TECHNICAL MEMORANDUM

To: Preston Jutte, PE DDOT - PSD

From: Kelsey Murray, EIT
Ashley Orr, P.E.
Daniel Solomon, AICP

Date: December 29, 2025

Subject: 2322 Nicholson Street SE BZA – Transportation Statement (BZA Case No. 21410)

Introduction

The purpose of this Transportation Statement is to support an application to the Board of Zoning Adjustments (BZA) and related zoning relief for a multi-family residential development containing 62 affordable units located at 2322 Nicholson Street SE, within Fairlawn neighborhood in Southeast Washington, DC. The property is bounded by Nicholson Street SE to the south, a public alley to the north, and single-family housing units to the east and west. The project site is currently comprised of three (3) single-family residences and is zoned in the RA-2 zoning district. Figure 1 identifies the site location within the region and Figure 2 shows an aerial view of the site. The DDOT scoping form is included in the Technical Attachments.

The proposed development will provide seven (7) vehicular parking spaces (two (2) of which are carshare spaces), 24 long-term bicycle parking spaces, four (4) short-term bicycle parking spaces, and one (1) service/delivery space. Vehicular parking spaces and the service/delivery space will be accessed via the ally to the north of the development. No curb cuts are proposed as part of the application. The Applicant, as part of the BZA application, is seeking a special exception for relief from providing 8 additional vehicular parking spaces and one (1) loading berth as required by the District's Zoning Regulations of 2016 (ZR16) due to the size of the lot and the desire to maximize the number of affordable dwelling units provided. Although no loading berth is proposed, the proposed delivery space is expected to accommodate the vast majority of loading activities associated with the site.

The project will include 24 long-term bicycle parking spaces and four (4) short-term bicycle parking spaces, exceeding the 21 long term and three (3) short term spaces required by the ZR16 for the site's Multi-Family Residential Housing use. Long-term bicycle parking spaces will be provided in a secure bicycle room and will be accessed on the cellar floor from the ground floor via stairwells. Primary pedestrian access is provided on the ground level via Nicholson Street SE.

The purpose of this Transportation Statement is to:

- Review existing site conditions and details of the proposed development plans;
- Review the major transportation elements of the site plan, namely vehicular, loading, pedestrian, bicycle, and transit facilities in the vicinity of the site;
- Provide a Transportation Demand Management (TDM) plan to be implemented for the life of the development;
- Provide a Loading Management Plan (LMP) to be implemented for the life of the development; and
- Review the transportation elements of the project to determine whether the project will have a detrimental impact on the surrounding transportation network.

This Transportation Statement concludes the following:

- The proposed project is surrounded by an existing network of sufficiently connected transit, bicycle, and pedestrian facilities that result in an environment for safe, enjoyable, and effective non-vehicular transportation;
- The proposed project's trip generation is below the threshold of 25 peak hour, peak direction vehicle trips at which DDOT requires detailed vehicular capacity analysis;
- The requested relief from the requirement to provide 19 on-site parking spaces (11 spaces proposed) is not expected to have a detrimental impact on the neighborhood due to the transit-rich area within which the site is located;
- The requested relief from the requirement to provide one (1) loading berth is not expected to have a detrimental impact on the neighborhood as the proposed delivery space is expected to accommodate the vast majority of loading activities associated with the site. The proposed project will establish an LMP that will ensure efficient operation of the service/delivery space and all loading operations, trash collection, and move in/move out activities;
- The proposed project will provide four (4) short- and 24 long-term bicycle parking spaces, exceeding zoning requirements;
- The proposed project will include TDM measures that adequately promote non-vehicular modes of travel; and
- The proposed project will not have an adverse impact on the surrounding transportation network.

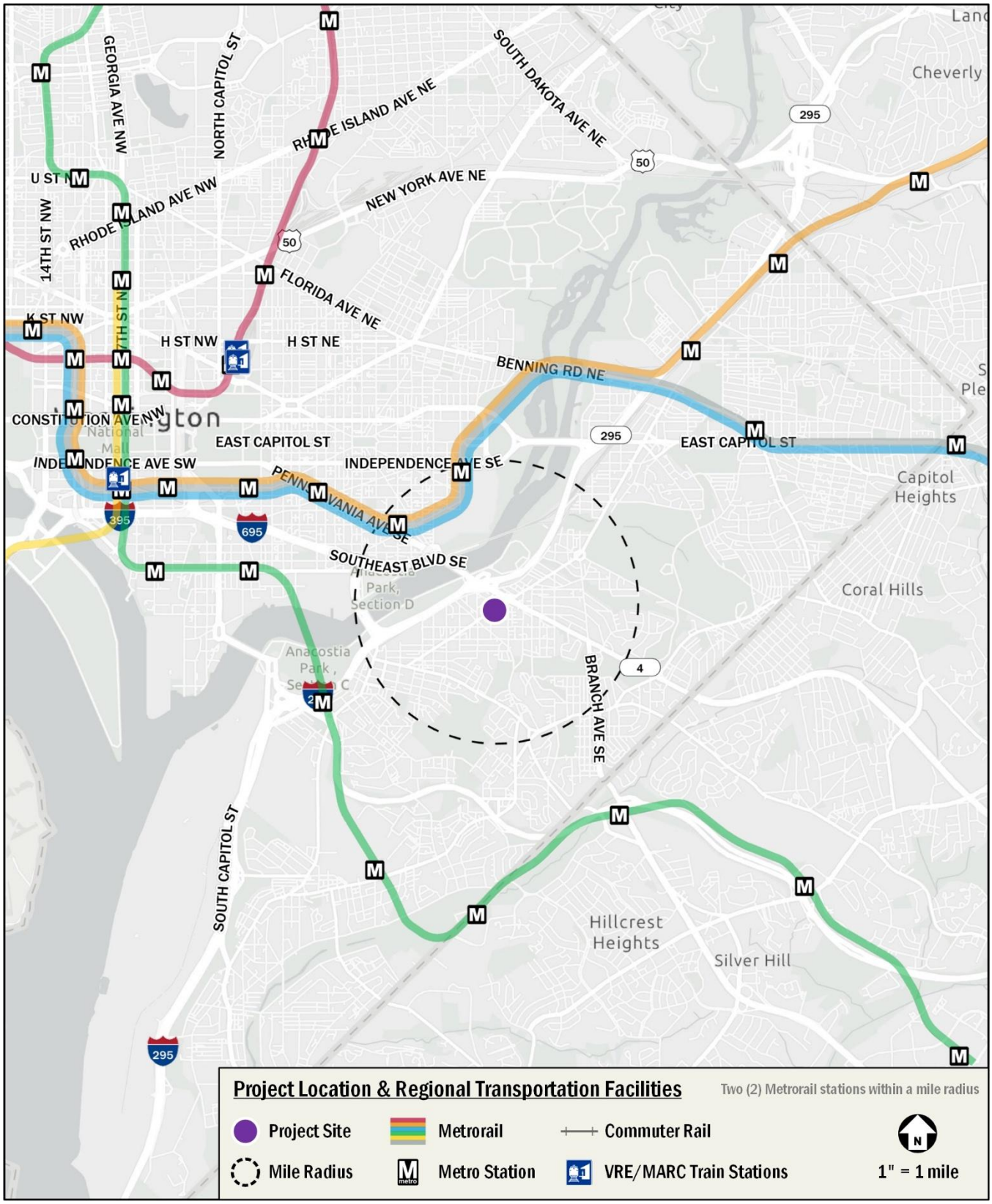

Figure 1: Project Location and Regional Transportation Facilities

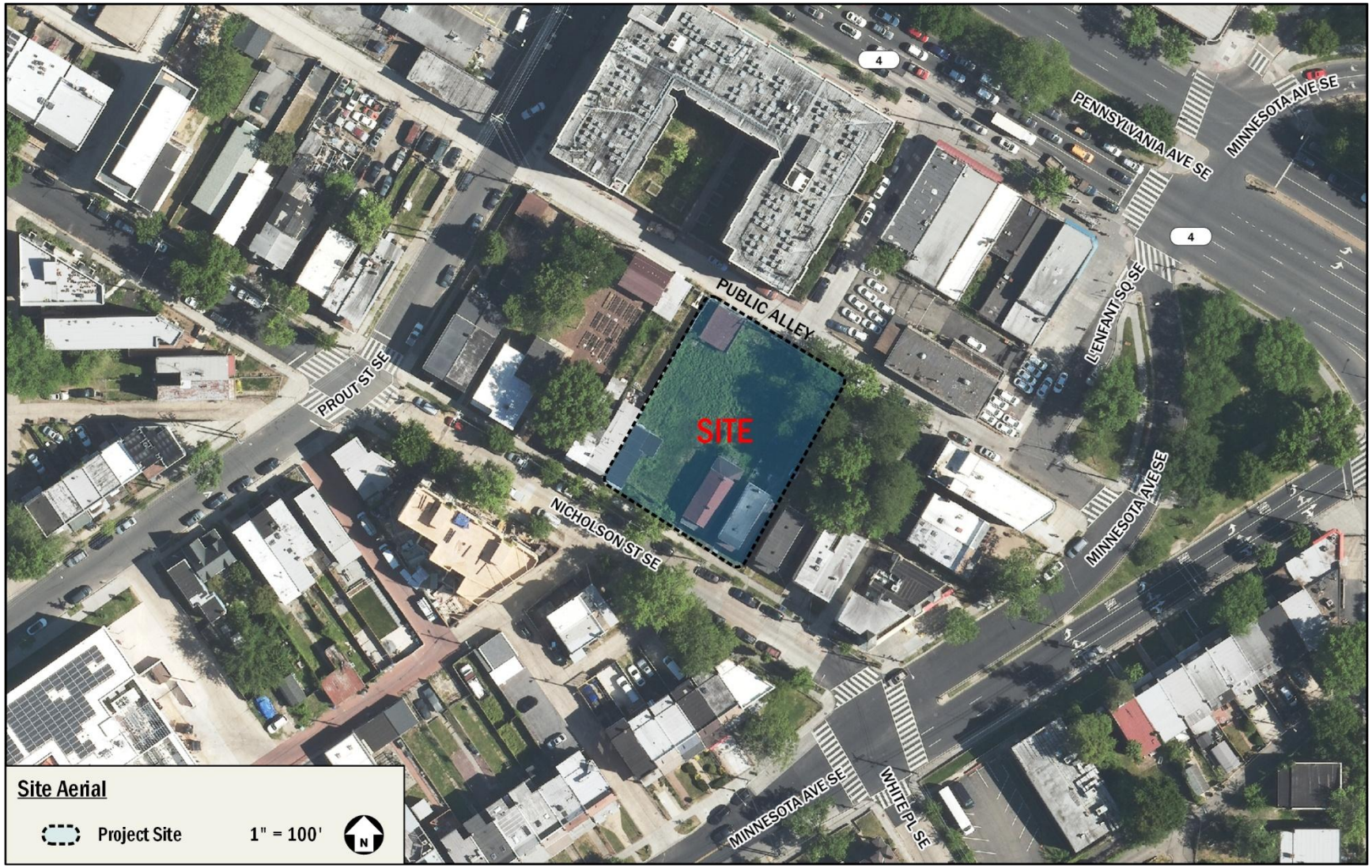

Figure 2: Site Aerial

Existing Transportation Conditions

This section reviews the existing vehicular, transit, bicycle, and pedestrian facilities as well as curbside management in the vicinity of the site. The Nicholson site is located within close proximity to multiple existing and planned priority bus corridors, in an increasingly bicycle- and pedestrian-friendly neighborhood, minimizing the need for personal vehicles. The site is well-served by five (5) bus routes that connect the site to other parts of DC as well as Maryland and Virginia. The development is also within a mile of the Potomac Avenue Metrorail station served by the Blue, Orange, and Silver Lines that can be reached via a five-minute bus ride. Additionally, the site is surrounded by a pedestrian network that consists of well-connected sidewalks and crosswalks.

