotel and the lack of a comparable downtown hotel in the WMATA DRRS, this hotel should be considered a conservative comparable to the operations expected at the 317 K Street development. The WMATA DRRS noted a 25 percent auto mode share for the Chevy Chase Embassy Suites hotel. For purposes of this study and given the

multiple non-auto transportation options in the surrounding area, a 20 percent auto modal split was applied to the 317 K Street hotel trip generation.

The resulting trip generation projections are given in Table 4 below and show that the development is conservatively anticipated to generate 28 AM peak hour vehicular trips (15 inbound and 13 outbound) and 33 PM peak hour vehicular trips (18 inbound and 15 outbound). It should be noted that this trip generation estimate is less than the 25 or more peak hour trips in the peak direction that would typically require additional vehicular study per CTR guidelines since the development is expected to generate at most 21 peak hour, peak direction trips (during the PM peak period) as noted below.

Table 4 Trip Generation and Mode Split

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Auto	18 veh/hr	16 veh/hr	34 veh/hr	30 veh/hr	21 veh/hr	51 veh/hr
Carpool/Uber	8 veh/hr	6 veh/hr	14 veh/hr	13 veh/hr	7 veh/hr	21 veh/hr
Transit	55 ppl/hr	42 ppl/hr	97 ppl/hr	90 ppl/hr	67 ppl/hr	157 ppl/hr
Bike	15 ppl/hr	11 ppl/hr	26 ppl/hr	21 ppl/hr	15 ppl/hr	36 ppl/hr
Walk	23 ppl/hr	20 ppl/hr	43 ppl/hr	43 ppl/hr	28 ppl/hr	71 ppl/hr

Site Access and Internal Circulation

Site Access

There will be four pedestrian access locations for the site, two along 4th Street and the remaining two along K Street. The primary residential entrance is planned for 4th Street while the remaining entrances are planned to serve the hotel. Two additional emergency egress points are planned with one along 4th Street and one along K Street on the edges of the property. Due to the abundance of non-auto transportation modes surrounding the site, 48 below grade parking spaces are proposed, which is 74 fewer than required by zoning. A TDM plan, as outlined further in this document, will be implemented to provide and encourage alternative modes of transportation for guests, employees, residents, and visitors. Access to the parking garage will be from 4th Street with any supplemental parking needs being provided via valet services curbside from 4th Street.

Parking

As mentioned previously, the project proposed to provide 48 on-site parking spaces. According to the zoning regulations set forth by the District, and based upon the existing zoning of the site location, the development is required to provide 122 parking spaces. Therefore, the applicant is seeking a parking variance from Section 2101.1 of the Zoning Regulations. Access to the underground parking garage will be via 4th Street on the northwest side of the site.

It should be noted that the Zoning Regulations are in the process of being rewritten, with final action scheduled for January 2016. Under section 702.3(b) of the proposed regulations, no parking would be required for the project because it is located in the proposed Downtown Zone. Further, even if the property were not located in the Downtown zone, which it is, under section 701.5 of the proposed zoning regulations, the maximum parking requirement would be 55 total parking spaces (10 residential parking spaces and 45 hotel parking spaces) based on the proposed new residential rate of one space for three dwelling units in excess of four units and the new lodging rate of 0.5 spaces per 1,000 sf in excess of 3,000 sf. However, under the new section 702.1, this theoretical parking requirement would be further reduced to 28 spaces. Under 702.1, the parking requirement of 55 spaces is reduced by 50% for any site located within one-half mile of a Metrorail

Station. Given that the site is located within one half mile of the Mount Vernon Square, Gallery Place, and Judiciary Square Metro Stations, the parking requirement under the proposed Zoning Regulations would be 28 parking spaces, which the development meets.

In the event that additional parking spaces are needed over the 48 provided on site, parking will be available in nearby parking garages via valet, and two valet parking spaces are proposed as part of the project. An assessment of nearby parking facilities revealed ample off-street parking availability within five to six blocks of the site that could absorb any valet or self-parking needs of residents, guests, and visitors. Further, the applicant has already obtaining letters of intent from the operators of four nearby parking facilities documenting the availability of parking spaces in the facilities to accommodate surplus parking from the project. These are depicted on Figure 6.

The development is projected to adequately serve the demands of the site due to the following various considerations:

- Well-situated to be served by the Gallery Place-Chinatown Metrorail station, and others, within walking distance of the site.
- Served by nine bus routes within a quarter-mile walking distance including Metrobus, Metro Express and DC Circulator routes.
- Capital Bikeshare has four existing bike share locations with 63 available docking stations near the site.
- The applicant has worked with DDOT to incorporate bicycle parking within the site. The design of these spaces will reflect similar dimensions as currently incorporated in other developments throughout the District. A total of 22 indoor bicycle parking spaces are proposed in the underground parking garage on-site.
- There are ample nearby off-street parking garages and surface parking lots within five to six blocks of the site that could accommodate valet operations or personal vehicle parking off-site.
- The site area has a walkability score of 95 as calculated by WalkScore.com, which is referred to as a “Walker’s Paradise”.

