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OFFICE OF PLANNING

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MEMORANDUM

TO: Zoning Commission for the District of Columbia

FROM: Travis Parker, Zoning Review Manager *TP*

DATE: October 3, 2008

SUBJECT: ZC Case 08-06-3
Response to the Zoning Commission on Proposed Amendments to the Loading Regulations 11 DCMR

The following are responses to questions at the September 4, 2008, Public Hearing.

1. Are there any places within the City where large trucks are not permitted and who enforces this regulation?

Trucks over 1 ¼ ton are prohibited on many residential streets – except to make deliveries or pick up. Using a map which identifies primary and secondary truck routes, DDOT issues a permit:

- If the truck is a single unit (box truck) longer than 40 feet – over-size permit is required with special routing.
- If a tractor trailer combination is over 55 feet long – over-size permit is required with special routing. Most tractor trailer combinations are 55 feet long or longer.
- If tractor trailer combination is over 70 feet - over-size permit is required with special routing and a police escort. If tractor trailer has the new 53 foot trailer (as many do) the combined length is almost always 70 feet or more.
- Enforcement is done by the Motor Carrier Division of MPD.

2. What are the actual lengths of larger trucks? The current Regulations call for loading berths to be 55 feet deep?

Many tractor-trailers use the new 53 foot trailer so the combined length is almost always 70 feet or more. With a standard 48 foot trailer – the tractor trailer combination length is generally about 65 feet.

3. Does DDOT have any Truck Management Studies on how to manage truck loading and unloading?

DDOT has a Truck Management Study entitled “District of Columbia Motor Carrier and Threat Assessment Study” August 2004. Among other things, the study provides recommendations on Truck Routes and loading/unloading issues. However, most of the issues addressed off-site conditions that cannot be covered by the Zoning Regulations.

See <http://www.ddot.dc.gov/ddot/cwp/view,a,1249,q,609850.asp>

ZONING COMMISSION
District of Columbia

CASE NO. *08-06-3*
EXHIBIT *13*
ZONING COMMISSION
District of Columbia
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EXHIBIT NO. 13

4. What are the basis on which DDOT will allow an apartment building developer to reduce the required loading berth from a 55-foot to a 30-foot berth?

In the past 5 years DDOT has recommended the approval of requested reductions in the size of loading berths on a case-by-case basis through the variance or PUD process. Applicants have been able to demonstrate that they cannot accommodate the required loading on the property or that the loading berth size required would not be necessary for their use. They have also demonstrated that the reduction would not be detrimental to the community.

This is part of private property construction. DCRA is the responsible agency. We are not aware that DCRA consults with DDOT regarding loading berth sizes.

5. Are there any regulations requiring a minimum turning radius for large trucks the access an alley?

DDOT standard curb return for an alley is a 10 foot radius. There are no specific regulations governing the turning radius of a vehicle. An adequate turning radius is assessed on a case-by-case basis. General turning guidelines for large trucks are provided by AASHTO (see attached maps or at <http://www.dot.state.fl.us/rddesign/rd/rtds/06/527.pdf> for examples.

6. What are the definitions of primary, secondary and tertiary (?) streets and what are the widths. Is there a map that shows these streets?

Level of Service:

In reference to street usage (i.e. number of vehicles and the purpose of travel), DDOT ranks roadways from Local (least traveled, local use) through Collector, Minor Arterial, Principal Arterial, to Highway. There is no standard width for the specific types of streets. Trucks over 1 ¼ ton are prohibited from traveling on some Minor Arterials (residential). See attached Functional Classification Map for road classifications or at:

http://www.ddot.dc.gov/ddot/lib/ddot/information/maps/fclass_e_p_2006-08-22_rev2.pdf

Truck Uses:

DDOT has identified certain roadways as primary and secondary truck routes. These are the preferred roadways for routing oversized trucks to and from locations throughout the city.

7. Does DDOT have any innovative ways of locating berths so that the maximum amount of loading is done on-site? Could there be underground drive-through loading docks?

Location of truck loading/unloading berths is handled by DCRA as part of the building permit application review in by-right projects. In the case of variances and PUD, DDOT reviews the location on a case-by-case basis. Generally, though, berths that are adjacent and parallel to an alley could work well if they are designed for 70 to 80 foot long trucks.

Underground drive-through loading docks could work – especially if a vehicle enters from and/or exits to an alley. However, these could involve vaults below public space which would require greater scrutiny.

8. Should the location of trash receptacles be addressed in the Building Code or in the Loading section of the Zoning Regulations?

The location of trash receptacles is not currently included in either the Building Code or Zoning Regulations. There have been complaints by many residents that in some instances they are not provided. Therefore, it was recommended that their locations and screening be identified on the Site Plans. Since it was addressed within the purview of the Loading chapter it was included in this section. However, as part of the overall Zoning Regulations Review, OP is willing to explore if it is more appropriate in another chapter of the Regulations.

9. Is the uses of "square feet" as the unit of measurement for uses such as apartments and hotels appropriate?

For loading requirements, a square foot measure is more appropriate for apartment uses than the number of units. Loading for apartments is mainly used to move furniture and possessions of the residents. The amount of furniture to be moved is directly related to the amount of floor area in the units; three bedroom units have proportionally more to move than studios. Therefore, the number of units in a building is not the best measure of the need for loading facilities.

10. What is DDOT's policy regarding the granting of curb cuts?

Currently, DDOT has a Proposed Rulemaking for public review to establish the District Department of Transportation's policies and procedures to obtain a public space permit to authorize a curb cut across public space to construct a driveway. The proposed regulations would prohibit the approval of a public space permit for a curb cut when there is potential access to an expanded alley network. If it can be demonstrated that there is no alternative way to access on-site loading dock through existing or proposed paved alleys or there is a special need a waiver can be granted. (Document will be attach if it is published)

11. What is the difference between a "loading dock," "loading berths" and a "loading area"?

In the OP Loading Report the terms were used interchangeable. However the correct term as used in the Zoning Regulations is "loading berths" and will continue to be used in the new regulations.

12. Provide policy regarding the lighting of loading areas.

OP will add in the proposed regulations that lighting of on-site loading areas shall be shielded and directed so as to prevent glare on surrounding properties or onto an adjacent street.

13. What will be the loading requirement for historic properties?

Similar to the parking requirements for historic resource, additional loading berths will only be required if the gross floor area of an addition to the historic resource is being increased by 50% or more.