

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



ZONING COMMISSION
District of Columbia

CASE NO. 04-11B

EXHIBIT NO. 26

d. Policy Planning and Sustainability

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

FROM: Samuel Zimbabwe *sz*
Associate Director, PPSA
District Department of Transportation

DATE: September 10, 2012

RECEIVED
D.C. OFFICE OF ZONING
2012 SEP 11 AM 8:37

SUBJECT: Zoning Commission Case 04-14. Application of Florida Rock Properties, Inc., together with MRP Realty, to modify an Approved Planned Unit Development (Square 708, Lot 14)

Project Summary

Florida Rock Properties, Inc. and MRP Realty ("The Applicant") have applied for a modification to a planned unit development ("PUD") for property located in Ward 6 in Square 708, Lot 14 ("Property"). The Property is bounded by South Capitol Street to the west, Potomac Avenue, S.E. to the north, the Anacostia River to the south and Diamond Teague Park to the east. The approved PUD included a related Map Amendment to the C-3-C Zone District and the project consisted of four phases of development including residential, office, hotel, and retail components, for a total development of approximately 1.1 million square feet of gross floor area. The Applicant is proposing to modify the application to convert the first phase of development from an office building to a residential building. Phase One will include approximately 300-350 residential units, 286 parking spaces and approximately 300,000 square feet of gross floor area. The Applicant is also proposing to convert the second-stage approvals for the remaining three phases of development to first-stage approvals. The designs of the three buildings will be refined in a future application. For the entirety of the four phases, the current proposal seeks approval of a maximum height of 130 feet, a total gross floor area of approximately 1,165,000 square feet.

Summary of DDOT Review

The purpose of DDOT's review is to assess the impact of the proposed project on the District's transportation network and, as necessary, propose appropriate mitigations. Prior to discussing potential impacts and mitigations, DDOT expresses concern with the Applicant's proposed action. DDOT is currently

completing the environmental approval process for the South Capitol Street Corridor EIS. As part of this process, DDOT is proposing a replacement of the Fredrick Douglass Bridge just southwest of the current bridge and a traffic oval where the new bridge lands on the north side of the river. The Applicant has responded to DDOT's plans by positioning development parcels such that they do not conflict with DDOT's planned improvements.

However, the Applicant appears to be proposing Stage 1 PUD approval for properties not controlled by the Applicant. It is DDOT's understanding that the Applicant is proposing Stage 1 PUD approval on property DDOT owns that currently serves as the ROW for the existing South Capitol Street facility as well as for property on the west side of the existing South Capitol Street controlled by a separate party. A portion of the proposed Phase 3 development and nearly all of the proposed Phase 4 development appear to be on the property of DDOT or the property of other parties. DDOT believes it is premature to include any DDOT ROW or other property that is not controlled by the Applicant in a zoning action. The request for zoning implies that there is agreement between DDOT and the Applicant to dispose to the Applicant excess property DDOT may control after construction of the South Capitol Street improvements. There is no agreement between DDOT and the Applicant and any disposal of DDOT right-of-way (ROW) must be done in keeping with DDOT's Right-of-way Policies and Procedures Manual. As such, DDOT believes Phase 3 and 4 should not be advanced in the zoning process until DDOT is able to dispose of any potential ROW that may no longer be necessary following our South Capitol Corridor project.

Despite our concerns about the inappropriate inclusion of DDOT ROW, DDOT evaluated the proposed action. After a thorough review of the analysis submitted by the Applicant, DDOT concludes:

- The Proposed Phase 1 PUD will not significantly affect the level of service (LOS) at any of the study intersections.
- Several study area intersections are projected to have a failing LOS in the Phase 2-4 build-out horizon year (2020), with the Site's impacts having a significant contribution to the failing conditions at one intersection.
- The amount of parking provided is inconsistent with the proposed mode split.
- The Site's waterfront represents an extension of the Anacostia Riverwalk Trail, as shown in the District's 2005 bike Master plan. The Applicant has proposed bicycle facilities along the waterfront that DDOT finds inadequate. DDOT believes the Applicant should work with DDOT to tweak the design until all concerns are addressed.
- The site is proposed to contain approximately 50% more parking than is necessary. DDOT is concerned that this excess parking will be leased to outside users, in particular to visitors of Nationals Park. Outside use of the excess parking has not been evaluated in the Applicant's analysis and should be prohibited or an evaluation of these trips should be included in the Applicant's analysis.
- The Applicant's TDM program is not adequate to facilitate adherence to the assumed mode split. This concern should be addressed through a reduction in parking supply, increase in TDM measures, and/or implementation of a robust performance monitoring program.
- Due to the large amount of on-site parking provided, DDOT will require a performance monitoring plan as a condition of issuing public space permits.