Given the urban nature of the site and its proximity to many non-auto modes of transportation, it is expected that the proposed amount of off-street parking will adequately serve the vehicular needs of the development based on the proposed use of the site.

Bicycle Facilities

As mentioned previously, at least 22 long-term bicycle parking spaces are proposed on-site in the underground parking garage. Short term outdoor bicycle parking along the perimeter of the development site will be provided in coordination with DDOT, exceeding required minimums.

Off-Street Parking

An evaluation of the off-street parking availability was also included in the survey of parking near the site. Given the site’s excellent access to numerous modes of transportation, minimal, if any, vehicular parking is anticipated to be necessary in addition to that being provided on-site. However, in the event that additional parking should be needed for residents, hotel guests, or employees, parking will be available in nearby parking garages. An assessment of nearby parking facilities

revealed available off-street parking near the site in parking garages within five to six blocks that could absorb any additional parking needs of the development. These are shown in Figure 6.

On-Street Parking

This section presents the findings of an on-street parking study, including full inventory of available parking spaces and a parking occupancy count within walking distance of the development site. The on-street parking study was conducted across an area considered to be within walking distance of the development site. An inventory of available on-street parking facilities was conducted that included tabulating the number of parking spaces by block face and identifying any relevant parking restrictions. The number of parking spaces inventoried within the study area totaled 146 parking spaces. The majority of the study area included metered parking spaces centered around commercial uses adjacent to the site.

Parking occupancy data was collected on Friday, March 28, 2014 every half hour from 5:00 to 8:00 PM to gather information on the parking occupancies of weekend evening conditions when residents, patrons, and visitors would most likely park on nearby streets. Table 5 gives a summary of the hourly utilization percentages for the weekday study period and Table 6 gives a summary of the hourly utilization percentages broken down by parking restrictions. It was determined that the weekday PM parking peak occurs from 8:00 to 9:00 PM with a parking utilization of 91 percent (or 133 vehicles occupying the 146 available spaces).

Table 5: Weekday Peak Parking Occupancy

	5:00 PM	5:30 PM	6:00 PM	6:30 PM	7:00 PM	7:30 PM	8:00 PM
Occupied Spaces	94	97	114	116	129	132	133
Available Spaces	52	49	32	30	17	14	13
Total Spaces	146	146	146	146	146	146	146
Utilization	64%	66%	78%	79%	88%	90%	91%

Table 6: Peak Hour Inventory and Occupancy Summary

Space Type	Existing Number of Spaces	Peak Period	
	Friday Evening Peak at 8:00 PM	Occupancy	Utilization
RPP	22	22	100%
Metered	106	107	101%
Non-Metered	18	4	22%
All On-Street Spaces	146	133	91%

Generally, parking utilization gradually increases from 5:00 PM to 8:00 PM, with many of the spaces occupied in the vicinity of the site. The availability of parking near the site becomes more limited after 6:30 PM, when many of the metered parking spaces in the area are not enforced after 6:30 PM, indicating that people are coming home and parking for the night in the metered spaces. This contributes to an anomaly that the metered spaces are actually utilized at a higher rate than under metered conditions with more vehicles utilizing the curb space after 6:30 PM than meters exist, particularly along K and L Streets between 4th and 5th Streets. Many of the parking spaces surrounding the area are highly utilized; however, there is still a large amount of unrestricted parking available on the north side of K Street, between 2nd and 3rd Street along the bridge that spans across I-395 below.

