

GOVERNMENT OF THE DISTRICT OF COLUMBIA

DEPARTMENT OF TRANSPORTATION



d. Policy Planning and Sustainability Administration

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

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

DATE: November 28, 2012

SUBJECT: ZC Case No. 12-07 (Office of Planning - Map Amendment @ Old Post Office)

APPLICATION

On June 30, 2012, the Office of Planning ("OP") filed a report with the Office of Zoning that served as OP's application requesting initial zoning for the site of Old Post Office Building at 1100 Pennsylvania Avenue NW, Lot 800, Square 323, and Parcels 1, 2 and 3 being part of Squares 349 and 350 (hereinafter referred to as the "Subject Property"). The Office of Planning report also served as the Pre-Hearing submission for this case. The case was set down for hearing on July 9, 2012. The Subject Property is currently unzoned. OP requested that the Zoning Commission map the Subject Property within the C-4 Central Business District and the Downtown Development (DD) Overlay, so that its map designation would be DD/C-4. The Subject Property is owned by the United States and administered by the General Services Administration ("GSA"), which has selected the "preferred "developer" for the commercial redevelopment of the building and site. The anticipated redevelopment would include hotel, accessory office, and retail components. Pursuant to § 16 of the Zoning Act of 1938, D.C. Official Code § 6-641.15, the provisions of the Act do not apply to "federal public buildings." Because the building will be used for private rather than governmental purposes, it will no longer be considered a federal public building and, therefore, will become subject to the provision of the Act. Among those provisions is the requirement that all construction requires building permits and all new uses require certificates of occupancy. D.C. Official Code § 6-641.09. The Zoning Regulations disallow the issuance of any building permit or

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certificate of occupancy “until after the Zoning Commission has designated zoning for the property.” Therefore, until zoning has been designated for this site, no building permit or certificate of occupancy can be issued for its private redevelopment. The C-4 District is designated for the downtown core that comprises the retail and office centers for both the District of Columbia and the metropolitan area. The C-4 District also shall contain high-density residential and mixed-use developments and would permit a maximum Floor-Area Ratio of 10.0 and a height of 130 feet for this site. The DD Overlay District was created to help accomplish the varied Comprehensive Plan land use and development policies related to the Downtown, which include the creation of a balanced mixture of uses by means of incentives and requirements for critically important land uses identified in the Plan. This public hearing will be conducted in accordance with the contested case provisions of the Zoning Regulations, 11 DCMR § 3022.

BACKGROUND AND DEVELOPMENT PROGRAM

The U.S. General Services Administration (GSA) proposes to redevelop the Old Post Office (OPO) located at 1100 Pennsylvania Avenue, NW, in Washington, DC, through a developer that was selected in February 2012. The intention of GSA is to lease the building to the prospective developer, which will redevelop and operate the Old Post Office as a mixed-use luxury hotel and conference facility. The specific development program will consist of the following land uses:

- 267-room luxury hotel with health/fitness club, typical bar, and retail/gift shop
- 16,600 SF quality restaurant
- 8,900 SF of coffee shop
- 1,000-seat conference center

In accordance with National Environmental Policy Act (NEPA), an Environmental Assessment (EA) was prepared for the subject site. A transportation impact study (TIS) is also prepared as part of the EA document. DDOT treated this site as a typical development project requiring scoping and analysis. GSA worked with DDOT to accommodate analysis needs and agreed to a DDOT approved scope of work. GSA provided a detailed study evaluating area intersections, access and circulation, parking and loading, along with trip generation.

As part of the NEPA process, the entire Draft EA is published and distributed to agencies for review and comments. In order to facilitate DDOT’s review process, the section of the EA that deals with the transportation impacts was submitted to District Department of Transportation (DDOT) as a stand-alone transportation impact study (TIS). DDOT reviewed the TIS dated October 25, 2012 and the following sections discuss DDOT’s findings and considerations.

Although DDOT is confident that the projection of travel conditions remains reliable if the land use program underlying the GSA analysis changes slightly, it is important to note that the site could be developed in a different manner than currently imagined and remain consistent with the proposed zoning. DDOT believes that even if a different development program is chosen for the site, the analysis provided by GSA represents transportation conditions that may be anticipated from similar downtown land uses. However, it is also important to note that in the case of a proposal to change the anticipated development program significantly, GSA would be required to prepare and submit a revised the EA document to DDOT (and other agencies) for review and comments. At that stage, DDOT would have an opportunity to evaluate the impacts of the new redevelopment program on the transportation network.