Transportation Analysis

DDOT is committed to achieving an exceptional quality of life in the nation's capital by encouraging sustainable travel practices, constructing safer streets and providing outstanding access to goods and

services. As one means to achieve this vision, DDOT works through the zoning process to ensure alternative modes are adequate to accommodate new travel demand while discouraging single occupancy vehicle trips. To facilitate this vision, DDOT requests that applicants going before the Zoning Commission for PUD approval perform a CTR for the project in order to determine its effect on the overall transportation network. The following analysis provided by DDOT evaluates the Applicant's CTR to determine its accuracy and consistency with the City's vision for its transportation network.

Overview

As part of the transportation impact assessment, DDOT requests applicants to evaluate the impacts to the pedestrian, bike, transit, and roadway networks. Accordingly, the Applicant is expected to show the existing conditions for each transportation mode affected, the proposed impact on the respective network and any proposed mitigations, along with the effects of the mitigations on *other* travel modes.

The Applicant coordinated with DDOT in the development of the traffic study scoping parameters and relevant study area intersections. The Applicant's methodology for evaluating existing traffic conditions and future traffic conditions was generally consistent with DDOT procedures as defined in the *Design and Engineering Manual*.

Roadway Capacity and Operations

As part of the evaluation of the impacts of the site on the transportation network, DDOT requests analysis of traffic conditions for the agreed upon study intersections for the current year and after the facility opens both with and without the site development. The analysis incorporates assumptions related to mode split, trip generation, trip distribution and assignment, as well as site access.

Mode Split

Every trip is made by a certain means of travel such as vehicle, bicycle, walking, etc. 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, availability and cost of parking, among many others. The Applicant's proposed mode split is shown in the table below:

Mode	Land Use			
	Residential	Retail	Office	Hotel
Vehicle	40%	35%	50%	45%
Transit	40%	40%	40%	30%
Walk	15%	20%	7%	20%
Bike	5%	5%	3%	5%

The Applicant's estimated mode split was based on the WMATA *Development Related Ridership Survey*, WMATA's *Station and Site Access Planning Manual*, the *Commuter Connections 2010 State of the Commute Survey Report*, year 2000 Census data, along with case studies. Given that the project's proximity to available transit, DDOT believes that these mode split assumptions are achievable, provided that the Applicant employs appropriate parking facilities and a substantive TDM plan.

Vehicle Trip Generation

The Applicant provided trip generation estimates, utilizing the Institute of Traffic Engineers (ITE) *Trip Generation Manual* as a starting point and included reduction factors for transit trips, walk trips and bike trips. Based on initial ITE trip rates and applied reduction factors for other travel modes, the Applicant's proposed vehicle trip generation is shown as follows:

Table 1: Weekday Vehicle Trip Generation

Phase	AM Peak		PM Peak	
	Inbound	Outbound	Inbound	Outbound
Phase 1 - Residential and Retail	17	55	63	41
Phases 2 - 4				
Retail	7	3	20	19
Office	205	30	36	179
Residential	11	46	45	23
Hotel	74	52	62	64
Total Trips	314	186	226	326
	500		552	

Study Area and Data Collection

The Applicant, in conjunction with DDOT and considering input from the community, identified nine intersections where detailed vehicle, pedestrian and bike counts would be conducted and a level of service analysis would be performed. These intersections are adjacent to the site and also include those subsequent intersections radially outward from the site that have the greatest potential to see moderate to significant increases in vehicle delay. DDOT acknowledges that not all affected intersections are included in the study area and there may be intersections outside of the study area which realize new trips. However, DDOT expects minimal to no increase in delay *outside* the study area as a result of the proposed project.

The Applicant collected vehicle and pedestrian intersection data in September of 2011 and September 2010. While some of the data sets exceed DDOT's preferred age limit on data, in general DDOT agrees with the time frame and collection dates.

Trip Distribution and Assignment

The Applicant assumed that trips related to each of the land uses would travel to and from different parts of the region in a manner specific to the land use. Therefore, the Applicant created unique trip distribution rates for retail, office, and residential trips. DDOT is in general agreement with the Applicant's proposed distribution of trips across the network, as well as the assignment of trips to proposed driveways.

