


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



**d.** Planning and Sustainability Division

**MEMORANDUM**

**TO:** District of Columbia Board of Zoning Adjustment

**FROM:** Anna Chamberlin  
Project Review Manager 

**DATE:** September 14, 2018

**SUBJECT:** BZA Case No. 19751 – 2619-2623 Wisconsin Avenue NW

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**APPLICATION**

MED Developers, LLC (the “Applicant”), pursuant to Title 11 (2016 Zoning Regulations) of the District of Columbia Municipal Regulations (DCMR), Subtitle X, Chapter 9, requests special exceptions under the use provisions of Subtitle U § 203.1(f), and under Subtitle C § 703.2 from the minimum parking requirements of Subtitle C §701.5 to construct a new continuing care retirement community in the R-1-B Zone. The site is located at 2619-2623 Wisconsin Avenue NW (Square 1935, Lots 44 and 812).

The Applicant proposes to construct a new memory care facility on two (2) vacant lots, which is anticipated to include the following development program:

- 34 assisted living units
- Nine (9) vehicle parking spaces perpendicular to the rear 15-foot public alley
- One (1) loading area parallel to the rear 15-foot public alley

**SUMMARY OF DDOT REVIEW**

The District Department of Transportation (DDOT) is committed to achieve an exceptional quality of life in the nation’s capital by encouraging sustainable travel practices, safer streets, and 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 and take advantage of the District’s multimodal transportation network. The purpose of DDOT’s review is to assess the potential transportation impacts of the proposed action on the District’s transportation network and, as necessary, propose mitigations that are commensurate with the action. After an extensive review of the case materials submitted by the Applicant, DDOT finds:

## Site Design

- Vehicle site access is proposed via a rear 15-foot public alley, which parallels Wisconsin Avenue NW. The alley is accessible via Edmunds Street NW, which is one-way westbound adjacent to the site, and Davis Street NW, which is one-way eastbound;
- The Applicant is not required to provide dedicated loading per Subtitle C 901.1, however, based on the site's delivery and trash collection needs, the Applicant proposes to provide a loading area parallel to the alley;
- Deliveries are anticipated twice per week, and larger trucks will need to make multiple movements in order to enter the alley. While this is generally not preferable, the cartway space on both Edmunds and Davis inhibit the potential for curbside loading, and trash vehicles servicing the home abutting the alley currently operate under the same conditions; and
- The loading area and 15-foot Building Restriction Line (BRL) on Edmunds Street NW limit the amount of site area that can be provided to at-grade dedicated off-street vehicle parking.

## Travel Assumptions

- Per Subtitle C § 701.5, the Applicant is required to provide 17 vehicle parking spaces. Due to site constraints, the Applicant proposes to provide nine (9) spaces accessible via the site's rear 15-foot public alley, resulting in a relief request of eight (8) vehicle parking spaces; and
- Per Subtitle C § 802.1, the Applicant is required to provide 11 long-term and two (2) short-term bicycle parking spaces. DDOT has not located these on the Applicant's plans (exhibit 41A).

## Transportation Analysis

- To support its request for vehicle parking relief, the Applicant submitted a parking utilization study, which found that peak vehicle parking demand occurred at 6:00 PM on weekdays (58 percent of the spaces across 18 surveyed block faces were used) and at 11:00 AM on Saturdays (64 percent of the spaces across 20 surveyed blocks were used). DDOT notes that the curbside adjacent to Wisconsin Avenue NW is restricted for rush hour use on weekdays between 4:00 PM and 6:30 PM, accounting for the discrepancy between the number of surveyed block faces;
- Residents of the memory care facility will not have personal vehicles on site;
- The Applicant anticipates that the use will require approximately 18 daytime and three (3) overnight staff members. While some employees are anticipated to take transit, in the event each employee drove a personal vehicle to the site, employees would require a maximum of 9 curbside spaces during the daytime; and
- The Residential Parking Permit (RPP) Streets nearby the project (see Figure 1) restrict parking to two (2) hours for vehicles for vehicles that do not display a Zone 3 permit. Employees would not be able to park on these streets for the entirety of a shift without being subject to enforcement.

## Mitigations

- DDOT anticipates that the proposed action will lead to a minor increase in vehicle, transit, pedestrian, and bicycle trips. In addition, the project has the potential to generate minor impacts to on-street parking conditions in the area. Vehicle parking demand may increase slightly as a result of the project, inducing a higher level of parking utilization in the immediate area;
- Despite these minor impacts, DDOT has no objection to the approval of the requested relief on the condition the Applicant:

- Satisfy the Transportation Demand Management (TDM) requirements of Subtitle C § 703.4 by offering full-time and shift employees a transit subsidy of no less than \$10 per week, which equates to 50 percent of the weekly cost of a standard Metrobus or Capital Bikeshare commute; and
- Satisfy the bicycle parking requirements of Subtitle C § 802.1, or request relief as necessary. Because residents are not anticipated to need bicycle parking, DDOT would support a relief request of up to 8 of the required long-term bicycle parking spaces, which would result in three (3) long-term spaces for employees and two (2) short-term spaces (or one inverted U-rack) fronting the site.

