

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

DATE: March 28, 2016

SUBJECT: ZC Case No. 16-03 – Hill East

PROJECT SUMMARY

DB Residential Hill East, LLC (the “Applicant”) seeks Design Review approval in order to construct two residential buildings on a site bounded by Burke Street to the north, 19th Street to the west, Massachusetts Avenue SE to the south, and the future 20th Street to the east (Square 1112E, Lots 802-804). The proposed development program includes the following development program on two parcels (G1 and F1):

- 349 residential units
- 32,974 square feet of retail
- 156 off-street vehicle parking spaces
- 119 long-term bicycle parking spaces

The Applicant proposes 156 vehicle parking spaces in lieu of the required 203 spaces. The Applicant also proposes two 30-foot berths and two service/delivery spaces and seeks relief from the required two 55-foot berths, two 200-square foot platforms, and two 100-square foot platforms.

SUMMARY OF DDOT REVIEW

The District Department of Transportation (DDOT) is committed to achieve an exceptional quality of life in the nation’s capital by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. As one means to achieve this vision, DDOT works through the zoning process to ensure that impacts from new developments are manageable within and take advantage of the District’s multimodal transportation network.

The purpose of DDOT’s review is to assess the potential safety and capacity impacts of the proposed action on the District’s transportation network and, as necessary, propose mitigations that are

commensurate with the action. After an extensive, multi-administration review of the case materials submitted by the Applicant, DDOT finds:

Site Design

- The subject sites are within the Reservation 13 development area. Zoning was established for the area through Zoning Commission Case No. 04-05, which required the creation of a new road network for the area by extending local streets through the site.
- A robust network of public streets consistent with ZC No. 04-05 will be constructed by the District in coordination with but separate from the subject action. These streets include extensions of Burke Street, C Street, and Massachusetts Avenue and the construction of a segment of 20th Street;
- The new street network has the potential to disperse site traffic in a way that minimizes the action's impact on the external road network and improve connectivity to the adjacent neighborhoods;
- The site is adjacent to Metrorail and well-served by transit;
- The proposed public access easement for a portion of a private alley lays the groundwork for a private alley system that will allow future adjacent developments to provide vehicular site access from the private alley. Additional specificity regarding the easement width is needed to more precisely identify the extent of the easement; and
- Loading for the retail and multi-family residential is proposed from the rear private alley.

Travel Assumptions

- The Applicant generally utilized sound methodology and assumptions to perform the analysis; and
- Future residents and retail visitors are likely to utilize transit, walking, and bicycling at high rates, thus auto use is likely to be low, and the proposed action is expected to generate a significant number of transit trips and a moderate number of auto, walk, and bicycle trips.

Analysis

- The action is projected to minimally increase travel delay in the area;
- Proposed pedestrian infrastructure and bicycle infrastructure can accommodate additional project demand;
- The proposed on-site parking provision of 156 spaces is 47 fewer than required by current zoning regulations. Additional curbside parking spaces are expected to be created with the new street network that will provide additional parking for retail patrons, visitors, and other users;
- The proposed TDM plan is a good basis to encourage non-auto travel and support the on-site parking provision, but needs to be strengthened to achieve the desired outcome; and
- The Applicant proposes to provide at least 119 long-term bicycle parking spaces, which meets current District requirements.

Mitigations

DDOT has no objection to the requested PUD with the following conditions:

- Offer each unit's incoming residents an annual carsharing membership or an annual Capital Bikeshare membership for a period of three years;
- Unbundle parking costs from the price of lease or purchase, and price parking no less than charges of the lowest fee garage within three-quarters of a mile; and

- Dedicate two parking spaces in each garage for car sharing services to use with right of first refusal.

Continued Coordination

Given the complexity and size of the action, the Applicant is expected to work with DDOT outside of the Zoning Commission process on the following matters:

- Public space, including curb and gutter, street trees and landscaping, street lights, sidewalks, and other features within the public rights of way, is expected to be designed and built to DDOT standards;
- All utility vaults are expected to be accommodated on private property;
- Location of a future Capital Bikeshare station within the public space or the Metro plaza; and
- Develop a curbside management and signage plan during the public space permitting process to allocate the use of curbside space in a manner consistent with DDOT standards and policies.

TRANSPORTATION ANALYSIS

DDOT requires applicants requesting an action from the Zoning Commission complete a Comprehensive Transportation Review (CTR) in order to determine the action's impact on the overall transportation network. Accordingly, an 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.

A CTR should be performed according to DDOT direction. The proposed developments are generally consistent from a density and use perspective with the underlying zoning for Reservation 13, which was predicated on a masterplanning process and approved by the Zoning Commission. Accordingly, the Applicant and DDOT did not engage in a formal scoping process for this CTR. The Applicant did provide information and analysis on a variety of areas requested by DDOT; however, some assumptions were not agreed upon, and as a result the full impacts of the action may not be known. Despite the lack of a mutually agreed-upon scope, DDOT's experience with other similarly sized development projects in similar contexts indicate that impacts to the transportation network as a result of the subject action are expected to be minimal.

The review of the analysis is divided into four categories: site design, travel assumptions, analysis, and mitigations. The following review provided by DDOT evaluates the Applicant's CTR to determine its accuracy and assess the action's consistency with the District's vision for a cohesive, sustainable transportation system that delivers safe and convenient ways to move people and goods, while protecting and enhancing the natural, environmental, and cultural resources of the District.

