


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: August 24, 2018

SUBJECT: BZA Case No. 19816 – 2461 Wisconsin Avenue NW

APPLICATION

InSite Real Estate Investment Properties LLC (the “Applicant”), pursuant to Title 11 (2016 Zoning Regulations) of the District of Columbia Municipal Regulations (DCMR), Subtitle X, Chapter 9, requests a special exception under the use requirements of Subtitle U § 203.1(g) to permit a daytime care use serving up to 128 children with 26 full-time staff. The site is located in the R-12 Zone at 2461 Wisconsin Avenue NW (Square 1299, Lot 959).

SUMMARY OF DDOT REVIEW

After reviewing the case materials submitted by the Applicant, DDOT finds:

Site Design

- The existing building at 2461 Wisconsin Avenue NW is currently served by a nonstandard curb cut on Calvert Street NW that is approximately 56 feet wide with a 5-foot median island;
- The Applicant proposes to reduce the curb cut to be 24 feet wide, which will bring the curb cut into compliance;
- The Applicant proposes to stripe the existing parking lot with three (3) standard, two (2) compact, one (1) accessible, and one (1) noncompliant tandem space, meeting the Applicant’s vehicle parking zoning requirement of six (6) off-street spaces;
- Zoning does not require the site to provide a dedicated loading facility. Dumpsters will be provided in the parking lot and trash collection will occur prior to operations to allow head-in, head-out garbage truck movements; and
- Per Subtitle C § 802.1 and § 802.3, the Applicant is required to provide two (2) long-term and two (2) short-term bicycle space. The Applicant proposes to meet this requirement by providing at least one inverted U-rack in public space (2 short-term bicycle parking spaces) and two (2) long-term bicycle parking spaces internal to the building.

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Travel Assumptions

- The Applicant's Comprehensive Transportation Review (CTR) Study anticipates that approximately 49% of the trips generated by the site will be made by transit users, pedestrians, and bicyclists based on observations at other daycare facilities. Due to the subject site's context, DDOT anticipates that the proposed daycare may generate a greater number of vehicle trips than what is suggested by the Applicant's CTR; and
- The Applicant's CTR anticipates that the use will generate approximately 38 morning pick-ups and 34 evening drop-offs. DDOT recommends the Applicant be subject to a morning cap of 38 vehicle drop-offs between the hours of 7:00 AM and 9:00 AM to ensure the Applicant meets the expectations it has defined in its CTR.

Transportation Analysis

- The pick-up and drop-off periods for the use will occur across two (2) peak hour windows in the morning and afternoon;
- To meet its pick-up and drop-off demand, the Applicant proposes to restrict six (6) of the seven (7) off-street vehicle parking spaces for pick-ups and drop-offs. In the event the off-street parking lot is full, parents may use the unrestricted spaces on Calvert Street NW. Additionally, the Applicant proposes to apply to sign 15 minute parking for a total of three (3) spaces fronting the site;
- The Applicant is working with the Department of Recreation to secure two (2) spaces at the nearby Guy Mason Recreation Center parking lot for parents who will need to stay on-site for longer periods;
- The Applicant proposes to restrict employees from using the parking lot to ensure it is available for pick-ups and drop-offs. To accommodate employees, the Applicant proposes to offer a transit subsidy in the amount of \$25.00 per paycheck, consistent with other KinderCare locations; and
- Based on DDOT's defined impact thresholds for both LOS and queuing, the project increases queues and delay at the eastbound approach at the intersection of Massachusetts Avenue and Observatory NW;

Mitigations

- The Applicant proposes to mitigate its impacts by striping a separate 50-foot left turn lane, which would reduce right-turn delay, but require the removal of approximately three (3) residential parking permit spaces. This is not an appropriate mitigation; and
- DDOT recommends that the Applicant employ Transportation Demand Management (TDM) strategies to reduce rather than accommodate the site's vehicular impacts on the District's network (discussed in the Recommendations section below).