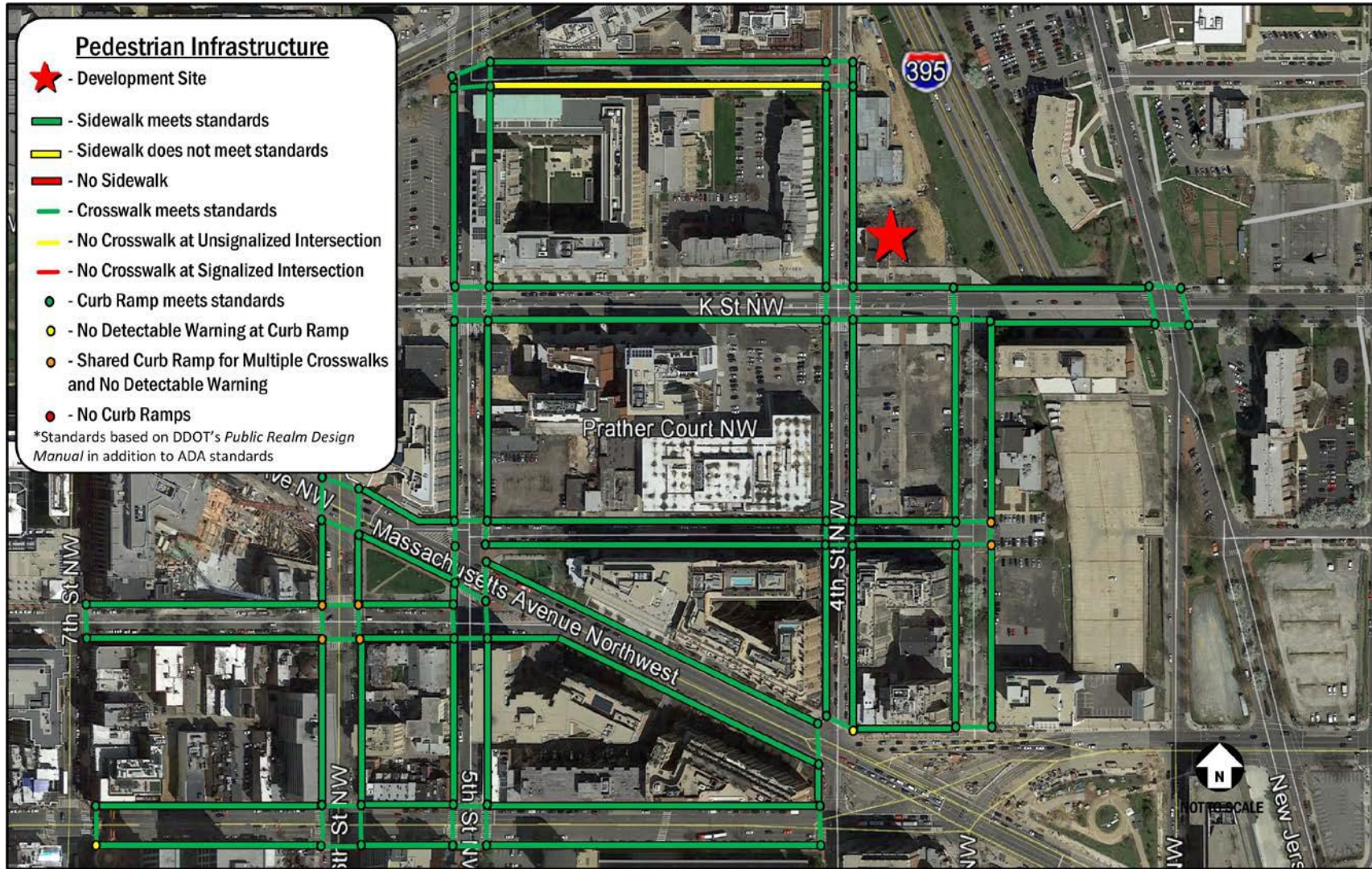


Figure 4: Pedestrian Infrastructure

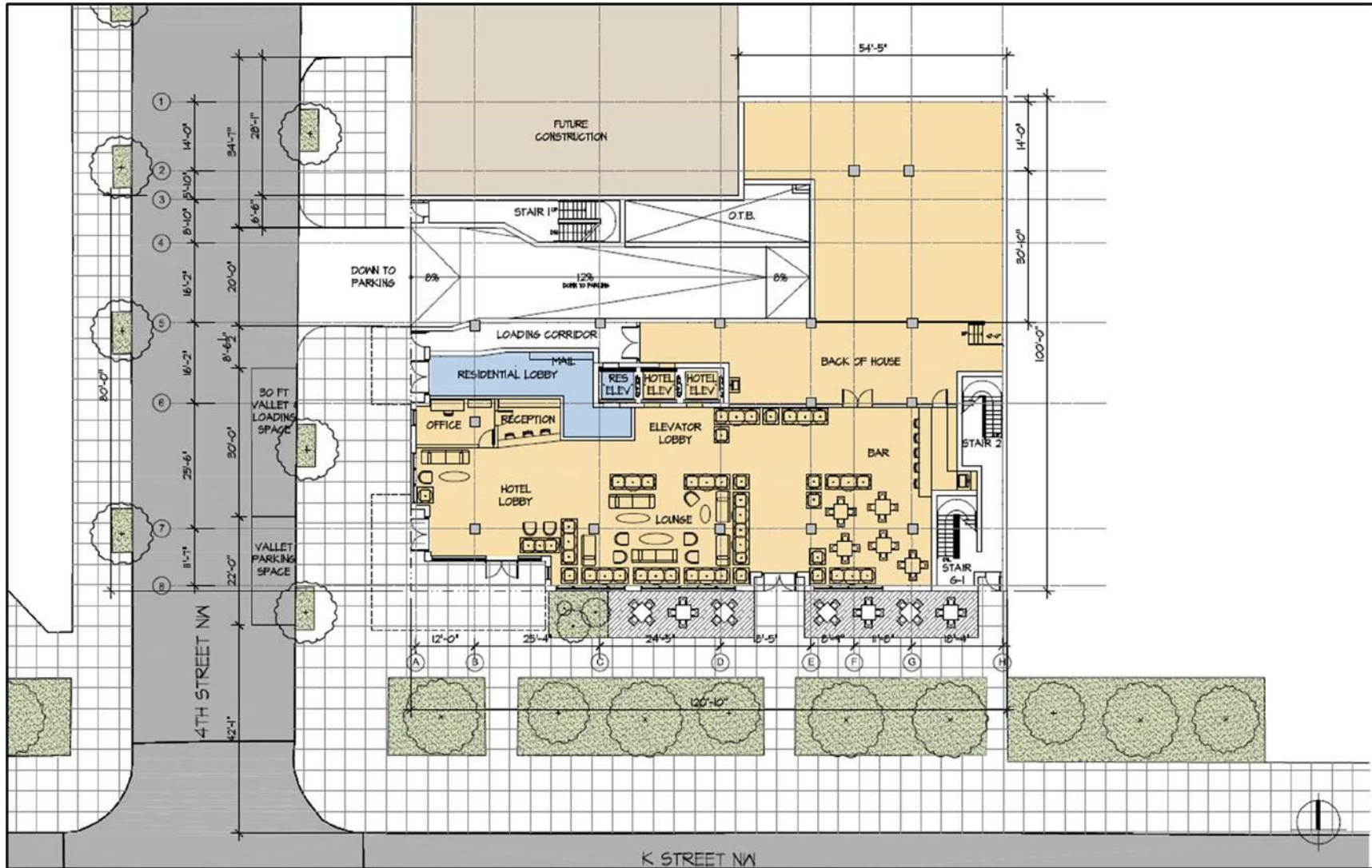


Figure 5: Site Plan

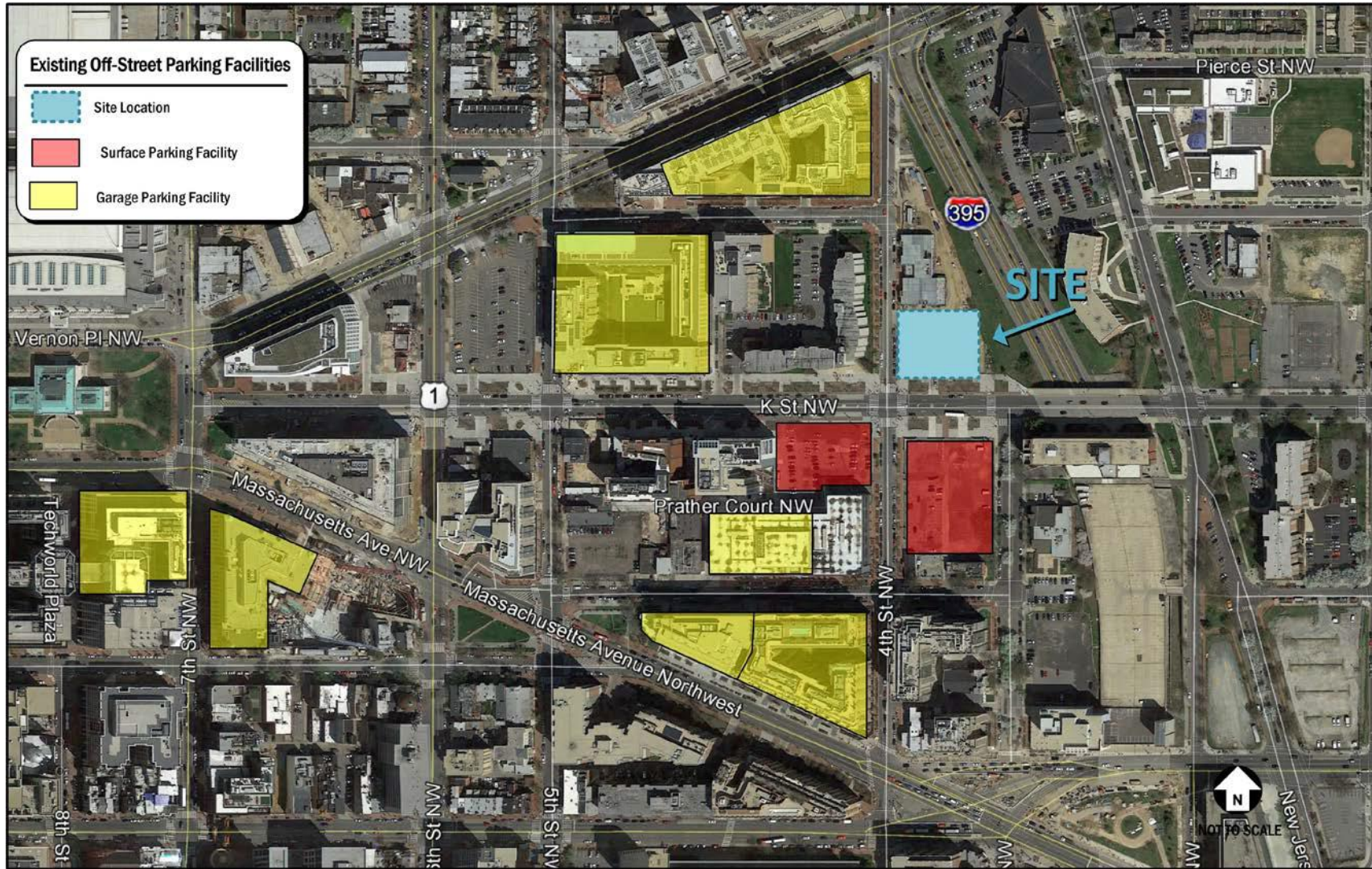


Figure 4: Nearby Off-Street Parking Facilities

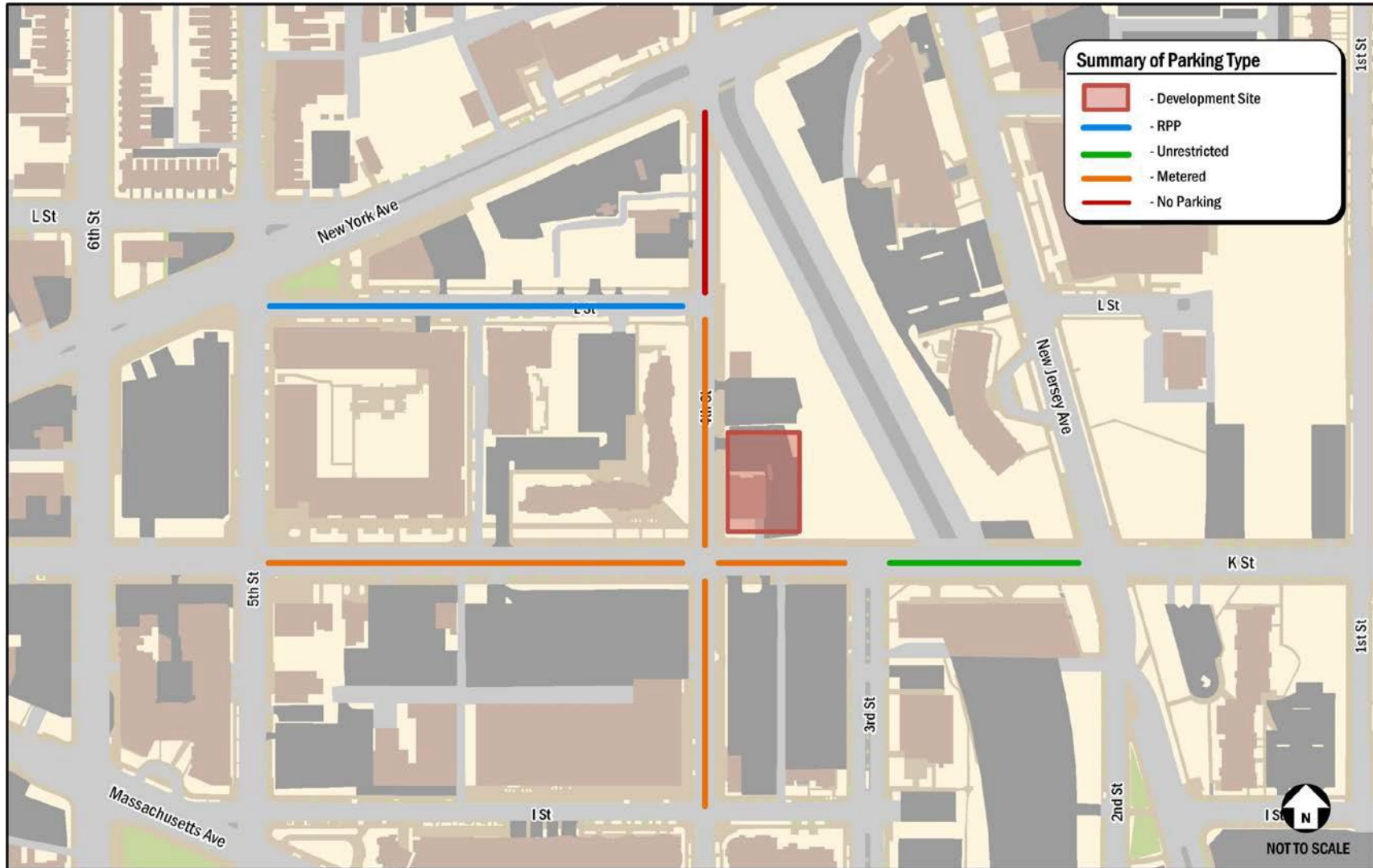


Figure 7: Parking Restrictions by Block Face

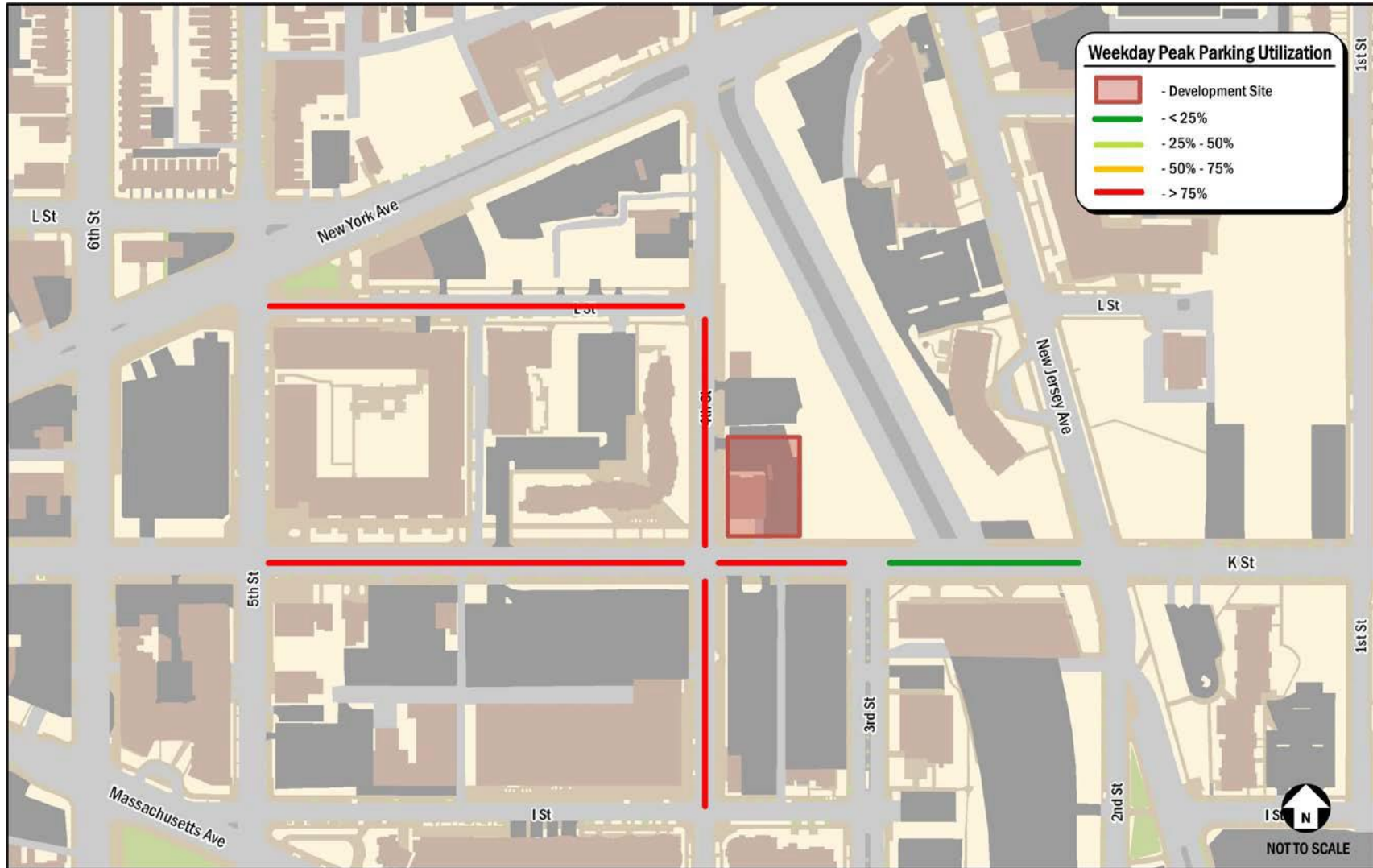


Figure 8: Weekday PM Peak Hour Street Parking Occupancy

Loading

The site is planned to provide a 20 foot service space, however the Zoning required 30 foot loading space and 100sf loading platform cannot be provided due to the compact nature of the site. As such, the Applicant is coordinating with DDOT to locate a loading space curbside on 4th Street adjacent to the parking garage curb cut that may also be used for valet operations, as shown on Figure 4. The number of truck trips generated by a project of this scale is relatively low. Based on previous studies, it is expected that the new project would not generate more than five to six (5-6) truck trips per day. These are likely to be primarily delivery trucks such as USPS, FedEx, UPS and other smaller delivery vehicles three to four (3-4) times per day. Given that the residential units are planned to be furnished, little to no truck activity is expected for residential move-in and move-out activities. However, two to three (2-3) larger trucks (up to 30 feet) could be expected per day for hotel deliveries. Deliveries will be accepted curbside on 4th Street and will utilize the service corridor adjacent to the curb cut and into the back-of-house space.