Vehicular Facilities

The site is served by Nicholson Street SE, which is a Local street and connects to Minor Arterial Minnesota Avenue SE. The development is also served by a public alley that connects to the Prout Street SE, which is a Local street. Both Prout Street SE and Minnesota Avenue SE provide access to Principal Arterial Pennsylvania Avenue SE. The existing network provides connections to other Principal Arterials, Minor Arterials, Collectors, and Local roads. These roadways provide connectivity to I-295, I-395, I-695, and the Capital Beltway (I-495) that surrounds Washington, DC and its inner suburbs in Virginia and Maryland.

The project proposes seven (7) vehicular parking spaces, which includes one (1) ADA space, two (2) full sized spaces, two (2) compact spaces, and two (2) carshare spaces that equate to six (6) spaces under Subtitle C §§ 708.2 for zoning purposes. As such, the proposed vehicular parking equates to 11 vehicular parking spaces, which falls below the 19 vehicular parking spaces required by the ZR16. The Applicant is seeking relief from providing the required 19 vehicular parking spaces (11 spaces proposed) as part of the BZA application. The relief is requested due to the size of the lot and the desire to maximize the number of affordable dwelling units provided and will not have significant impacts on the neighborhood due to the transit-rich area within which the site is located.

It should be noted that the Zoning Commission recently voted to approve the Z.C Case 25-12 - Omnibus Text Amendment to Modify & Clarify Various Provisions of 11-DCMR on December 18, 2025, which modifies Subtitle C § 702.1 and removes the restriction on streets on which a District Residential Parking Permit program is permitted from applying the 50% reduction in minimum parking requirements. Once the ZC order is published, the proposed development would be permitted to apply a 50% reduction to the minimum parking requirements. This would result in a minimum parking requirement of 10 spaces; therefore, the provided parking supply would exceed the minimum parking requirement, and no parking relief would be required. In any case, the project will be supported by a robust Transportation Demand Management (TDM) plan tailored to further reduce parking demand of the project.

The project proposes one (1) service/delivery space and no loading berth, which falls below the ZR16 requirement of one (1) service/delivery space and one (1) loading berth. A loading berth is not being proposed on-site due to the size of the lot and the desire to maximize the number of affordable dwelling units provided. Similar to other small residential developments without first-floor retail or other uses, the majority of the building's loading activity are expected to involve small delivery trucks and vans, service/maintenance vehicles, and moving trucks. Loading demand is not expected to be heavy, and based on information provided by the Applicant, the service/delivery space should accommodate the building's typical demand. Per the LMP, use of the space will be managed and coordinated, and if a larger truck that cannot be accommodated by the provided service/delivery space is needed for move in/out activities, residents will obtain a public space permit and Emergency No Parking signs through TOPS for curbside loading and unloading.

Vehicular parking spaces and the service/delivery space will be accessed via the public alley to the north of the development. Trash collection will also occur in the alley. No curb cuts are proposed as part of the application.

Carsharing

Two (2) companies provide carsharing services in the District of Columbia: Free2Move and Zipcar. Both services are private companies that provide registered users access to various automobiles. Free2Move operates a point-to-point model that allows customers to pick up a vehicle at a location and drop it off at any non-restricted metered curbside parking space or Residential Parking Permit (RPP) location in the defined "Home Area". Zipcar operates a reserved-space model where customers are required to borrow from and return vehicles to the same reserved carsharing space. Currently, there is one (1) Zipcar location within a quarter mile of the project site:

- Four (4) vehicles are located within a three-minute walk from the site within a Mobil gas station parking lot at 2305 Pennsylvania Avenue SE.

Furthermore, two (2) carshare spaces are proposed as part of the project and will be available for use by residents of the building and residents of the surrounding neighborhood.

Pedestrian Facilities

Overall, the site is served by well-connected pedestrian facilities within the study area that provide connectivity to major local destinations. A summary of existing pedestrian facilities within approximately a quarter-mile radius is shown in Figure 3, with a summary of sidewalk width requirements shown in Table 1. The approximate 10-, 20-, and 30-minute walking travel sheds to and from the project site are shown in Figure 4.

As shown in Figure 3, the streets within the pedestrian study area fall into the "low density to moderate density residential" and "high density residential to light commercial" categories of sidewalk width requirements. The required minimum buffer width, minimum sidewalk unobstructed width, and total minimum sidewalk width for each category are shown in Table 1. As shown in Figure 3, much of the sidewalk within the "low density to moderate density residential" category meets the minimum sidewalk and buffer width, but some sidewalks within the "high density residential to light commercial" category, specifically on Fairlawn Avenue SE, do not meet width requirements.

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 are not desired but where they are present, a 48" clear space is required outside active vehicle traffic lanes and within marked crossings. As shown in Figure 3, under existing conditions, curb ramps are present where there is a crosswalk.

As shown in Figure 4, multiple schools and recreational areas are located within a 10-minute walk from the site, and Skyland Town Center and the neighborhoods of Greenway, Lincoln Park, and Barracks Row are located within a 20- to 30-minute walk from the site.

Table 1: DDOT Sidewalk Width Requirements

Street Type	Curb Walk	Tree/Furnishing Zone	Sidewalk Unobstructed Clear Width	Total Minimum Sidewalk Width
Low to Moderate Density Residential	None	4 - 6 feet	6 feet	10 feet
High Density Residential or Light Commercial	1 foot	4 - 8 feet	8 feet	13 feet
Central DC and Commercial Areas	1 - 2 feet	4 - 10 feet	10 feet	16 feet

Source: DDOT *Design and Engineering Manual*

Pedestrian Infrastructure Improvements

There are various recommended infrastructure improvements within a quarter mile of the site that are listed below. Future pedestrian facilities are shown in Figure 5.

- Pennsylvania Avenue East Small Area Plan
    - Build the Shepherd Branch trail on the unused portion of the CSX property along Fairlawn Avenue SE in coordination with DDOT's feasibility study for a pedestrian/cyclist trail from E Street SE to Firth Sterling.
- Improvement of the Pennsylvania Ave SE and Minnesota Ave SE Intersection
    - Reconfigure the Pennsylvania Ave SE and Minnesota Ave SE Intersection and bring all pedestrian infrastructure up to current standards.