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RECOMMENDATIONS IN BRIEF

Based on the Year 2016 build-out traffic conditions and analysis results under full access and partial access (right-in/right-out) scenarios, all of the study area intersections are projected to operate at acceptable Levels of Service (LOS) during the morning, afternoon, and Saturday peak hours. Based on the review of the existing and future traffic conditions from operational and safety perspectives, it is DDOT's opinion that the proposed change in zoning would not have any adverse impacts on the transportation network.

Since DDOT treated the review of this case similar to any other development proposal, the following set of considerations were developed and are expected to be addressed by the potential developer/lessee during the public space permitting process:

- Southward extension of 11th Street from its current terminus at the Pennsylvania Avenue intersection is the preferred vehicular access scenario. DDOT has no concerns for the proposed modifications under full access or partial access (right-in/right-out) scenarios. However, it is expected that, during the public space permitting process, design and construction of the proposed alignment and associated modifications traffic control devices at the Pennsylvania Avenue and 11th Street intersection, as well as the extension of 11th Street are closely coordinated with DDOT.
- There were several locations identified where the bus stops are on the near-side of the intersection or may conflict with access points. These stops may need to be moved.
- DDOT will determine adequate number of on-site bicycle parking spaces, along with shower/locker facilities for the potential employees.
- In order to further promote alternative modes of transportation for employees, additional TDM measures such as transit subsidies (full or pre-tax dollars), payment of membership fees for Capital Bikeshare and carsharing services, etc. should be considered.

TRANSPORTATION ANALYSIS

DDOT is committed to achieving an exceptional quality of life in the Nation's Capital by encouraging sustainable transportation 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 of transportation are adequate to accommodate new travel demand while discouraging single occupancy vehicle trips. The following analysis evaluates the TIS to determine its accuracy and consistency with the District's vision and goals for its transportation network.

Roadway Network, Capacity, and Operations

Based on the aforementioned Scoping Agreement, DDOT agreed that the following five intersections would be included in the study area:

1. Pennsylvania Ave NW @ 12th St NW
2. Pennsylvania Ave NW @ 11th St NW
3. Pennsylvania Ave NW @ 10th St NW

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4. Constitution Ave NW @ 12th St NW
5. Constitution Ave NW @ 10th St NW

The peak hours at the study area intersections vary between the hours of 8:00 AM and 9:45 AM during the morning, and 4:45 PM and 6:00 PM during the afternoon, and 1:00 PM and 2:00 PM during Saturday peak periods. The TIS used capacity analysis methods described in the most recent release of the Highway Capacity Manual to evaluate the intersection capacities under the existing (Year 2012), background (Year 2016), and build-out conditions (Year 2016). The following sections discuss the summary of findings for each analysis year scenario.

Existing Conditions – Based on the analysis results under the existing traffic conditions, all of the study area intersections are observed to be operating at acceptable Levels of Service (LOS) during the morning, afternoon, and Saturday peak hours. However, although the overall intersection operations are at acceptable levels, it was noted that the northbound approach of the Constitution Avenue and 12th Street intersection experienced delays that are above the established thresholds during the weekday AM and PM peak hours.

Background Conditions (Year 2016) – As part of the analysis of future conditions without the development of the subject site, DDOT requires to account for the following three factors that would affect the roadway network's capacity:

- 1) *Regional Growth* - Reflects future growth of traffic volumes that have neither origin nor destination in the study area, except the traffic on the thoroughfares. Based on the Annual Average Daily Traffic (AADT) trends, as shown on the DC Traffic Volume Maps, growth in through traffic was determined to be stable along the corridors in the study area. Therefore, an annual growth rate was not applied to the through traffic volumes.
- 2) *Background Growth* - Includes traffic on the roadway network that has either an origin or destination in the study area due to the trips expected to be generated by the planned/approved developments. There were no approved but un-built background developments identified during the Scoping Agreement phase that would be included in the TIS.
- 3) *Funded Transportation Improvements* -Funded transportation infrastructure improvements (public or private) that would have an expected impact on the capacity of the roadway system. It is important to note that this element considers only the projects that are funded for construction. K Street, NW Transitway project was discussed during the Scoping Agreement Meeting(s); however, due to the location of that project, it was decided that it would not have significant impact on the roadway capacity in the immediate study area.