All trash pick-up activity will occur curbside from the loading space. All trash bins will be fully enclosed within the building; the bins will be wheeled curbside only for trash pick-up and will be promptly returned to the trash room. At no time will trash bins be left curbside unattended for pick-up. Trash pick-up is expected one to two (1-2) times per day and is expected to utilize the loading corridor or the garage ramp to access the trash room in the parking garage.

In addition, a loading management plan has been developed for the project. The goals of this plan are to minimize undesirable impacts to the neighborhood and to building tenants, reduce conflicts between truck traffic using the curbside loading space and potential valet operations, and ensure smooth operation of the loading operations through appropriate levels of management and scheduling. The components of the loading management plan are as follows:

- Vendors and on-site tenants will be required to coordinate and schedule deliveries and a loading coordinator will be on duty during delivery hours.
- Trucks accessing the on-street loading space will be limited to a maximum of 30 feet in length.
- All tenants will be required to schedule any loading operation conducted using a truck greater than 20 feet in length.
- Deliveries will be scheduled such that the on-street loading capacity is not exceeded and so as not to conflict with potential valet operations. In the event that an unscheduled delivery vehicle arrives while the loading space is full, that driver will be directed to return at a later time when the loading space will be available so as to not impede traffic along 4th Street.
- Deliveries from 30-foot trucks or 20-foot service vehicles will prohibited from being delivered directly from K Street and instead will be required use the loading area proposed on 4th Street.
- Trucks using the loading area will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (Engine Idling), the regulations set forth in DDOT’s Freight Management and Commercial Vehicle Operations document, and the primary access routes listed in the DDOT Truck and Bus Route System.
- The loading area operation will be limited to daytime hours of operation, with signage indicating these hours posted prominently at the loading space with notification also given to tenants. The use of the on-street space for loading will be coordinated with valet operations so as to determine the most optimal times for loading.

Transportation Demand Management

Transportation Demand Management (TDM) is the application of policies and strategies used to reduce travel demand or to redistribute demand to other times or spaces. TDM typically focuses on reducing the demand of single-occupancy private vehicles during peak period travel times or on shifting single-occupancy vehicular demand to off-peak periods. TDM's importance within the District is highlighted within section T-3.1 of the DC Comprehensive Plan, where it has its own dedicated section including TDM policies and actions.

Proposed TDM Plan