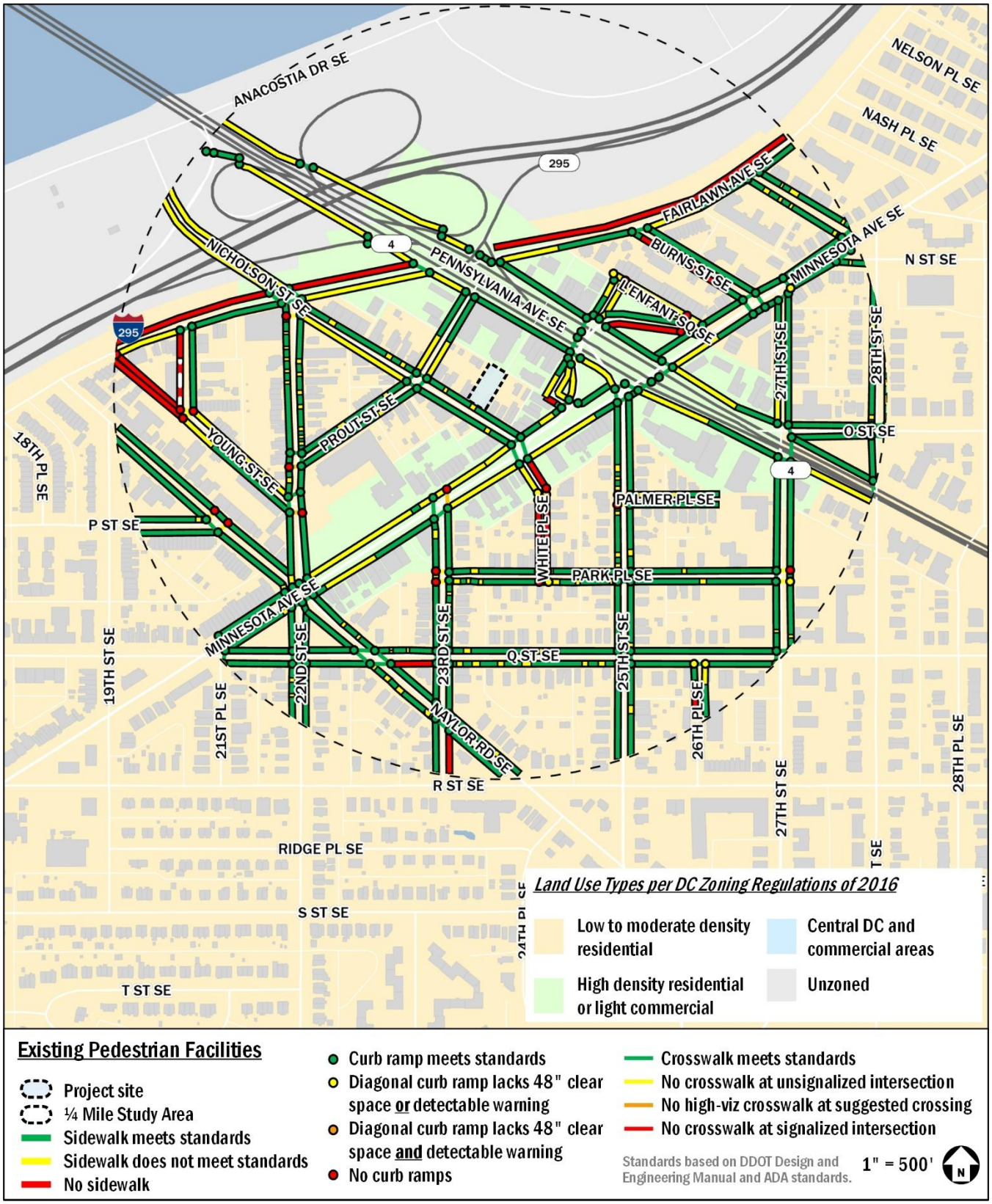

Figure 3: Existing Pedestrian Facilities

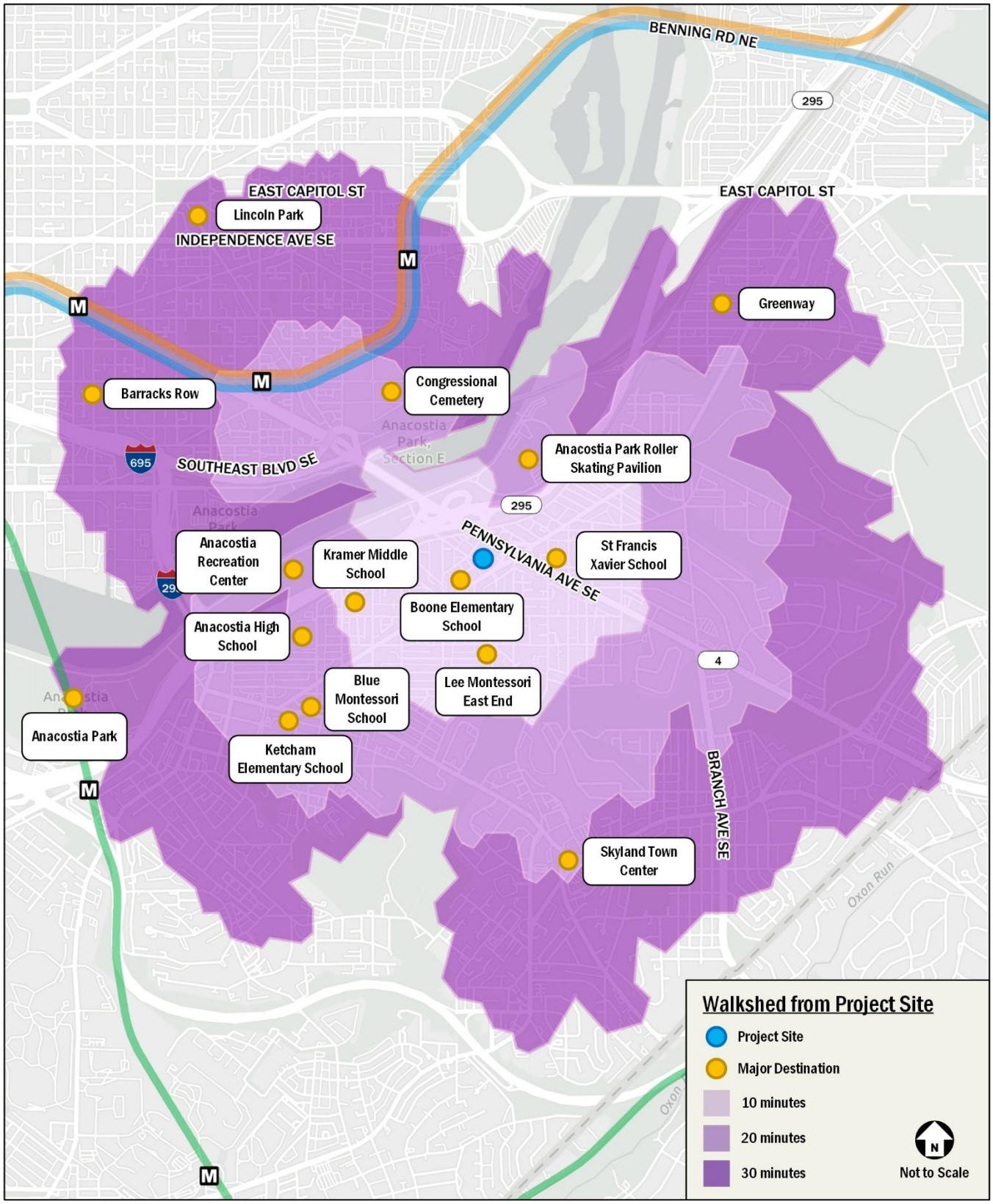

Figure 4: Walkshed from Project Site

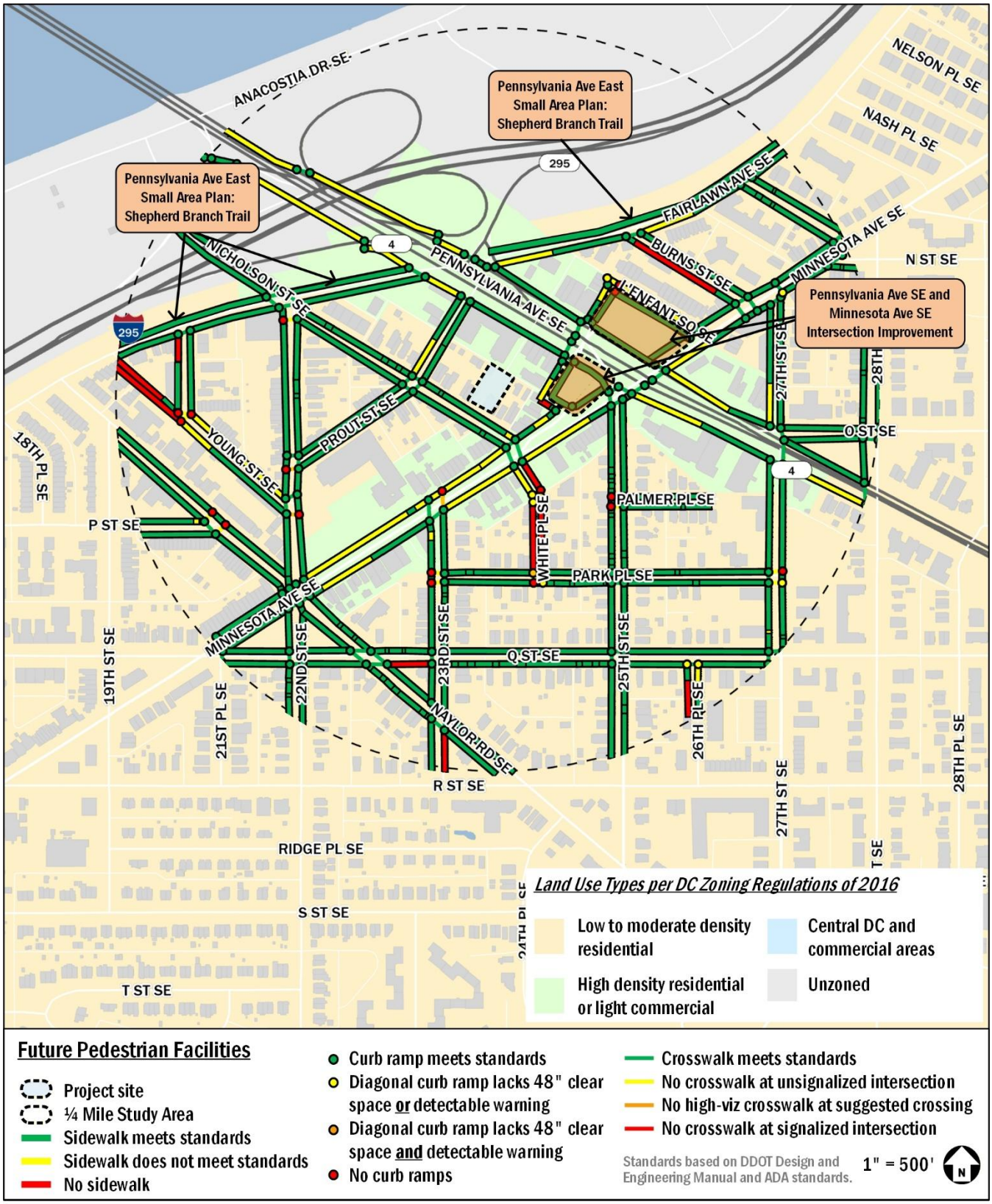

Figure 5: Future Pedestrian Facilities

Bicycle Facilities

Existing Bicycle Facilities

The project is close to on- and off-street bicycle facilities, including an off-street trail along sections of Pennsylvania Avenue SE that lacks connectivity, a painted bike lane along 25th Street SE, and multiple signed routes along Prout Street, SE, Naylor Road SE, Nicholson Street SE, and Fairlawn Avenue SE. The site is also located in proximity to the Anacostia Riverwalk Trail which provides connections along the Anacostia River. Figure 6 shows the existing bicycle facilities near the site.

The approximate 10-, 20-, and 30-minute bicycle travel sheds to and from the project site are shown in Figure 7. Destinations in Washington such as Navy Yard, Downtown, George Washington and Howard Universities, and Union Station are accessible within 20 to 30 minutes via bicycle.

Capital Bikeshare

In addition to personal bicycles, the Capital Bikeshare program will provide additional bicycle options for residents of the proposed project. The program has placed over 700 bikeshare stations across the greater Washington region with over 5,000 bicycles and electric-assist bicycles (e-bikes) in the fleet. One (1) existing Capital Bikeshare station is within a quarter mile of the site at Pennsylvania Avenue SE and Minnesota Avenue SE and houses 11 docks. The most recent update of the DDOT's Capital Bikeshare Development Plan was released in 2020 and shows three (3) planned Capital Bikeshare stations near the proposed project at the following locations:

- Near the intersections of R Street SE, 25th SE, and Naylor Road SE
- Near the intersection of N Street SE and 30th Street SE
- Near the intersection of Minnesota Avenue SE and Nelson Place SE

Shared Mobility

In addition to Capital Bikeshare, four (4) electric-assist scooter (e-scooter) and electric-assist bicycle (e-bike) companies provide Personal Mobility Device (PMD) service in the District: Lime, Lyft, Spin, and Veo. These PMDs are provided by private companies that give registered users access to a variety of e-scooter and e-bike options. These devices are used through each company-specific mobile phone application. Many PMDs do not have designated stations where pick-up/drop-off activities occur like with Capital Bikeshare; instead, many PMDs are parked in public space, most commonly in the "furniture zone" (the portion of sidewalk between where people walk and the curb, often where other street signs, street furniture, trees, parking meters, etc. are found).

Future Bicycle Facilities

moveDC Bicycle Priority Network

The 2021 update to *moveDC* includes future planned, not yet funded improvements along Branch Avenue SE, Pennsylvania Avenue SE, and Minnesota Avenue SE. These improvements will bridge gaps in existing facilities within the study area, as shown in Figure 8. Based on roadway classifications and existing facilities along the roadways, improvements along Pennsylvania Avenue SE will likely be off-street trails and improvements along Branch Avenue SE and Minnesota Avenue SE will likely be protected bike lanes.

Pennsylvania Avenue East Small Area Plan

The 2023 Pennsylvania Avenue East Small Area Plan lays out the framework for a community-informed vision of a thriving commercial main street where all residents can live, work, eat, and play. Included in the improvements laid out in the plan is the

Shepherd Branch trail on the unused portion of the CSX property along Fairlawn Avenue SE in coordination with DDOT's feasibility study for a pedestrian/cyclist trail from E Street SE to Firth Sterling. This trail is shown in Figure 8.