Public Space Coordination

- Based on the application materials, the following public space issues need to be resolved outside of the zoning process:
 - The Applicant should work with DDOT to amend the signage on Calvert Street NW to create one (1) 15 minute vehicle parking space east of the proposed curb cut and at least two (2) 15 minute parking spaces to the west of the proposed curb cut. This will require relocation of existing "NO PARKING" signage;
 - The existing site contains a vault within public space on Calvert Street NW. Because no major additions or changes to the building are proposed, the Applicant will not be required

to remove the vault; however, the Applicant should design a public space program that screens the vault to the extent possible;

- The Applicant should bring the revised driveway and curb cut up to DDOT standards and carry the sidewalks grade, material, and scoring pattern across the driveway;
 - The Applicant should restore landscaping in the location where the curb cut width reduction is proposed, as well as provide and install one (1) street tree at this location;
 - The Applicant should continue to work with DDOT's Urban Forestry Division through the permitting process to ensure the location of the proposed bike racks does not conflict with the critical root zone of any street tree;
 - Per Subtitle C § 714.2, the Applicant is required to screen its surface parking lot and should request 42" hedges within public space around the lot's perimeter; and
 - The Applicant should provide an additional lead walk on Calvert Street NW at the location of an existing corner doorway to facilitate access into the site.
- Changes should be made outside of the zoning process when the Applicant applies for public space permits.

RECOMMENDATION

DDOT has reviewed the application materials and determined that the proposed action will lead to an increase in vehicle, transit, pedestrian, and bicycle trips. In addition, the project will reduce the amount of available on-street parking within the immediate area, particularly during pick-up and drop-off periods. Despite these impacts, DDOT has no objection to the approval of the application on the following conditions:

- Provide signage in the off-street vehicle parking lot indicating that the six (6) compliant parking spaces should be used for pick-up and drop-off only;
- Rather than implement striping for separate turn lanes to mitigate transportation impacts at Observatory and Massachusetts Avenue NW, the Applicant should provide the following TDM measures:
 - Offer all full-time employees the option to participate in WMATA's SmartBenefits program or another program that allows employees to set aside up to \$260 pre-tax dollars for use on public transportation or vanpooling, as required by the DC Commuter Benefits Law;
 - Offer all full-time employees a transit benefit of no less than \$25 per paycheck, as proposed in the Applicant's pre-hearing statement;
 - Offer all full-time employees annual Capital Bikeshare memberships at no cost, upon request; and
 - Submit a carpooling plan to DDOT's TDM coordinator for review and approval. The plan should include strategies to connect families based on geographic location.
- Submit an annual performance monitoring report to DDOT's Planning and Sustainability Division (PSD) with the following components:
 - Demonstrate adherence to a morning trip cap of 38 inbound vehicle trips by taking at least two (2) morning counts on a typical school day at least twice per year;
 - Provide the number of families carpooling to and from the site;

- Provide the number of employees who take advantage of the employer provided transit subsidy and no-cost Capital Bikeshare membership;
- The total number of employees who take advantage of the no-cost Capital Bikeshare membership or transit subsidy should be no less than 14 full time employees, consistent with the mode-split applied in the Applicant's CTR;
- If the Applicant can show compliance with the 38 inbound vehicle trip cap and 14 employee non-auto mode-split requirement for a total two (2) consecutive years, performance monitoring shall no longer be required;
- In the event the Applicant does not meet its requirements, it will be required to coordinate with DDOT's Planning and Sustainability Division to increase the intensity of its TDM measures until its requirements are met for two (2) consecutive years; and
- In the event the Applicant fails to submit its required reports, it will be assumed that the Applicant has not met its requirements, in which case it will be required to coordinate with DDOT's Planning and Sustainability Division to increase the intensity of its TDM measures until its requirements are met for two (2) consecutive years.