Based on the DDOT expectations for TDM programs, and analyzing the specific attributes of the development site, the following outlines the proposed TDM plan for the 317 K Street development.

- ***Transportation Management Coordinator (TMC)***
Effective Transportation Management Programs (TMPs) require a coordinator to implement and manage TDM strategies. The TDM plan is designed to encourage alternate modes of transportation vs. a private vehicle to and from the property. As such, the TDM plan will be implemented and managed by a selected coordinator at the development. A member of the property management group will serve as primary point of contact and will be responsible for coordinating, implementing and monitoring the TDM strategies between all uses on site, as identified below. This responsibility includes the development and distribution of information and promotional brochures to residents, hotel guests, visitors, and employees regarding transit facilities and services, pedestrian and bicycle facilities and linkages, ridesharing (carpool and vanpool), and car sharing. This person will also be responsible for ensuring the plan's effectiveness, and improving upon it over time, if necessary.
- ***On-Site Services***
A TransitScreen will be installed in the hotel and residential lobbies to provide residents, hotel guests, visitors, and employees available transportation choices and provide real-time transportation updates. While all residents and guests will enjoy the information on the TransitScreen, it is envisioned that the ease of transportation alternatives at this location, including the real-time transportation information in the hotel and residential lobbies, will be one of the factors in residents' and guests' decisions to patronize at this location. The TransitScreen is just one tool for residents, guests, and employees to utilize, in order to aid them in opting for transit-related modes of transportation vs. driving a private vehicle. In addition, the TMC will make printed materials related to local transportation alternatives available to residents, guests, and employees upon request. These printed materials may include, but are not limited to, Metrorail and Metrobus maps and schedules, Capital Bikeshare maps, DC Circulator maps, and other non-auto services.
- ***Marketing Program***
The TMC will establish a TDM marketing program that provides detailed transportation information and promotes walking, cycling, and transit. This program will consist of a multi-modal access guide that provides comprehensive transportation information compiled in a brochure for distribution and/or provided on hotel and residential websites. The marketing program will also provide website links to CommuterConnections.com and goDCgo.com, which provide transportation information and options for getting around the District. Additionally, this marketing program will promote useful smartphone apps to direct residents, guests, and employees to useful commuting options such as Lyft, Uber, RideScout, CapitolHop, Embark DC Metro, MyNextBus, and WMATA.com.