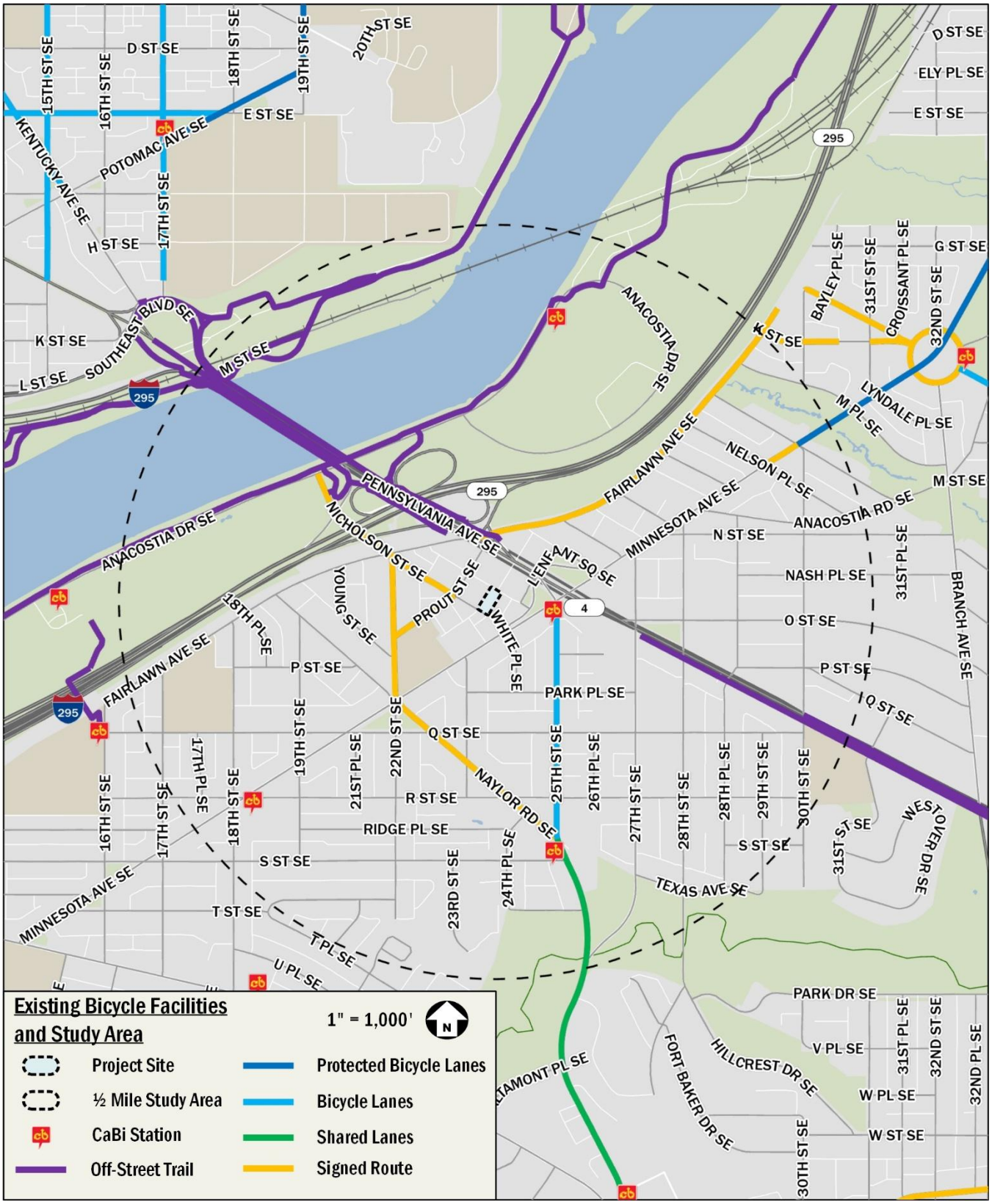

Figure 6: Existing Bicycle Facilities

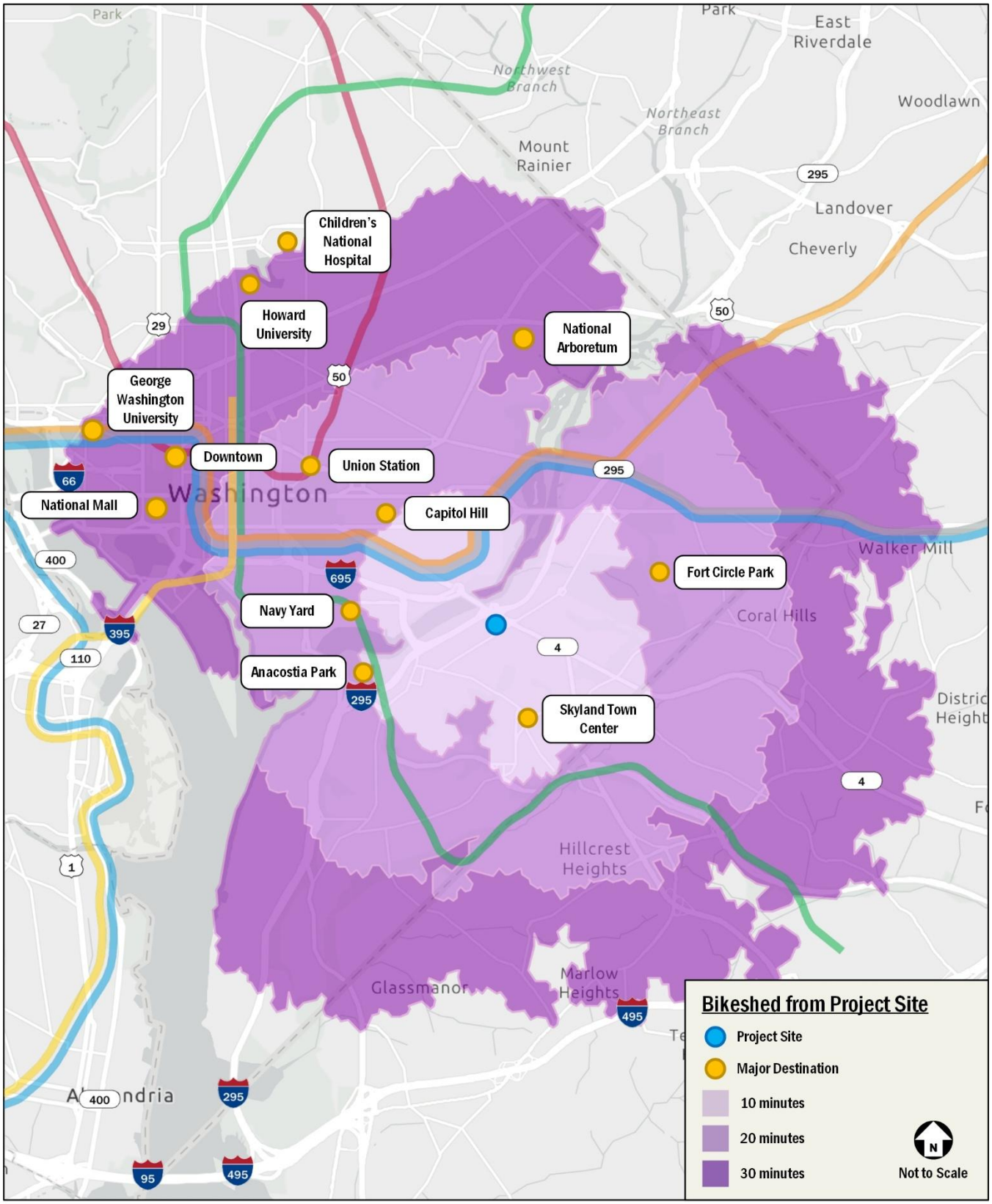

Figure 7: Bikeshed from Project Site

Figure 8: Future Bicycle Facilities

Transit Facilities

The site is well-served by five (5) Metrobus routes providing reliable, high-frequency bus service that connects the site to neighboring areas within DC as well as Maryland and Virginia. These bus routes provide connections to 14 Metrorail stations serving all six (6) Metrorail lines.. Multiple bus stops served by these bus routes are within a quarter-mile walk of the site, the closest of which is located along Minnesota Avenue SE and Pennsylvania Avenue SE, as shown in Figure 9. Table 2 shows a summary of the bus route information for the routes that serve the site, including service hours, headway, and distance to the nearest bus stop.

Table 3 shows WMATA's recommended amenities for each type of bus stop. Table 4 shows a detailed inventory of the amenities appearing at each existing bus stop within the transit study area.

The closest Metrorail station to the site is the Potomac Avenue Metrorail station, which is served by the Orange, Silver, and Blue Lines and is located approximately 1.0 miles or a 22-minute walk northwest of the site. The station can also be accessed via the C15, D1X, C37, and D10 Metrobus lines which have 15–30-minute, 20–30-minute, 15–30-minute, and 12–20-minute headways, respectively. All four lines have bus stops less than a 0.1 mile walk away from the site. The Blue Line travels from Franconia-Springfield in Virginia, through Alexandria, Ronald Reagan Washington National Airport (DCA), Alexandria, and District core before heading east through Capitol Heights to Downtown Largo in Maryland. The Orange Line travels from Vienna in Fairfax County, through Falls Church, Arlington County, and the District core before heading northeast through Landover and Deanwood to New Carrollton, MD. The Silver Line travels from Ashburn in Virginia, through the Dulles International Airport (IAD), Reston, Tysons Corner, Arlington, and the District core before heading east through Capitol Heights to Downtown Largo in Maryland. Table 5 and Table 6 provide details of Metrorail information, including service hours and timetables.

The approximate 10-, 20-, and 30-minute transit travel sheds to and from the project site on a typical weekday morning are shown in Figure 10. As shown in the figure, the transit facilities within the vicinity of the site connect the development to Downtown and much of Southeast Washington as well as parts of Maryland and Northern Virginia including the neighborhoods of New Carrollton, Columbia Heights, Rosslyn, and Pentagon City within 30 minutes of travel from the project site.

Table 2: Local Bus Route Information

Route Number	Line Name	Service Hours at Nearest Bus Stop[1]			Headway (min)	Walking Distance to Nearest Bus Stop[2]
		Weekday	Saturday	Sunday		
WMATA Routes						
C15	MLK Ave-Southern Ave Line	6:06am-12:22am	6:56am-12:22am	6:56am-12:33am	15-30	0.1 mi (1 minute)
D1X	Pennsylvania Ave Limited Line	5:55am-2:22am	6:53am-2:22am	6:53am-2:02am	20-30	0.1 mi (1 minute)
C31	Minnesota Ave Line	5:20am-4:56am	5:23am-4:57am	5:23am-4:57am	8-20	0.1 mi (1 minute)
C37	Lincoln Hts-Potomac Ave Line	5:02am-4:32am	5:02am-2:05am	6:03am-2:15am	15-30	0.1 mi (1 minute)
D10	Pennsylvania Ave Line	5:02am-4:42am	5:02am-4:42am	5:02am-4:42am	12-20	0.1 mi (1 minute)

[1] Service hours are based on the most recent effective schedules available on WMATA websites.
[2] Only bus stops within the transit review area shown in Figure 9 are included.