TRANSPORTATION ANALYSIS

Site Access

The existing building at 2461 Wisconsin Avenue NW was formerly occupied by an office tenant and is currently served by an approximately 56-foot wide curb cut on Calvert Street NW with a 5-foot median island. The existing curb cut does not comply with DDOT access standards because it is too wide. Additionally, there is no need for two (2) two-way entry and exit points in the parking lot. The Applicant has agreed to eliminate the existing pedestrian island and will reduce the curb cut to 24 feet, which will allow for the restoration of a portion of public space to landscaping.

Trip Generation

The Applicant ran a series of trip generation calculations using the Institute of Transportation Engineers (ITE) *Trip Generation Manual* based on the site's number of employees, student capacity, and square footage. Trip generation was ultimately provided based on square feet because this method yielded the most conservative approach. Consistent with DDOT standard practice, the Applicant converted vehicle trips to person trips using Average Vehicle Occupancy (AVO) rates from the National Household Travel Survey. For daycare uses, the AVO is 2.0 persons per car in the morning and 3.0 persons per car in the evening. Additionally, the Applicant developed its mode-split assumptions by looking at the average across four (4) other daycares operating in the northwest quadrant of the District, including the House of Ruth, the Jewish Community Center, the School for Friends, and Jubilee Jumpstart. Based on its data collection, the Applicant anticipates that approximately 49% of trips generated by the site will be non-personal vehicle trips. While this approach is generally acceptable, because the walkability and transit options surrounding the four (4) surveyed daycares differ from the subject site, DDOT anticipates that the proposed daycare may generate a greater number of vehicle trips than what is suggested by the Applicant's CTR.

DDOT recommends the Applicant be subject to a morning cap of 38 vehicle drop-offs between the hours of 7:00 AM and 9:00 AM to ensure the Applicant meets the expectations it has defined in its CTR. The 38 cap represents the anticipated number of inbound vehicle trips, which should roughly mirror the

number of parents dropping students off in the morning assuming employees who choose to drive arrive prior to the peak drop-off period.

The Applicant’s trip generation is provided in Table 1 below.

Trip Component	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
12,616 SF Daycare (128 Students, 26 Staff) – LUC 565						
Total Person Trips	148	130	278	198	222	420
Non-auto Trips (49%)	73	64	137	97	109	206
Transit (21%)	31	27	58	42	47	89
Pedestrian/Bicycle (28%)	42	37	79	55	62	117
Person Vehicle Trips (51%)	75	66	141	101	113	214
Vehicle Trips ¹	38	33	71	34	37	71
1. Vehicle trips converted from person trips based on 2009 NHTS data.						

Table 1 – Trip Generation (Source: Wells + Associates, July 2018, Comprehensive Transportation Review, Table 9)

Roadway Capacity and Operations

The Applicant was required to provide a capacity and queuing analysis. The results of the study indicate that the proposal impacts the eastbound approach of Observatory Circle NW at Massachusetts Avenue NW based on delay and queueing thresholds. Accounting for background growth, left-turning vehicles will experience an additional 148 seconds of delay as a result of the project, which will increase queue lengths at the intersection.

To mitigate its impact, the Applicant proposes to stripe a 50-foot left turn lane at the intersection. This would require the removal of approximately three (3) residential parking permit spaces on the northern side of Observatory Circle NW.

At this time, DDOT does not support the implementation of the proposed mitigation due to the loss of parking and lack of community support. Rather than make the proposed improvements, DDOT recommends that the Applicant employ Transportation Demand Management (TDM) strategies to reduce rather than accommodate the site’s vehicular impacts on the District’s network. The recommended Performance Monitoring plan will ensure the District has a mechanism to track the Applicant’s effort.

Off-Street Vehicle Parking

Per Subtitle C § 701.5, the Applicant is required to provide six (6) vehicle parking spaces and proposes to meet its requirement by striping an existing surface parking lot accessed via Calvert Street NW. The striped lot will provide six (6) vehicle parking spaces compliant with zoning, and an additional tandem space. The six (6) compliant spaces will be restricted to pick-up and drop-off use only. The single tandem space will be used by the site manager as it will not be accessible at all times.