With respect to hotel guests, the TDM marketing program will include a multi-level approach, as follows:

First – Prospective guests will be informed about parking and alternate modes of transportation as part of the pre-reservation and reservation process, through check-in. The importance of effectively communicating what guests should expect with regards to parking and transportation should not be taken lightly. To that end, potential guests will be thoroughly informed regarding transportation alternatives and parking information so that guests know what to expect when booking a reservation. Detailed transportation and parking information will be prominently displayed on:

- The hotel and restaurant websites
- Online Travel Agency (OTA) websites
- Other on-line booking and informational website the hotel or restaurant partners with (including rating review websites)
- Email booking confirmations
- Email booking reminders
- Verbally via reservationists
- Printed brochure available for distribution

All information will emphasize and encourage alternate modes given the hotel's convenient location near several Metrorail stations. These alternate modes will include regional travel options that include Union Station and the nearby airports and their connections to the hotel via commuter rail, Metrorail, intercity bus, taxi, Uber, and carshare.

Second – As noted above, hotel confirmations will contain notice to guests that limited parking is available on-site and that the hotel encourages and emphasizes alternative modes. The reservation email will provide the alternative transportation options and the locations of off-site parking facilities, in the event guests decide to drive and will assist guest in planning ahead to use alternative methods of transportation.

▪ *Hotel Guest Transportation Incentives*

To help encourage non-auto transportation uses, the hotel operator will offer, and the TMC will coordinate, daily Capital Bikeshare passes to hotel guests as a part of Capital Bikeshare's Bulk Membership program for hotels. These daily passes will be available upon request for hotel guests. The Capital Bikeshare pass incentive to guests will be prominently displayed on the various booking sources for the hotel. While it is not expected that hotel guests will arrive for their stay via Capital Bikeshare, the passes will be offered to guests as a convenient mode of transportation, thereby lessening the need for a personal vehicle during their stay.

▪ *Resident Transportation Incentives*

To help encourage non-auto transportation uses among residents, the Applicant will offer the first occupant of each residential unit with a one-time, one-year carsharing membership and application fee, a \$100 Smartrip card, or a one-time, one-year Capital Bikeshare membership to help alleviate the reliance on personal vehicles. These incentives will be offered in a move-in transportation package that includes brochures for transit facilities as well as bicycle and car sharing services for the first occupant of each residential unit.

- *Bicycle Amenities*
The operator will encourage all alternative transportation modes including bicycling. Bicycling will be promoted for employees, hotel guests, and residents with the provision of secure on-site bicycle parking spaces as well as exterior temporary bicycle parking. These spaces will be provided at a rate that exceeds current requirements and will be provided consistent with the rates proposed in the Zoning Regulations Review (ZRR) currently under consideration. The TDM marketing program will include brochures and links to websites on bicycling in the District and for Capital Bikeshare.
- *Ride-matching/Ridesharing Program*
Employees who wish to carpool will be provided detailed carpooling information as part of the TDM marketing program and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG), as described above.

Conclusions

This memorandum presents the findings of a Comprehensive Transportation Review for the 317 K Street development. The proposed development consists of 30 furnished residential units and a 200-room hotel. The following conclusions were made regarding the development:

- The site is surrounded by an extensive network of transit, bicycle, and pedestrian facilities that results in an adequate environment for safe and effective non-auto transportation;
- Based on the site location near ample transit services, the surrounding mixed-use walkable location, and an aggressive TDM plan, the proposed parking will adequately serve the needs of the development;
- Based on an estimation of loading activity for the development, it was determined that the amount of loading activity expected to take place at the site will be adequately served by the on-street loading area proposed along 4th Street; and
- A TDM plan for the development will include the implementation of a TDM coordinator, on-site services, a marketing program, transportation incentives, bicycle amenities, and ride-matching/ridesharing programs.