Table 3: WMATA Recommended Bus Stop Amenities

Amenity	Basic Stop		Enhanced Stop	Transit Center Stop
	< 50 daily boardings	≥ 50 daily boardings		
Bus stop flag	●	●	●	●
Route map and schedule	●	●	●	●
5’ x 8’ landing pad	●	●	●	●
40’/60’ x 8’ landing pad			●	●
4’ sidewalk	●	●	●	●
Bench		●	●	●
Shelter		●	●	●
Lighting (on shelter or within 30’ if overhead)	Recommended for stops with early morning and evening service		●	●
Dynamic information signage	Contingent on presence of shelter			
Trash and recycling receptacles	Recommended where surrounding uses may generate trash			

Source: 2019 WMATA *Bus Stop Amenity Reference Guide*

Table 4: Bus Stop Inventory

Location	Stop ID	Routes Served	Amenities								
			Bus stop flag	Route map & schedule	Landing pad	Sidewalk	Bench	Shelter	Dynamic info sign	Lighting	Trash Receptacle
Pennsylvania Ave SE & L'Enfant Sq SE (WB)	1000482	C15, C37, D1X, D10	●		●	●		●		●	●
Pennsylvania Ave SE & L'Enfant Sq SE (EB)	1000485	C15, C37, D1X, D10	●		●	●	●	●	●	●	●
Pennsylvania Av SE & 27 St SE	1003754	C37, D1X	●			●					
Pennsylvania Av SE & 28 St SE	1000469	C37, D1X	●			●	●			●	●
Pennsylvania Av SE & 30 St SE (WB)	1000459	C37, D1X	●		●	●	●	●		●	●
Pennsylvania Av SE & 30 St SE (EB)	1003391	C37, D1X	●		●	●	●	●	●		●
Minnesota Av SE & 18 St SE (NB)	1000442	C15, C31	●		●	●	●	●		●	●
Minnesota Av SE & 18 St SE (SB)	1000444	C15, C31	●		●	●	●	●			●
Minnesota Av SE & 19 St SE (NB)	1000449	C15, C31	●		●	●	●	●			●
Minnesota Av SE & 19 St SE (SB)	1000452	C15, C31	●		●	●	●	●			●
Minnesota Av SE & 22 St SE (NB)	1000460	C15, C31	●		●	●					●
Minnesota Av SE & 22 St SE (SB)	1000462	C15, C31	●		●	●					●
Minnesota Av SE & White Pl SE	1000471	C15, C31	●		●	●					●
Minnesota Av SE & Nicholson St SE	1000473	C15, C31	●			●					●
Minnesota Av SE & Pennsylvania Av SE	1000480	C31	●		●	●	●	●			●
Minnesota Av SE & 28 St SE	1000487	C31	●		●	●					●
Minnesota Av SE & N St SE	1000488	C31	●		●	●					●
Minnesota Av SE & Nelson Pl SE (SB)	1000490	C31	●		●	●					
Minnesota Av SE & Nelson Pl SE (NB)	1000489	C31	●		●	●				●	●
Naylor Rd SE & S St SE	1000437	D10	●		●	●	●	●			●
25 St & R St SE	1000448	D10	●		●	●					●
25 St SE & Park Pl SE	1000461	D10	●		●	●					
27 St SE & R St SE	1005050	D10	●			●					

Table 5: Metrorail Service Hours

Day	Time
Monday – Thursday	5 AM – midnight
Friday	5 AM – 2 AM
Saturday	6 AM – 2 AM
Sunday	6 AM – midnight

Table 6: Metrorail Service Intervals

Rail Line	Monday - Friday	Saturday & Sunday
Blue, Orange, Silver	5 AM – 7 AM: 12 min 7 AM – 9 AM: 10 min 9 AM – 4 PM: 12 min 4 PM – 6 PM: 10 min 6 PM – 9:30 PM: 12 min 9:30 PM – close: 15 min	6 AM – 9:30 PM: 12 min 9:30 – close: 15 min

Curbside Management

Existing curbside uses were reviewed within approximately two (2) blocks of the site, as shown in Figure 11. The residential neighborhood surrounding the site mainly consists of unrestricted parking or time-restricted/Residential Permit Parking for Zone 7 and/or 8 permit holders. There are stricter parking designations along the Minor Arterial of Minnesota Avenue SE and the Principal Arterial of Pennsylvania Avenue SE.