**Public Space Coordination**

- There are two (2) 15-foot Building Restriction Lines (BRL) adjacent to the site on Wisconsin Avenue NW and Edmunds Street NW. Based on the current site design, it appears that a leadwalk, and potentially part of a ramp and stairwell, are proposed within the BRL area and will need to be permitted.

**TRANSPORTATION ANALYSIS**

Vehicle Parking

Per Subtitle C § 701.5, the Applicant is required to provide 17 vehicle parking spaces. Due to site constraints and loading needs, the Applicant proposes to provide nine (9) spaces accessible via the site’s rear 15-foot public alley, resulting in a relief request of eight (8) vehicle parking spaces. To support its request, the Applicant provided a parking study, which examined the curbside vehicle parking utilization within the vicinity of the project. The study blocks and their associated restrictions can be found in Figure 1 below.

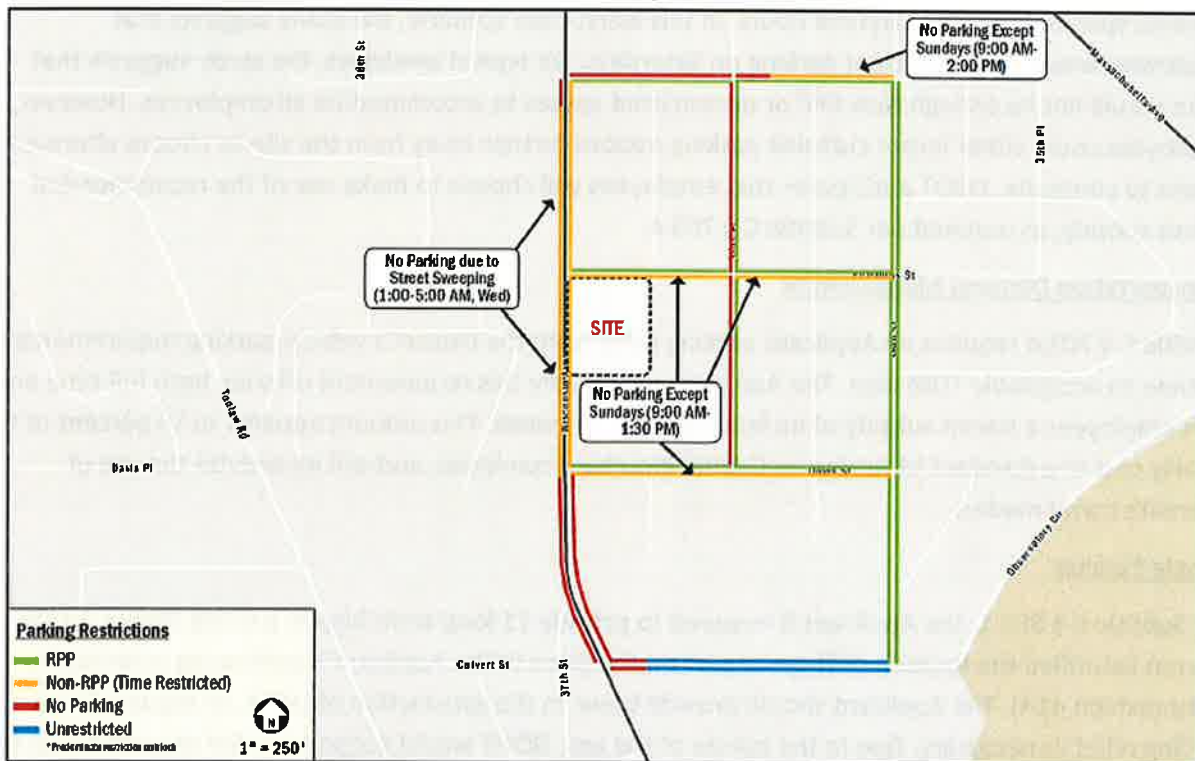


Figure 1 – Parking Restrictions (Source: Technical Memorandum prepared by Gorove/Slade, dated May 2, 2018)

As illustrated in Figure 1, the majority of streets within the vicinity of the project are Residential Parking Permit streets, which limit parking for vehicles to two (2) hours between 7:00 AM and 8:30 PM, Monday through Friday, for vehicles that do not display zone 3 permits. The time-restricted streets internal to the residential street network limit parking to Sundays, between 9:00 AM and 1:30 PM. On Wisconsin, vehicle parking is time-restricted along the northbound curb between 4:00 PM and 6:30 PM on weekdays to provide additional capacity for rush hour traffic. On the southbound side of Wisconsin, parking is restricted on Wednesdays between 1:00 AM and 5:00 AM for street cleaning purposes.