Background Developments and Regional Growth

As part of the analysis of future conditions, DDOT requires applicants to account for future growth in traffic on the network or what is referred to as background growth. The Applicant in their original CTR included thirty-five (35) nearby developments that are actively planned or under construction, and whose trip impact will coincide with the study area in the 2015 and 2020 build-out year. As such, the Applicant did not apply any annual growth rate to South Capitol Street, as is typically done for arterials. While this is not typical, DDOT is confident the Applicant is taking a conservative approach to evaluating future travel conditions.

Future Planned Infrastructure

Three major DDOT initiatives are underway that will impact travel patterns in the area surrounding the proposed development. DDOT is planning and/or implementing changes in the following corridors:

- 11th Street Bridges.
- South Capitol Street Corridor.
- M St SE/SW Corridor.

The 11th Street Bridges project will add missing movements to the District's freeway system and will separate regional and local traffic. The project will reduce congestion, improve safety, increase access for communities at the edge of the river, and improve regional mobility. The South Capitol Street Corridor project will rebuild South Capitol Street into a six-lane landscaped boulevard with at-grade intersections along the north side of the Anacostia River. DDOT is in the planning process for improvements to the M Street SE/SW Corridor that could include new premium transit service in the corridor. These improvements will significantly change the transportation patterns in the area by adding multimodal transportation capacity to serve a high growth area of the City.

Analysis

Analysis provided by the Applicant shows that vehicle traffic impacts from the project will produce a very minor increase in delay to several intersection that currently have a failing level of service (LOS) or are projected to by 2015. LOS was calculated using Highway Capacity Manual (HCM) software at all of the study area intersections, per DDOT's recommended methodology. The Applicant compared existing LOS and delay with 2015 background conditions and 2015 build-out conditions – which include Phase 1 of the Applicant's project, but no roadway improvements based on the South Capitol Street EIS. The Applicant's proposed development is projected to have negligible impacts on the average delay at these intersection approaches. Further analysis showed that while a handful of approaches may be failing in 2015, only one *overall* intersection will have a failing LOS: South Capitol Street at Potomac Ave, SE. This intersection is currently failing and will continue to do so in the 2015 background condition and 2015 build-out condition. While DDOT is in general agreement with the accuracy of this impact analysis, the negligible impact should be mitigated with a robust TDM plan that emphasized biking, walking and transit options.

The Applicant analyzed 2020 travel conditions, with and without the full build out of the proposed 4-phase project. For the purpose of the analysis, both conditions assumed that the South Capitol Street EIS would be complete as shown in the preferred alternative. The site generated traffic was shown to have an effect in the PM peak hour conditions for the northbound and southbound approaches of the intersection of 1st and M Street, SE, resulting in a forecasted degradation in LOS from D to F for the overall intersection. The Applicant proposed signal retiming for this intersection to mitigate the addition site-generated trips. This may be appropriate to address some of the concern but the Applicant should incorporate and enforce a robust TDM plan to mitigate the impact.

Site Access

The Applicant is proposing vehicle access off of Potomac Ave, SE, currently a low-volume collector between 1st St, SE and South Capitol Street. The Applicant is proposing two full access driveways on Potomac Ave. The eastern driveway will serve Phase 1 of the PUD and the western driveway will serve phases 2 through

4. DDOT has no objection to the number of proposed vehicle access points, however any access restrictions will be determined as part of the public space permitting process. Further, the Applicant should coordinate with DDOT as the design of DDOT's South Capitol Street Corridor advances so that the Applicant's access needs may be addressed.

Loading

All loading facilities are proposed to be internal to the site, with access from the two driveways off of Potomac Ave. In accordance with the *Design and Engineering Manual*, no back-up maneuvers will occur in public space. Care should be taken by the Applicant to design the loading facilities with the safety of pedestrians in mind, as this private space is expected to experience significant pedestrian traffic, particularly during baseball game days.

Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, and price/supply of parking spaces. However in urban areas, other factors contribute to the demand for parking such as the availability of nearby high-quality public transit. With the site in proximity to such transit, DDOT expects a low demand for on-site parking. However, the Applicant is proposing 1144 on-site parking spaces, allocated as shown in the table below.