Since no regional growth factor, background developments, and transportation improvements were considered under the no-built future conditions, analysis results for the existing conditions were considered to continue under the background conditions.

Build-out Conditions (Year 2016) - The proposed land uses will include a 267-room hotel, a 1,000-seat conference center, 4.4 KSF health/fitness club, 10.7 KSF combined coffee shop/bar, 16.6 KSF quality restaurant, and 1.7 KSF retail. In addition, proposed vehicular access to the site will be provided through southward extension of 11th Street, NW beyond its current terminus at the Pennsylvania Avenue, NW intersection. Since this proposed geometric modification would introduce a new southern leg to the

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existing 11th Street/Pennsylvania Avenue intersection, DDOT asked the following two access scenarios to be analyzed:

1. Full movement access (or two-way access) where vehicles would be allowed to turn left or right from Pennsylvania Avenue onto the proposed 11th Street extension during the inbound, and to turn left or right onto Pennsylvania Avenue during the outbound movements.
2. Right-in/right-out access where vehicles would be allowed to access the site only from the eastbound direction along Pennsylvania Avenue by turning right onto the proposed 11th Street extension, and leave the site only by turning right onto Pennsylvania Avenue in the eastbound direction.

Multimodal trip generation estimates are discussed in the TIS in detail, along with assumptions and documented justifications for each proposed land use and modal split. The initial trip generation calculations were based on the guidelines as outlined in the most recent release of the Institute of Transportation Engineers (ITE) Trip Generation. The base trip generation rates were adjusted to compensate for the modal split assumptions using WMATA Development-related Ridership Survey (2005), and several other trip estimation methods such as trip generation and business operation estimations as outlined in the Environmental Impact Statement prepared for Washington Convention Center, discussions with the GSA staff and developer's representatives regarding their operational expectations, and professional judgment based on local knowledge on area hotel accommodations, parking provisions, and expected clientele.

On-site parking will be reserved for hotel guests and events, except five to six spaces that will be reserved for staff in management positions. Although the number of staff is expected to be 250 employees during each of the two shifts, employee parking will not be provided at the site; therefore minimal employee related automobile trips such as drop-off and pick-up assumed for the subject development. There are areas that will attract public such as the clock tower and visitors for these attractions were assumed to use public transportation or travel by tour buses. Based on the above calculations and assumptions, the following *Table 1* summarizes vehicle trip generation of the proposed development:

Table 1. Vehicular Site Trip Generation

Land Use	AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
	In	Out	Total	In	Out	Total	In	Out	Total
Hotel	23	15	38	21	19	40	27	21	48
Health/Fitness Club*	0	0	0	0	0	0	0	0	0
Bar/Coffee Shop	73	83	156	34	33	67	6	6	12
Quality Restaurant	0	0	0	12	6	18	15	10	25
Conference Center (including taxis)	50	14	64	13	39	52	25	18	43
Retail*	0	0	0	0	0	0	0	0	0
TOTAL SITE-GENERATED TRIPS	146	112	258	80	97	177	73	55	128
Existing Trips (current Land Use)	113	65	178	36	79	115	20	18	38
NET NEW TRIPS	33	47	80	56	18	74	53	37	90

* Health/fitness club and retail will serve hotel patrons only

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Based on the build-out traffic conditions analysis results under full access and partial access (right-in/right-out) scenarios, all of the study area intersections are projected to operate at acceptable Levels of Service (LOS) during the morning, afternoon, and Saturday peak hours.

Bicycle and Pedestrian Facilities

A detailed qualitative evaluation of the bicycle and pedestrian facilities and their connection to the transit facilities along Pennsylvania Avenue, Constitution Avenue, 12th Street, and 10th Street were provided in the TIS.

Currently, center lane bicycle tracks are installed along Pennsylvania Avenue between 3rd Street and 14th Street, NW. Based on the DC Bicycle Master Plan, the majority of the roadways within the study area are planned to have designated bicycle lanes, which would encourage bicycling as a widely used transportation mode in the near term to access the proposed redevelopment and its surroundings. One of the current Old Post Office building tenants is a bicycle rental establishment and it was mentioned in the TIS that the business will be at a nearby new place after the subject site is redeveloped. There is also a Capital Bikeshare station on 10th Street between Pennsylvania and Constitution Avenues.