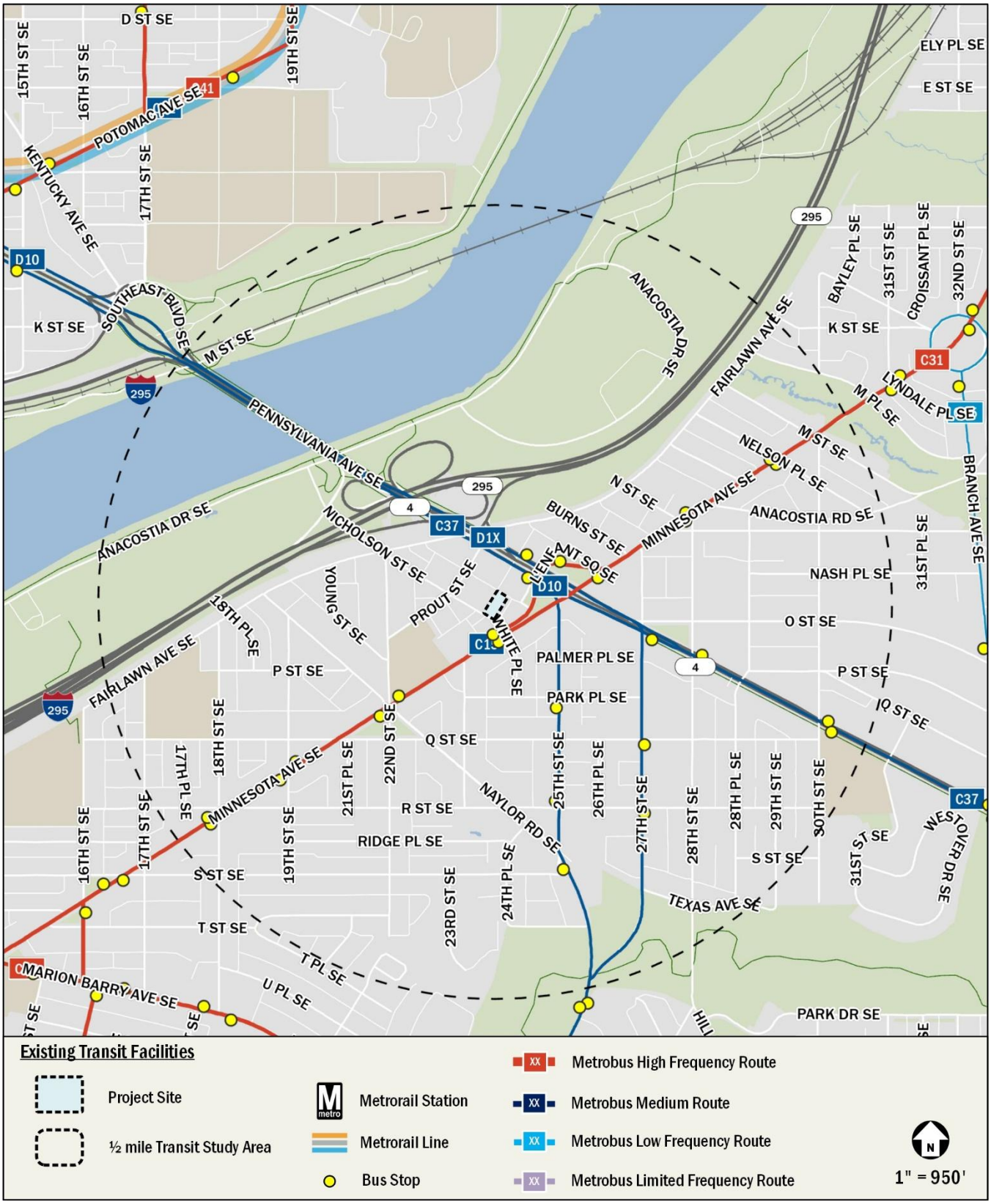

Figure 9: Existing Transit Service

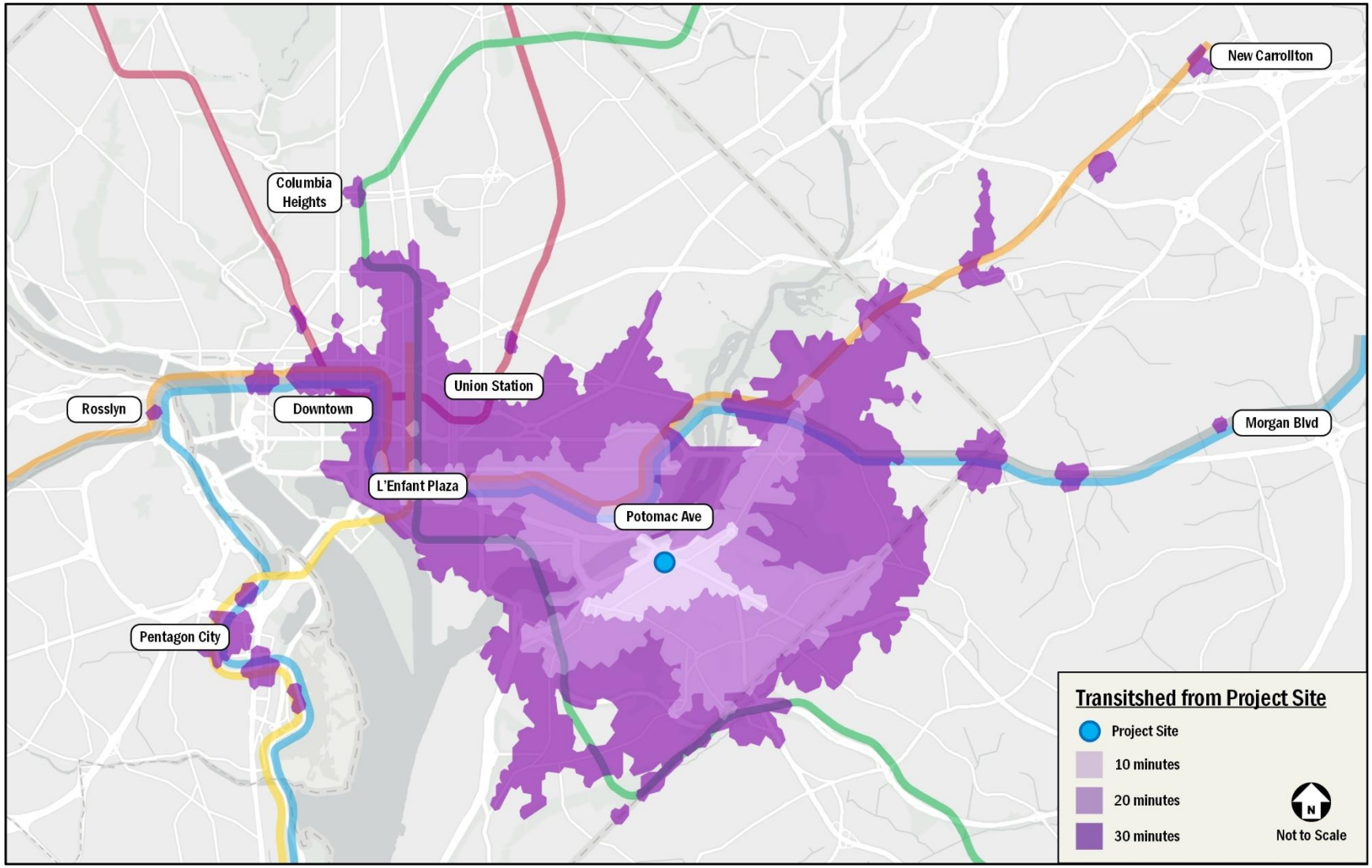

Figure 10: Transitshed from Project Site

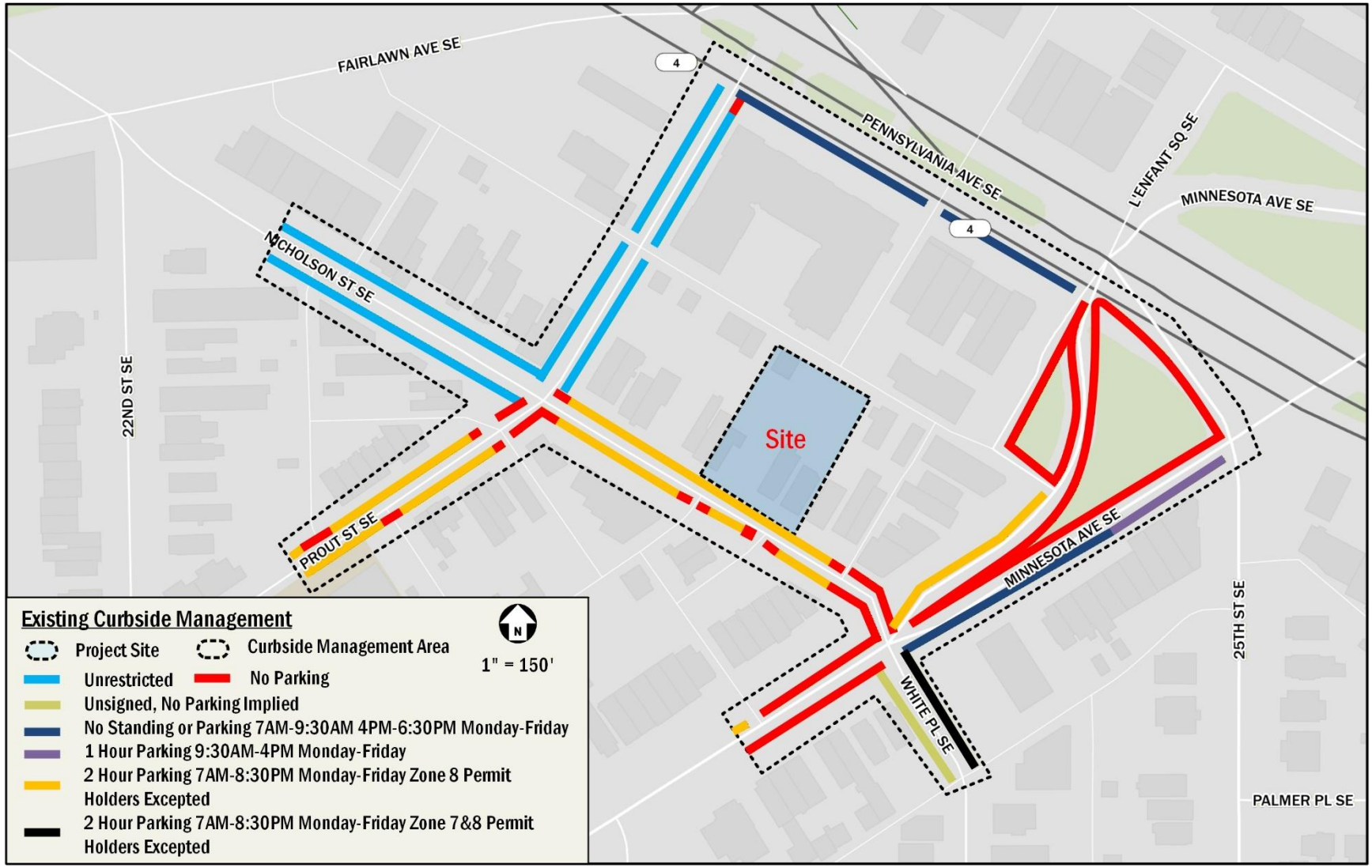

Figure 11: Existing Curbside Management

Strategic Planning Documents and Initiatives

Several District of Columbia-wide and local planning documents and projects located in the vicinity of the project site. These items are summarized below, along with their implications for or in relation to the proposed project.

Transportation and Infrastructure

moveDC

As the District of Columbia grows, so must the transportation system, specifically in a way that expands transportation choices while improving the reliability of all transportation modes. In order to meet this challenge and capitalize on future opportunities, DDOT maintains and regularly updates its long-range transportation plan, *moveDC*, to identify transit challenges and opportunities and to recommend investments.

The *moveDC* 2014 update outlined recommendations by mode with the goal of having them complete by 2040, including improvements to the District's transportation system such as:

- 70 miles of high-capacity transit (streetcar or bus);
- 200 miles of on-street bicycle facilities or trails;
- Sidewalks on at least one side of every street;
- New street connections;
- Road management/pricing in key corridors and the Central Employment Area;
- A new downtown Metrorail loop;
- Expanded commuter rail; and
- Water taxis.

As part of the *moveDC* 2021 update, Mobility Priority Networks were created to show where investments in safety and mobility improvements will take place for specific modes of transportation. The Transit Priority Network highlights streets where infrastructure improvements such as dedicated transit lanes, better transit stops, and/or special intersection treatments for buses will be prioritized to improve transit travel times and reliability. The Bicycle Priority Network includes bicycle priority routes from the *moveDC* 2014 update and additions from recent planning and public engagement efforts. From the final *moveDC* 2021 update published in December 2021, the Transit and Bicycle Priority Networks near the site include:

- Four (4) transit priority corridors, one (1) along Pennsylvania Avenue SE from 2nd Street SE to Branch Avenue SE, one (1) along Minnesota Ave SE from Marion Barry Avenue SE to East Capitol Street, one (1) along 25th Street SE from Pennsylvania/Minnesota Avenue SE to Naylor Road SE, and one (1) along Naylor Road from 25th Street SE to Marrion Barry Avenue SE. These corridors cover existing Metrobus routes C15, D1X, C31, C37, and D10; and
- Off-street trails along Pennsylvania Avenue SE connecting existing trails, protected bike lanes along Minnesota Avenue from M Street SE to Pennsylvania Avenue SE, and protected bike lanes along Branch Avenue SE from Randle Circle SE to Southern Avenue SE.

Vision Zero Action Plan

DDOT's *Vision Zero Action Plan* is the implementation strategy of DC's Vision Zero Initiative, which commits to reaching zero fatalities and serious injuries to travelers of DC's transportation system by the year 2024. The *Action Plan* is based on DC interagency workgroups, public input, local transportation data and crash statistics, and national and international best practices.

Workgroups identified the guiding themes for the *Vision Zero Action Plan* and the goals of the DC government. The *Action Plan* focuses on the following themes:

- Create Safe Streets
- Protect Vulnerable Users
- Prevent Dangerous Driving
- Be Transparent and Responsive

Strategies within each theme assign lead and supporting agencies responsible for the planning and implementation of each program. The plan also calls for partners external to the District government to ensure accountability and aid in implementation.

The proposed development supports DC's overall Vision Zero goals by reducing conflict points between vehicles, bicycles, and pedestrians by not proposing curb cuts along the site's frontage, as well as de-emphasizing the need for personal automobiles by including carsharing spaces onsite.

WMATA Better Bus Network 2025

Better Bus is Metro's initiative to improve regional bus service and deliver more frequent, reliable, and user-friendly bus service to communities across Washington, DC, Maryland, and Virginia. On June 29, 2025, Metro launched its new bus network, which is the first major overhaul of the WMATA bus system in 50 years. WMATA bus routes within the vicinity of the site remain largely unchanged, with bus routes continuing to travel along the Pennsylvania Avenue SE and Minnesota Avenue SE.

Capital Bikeshare Development Plan

The District Department of Transportation (DDOT) embarked on the Capital Bikeshare Development Plan in 2015 to understand how the program was performing five years after launch and devise a strategy for future growth and funding. The most recent update of the DDOT's Capital Bikeshare Development Plan was released in 2020 and includes a strategic plan update, market analysis update, expansion priorities, financial plan update, and business plan. The Plan includes three (3) planned Capital Bikeshare stations near the proposed project at the following locations:

- Near the intersections of R Street SE, 25th SE, and Naylor Road SE
- Near the intersection of N Street SE and 30th Street SE
- Near the intersection of Minnesota Avenue SE and Nelson Place SE

Pennsylvania Avenue East Small Area Plan

On February 7, 2023, the DC Council unanimously voted to approve the Pennsylvania Avenue East Small Area Plan, which lays out the framework for a community-informed vision of a thriving commercial main street where all residents can live, work, eat, and play. Building on the 2008 Pennsylvania Avenue SE Corridor Land Development Plan, this small area plan will guide infill development, create vibrant public spaces, improve access to existing and new community amenities and increase housing opportunities for all.

The plan makes the following transportation recommendations:

- Improve the pedestrian access and connection between Pennsylvania Avenue East to Anacostia Park and Anacostia River through improvements to the pedestrian experience leading to and along the Sousa Bridge.
    - Identify locations where pedestrian sidewalks can be widened leading to the Sousa Bridge and provide direct and ADA-accessible pedestrian connection to the river.

  - Study improvements to the I-295 on/off ramps to increase safety for pedestrians and cyclists while slowing vehicle traffic. Study should address physical improvements to roadways, including opportunities for enhanced ADA ramps and pedestrian crossings, and introduction of traffic signals, signs, lighting, pavement markers, and guardrails.
  - Identify locations for and design gateway features that highlight both the sense of arrival to Pennsylvania Avenue East and to visually connect the community.
- Explore developing a “transit hub” at the reconfigured intersection of Pennsylvania Avenue SE and Minnesota Avenue SE, within the restored Twining Square to include an expanded bus shelter with digital displays, improved lighting, and direct access to micromobility such as Bikeshare.
- Extend the Pennsylvania Bus priority corridor west of the Anacostia River.
- Improve pedestrian and bicycle access throughout the study area.
  - Build the Shepherd Branch trail on the unused portion of the CSX property along Fairlawn Avenue SE in coordination with DDOT’s feasibility study for a pedestrian/cyclist trail from E Street SE to Firth Sterling. Highlight this section of the trail as part of the Pennsylvania Avenue community through creative signage and public art or lighting.
  - Study phasing out actuated pedestrian signals along the corridor and prioritize Pennsylvania Avenue and Branch Avenue.
  - Study design improvements that would expand the bicycle network in and surrounding the study area. Expanded facilities should consider north-south bicycle lanes, additional trails, and bicycle connections west of the study area (i.e., across the Sousa bridge and to the Potomac Avenue Metro station), and connections from areas along Fairlawn Avenue SE to Anacostia Drive.
- Provide an enhanced system of bus shelters and bus stops along the Pennsylvania Avenue East corridor.
  - Install new bus shelters with seats at key locations along the corridor.
  - Identify bus shelters that would be appropriate candidates for solar power, illumination, and passenger information display screens.
  - Work with DDOT, NPS, and WMATA to identify the appropriate owner/maintainer of the bus shelter at Penn/38th Street SE to improve the bus rider experience.
  - Coordinate with WMATA to conduct a comprehensive review of transit service including the possibility of Metrorail service in the future that would improve travel times to critical services and employment areas.

In the first quarter of 2021, Ward 7 experienced the most crashes and most fatalities of any other Ward. After two fatal crashes along the corridor, DDOT had identified the following additional next steps for the Pennsylvania and Minnesota Avenue SE intersection. A portion but not all of these steps have been implemented at the intersection as of November 2025:

- Install signage noting curving roadway
- Include advisory speed signage
- Install pedestrian signs at Minnesota Avenue and L’Enfant Square crosswalk
- Refurbish road markings on Minnesota Avenue
- Continue evaluation of the block through the Pennsylvania Avenue-Minnesota Avenue Intersection Improvement Project.