Table 2: Proposed underground parking supply and space allocation

Phase	Use	Parking Spaces	Ratio ¹
Phase 1	Residential	286	0.82 spaces/Unit
Phase 2	Residential	178	0.61 spaces/Unit
Phase 3	Office	341	1 space/950 SF
Phase 4	Hotel	339	0.85 spaces/room

1. Some uses have also retail, assumed at 1 space per 1000 SF

This level of parking far exceeds the amount generally needed for sites with comparable locations, close multiple high capacity transit facilities - particularly, in light of the Applicant's proposal to unbundle parking.

Based on other projects in similar highly urbanized, transit rich locations, DDOT usually sees the following approximate parking ratios for weekday occupancy:

- Residential: 1 space per two units
- Hotel: 1 space per two units
- Office: 1 space per 1750 ft²
- Retail: 1 Space per 1000 ft²

Based on these ratios, estimates that parking demand could be:

Phase	Use	Parking Spaces
Phase 1	Residential	181
Phase 2	Residential	147
Phase 3	Office	192
Phase 4	Hotel	213

1. Some uses have also retail, assumed at 1 space per 1000 SF

Accordingly, the total expected parking spaces will be around 733 spaces, about 400 spaces less than in the Applicant's proposal. In addition, DDOT notes that the land use program is ideal for shared parking as the peak parking demand for office is not the same as that of residential and retail. Thus, these spaces could be shared between the land uses further lower the amount of needed spaces. DDOT agrees with the Applicant's transportation consultant that the hotel is over-parked and can share parking space with the Office, particularly on the weekends when office use is minimal. Sharing spaces would further reduce this number of spaces from 733 to below 700.

DDOT recommends to the Zoning Commission that, in addition to the unbundling of parking, any unleased spaces will not be leased for non-site uses in particular to serve Nationals Park events. The Applicant's transportation analysis does not include an analysis of conditions if stadium parking is allowed. If parking for stadium events is allowed, the analysis submitted by the Applicant will not reflect future travel conditions. If parking is desired for this purpose, the Applicant should update their analysis to reflect travel conditions in this scenario.

Bicycle Parking

As noted by the Applicant, most parked bicycles in the study area were chained to signs or parking meters, indicating an existing need for public bicycle parking. The Applicant's project is proposed to have a large ground-floor retail component that will increase the demand for on-street bicycle parking. To accommodate the existing and future demand, the Applicant has proposed to provide short term public on-street bicycle parking spaces near building entrances and high-visibility areas. DDOT agrees with this approach and estimates that a minimum of 30 racks may be needed to serve the short term bike parking needs associated with the retail component of the project. The Applicant should consult with DDOT during the public space permitting process to determine the number, location and design of the racks in the public right of way.

In addition to public bike parking, the Applicant has proposed private secure bike parking in all of the project's underground garages, as well as changing facilities for the office and hotel phases. DDOT agrees that these changing facilities are necessary features for encouraging bicycle commuting and for achieving the desired bicycling mode split. DDOT reminds the Applicant that for residential buildings, District policy requires one bicycle parking space for every three units, with all spaces to be located on the first floor of each parking garage. For office buildings, minimum bicycle parking is 5% of the zoning required vehicle parking requirements.

Bicycle and Pedestrian Facilities

The District of Columbia is committed to enhancing the walk-ability and bike-ability of the city by ensuring consistent investment in pedestrian and bike infrastructure on the part of both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including pedestrian and bicycle trips.

Bicycle Facilities

As noted by the Applicant, the Site is well-served by bicycling facilities. Notably, the site has a direct bicycling access via three routes:

- 1st Street, SE (dedicated bike lanes in both directions)
- Potomac Ave, SE (dedicated bike lanes in both directions)
- Anacostia Riverwalk Trail Shared-used path/boardwalk network

Both the 1st Street and Anacostia Riverwalk Trail bicycling facilities are programmed to connect, via planned dedicated facilities, to major commercial areas throughout the City, allowing for near city-wide access from the Site. Two bike-sharing stations exist within the study area, including a 17-dock station one block from the Site, while another is proposed at 3rd and N Streets. The Applicant has estimated that over 600 daily bike trips will be generated by the Site, taking advantage of the District's investment in developing a multimodal transportation network and allowing for a reduction in single occupancy vehicle trips.

Additionally, the Anacostia Riverwalk Trail will be accommodated across the Site between Diamond Teague Park and the planned realignment of the South Capitol Street Bridge as noted by the Applicant. The Applicant is proposing an open space plan between the river and the development site that includes space for a trail alignment. DDOT has worked with the Applicant to address the needs of cyclists traveling through the area along the Anacostia Riverwalk Trail. As part of this collaboration, the Applicant has included a design that utilizes red hash marks to delineate the trail alignment portion of the proposed boardwalk that is preferred for bicycle through traffic¹. DDOT finds this delineation to be appropriate though some final details of the design remain to be addressed. DDOT requests that the Applicant continue to work with DDOT to address the final issues of trail design.

