

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, AICP
Associate Director 

DATE: September 29, 2020

SUBJECT: BZA Case No. 20291 – 2100 M Street NW

APPLICATION

2100 M Street Property Owner 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 from under Subtitle C §1504.1 to modify the penthouse setback requirements in Subtitle §1502.1, and pursuant to Subtitle X, Chapter 10, requests a variance from the setback requirements of Subtitle I §201.6, from the closed court area requirements of Subtitle I §207.1, and the loading berth requirements of Subtitle C §905.2, to renovate and expand an existing 11-story office and retail building. The site is in the D-5 Zone at 2100 M Street NW (Square 72, Lot 75).

The Applicant is proposing to renovate and expand an existing mixed-use building by adding 107,398 square feet of office and 8,051 square feet of retail, resulting in a building of 364,933 square feet of office and 19,440 square feet of retail. The Applicant proposes to reduce the existing garage by five (5) vehicle parking spaces, resulting in 287 vehicle parking spaces, which includes 21 existing vault spaces.

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. 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 multi-modal transportation network.

The purpose of DDOT’s review is to assess the potential safety and capacity 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:

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- The site is located within ½ mile of three (3) Metrorail stations;
- The site is projected to generate an additional 25 morning peak hour vehicle trips and 29 evening peak hour vehicle trips, as compared to existing conditions;
- The Applicant is proposing to exceed the minimum requirements for short- and long-term bicycle parking, clothing lockers, and showers;
- The site is reducing on-site parking by five (5) spaces to 287 spaces (including non-compliant vault spaces). However, the parking ratio is still high considering its location downtown and proximity to transit;
- To mitigate the demand for driving from the additional density and the potential for induced demand from the high parking ratio, the Applicant has proposed a TDM plan that DDOT finds sufficiently robust. It should be included as a condition; and
- The Applicant is requesting relief from the 14-foot vertical clearance for the loading bay by providing only 12 feet 5 inches. DDOT has no objection so long as the Applicant implements the LMP proposed in the August 21, 2020 Transportation Statement, with the following additional condition:
 - Install a low clearance bar at the garage entry that notes the height of the low ceiling clearance.

RECOMMENDATION

The District Department of Transportation (DDOT) has reviewed the Applicant’s request and determined that based on the information provided, this proposed project will have no adverse impacts on the travel conditions of the District’s transportation network. The proposed project may lead to a minor increase in vehicular, 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 potential impacts, DDOT has no objection to the approval of the requested special exceptions on the following conditions:

- The Applicant will implement the following Transportation Demand Management (TDM) Plan, for the life of the project, as proposed in the August 21, 2020 Transportation Statement:
 - Identify Transportation Coordinators for the planning, construction, and operations phases of development. There will be a Transportation Coordinator for each tenant and the entire site. The Transportation Coordinators will act as points of contact with DDOT, goDCgo, and Zoning Enforcement.
 - Will provide Transportation Coordinators’ contact information to goDCgo, conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year. All employer tenants must survey their employees and report back to the Transportation Coordinator.

- Transportation Coordinators will develop, distribute, and market various transportation alternatives and options to the employees, including promoting transportation events (i.e., Bike to Work Day, National Walking Day, Car Free Day) on property website and in any internal building newsletters or communications.
 - Transportation Coordinators will receive TDM training from goDCgo to learn about the TDM conditions for this project and available options for implementing the TDM Plan.
 - Will notify goDCgo each time a new office tenant moves in and provide TDM information to each tenant as they move in.
 - Will provide links to CommuterConnections.com and goDCgo.com on property websites.
 - Transportation Coordinator will implement a carpooling system such that individuals working in the building who wish to carpool can easily locate other employees who live nearby.
 - Distribute information on the Commuter Connections Guaranteed Ride Home (GRH) program, which provides commuters who regularly carpool, vanpool, bike, walk, or take transit to work with a free and reliable ride home in an emergency.
 - Provide employees who wish to carpool with detailed carpooling information and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOC) or other comparable service if MWCOC does not offer this in the future.
 - Will meet ZR16 requirements for showers and lockers for use by employees. Six (6) showers and 61 lockers would be required if the project was new construction.
 - Will exceed ZR16 short- and long-term bicycle parking requirements. Long-term bicycle parking will be provided free of charge to all employees. 16 short-term and 100 long-term bicycle spaces will be provided.
 - Long-term bicycle storage rooms will accommodate non-traditional sized bikes including cargo and tandem bikes.
- The Applicant will implement the following Loading Management Plan (LMP), for the life of the project, as proposed in the August 21, 2020 Transportation Statement:
 - A loading dock manager will be designated by the building management who will be on duty during delivery hours. The dock manager will be responsible for coordinating with vendors and office and retail tenants to schedule deliveries.
 - The dock manager will monitor inbound and outbound truck maneuvers and will ensure that trucks accessing the loading dock do not block vehicular, bike, or pedestrian traffic along 21st Street NW except during those times when a truck is actively entering or exiting a loading berth.
 - Service vehicle/truck traffic interfacing with 21st Street NW traffic will be monitored during peak periods and management measures will be taken, if necessary, to reduce conflicts between truck and vehicular movements.