Minnesota Avenue SE Bus Priority

In May of 2022 DDOT began construction along Minnesota Avenue focused on improving bus operations and safety between Pennsylvania Avenue and East Capitol Street. Phase 1 was completed February 2023 and included 28 curb extensions, 6 medians, and improvements to make crossing safer for pedestrians and bus travel times more efficient. Phase 2, which includes a southbound morning rush hour bus lane south of Nelson St SE, will be implemented following the planned reconstruction of the intersection of Pennsylvania Ave and Minnesota Ave SE described below.

Improvement of the Pennsylvania Ave SE and Minnesota Ave SE Intersection

The District of Columbia Department of Transportation (DDOT) and the Federal Highway Administration (FHWA), in cooperation with the National Park Service (NPS) and National Capital Planning Commission (NCPC) are proposing improvements to the intersection at Pennsylvania Avenue and Minnesota Avenue, SE (Twining Square area). This project improves the existing split roadway system that currently contains two complex intersections by reducing multiple traffic movements into one signalized intersection. Improvements to the area include the following:

- Increasing left-turn bay storage length for vehicles from eastbound Pennsylvania Avenue SE to northbound Minnesota Avenue SE
- Creating new streetscapes and consolidating green space
- Creating a new and improved drainage system
- Upgrading traffic signals
- Installing new streetlights
- Installing new and widened sidewalks and new pavement

This project is expected to improve pedestrian and vehicular safety, increase multimodal connectivity and access, and create a consolidated, usable green space that can serve the redevelopment. The project website notes that it is currently pursuing Notice to Proceed (NTP) with construction estimated to begin October 2025, but no construction has been observed at the intersection as of November 2025.

Land Use and Sustainability

DC Comprehensive Plan

The *DC Comprehensive Plan* is a high-level guiding document that sets a positive, long-term vision for the District through the lens of its physical growth and change. The existing Comprehensive Plan was enacted in 2006 and updated in 2011 and again in 2021 with the DC Council passing the updated plan in May 2021. The new plan officially became law on August 21, 2021.

The Comprehensive Plan's Transportation Element contains the following policies which are supported by the proposed development:

- *"Policy T-1.1.8: Minimize Off-Street Parking.* An increase in vehicle parking has been shown to add vehicle trips to the transportation network. In light of this, excessive off-street vehicle parking should be discouraged."
- "*Policy T-1.2.3: Discouraging Auto-Oriented Uses*. Discourage certain uses, like "drive-through" businesses or stores with large surface parking lots, along key boulevards and pedestrian streets, and minimize the number of curb cuts in new developments. Curb cuts and multiple vehicle access points break-up the sidewalk, reduce pedestrian safety, and detract from pedestrian-oriented retail and residential areas."

The proposed project is designed to de-emphasize the need for personal automobiles by providing fewer on-site vehicular parking spaces than required by the ZR16 and including carsharing spaces onsite, as well as proposing Transportation Demand

Management (TDM) measures described later in this report that emphasize transportation alternatives and carsharing to and from the site.

Sustainable DC 2.0 Plan

Sustainable DC is the District of Columbia's major planning effort to make DC the most sustainable city in the nation. It proposes a variety of sustainability goals, targets, and actions related to the built environment, transportation, and other topics.

The 2019 iteration of the plan, the *Sustainable DC 2.0 Plan*, includes the following proposed action which is supported by the development:

- "TR3.1 Encourage carpooling and carsharing."

The proposed development supports this action by de-emphasizing the need for personal vehicles by providing fewer on-site vehicular parking spaces than required by the ZR16 and including carsharing spaces onsite, as well as proposing Transportation Demand Management (TDM) measures described later in this report that emphasize transportation alternatives and carsharing to and from the site.

Site Trip Generation

Trips generation calculations were based on the methodology outlined in the Institute of Transportation Engineers' (ITE) *Trip Generation*, 11th Edition. Trip generation for the site was calculated based on ITE Land Use 221 (Multifamily Housing (Mid-Rise) - Not Close to Rail Transit) and existing single-family attached housing was calculated using ITE Trip Generation, 11th Edition rates for Land Use 215 (Single-Family Attached Housing),

Mode split assumptions were based on travel patterns of the existing use and are informed by Census data at the tract level of residents that live and work near the site, data contained in WMATA's 2005 Development-Related Ridership Survey and MWCOG's 2022 State of the Commute Survey Report, proximity to transit, and the proposed parking supply. Table 7 presents a mode split summary and Table 8 presents a trip generation summary for the proposed development.

Table 7: Mode Split Assumptions

Use	Mode				
	Drive[1]	Transit	Bike	Walk	Telecommute
Residential Mode Split	30%	45%	5%	15%	5%

[1]Drive mode split includes use of car share.

Table 8: Trip Generation Summary

Mode	AM Peak Hour			PM Peak Hour			Weekday Total
	In	Out	Total	In	Out	Total	
Proposed Multifamily Residential Housing (62 du)							
Auto	2 veh/hr	3 veh/hr	5 veh/hr	4 veh/hr	4 veh/hr	8 veh/hr	75 veh
Transit	2 ppl/hr	7 ppl/hr	9 ppl/hr	8 ppl/hr	6 ppl/hr	14 ppl/hr	132 ppl
Bike	0 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr	15 ppl
Walk	1 ppl/hr	1 ppl/hr	2 ppl/hr	3 ppl/hr	0 ppl/hr	3 ppl/hr	44 ppl
Telecommute	0 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr	15 ppl
Existing Single-Family Attached Housing (3 du)							
Auto	0 veh/hr	0 veh/hr	0 veh/hr	0 veh/hr	1 veh/hr	1 veh/hr	7 veh
Transit	0 ppl/hr	0 ppl/hr	0 ppl/hr	1 ppl/hr	0 ppl/hr	1 ppl/hr	12 ppl
Bike	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	1 ppl
Walk	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	1 ppl
Telecommute	0 ppl/hr	1 ppl/hr	1 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	4 ppl
Net New Trips							
Auto	2 veh/hr	3 veh/hr	5 veh/hr	4 veh/hr	3 veh/hr	7 veh/hr	68 veh
Transit	2 ppl/hr	7 ppl/hr	9 ppl/hr	7 ppl/hr	6 ppl/hr	13 ppl/hr	120 ppl
Bike	0 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr	14 ppl
Walk	1 ppl/hr	1 ppl/hr	2 ppl/hr	3 ppl/hr	0 ppl/hr	3 ppl/hr	43 ppl
Telecommute	0 ppl/hr	0 ppl/hr	0 ppl/hr	1 ppl/hr	1 ppl/hr	2 ppl/hr	11 ppl

The Nicholson development is expected to generate approximately five (5) vehicular trips (two inbound and three outbound) during the morning peak hour and eight (8) vehicular trips (four inbound and four outbound) during the afternoon peak hour.

The level of trip generation is below the threshold of 25 peak hour trips in the peak direction at which DDOT requires detailed vehicular capacity analysis. As such, a vehicular capacity analysis is not included in this Transportation Statement.

Project Design

This section provides an overview of the on-site transportation features of the proposed development, including an overview of site access by pedestrians, bicycles, private vehicles, and loading vehicles.

Overview

The project site is bounded by Nicholson Street SE to the south, a public alley to the north, and single-family housing units to the east and west. The proposed building will house the multi-family residential development containing 62 affordable units, as well as seven (7) vehicular parking spaces, two (2) of which will be carshare spaces, 24 long-term bicycle parking spaces, four (4) short-term bicycle parking spaces, and one (1) service/delivery space.

Site Access, Circulation, and Parking

Pedestrian Access

Pedestrian access to the project is proposed at the front entrance along Nicholson Street SE, as shown in Figure 12.

Bicycle Access and Parking

The project includes 24 long-term bike parking spaces in a secure storage room in the cellar that can be accessed by stairwells at each corner of the site. Four (4) short-term spaces are proposed along the site's frontage on Nicholson Street SE. This exceeds the zoning requirements of 21 long-term and three (3) short-term bicycle parking spaces for the project, as shown in Table 9.

Table 9: Bicycle Parking Requirements and Proposed Supply

Land Use	Size	Bicycle Parking ZR16 Requirements		Bicycle Parking Spaces Required		Provided	
		Long-Term	Short-Term	Long-Term	Short-Term	Long-Term	Short-Term
Residential	62 du	1 for 3 du	1 for 20 du	21	3	24	4

Bicycle access to the building is provided via Nicholson Street SE and the alley along the north side of the building, as shown in Figure 12.

Vehicle Access and Parking

Vehicular access to the building is provided via the public alley along the north side of the building, as shown in Figure 12. Due to the size of the lot, as well as the desire to maximize the number of affordable dwelling units that can be provided, the Applicant is proposing to provide seven (7) parking spaces, two of which are reserved for carshare. Per Subtitle C § 708.2, up to two (2) dedicated car share spaces provided in accordance with this provision may each count as three (3) required parking spaces for the purpose of calculating the provision of required parking. As such, the site effectively proposes 11 vehicle parking spaces, which falls below the 19 vehicular parking spaces currently required by the ZR16. The Applicant is seeking relief from providing the required 19 vehicular parking spaces (11 spaces proposed) as part of the BZA application. This relief will not have significant impacts on the neighborhood due to the transit-rich area within which the site is located. Furthermore, the project is supported by a robust Transportation Demand Management (TDM) plan tailored to further reduce parking demand of the project, summarized in a later section.

Notably, in light of Z.C Case 25-12 - Omnibus Text Amendment to Modify & Clarify Various Provisions of 11-DCMR, which the Zoning Commission recently voted to approve and which removes the restriction on streets on which a District Residential Parking Permit program is permitted from applying the 50% reduction in minimum parking requirements, the proposed development would be permitted to apply a 50% reduction to the minimum 19 vehicular parking spaces required by the ZR16. This results in a minimum parking requirement of 10 spaces. **Therefore, once the ZC order is published, the proposed 11 vehicular parking spaces would meet requirements and parking relief would not be required as part of this application.**

The vehicular parking requirements and proposed supply are summarized in Table 10.

Table 10: Vehicular Parking Requirements and Proposed Supply

Land Use	Size	ZR16 Parking Requirement	ZR16 Spaces Required Prior to Amendment Adoption[1]	ZR16 Spaces Required After Amendment Adoption[1]	DDOT Preferred Maximum Parking Rate	DDOT Preferred Maximum Parking Spaces	Proposed Parking
Residential	62 du	1 space/3 units in excess of 4 units	19	10	0.35 spaces/unit	22	11

[1] The ZR16 minimum vehicle parking supply is calculated based on the table of Subtitle C § 701.5. Per Subtitle C § 702.1, the development is within one-quarter mile of two (2) Priority Bus Routes. Since Nicholson Street SE permits participation in the Residential Parking Permit program, a 50% reduction in minimum parking requirements is not permitted in accordance with current regulations. However, the Zoning Commission has recently voted to approve ZC Case 25-12, which removes the restriction on streets where an RPP program is permitted from applying this reduction. Once the order is published, the requested relief would no longer be required.

The size of the property and the transit-rich area where the site is located minimize the need for additional vehicular parking. The Minnesota Avenue SE and Pennsylvania Avenue SE Priority Bus Routes and 10 Metrobus stops, and one (1) Capital Bikeshare station are within a quarter mile of the site.

Loading Access

Per ZR16 requirements, any residential development providing 50 or more dwelling units is required to provide one (1) 12'x30' loading berth and one (1) 10'x20' service/delivery space. As the proposed development provides 62 dwelling units, the site is required to provide one (1) 12'x30' loading berth and one (1) 10'x20' service/delivery space.