Pedestrian Facilities

The primary pathway between the Site and the M Street, SE commercial corridor and the nearest WMATA bus and Metro stops will be via 1st Street, SE. Pedestrian facilities along the segment of 1st Street are wide and well-lit. These conditions will facilitate the Applicant's high forecasted walking and transit mode split. Further, as part of the public space permitting process, the Applicant will be required to design public space and pedestrian facilities along Potomac Avenue consistent with DDOT requirements.

Transit Service

The District and Washington Metropolitan Transportation Authority (WMATA) have partnered to provide extensive public transit service in the District of Columbia. DDOT's vision is to leverage this investment to increase the share of non-automotive travel modes so that economic development opportunities increase with minimal infrastructure investment.

The site is located about 1/3rd mile from the Navy Yard Metro Station, with the access to WMATA's green line. In addition, the site is approximately 1/3rd mile from several WMATA bus routes, with short peak hour headways, as well as the District's *Union Station to Navy Yard Circulator Route*. This access provides potential for the Applicant to utilize the District's investment in transit in order to reduce vehicle trips.

¹ Site Plan, page L1.03. August 31st, 2012 *Supplemental Submission* to the Zoning Commission

Safety

DDOT requires that the Applicant conduct a safety analysis to demonstrate that the site will not create new, or exacerbate existing, safety issues for all travel modes. DDOT asks for an evaluation of crashes at study area intersections as well as a site distance analysis along the public space where there is expected to be conflicts between competing modes (e.g. crosswalks, driveway entrances, etc.).

The Applicant reviewed pedestrian, bike, and vehicle crash data at the study area intersections. These crash data. The Applicant noted that three intersections had vehicle crash rates over 1.0 crashes per million entering vehicle – generally considered a threshold for further review. The Applicant did not recommend mitigation measures for these intersections, as their contribution to the vehicle exposure was very low.

DDOT noted several other safety concerns related to pedestrian and bicycle safety within the site and along the site frontage. As noted previously the Applicant is utilizing two driveways off Potomac Ave, SE to access internal site alley that serve passenger vehicles and for delivery trucks. However, these internal alleys will also carry heavy pedestrian and bike traffic, due the location and amount of ground floor retail. Additionally, the waterfront portion of the site will be a pedestrian draw from visitors exiting events and ball games at Nationals Park. Accordingly, there will be delivery trucks and passenger vehicles making turn movements, in conflict with a heavy pedestrian presence. Proper design is required to mitigate the impact of turning vehicles on the safety of a heavily pedestrian-traveled area.

As mentioned previously, pedestrians and bicyclists will mix along the Site's waterfront boardwalk area, particularly where the Anacostia Riverwalk Trail crosses the site frontage along the Anacostia River bank. While DDOT recognizes that the water's edge will serve as a pedestrian and bicyclist draw for the Site, the frontage also serves as a pass-through along the Anacostia Riverwalk Trail. Accordingly, proper delineation of the preferred bicycle "through traffic" area is needed.

Streetscape

In line with District policy and practice, any substantial new building development or renovation is expected to rehabilitate streetscape infrastructure between the curb and the property lines. This includes curb & gutter, street trees and landscaping, street lights, sidewalks, and other appropriate features within the public rights of way bordering the site. The Applicant must work closely with DDOT and OP to ensure that the design of the public realm meets current standards and will substantially upgrade the appearance and functionality of the streetscape for public users needing to access the property or circulate around it. The *DDOT Public Realm Design Manual* will serve as the main public realm references for the Applicant. DDOT staff will be available to provide additional guidance during the Public Space permitting process.

In addition, though no utility vaults are specifically noted in the zoning application, DDOT notes that its policy is to not allow vaults in public space, particularly in areas that are expected to see substantial pedestrian activity.

Transportation Demand Management

As part of all major development review cases, DDOT requires the Applicant to produce a comprehensive Transportation Demand Management (TDM) plan. TDM is a set of strategies, programs, services, and

physical elements that influence travel behavior by mode, frequency, time, route, or trip length in order to help achieve highly efficient and sustainable use of transportation facilities. In the District, this typically means implementing infrastructure or programs to maximize the use of mass transit, bicycle and pedestrian facilities, and reduce single occupancy vehicle trips during peak periods.