- The dock manager will schedule deliveries using the berths such that the dock's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver will be directed to return at a later time when a berth will be available so as to not compromise safety or impede traffic flows on 21st Street NW.
- Trucks using the loading dock 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 goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map (godcgo.com/freight).
- The dock manager will be responsible for disseminating suggested truck routing maps to the building's tenants and to drivers from delivery services that frequently utilize the development's loading dock. The dock manager will also distribute flyer materials, such as the MWCOG Turn Your Engine Off brochure, to drivers as needed to encourage compliance with idling laws. The dock manager will also post these materials and other relevant notices in a prominent location within the loading area.
- A low clearance bar will be installed at the garage entry noting the height of the ceiling clearance.

TRANSPORTATION ANALYSIS

Vehicle Parking

The existing building includes a parking garage with 271 zoning-compliant vehicle parking spaces used for both public parking and reserved parking for the site's office use, and 21 additional non-compliant spaces provided in the public space vaults adjacent to the property (292 spaces total). The Applicant is proposing to reduce the number of parking spaces by five (5) to 287 spaces. At least five (5) of the spaces will be dedicated for electric vehicle stations. Subtitle I §212.1 of the 2016 Zoning Regulations (ZR16) does not require a minimum number of vehicle parking spaces for D zones. As such, the Applicant meets the require number of parking spaces of the project.

Per DDOT's *Guidance for Comprehensive Transportation Review*, the preferred maximum parking ratio for the proposed development is 0.5 spaces per 1,000 gross square feet for the office and 1.25 spaces per 1,000 gross square feet for the proposed retail, for sites within ½ mile of a Metrorail Station, resulting in a total of approximately 200-225 parking spaces. While the Applicant is proposing to reduce the number of existing vehicle parking spaces, the proposed development still provides 60 additional off-street vehicle parking spaces than DDOT's preferred maximum. Providing additional parking has the potential to induce more demand for driving.

To offset the high number of off-street vehicle parking spaces provided the Applicant proposed a TDM plan in the August 21, 2020 Transportation Statement (Exhibits 33A1 and 33A2), which DDOT finds to be sufficiently robust to support the non-automatic travel needs of the employees. The TDM plan should be included in the BZA Order (see Recommendation section above).

Bicycle Parking

Subtitle C §802.1 of the 2016 Zoning Regulations requires 42 long-term and five (5) short-term bicycle parking spaces for the proposed office and retail addition. The Applicant proposes to exceed this

requirement by providing 100 long-term bicycle spaces in a secure storage room and at least 16 short-term bicycle spaces in the furniture zone of the public right-of-way. The final location and design of the short-term bicycle spaces will be determined during the public space permitting process.

Sections 806.3 and 806.4 of ZR16 requires a minimum of two (2) showers and a ratio of 0.6 lockers for every long-term bicycle parking space for non-residential projects that occupy more than 25,000 square feet, which equates to 25 lockers and two (2) showers for this project. The Applicant plans to provide 40 bicycle lockers and four (4) showers in each male/female locker room, which will be located on Garage Level 1, thereby meeting the ZR16 locker and shower requirements.

Loading

DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle mode areas and limiting any hindrance to traffic operations. For new developments, DDOT 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 the alley network; however, this site does not have access to an alley. Access to this building for loading and unloading, delivery and trash pick-up is an important consideration, and DDOT expects the Applicant to comply with DDOT's standards for loading.

Per Subtitle C §901.1 of the 2016 Zoning Regulations, buildings with more than 200,000 square feet of gross floor area must provide at least three (3) loading berths and one (1) service/delivery space. The Applicant proposes to meet this requirement by maintaining the two (2) existing 8-foot by 30-foot loading berths and providing one (1) new 12-foot by 30-foot loading berth on 21st Street NW and one (1) service space on the first floor of the parking garage.

The Applicant is seeking relief from the minimum 14-foot vertical clearance requirement for loading berths due to structural limitations, per Subtitle C §905.2 of ZR16. The Applicant is proposing the vertical clearance be 12 feet, five (5) inches due to the limitations set by the existing overhead slab and transfer beam above the loading area. DDOT supports the proposed loading relief because the Applicant is inheriting the design complications of the existing office building and does not have access to other loading opportunities.

The help facilitate truck movement and manage conflicts with vehicles and pedestrians at the curb cut on 21st Street NW, the Applicant has proposed the following loading management plan (LMP) in the August 21, 2020 Transportation Statement for the project. DDOT concurs with the proposed LMP above and has no objection to the site's loading scheme, so long as the Applicant also installs a low-clearance bar in the garage entry that notes the height of the ceiling clearance. This additional condition helps to mitigate the requested zoning relief from the 14-foot vertical clearance requirement. The LMP should be included in the BZA Order (see Recommendation section above).

Trip Generation

Each trip a person makes is made by a certain means of travel, such as vehicle, bicycle, walking, and transit. The means of travel is referred to as a 'mode' of transportation. A variety of elements impact the mode of travel, including density of development, diversity of land use, design of the public realm, proximity to transit options, availability and cost of vehicle parking, among many others.