During the design review process, the Applicant worked with DDOT to design the lot striping in a manner that will allow cars to enter head-in and exit-head out, however, these maneuvers will in some cases require multiple point turning movements. Figure 1 shows the Applicant’s parking lot.

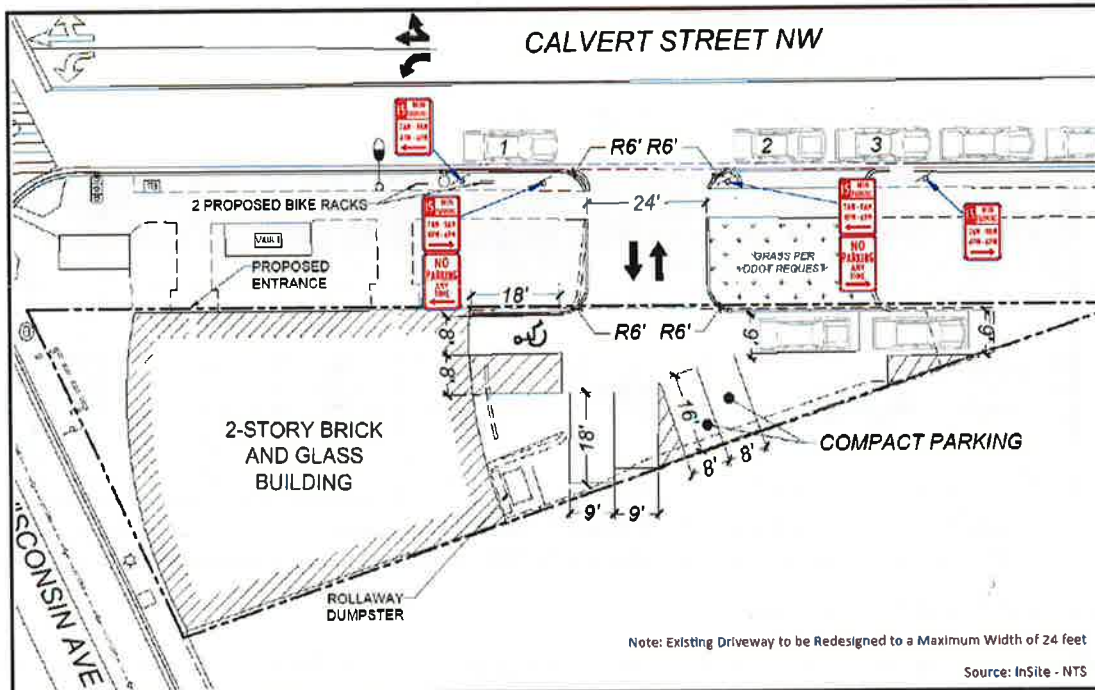


Figure 1 – Site Plan (Source: Wells + Associates, July 2018, Comprehensive Transportation Review, Figure 2)

Per Subtitle C § 714.2, the Applicant's surface parking will need to be screened with a wall, solid fence, or evergreen hedges of at least 42 inches. To maintain the number of parking spaces provided in the parking lot, the Applicant will not be able to provide screening on private property. The Applicant has the option of either requesting relief from the BZA or providing the required screening within public space. DDOT notes that fencing within public space may not be above 42 inches high and cannot be opaque. Therefore, if the Applicant chooses not to request relief from the screening requirements, its public space package should include 42-inch hedges around the perimeter of the lot.

Pick-Up and Drop-Off

The Applicant proposes to facilitate the majority of its pick-up and drop-off operations within the off-street parking lot. While the site only will provide six (6) vehicle spaces, the pick-up and drop-off periods will occur across two (2) peak hour windows.

To accommodate additional pick-up and drop off needs, the Applicant proposes to sign three curbside spaces adjacent to the site for 15 minute parking during the hours of 7:00 AM through 9:00 AM and 4:00 PM through 6:00 PM. Because the Applicant is reducing the existing curb cut, it will add roughly one (1) vehicle parking space along the curb. The Applicant proposes to add an additional space by relocating the existing no parking sign. The Applicant should continue to coordinate with DDOT outside the zoning process to implement curbside changes prior to the start of operations.

