

TECHNICAL MEMORANDUM

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From: Meridith Moldenhauer, Esq., Cozen O'Connor
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Date: [date]

Subject: 635 North Carolina Avenue, S.E. (BZA App. No. [case no.]) – Loading Management Plan

Introduction

This memorandum presents the Loading Management Plan (“LMP”) for the redevelopment of the Rumsey Aquatic Center at 635 North Carolina Avenue, S.E. (Square 0872, Lot 62) (the “Property”) in support of the Applicant’s request for special exception relief pursuant to Subtitle C § 909.2 and Subtitle X § 901.2. The Applicant is the District of Columbia Department of General Services (“DGS”), and the facility is operated by the District of Columbia Department of Parks and Recreation (“DPR”).

The Property is located in the MU-4 zone and is improved with the existing Rumsey Aquatic Center, which will be razed and replaced with a two-story public recreation and community facility containing aquatic, fitness, community, senior, and multipurpose spaces (the “Project”). The Project will contain approximately 31,705 square feet of gross floor area. Under Subtitle C § 901.1, a Government, Local use of this size is required to provide one loading berth and one service/delivery space. The Project proposes neither, and relief is therefore requested pursuant to Subtitle C § 909.2(a)(2) on the basis of this LMP.

The Property fronts on North Carolina Avenue, S.E. to the north and C Street, S.E. to the south, and abuts the Eastern Market property to the east. The private alley along the eastern boundary is located on the Eastern Market property, is not part of the Property, and is therefore unavailable to serve the Project’s loading needs. The public alley along the western boundary is approximately ten feet wide and cannot satisfy the loading access requirements of Subtitle C § 904. Locating a loading berth off the western alley would therefore require additional zoning relief, introduce delivery vehicles into a narrow residential alley where dedicated loading does not presently occur, and may not allow delivery vehicles to enter and exit in a forward direction.

The existing facility has operated for decades without an on-site loading berth or service/delivery space. Facility operations generate limited and predictable service activity and a designated DPR staff member coordinates the facility’s deliveries. Chlorine and carbon dioxide (CO₂) deliveries occur twice per month, with the delivery days varying as needed. Trash is collected weekly on Mondays, and recycling is collected weekly on Tuesdays. Other routine supplies are delivered by passenger vehicles and small vans. The Project’s anticipated loading and collection demand is reflected in the schedule and management procedures set forth below.

The Project will not materially increase this demand. The added fitness, senior, community, and multipurpose programming does not generate regular freight activity, and the Project includes no restaurant, retail, or similar use. No designated loading zone or other change to the curb along C Street, S.E. is proposed. The Applicant proposes to formalize the facility’s loading, delivery, and collection procedures through the management measures set forth below.

Loading Management Plan

The goals of this plan are to maintain a safe environment for all users of the site, the adjacent streets, and nearby intersections; minimize undesirable impacts to pedestrians and to facility users; reduce conflicts between service vehicles and other street users; and ensure efficient operation through appropriate levels of management and scheduled operations. Consistent with DDOT guidelines, the components of the loading management plan that will be implemented for the life of the Project are as follows:

- DPR will continue to designate a member of facility staff to serve as the loading coordinator, on duty during the facility's operating hours. The loading coordinator will schedule and receive all deliveries, coordinate with vendors and collection crews, and serve as the point of contact for neighboring property owners and ANC 6B to resolve any conflicts that may arise. The loading coordinator's contact information will be available upon request by the ANC 6B;
- All deliveries made by a vehicle twenty feet or longer in length will be scheduled in advance with the loading coordinator, who will schedule deliveries such that no more than one vehicle is at the curb at a time. In the event an unscheduled vehicle arrives while another is loading, the driver will be directed to return at a later time so as not to compromise safety or impede traffic flow along C Street, S.E.;
- The facility's weekly trash collection will be scheduled for Mondays. Recycling collection will be scheduled for Tuesdays. All deliveries and collections will occur outside the hours of 7:00 to 9:30 AM and 4:00 to 6:30 PM, and will avoid weekends so as not to conflict with Eastern Market's operation;
- All loading, deliveries, and collection will occur from the curb along C Street, S.E. in accordance with the posted curbside designations and restrictions in effect at the time. No dedicated loading space or signage is proposed, and the Applicant is not requesting any change to existing curbside regulations;
- The loading coordinator will monitor delivery and collection activity to ensure that vehicles do not block the travel lane, any bicycle facility, or the sidewalk along C Street, S.E., except during those times when a vehicle is actively loading or unloading, and that a clear and accessible pedestrian path of travel is maintained;
- Building staff will move trash and recycling receptacles to the curb at the time of collection and will return them to the trash room expeditiously after collection. Receptacles will not be staged at the curb overnight or in advance of the scheduled collection time;
- Vehicles serving the Property 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 coordinator will 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, and will post these materials and other relevant notices in a prominent location at the service entrance;
- The loading coordinator will be responsible for disseminating suggested truck routing maps to facility staff and to vendors and delivery services that frequently serve the Property, and for notifying all drivers of any access or egress restrictions applicable to C Street, S.E.;
- If the curb is obstructed, the loading coordinator may call 311 to request enforcement of the applicable parking restrictions by the Department of Public Works, and will obtain "Emergency, No Parking" signage from DDOT in advance of any delivery or activity requiring extended occupancy of the curb; and

- This LMP governs operation of the completed Project. Construction period truck traffic, staging, and curb occupancy will be addressed separately through the maintenance of traffic and construction staging plans approved by DDOT.

This LMP is submitted as part of DGS's application. The Applicant will work with DDOT to obtain approval of this LMP in accordance with Subtitle Y § 300.14 and its implementation will be a condition of the Board's approval pursuant to Subtitle C § 909.2(a)(2).

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