The Applicant’s survey included hourly counts on a typical Thursday between 4:00 PM and 9:00 PM and Saturday between 10:00 AM and 5:00 PM. Blocks restricted during the surveys were excluded from the counts. Table 1 summarizes the results of the parking study.

Space Type	Thursday Peak Period (6:00 PM)				Saturday Peak Period (11:00 AM)			
	Spaces	Occupancy	Utilization	Available	Spaces	Occupancy	Utilization	Available
Non-RPP	22	17	77%	5	56	45	80%	11
RPP	205	106	52%	99	205	114	56%	91
Unrestricted	24	23	96%	1	24	23	96%	1
<b>All On-Street Spaces</b>	<b>251</b>	<b>146</b>	<b>58%</b>	<b>105</b>	<b>285</b>	<b>182</b>	<b>64%</b>	<b>103</b>

**Table 1 – Summary Table (Source: Technical Memorandum prepared by Gorove/Slade, dated May 2, 2018)**

Table 1 illustrates that there is sufficient curbside parking to support the needs of the facilities guests, who are anticipated to have parking needs within the two (2) hour limits allowed per RPP restrictions. In regard to employees, the Applicant anticipates that the use will require approximately 18 daytime and three (3) overnight staff members. While some employees are anticipated to take transit, in the event each employee drove a personal vehicle to the site, employees would require a maximum of nine (9) curbside spaces during the daytime hours. In this worst-case scenario, the study suggests that employees would have sufficient parking on Saturdays. On typical weekdays, the study suggests that there would not be enough Non-RPP or unrestricted spaces to accommodate all employees. However, employees could either locate curbside parking options further away from the site or choose alternate means to commute. DDOT anticipates that employees will choose to make use of the recommended transit subsidy, as required per Subtitle C § 703.4.

Transportation Demand Management

Subtitle C § 703.4 requires an Applicant seeking relief from the District’s vehicle parking requirements to provide an acceptable TDM plan. The Applicant may satisfy this requirement offering both full-time and shift employees a transit subsidy of no less than \$10 per week. This amount equates to 50 percent of the weekly cost of a standard Metrobus or Capital Bikeshare commute, and will incentivize the use of alternate travel modes.

Bicycle Parking

Per Subtitle C § 802.1, the Applicant is required to provide 11 long-term bicycle parking spaces. DDOT has not identified the location of these spaces on the plans in the Applicant’s prehearing submission plans (exhibit 41A). The Applicant should provide these to the satisfaction of DCRA, or request bicycle parking relief as necessary. Due to the nature of the use, DDOT would support a relief request for up to eight (8) of the required long term spaces in order to maintain at least three (3) long-term spaces for employees. The Applicant is also required to provide two (2) short-term bicycle parking spaces, which

can be accommodated by supplying one (1) inverted U-rack in public space fronting Wisconsin Avenue NW.

#### Loading and Trash Collection

Dedicated loading facilities are not required by zoning. However, the Applicant proposes to facilitate loading and trash operations in a loading area parallel to the rear 15-foot public alley. Trucks will need to turn into the alley from either Davis Street NW or Edmunds Street NW, which both have narrow cartways. As such, larger vehicles may need to make multiple movements on the low-volume streets in order to enter the alley, which is consistent with existing trash operations. If approved, the Applicant should monitor conditions at the alley's intersections to assess whether or not curbside parking needs to be restricted on Edmunds or Davis adjacent to the alley to allow additional room for maneuvers into the alley.

#### Public Space

DDOT's lack of objection to the application should not be viewed as an approval of the project's public space elements. If any portion of the project has elements in the public space requiring approval, the Applicant is required to pursue a public space permit through DDOT's permitting process.

The Applicant will need to apply for the elements identified below and any other elements proposed in public space. DDOT expects the Applicant's proposed public space design to meet all District standards. A permit application can be filed through the DDOT [Transportation Online Permitting System \(TOPS\)](#) website:

- Leadwalk, Ramp, and Stairs – The Applicant proposes a stairwell, ramp, and leadwalk facilitating access to the site from Wisconsin Avenue NW. There is a BRL at this location, and it is unclear whether or not portions to the ramp and stairs fall within the 15-foot BRL area fronting the site. The Applicant will need to apply for a permit for any elements within the BRL area.
- Short-Term Bicycle Rack – Per Subtitle C § 802.1, the Applicant is required to provide two (2) short-term bicycle parking spaces, which can be accommodated by supplying one (1) inverted U-rack in public space fronting Wisconsin Avenue NW.
- Turning Maneuvers on Davis and Edmunds – The Applicant should monitor conditions at the alley's intersections with adjacent streets to assess whether or not curbside parking needs to be restricted on Edmunds and Davis adjacent to the alley to allow additional room for maneuvers into the alley.

The Applicant should refer to Titles 11, 12A and 24 of the [DCMR](#) and the most recent versions of DDOT's [Design and Engineering Manual](#) and [Public Realm Design Manual](#) for public space design guidance.

AC:pr