Finally, the Applicant is currently working with the nearby Guy Mason Recreation Center for two (2) additional spaces, which may be used by parents who need longer parking durations during pick-up and drop-off periods. Parents may also use the unrestricted on-street spaces between the recreation center and the use.

Bicycle Parking

Per Subtitle C § 802.1 and § 802.3, the Applicant is required to provide two (2) long-term and two (2) short-term bicycle space. The Applicant proposes to meet this requirement by providing at least one inverted U-rack in public space (2 short-term bicycle parking spaces) and two (2) long-term bicycle parking spaces internal to the building.

Loading & Trash Collection

Per Subtitle C § 901.1, the Applicant is not required to provide a dedicated loading berth or a service and delivery space. The Applicant proposes to accommodate deliveries and trash collection during hours when the use is not in operation. This will allow garbage trucks to access the dumpsters located in the parking lot, as well as maneuver head-in and head-out.

Transportation Demand Management and Performance Monitoring

Rather than implement the proposed striping mitigation at Massachusetts Avenue NW and Observatory Circle NW, the Applicant should implement a robust TDM plan, which will be evaluated by recommended performance monitoring. Per District Law, the Applicant is required to participate in WMATA's SmartBenefits program—or another similar program—that allows employees to set aside up to \$260 pre-tax dollars for use on public transportation or vanpooling. In addition, and because the Applicant is not providing on-site parking for employees, the Applicant should offer employees a transit subsidy of no less than \$25 per paycheck and an annual Capital Bikeshare memberships at no cost. Based on the mode split employed in the CTR, DDOT recommends that the Applicant demonstrate that at least 14 full-time employees take advantage of these benefits through its performance monitoring plan.

To reduce parent trips to the site, the Applicant should submit a carpooling plan to DDOT's TDM coordinator for review and approval. The plan should include strategies to connect families based on geographic location. To ensure the Applicant's trips are consistent with the CTR study, DDOT recommends a trip cap of 38 morning inbound trips.

DDOT recommends that the Applicant submit an annual performance monitoring report, which should be provided no more than one (1) year subsequent to the date of BZA approval or its previously submitted report. If the Applicant can demonstrate compliance with its trip cap and employee TDM requirement across two (2) years, the Applicant will no longer be required to provide annual reports. In the event the Applicant cannot demonstrate compliance, it will be required to work with DDOT's Planning and Sustainability Division to develop more robust TDM strategies until its requirements are met for two (2) consecutive years of reporting.

PUBLIC SPACE

DDOT's lack of objection to the application should not be viewed as an approval of 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.

- The Applicant should work with the agency's curbside operations team to amend the signage on Calvert Street NW to create one (1) 15 minute vehicle parking space east of the proposed curb cut and at least two (2) 15 minute parking spaces to the west of the proposed curb cut. This will require relocation of existing "NO PARKING" signage;
- The existing site contains a vault within public space on Calvert Street NW. Because no major additions or changes to the building are proposed, the Applicant will not be required to remove the vault; however, the Applicant should design a public space program that screens the vault to the extent possible;
- The Applicant should bring the revised driveway and curb cut up to DDOT standards and carry the sidewalks grade, material, and scoring pattern across the driveway;
- The Applicant should restore landscaping in the location where the curb cut width reduction is proposed, as well as provide and install one (1) street tree at this location;
- The Applicant should continue to work with DDOT's Urban Forestry Division through the permitting process to ensure the locations of any proposed bike rack fall beyond the critical root zone of any street tree;
- Per Subtitle C § 714.2, the Applicant is required to screen its surface parking lot and should request 42" hedges within public space around the lot's perimeter; and
- The Applicant should provide an additional lead walk on Calvert Street NW at the location of an existing corner doorway to facilitate access into the site.

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.

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