The Applicant has proposed the following TDM strategies:

- During construction, the Applicant will maintain or coordinate relocation of any existing bus stops at their expense. (There are currently no bus stops adjacent to the site)
- The site design complies with zoning requirements to provide bicycle parking/storage facilities.
- The development will unbundle all parking costs from the cost of lease or purchase. Parking costs will be set at no less than the charges of the lowest fee garage located within ¼ mile.
- The developer will post all TDM commitments on-line, publicize availability, and allow the public to see what commitments have been promised.
- The developer will identify a TDM Leader (for planning, construction, and operations), and provide DDOT/Zoning Enforcement with annual TDM Leader contact updates.
- The developer will provide website links to CommuterConnections.com and goDCgo.com on developer and property management websites.
- The developer will provide an on-site business center to residents with access to copier, fax, and internet services.
- Commuter showers/lockers in all retail and office locations.
- The developer will provide a one-time membership fee subsidy in a car sharing program for each residential unit.

DDOT is in general agreement with these measures but requests the Applicant add the following TDM strategies:

- Pre-paid Smartrip card for new residents, office workers.
- A one-time annual membership to Capital Bikeshare.

Performance Monitoring

If the Applicant pursues its request for parking supply that exceeds the parking demand for the site without evaluating impacts that would result from the oversupply, as described in their filings, DDOT will request of the Zoning Commission and require in the Public Space permitting process a robust monitoring program designed to limit trips entering the site to site specific trips.

The Applicant has proposed the following performance monitoring:

[Two years after Phase 1 is constructed, the developer will conduct a performance monitoring study of TDM measures. At minimum, this study will include a peak hour trip generation analysis and parking demand analysis of the Phase 1 parking garage. The report will include a comparison of the peak hour trip generation measured and the projections contained within this report.]

While DDOT agrees that a performance monitoring plan will be needed, such a plan will be needed for *all four phases* of the project. As noted prior, the Applicant is proposing a substantial amount of parking in excess of what DDOT traditionally sees for similarly located sites. Accordingly, DDOT will request of the Zoning Commission and require in the Public Space permitting process a robust monitoring program

designed to limit trips entering the site to site specific trips. The monitoring program would have to address Nationals Park events. DDOT will coordinate with the Applicant on details of the performance monitoring plans. The program should consist of annual monitoring reports for the first 3 years after the project is at least 70% occupied.

In the event that the projected impacts on the peak am and pm hour roadway conditions exceed projections by 10% or more of the traffic impacts forecasted for the site, the Applicant will provide DDOT with an updated TDM and Mitigation Plan designed to bring the impacts back to a level at or below that evaluated in the transportation analysis.

The TDM will be updated as follows:

- Provide a list of Transportation Demand Management measures that are currently in place.
- Propose additional TDM measures to implement within three (3) months after submission of an annual Monitoring Plan that are designed to reduce vehicle trip generation to the original level projected.

In the event that the Applicant exceeds the projected vehicle trip generation outlined in Table 1, for two (2) consecutive monitoring time periods then the Applicant will conduct surveys of office employees, retail employees, retail patrons and residents to determine the current am and pm peak period transportation modes in order to implement additional incentives to encourage alternate modes of transportation or travel during off peak time periods. The Applicant will then submit marketing and/or implementation plans based on such survey results.

The Applicant will be required to continue extending this monitoring protocol until it reaches its vehicle trip generation goal (no more than 10% greater than the projected vehicle trip generation outlined in Table 1, for two consecutive years.

Conclusion

In summary, DDOT concludes the following:

- Phases 3 and 4 should not be moved forward in the zoning process until DDOT is able to dispose of excess ROW.
- The Proposed Phase 1 PUD will not significantly affect the LOS in the study area.
- The Proposed Phase 2-4 of the PUD are projected to have a failing LOS in the build-out horizon year (2020) and will have a significant impact at one intersection.
- The amount of parking provided is inconsistent with the proposed mode split.
- The Applicant should work with DDOT to satisfactorily modify the Riverfront trail design prior to approval of the requested zoning.
- The Applicant is proposing more parking than necessary. The Applicant should not be allowed to lease the excess space to non-site users in particular Nationals Park patrons without proper analysis.
- The Applicant's TDM program should be modified to achieve the assumed mode split.
- DDOT will require a performance monitoring plan as a condition of issuing public space permits.

SZ|bw