Based on the field observations and inventory of the pedestrian facilities (i.e., sidewalks, crosswalks, ADA-compliant ramps), it was observed that all of the study area intersections and roadway network provide adequate and functional facilities to promote connectivity between land uses and transit facilities. Within the study area boundaries, continuous sidewalks are provided along both sides of Pennsylvania Avenue, Constitution Avenue, 12th Street, and 10th Street, as well as all of the minor approaches. All of the study intersections are equipped with accessible signals, as well as count-down pedestrian signal heads. ADA-compliant ramps are also observed to be adequately placed, except some locations where minor modifications are needed. Some minor items were identified along the pathways of pedestrians with disabilities that would need further attention.

Existing pedestrian crossing volumes at the study intersections were provided in detail showing the direction of crossing. The majority of volumes were observed to vary between approximately 200 and 400 pedestrians during the AM, PM, and Saturday peak hours, where the maximum volume was observed to be 785 pedestrians crossing the south leg of 12th Street at its intersection with Constitution Avenue during the Saturday peak hour.

Based on the existing and qualitatively forecasted pedestrian and bicycle volumes, transit accessibility and connection of the subject site is considered adequate. DDOT believes that the current bicycle and pedestrian facilities are adequate to accommodate the additional bicycle and walking trips to be placed upon them. Considering the minor items identified during their field inventories, further coordination in the public space permitting process will be necessary to ensure that the pedestrian facilities within public space surrounding the site are designed to meet DDOT standards.

Transit Services

DDOT and Washington Metropolitan Transportation Authority (WMATA) have partnered to provide extensive public transit service in the District. 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.

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Proximity of the subject site to the two Metro Stations and the adequacy of the bus service along the routes that serve the subject area were evaluated. The site is served primarily by the Blue and Orange Lines at the Federal Triangle Metro Station, which is across the street from the 12th Street entrance of the Old Post Office (the entrance will be kept as one of the pedestrian access points after redevelopment). The site is also accessible by Yellow and Green Lines at the Archives/Navy Memorial/Penn Quarter Metro Station, which is approximately 1,500 feet from the subject site.

The site is also served by 25 different bus routes that have stops in the vicinity of the subject site (bus routes 32, 33, 34, 37, 39, 54, 63, 64, D1, P6, P17, P18, P19, W13, W14, 7Y, 13G, N3, X1, S2, S4, 16F, A11, A42, A48). There is a bus stop in front of the Old Post Office building on the southern side of Pennsylvania Avenue for eastbound bus service. However, although the concrete bus pad is still in place, the westbound pair on Pennsylvania Avenue's northern side is not provided. There were also several locations identified where the bus stops are on the near-side of the intersection, which is not the preferred location for bus stops due to safety concerns. During the redevelopment stages, DDOT will evaluate these locations to determine feasibility of relocating these bus stops to the far-side of the intersection.

Although the proposed redevelopment is expected to generate significant number of transit ridership, based on the available capacity of the four Metro lines, spread of the bus ridership to 25 different bus lines, and several commutes bus lines serving the area, DDOT believes that the proposed development will be served adequately with the existing bus routes, as well as the two Metro Stations that are within a short walking distance.

Site Access and Loading

Pedestrian access will be provided at four access points along each side of the building utilizing the current pedestrian entrances to the Old Post Office. Pennsylvania Avenue will serve as the primary pedestrian entrance, access through the proposed extension of 11th Street will be mainly for conference center and banquet hall, and 12th and C Street entrances are planned to serve the patrons/employees that are disembarking at the Metro Station. A pedestrian plaza located at the terminus of C Street, just to the south of the building is also proposed as part of the redevelopment program. It is envisioned that this plaza and entrance off of C Street will attract the patrons visiting the clock tower and other historic amenities in the building. Loading access and pedestrian plaza will be physically separated by a landscape buffer.

Single vehicular access will be provided from the proposed 11th Street extension through a circular driveway. The driveway will also serve for vehicle drop-off area for valet parking, where the vehicles will be parked at the proposed 150-space garage located at the Annex Building to the east of the main building. This circular driveway will also serve for taxi cab and other types of drop-offs. It is expected that the design and construction of the proposed modifications to the Pennsylvania Avenue and 11th Street intersection, as well as the extension of 11th Street will be in close coordination with DDOT and following DDOT design and engineering standards. DDOT would like to ensure that the intersection design of Pennsylvania Avenue and 11th Street extension uses visual clues and geometry to emphasize that this location is a functional intersection for vehicular access (i.e., conflict points and safety features such as crosswalks and ramps should be emphasized).