One (1) 10' X 20' service/delivery space is proposed as part of the development and will be accessed via the public alley to the north of the property, as shown in Figure 12. Trash collection will also occur in the alley.

Due to the small number of proposed units and subsequent lack of demand for loading services, the Applicant is requesting relief for the loading requirements of one (1) 12'x30' loading berth. Similar to what we would expect for other small residential developments without first-floor retail or other uses, we expect the majority of the building's loading activity will involve small delivery trucks and vans, service/maintenance vehicles, and moving trucks. Loading demand is not expected to be heavy, and based on information provided by the Applicant, the service/delivery space should accommodate the building's typical demand. Per the LMP, use of the space will be managed and coordinated, and if a larger truck that cannot be accommodated by the provided service/delivery space is needed for move in/out activities, residents will obtain a public space permit and Emergency No Parking signs through TOPS for curbside loading and unloading.

Loading Management Plan (LMP)

DC Zoning Regulations (Subtitle 11-C § 901.1) require that one (1) 12'x30' loading berth and one (1) 10'x20' service/delivery space be provided for the proposed development. However, due to the size of the lot and the desire to maximize the number of affordable dwelling units provided, it is not feasible to meet these requirements. As such, the Applicant is seeking relief from the zoning requirements to provide one (1) 12'x30' loading berth.

In support of the requested zoning flexibility, a Loading Management Plan (LMP) is proposed to mitigate any impact that the proposed loading activities may have within the public space. The goals of this plan are to maintain a safe environment for all users of the site, the loading area, the adjacent streets, and any nearby intersections; minimize undesirable impacts to pedestrians and to building tenants; reduce conflicts between truck traffic using the loading facilities and other users; and ensure efficient operation of the loading facilities through appropriate levels of management and scheduled operations. Consistent with recommended DDOT guidelines, the components of the loading management plan that will be implemented for the life of the project are as follows:

- A loading manager will be designated by the building management who will be on duty during delivery hours. The loading manager will be responsible for coordinating with vendors to schedule deliveries and will work with the community and neighbors to resolve any conflicts should they arise.
- A lease provision will require all residents to schedule and use the service/delivery space or use a public space permit and Emergency No Parking signs obtained through the DC Transportation Online Permitting System (TOPS) for all deliveries and move-in/move out activities that are conducted using a truck 20-feet in length or larger. The fees for this service will be paid by the resident.
- The loading manager will schedule deliveries using the space such that the space's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the service/delivery space is full, that driver will be directed to return at a later time when the space will be available so as to not compromise safety or impede alley functionality.
- Trucks using the service/delivery space 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 loading manager will also distribute flyer materials, such as the MWCOG Turn Your Engine Off brochure and others from DDOT and goDCgo, to drivers as needed to encourage compliance with idling laws. The loading manager will also post these materials and other relevant notices in a prominent location within the space.

- The service/delivery space manager will be responsible for disseminating suggested truck routing maps to drivers from delivery services that frequently utilize the development's service/delivery space as well as notifying all drivers of any access or egress restrictions.
- Trash collection will occur in the public alley to the north of the site.

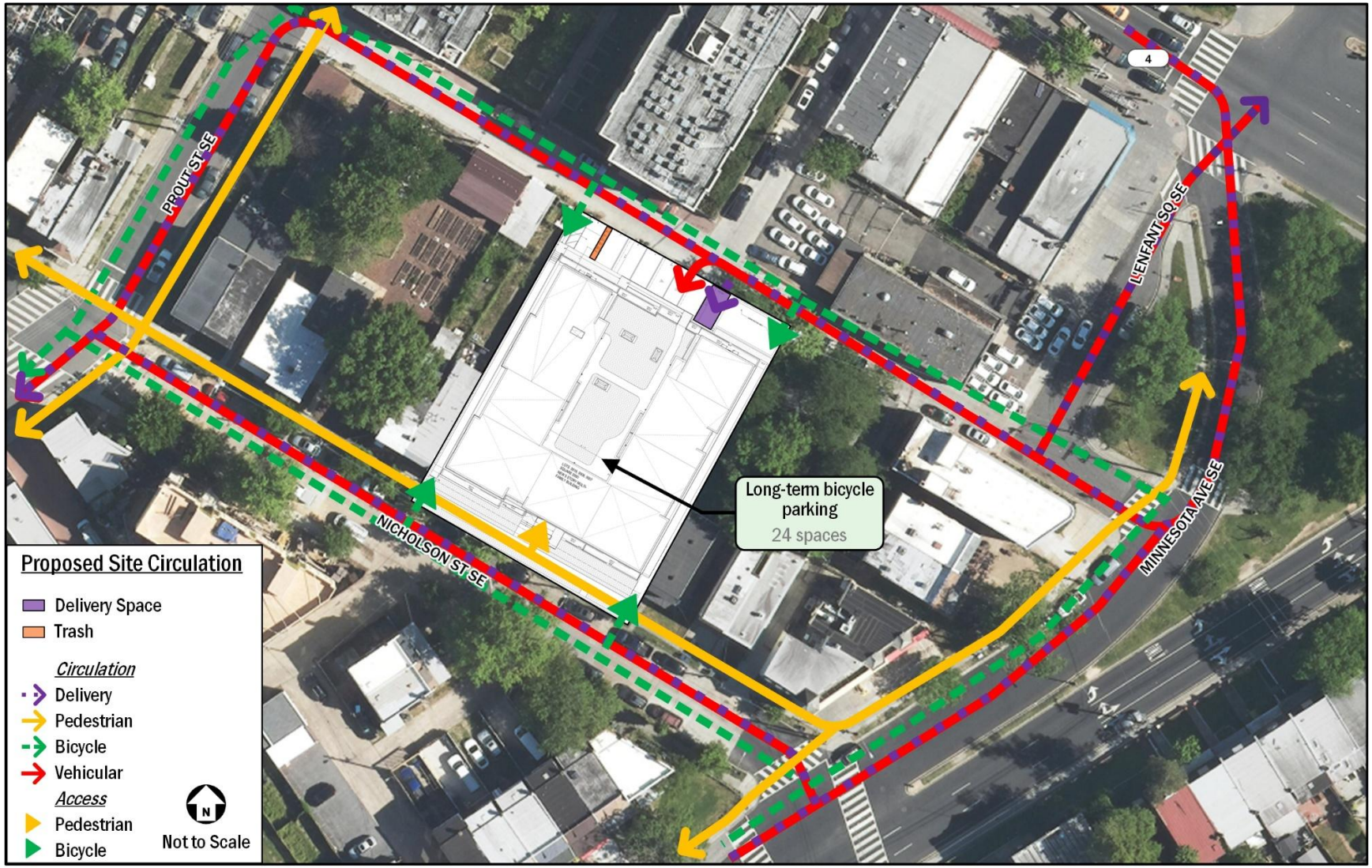

Figure 12: Proposed Site Circulation

Transportation Demand Management (TDM)

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 elements typically focus 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.

The TDM plan for the proposed project is based on DDOT expectations for TDM programs for developments of this type and size, as outlined in the *DDOT Comprehensive Transportation Review Guidance, May 2024*. As such, the Applicant proposes the following TDM measures:

- Unbundle the cost of vehicle parking from the lease or purchase agreement for each residential unit and charge a minimum rate based on the average market rate within a quarter mile.
- Identify Transportation Coordinators for the planning, construction, and operations phases of development. The Transportation Coordinators will act as points of contact with DDOT, goDCgo, and Zoning Enforcement and will provide their contact information to goDCgo.
- Transportation Coordinator will conduct an annual commuter survey of building employees and residents on-site, and report TDM activities and data collection efforts to goDCgo once per year.
- Transportation Coordinator will develop, distribute, and market various transportation alternatives and options to the residents, 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 Coordinator will subscribe to goDCgo's residential newsletter and receive TDM training from goDCgo to learn about the transportation conditions for this project and available options for implementing the TDM Plan.
- Provide welcome packets to all new residents that should, at a minimum, include the Metrorail pocket guide, brochures of local Metrobus lines, carpool and vanpool information, CaBi coupon or rack card, Guaranteed Ride Home (GRH) brochure, and the most recent DC Bike Map. Brochures can be ordered from DDOT's goDCgo program by emailing info@godcgo.com.
- Provide residents 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 (MWCOG) or other comparable service if MWCOG does not offer this in the future.
- Provide a copy of the Loading Management Plan (LMP) to the Transportation Coordinator so they are aware of this commitment.
- Post all transportation and TDM commitments on building website, publicize availability, and allow the public to see what has been promised.
- Offer a SmarTrip card and one (1) complimentary Capital Bikeshare coupon good for a free ride to residents and employees at the time of initial leasing of the building.
- Provide at least four (4) short- and 24 long-term bicycle parking spaces, exceeding zoning requirements.
- Long-term bicycle storage rooms will accommodate non-traditional sized bikes including cargo, tandem, and kids bikes, with a minimum 5% of spaces (2 proposed) be designed for longer cargo/tandem bikes, and a minimum of 10% of spaces will be designed with electrical outlets for the charging of electric bikes and scooters (2 proposed). There will be no fee to the residents for usage of the bicycle storage room and strollers will be permitted to be stored in the bicycle storage room.
- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit documentation summarizing compliance with the transportation and TDM conditions of the Order (including, if made

available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case.

- Following the issuance of a Certificate of Occupancy for the Project, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo every five (5) years (as measured from the final Certificate of Occupancy for the Project) summarizing continued substantial compliance with the transportation and TDM conditions in the Order, unless no longer applicable as confirmed by DDOT. If such letter is not submitted on a timely basis, the building shall have sixty (60) days from date of notice from the Zoning Administrator, DDOT, or goDCgo to prepare and submit such letter.

Summary and Conclusions

The purpose of this Transportation Statement is to:

- Review existing site conditions and details of the proposed development plans;
- Review the major transportation elements of the site plan, namely vehicular, loading, pedestrian, bicycle, and transit facilities in the vicinity of the site;
- Provide a Transportation Demand Management (TDM) plan to be implemented for the life of the development;
- Provide a Loading Management Plan (LMP) to be implemented for the life of the development; and
- Review the transportation elements of the project to determine whether the project will have a detrimental impact on the surrounding transportation network.

This Transportation Statement concludes the following:

- The proposed project is surrounded by an existing network of sufficiently connected transit, bicycle, and pedestrian facilities that result in an environment for safe, enjoyable, and effective non-vehicular transportation;
- The proposed project's trip generation is below the threshold of 25 peak hour, peak direction vehicle trips at which DDOT requires detailed vehicular capacity analysis;
- The requested relief from the requirement to provide 19 on-site parking spaces (11 spaces proposed) is not expected to have a detrimental impact on the neighborhood due to the transit-rich area within which the site is located;
- The requested relief from the requirement to provide one (1) loading berth is not expected to have a detrimental impact on the neighborhood as the proposed delivery space is expected to accommodate the vast majority of loading activities associated with the site. The proposed project will establish an LMP that will ensure efficient operation of the service/delivery space and all loading operations, trash collection, and move in/move out activities;
- The proposed project will provide four (4) short- and 24 long-term bicycle parking spaces, exceeding zoning requirements;
- The proposed project will include TDM measures that adequately promote non-vehicular modes of travel; and
- The proposed project will not have an adverse impact on the surrounding transportation network.