Mode split assumptions were informed by the Census, WMATA’s 2005 Development-Related Readership Survey, and mode splits used for nearby developments. Given the site’s location downtown and proximate to three (3) Metrorail Stations, it was assumed that the office use would have a 75% non-auto mode share and the neighborhood serving retail 95% non-auto modeshare.

The Applicant provided trip generation estimates which utilized the rates published in the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 10th Edition* (Land Use Code 710 General Office and Code 820 Shopping Center) and the assumed modeshare to convert base vehicular trips to base person trips using average auto occupancy data and then back to vehicular, transit, bicycle, and pedestrian trips. Figure 1 below shows a comparison of trips generated by the existing office building and the proposed building addition.

Figure 1 | Multi-Modal Trip Generation Summary (Source: Gorove/Slade, Transportation Memo, 8/21/20, Table 5)

Mode		AM Peak Hour			PM Peak Hour			Weekday
		In	Out	Total	In	Out	Total	Total
Auto	Existing	59 veh/hr	9 veh/hr	68 veh/hr	12 veh/hr	60 veh/hr	72 veh/hr	685 veh
	Proposed	81 veh/hr	12 veh/hr	93 veh/hr	17 veh/hr	84 veh/hr	101 veh/hr	968 veh
	Difference	22 veh/hr	3 veh/hr	25 veh/hr	5 veh/hr	24 veh/hr	29 veh/hr	283 veh
Transit	Existing	178 ppl/hr	29 ppl/hr	207 ppl/hr	36 ppl/hr	183 ppl/hr	219 ppl/hr	2076 ppl
	Proposed	245 ppl/hr	41 ppl/hr	286 ppl/hr	50 ppl/hr	255 ppl/hr	305 ppl/hr	2924 ppl
	Difference	67 ppl/hr	12 ppl/hr	79 ppl/hr	14 ppl/hr	72 ppl/hr	86 ppl/hr	848 ppl
Bike	Existing	15 ppl/hr	2 ppl/hr	17 ppl/hr	5 ppl/hr	16 ppl/hr	21 ppl/hr	196 ppl
	Proposed	20 ppl/hr	4 ppl/hr	24 ppl/hr	7 ppl/hr	23 ppl/hr	30 ppl/hr	287 ppl
	Difference	5 ppl/hr	2 ppl/hr	7 ppl/hr	2 ppl/hr	7 ppl/hr	9 ppl/hr	91 ppl
Walk	Existing	24 ppl/hr	9 ppl/hr	33 ppl/hr	35 ppl/hr	46 ppl/hr	81 ppl/hr	822 ppl
	Proposed	35 ppl/hr	14 ppl/hr	49 ppl/hr	61 ppl/hr	76 ppl/hr	137 ppl/hr	1355 ppl
	Difference	11 ppl/hr	5 ppl/hr	16 ppl/hr	26 ppl/hr	30 ppl/hr	56 ppl/hr	533 ppl

As shown above, the project is expected to add approximately 25 AM peak hour vehicles and 29 PM peak hour vehicles to the roadway network, as compared to existing conditions. A CTR study was not required because the amount of additional net new trips did not exceed DDOT’s threshold of 25 peak hour vehicle in either the inbound or outbound direction. However, the Applicant was required to provide a Transportation Statement which proposed a Transportation Demand Management (TDM) Plan containing strategies to mitigate the additional vehicle trips and high parking ratio.

PUBLIC SPACE

All elements of the project proposed in public space require the Applicant to meet all District design regulations and pursue a public space permit through DDOT’s permitting process. The Applicant will need to apply for the elements identified below and any other features proposed in public space:

- **Outdoor Sidewalk Cafes:** The outdoor cafés proposed on 21st Street NW will need approval by the Public Space Committee and are subject to the regulations in Title 24 of the DCMR. Sidewalk cafes must have 15 square feet for every seat within their seating area. Ensure that there is at least a 10-foot pedestrian path between the edge of the patio and tree boxes on 21st Street NW.
- **Steps.** The proposed steps on 21st Street NW should not project more than 10 feet into public space.

- **Crosswalks.** Realign the M Street NW crosswalk and curb ramp to shorten the distance pedestrians must travel across the travel lanes.
- **Canopies.** Canopies shall not project more than five (5) feet into public space.
- **Street Trees.** Install additional street trees and treeboxes where missing along 21st Street and M Street NW.
- **Short Term Bicycle Racks.** Determine final location for the bicycle racks. They should be of an inverted-U design and located near building entrances in the ‘furniture zone.’
- **Capital Bikeshare Station.** During public space permitting, designate an area in public space for a 19-dock Capital Bikeshare station currently at New Hampshire Avenue and Ward Place NW to accommodate construction on this project. A possible location could be in the 2100 block of M Street NW between the two eastern-most treeboxes.

The Applicant should refer to Titles 11, 12A, and 24 of the [DCMR](#), and the most recent version of DDOT’s [Design and Engineering Manual \(DEM\)](#), and [Public Realm Design Manual](#) for public space regulations and design guidance. A permit application can be filed through the DDOT [Transportation Online Permitting System \(TOPS\)](#) website.

AC:kv