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Loading access is proposed to be provided at an area located at the terminus of C Street, NW to the east of its intersection with 12th Street, NW. Current loading operations for the Old Post Office building are also provided at the same location. All delivery trucks will access the loading area front end in and out.

Finalization of the design considerations for the aforementioned pedestrian, vehicular, and loading access would require involvement of and close coordination with DDOT. DDOT expects finalization of access and design alternatives during the public space permitting process, especially the geometric design, traffic and access control options for the proposed Pennsylvania Avenue and 11th Street intersection modifications.

Parking

Since the site is currently not zoned and re-zoning for C-4 is sought, DDOT determined the parking requirements based on the proposed zoning. DCMR §2101.1 requires that developments within a C-4 district provide one parking space for each eight rooms suitable for sleeping. Based on the proposed number of 267 rooms, the number of minimum parking under the provisions of the zoning regulations computes to 33 parking spaces. Although one parking space for each 150 SF of exhibit space is also allowed in other districts such as C-1, C-2, C-3A, etc., there are no minimum parking provisions for exhibit space/convention/banquet hall in C-4 districts.

Currently, there is no on-site parking provided in the Old Post Office building. Current office employees park their vehicles in the nearby commercial garages. The TIS provided locations and pricing of the nearby garages for public parking. Based on this information, there are approximately ten parking garages within two blocks (in each direction) of the subject site and approximately 50 parking garages within a five-block radius. Daily parking rates range between \$12 and \$41, where the average rate is approximately \$20. The proposed redevelopment is planned to provide approximately 150 parking spaces at the Annex Building, where the banquet hall/conference center will be located, just to the east of the main Old Post Office Building. Parking cost will be unbundled from the lease, and, in order to be competitive, and the parking fees will be set to be no less than the lowest daily fee charged by nearby parking garages within the ¼-mile radius.

Bicycle racks at key locations along the perimeter of the building are proposed, as well as secure bicycle parking within the premises of the proposed redevelopment. However, the number of bicycle parking was not mentioned in the TIS and it is expected that DDOT will be consulted during the design stages to determine adequate number of on-site bicycle parking spaces, along with shower/locker facilities for the potential employees that would use bicycling as their choice of travel mode. Details of the location will be discussed while the project progresses, and DDOT will ensure that the bicycle parking be provided at an easily accessible location in a secure (locked) area following DDOT's design guidelines.

Transportation Demand Management (TDM)

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/pedestrian facilities, and reduce single occupancy vehicle trips during peak periods.

The following TDM measures were suggested in the TIS as a baseline:

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- Resident TDM Leader during planning, construction, and operation phases of the redevelopment
- Website links to CommuterConnections.com and goDCgo.com on the developer and property management websites
- Posting all TDM commitments online on a public website
- In addition, DDOT recognizes that by not providing parking spaces for staff, alternative modes of transportation for the 500 potential employees in two shifts will be encouraged.

In order to further promote alternative modes of transportation for potential employees, DDOT would like to recommend additional TDM measures such as transit subsidies (full or pre-tax dollars), payment of membership fees for Capital Bikeshare and carsharing services, etc., to be discussed during the design stages.

Safety

Most recent three year's crash data (2008-2011) at the study area intersections were evaluated. Based on the crash rate calculations, only one of the five intersections' crash rate is above DDOT's established criteria. The intersection of Pennsylvania Avenue and 11th Street experienced a crash rate of 1.22 per million entering vehicles, where the majority of crashes were sideswipes. Although several injuries were reported at the study area intersections, no fatalities were recorded at any of the study intersections during the analysis period.

Since geometric and traffic control modifications will be undertaken as part of the 11th Street extension, DDOT will ensure that the intersection of Pennsylvania Avenue and 11th Street be evaluated further to enhance the safety conditions at this intersection.

Streetscape and Public Realm

In accordance 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 following streetscape enhancement proposal was included in the TIS in a brief format (extracted from the TIS):

"The existing character of the surrounding streetscapes supporting pedestrian movement is proposed to remain and be enhanced. Gardens or public open spaces are proposed on the north, east, and south sides of the OPO building. On Pennsylvania Avenue, the existing plaza, with its sidewalk pavers and artwork, would remain. Restaurant seating would flank the primary pedestrian entrance to the building. On C Street, the existing plaza south of the OPO building would be expanded to provide additional restaurant seating. Landscaping and/or an architectural element would physically and/or visually separate the plaza from the service drive."

DDOT will 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.

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