Site Design

Site design, which includes site access, loading, and public realm design, plays a critical role in determining a proposed action's impact on the District's infrastructure. While transportation impacts can change over time, the site design will remain constant throughout the lifespan of the proposed development, making site design a critical aspect of DDOT's development review process. Accordingly, new developments must provide a safe and welcoming pedestrian experience, enhance the public realm, and serve as positive additions to the community.

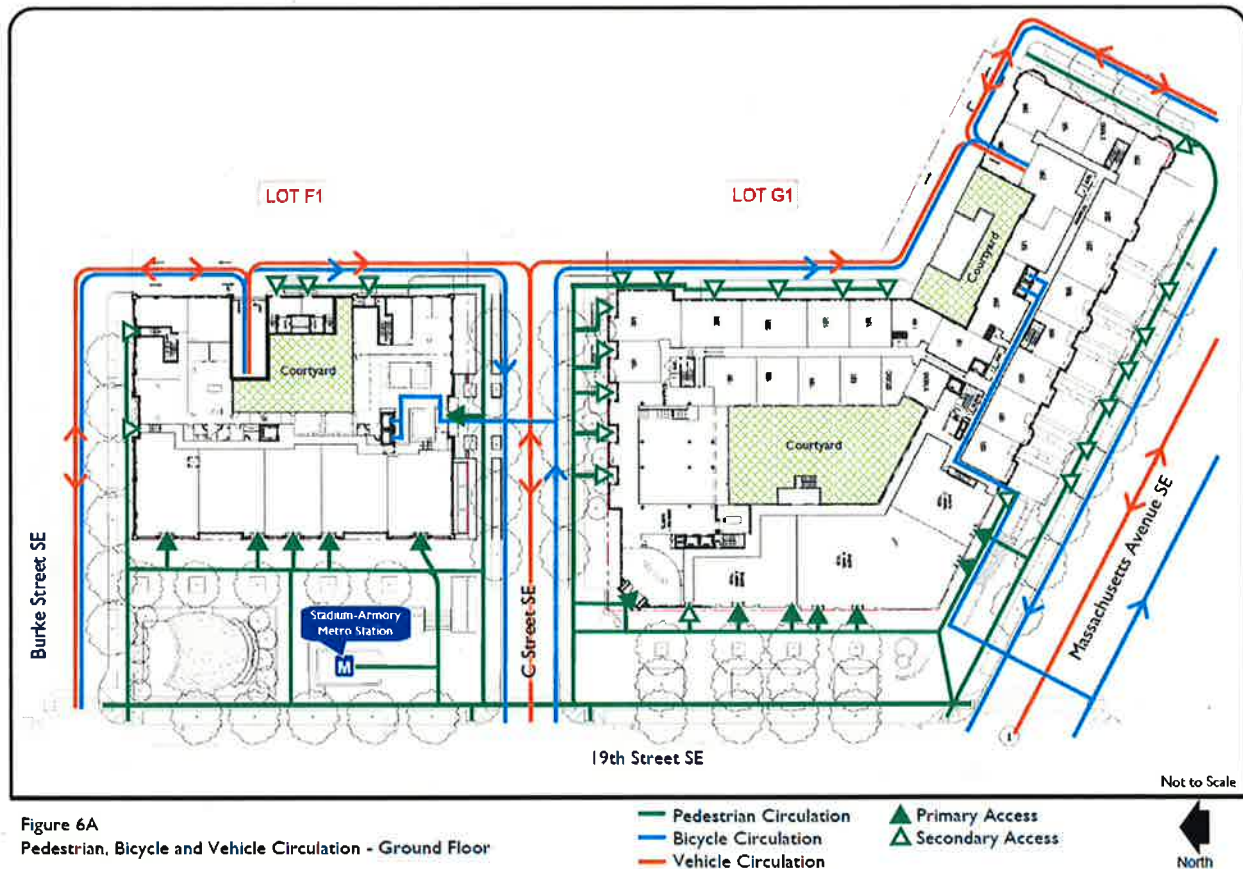
Site Access

The subject sites are within the Hill East District Waterfront, formerly known as Reservation 13, a 67-acre area between 19th Street to the west, Independence Avenue to the north, Water Street to the east, and Massachusetts Avenue to the south. Reservation 13 was subject to a Text and Map Amendment process by the Zoning Commission (ZC No. 04-05), which created the Hill East Zoning District. A key element of the redevelopment plan was to “extend the existing pattern of local streets to and through the site to create simple, well-organized city blocks and appropriately-scaled development” (ZC No. 04-05 Zoning Order). The *Reservation 13 Hill East Waterfront Design Guidelines* were developed to guide future development of the street work. The document lays out a street grid, establishes minimum street rights-of-way (ROW), and suggests each ROW’s cross section.

50 acres of the Hill East District are anticipated to be redeveloped into a mixed-use community, and the street network is expected to be built out in coordination with each phase of redevelopment. An extension of Burke Street, C Street, and Massachusetts Avenue to the edge of the subject parcels and the creation of a portion of 20th Street is proposed in coordination with the subject action. The District is responsible for the construction of the new streets which is not part of the zoning action. All new streets will be designed and constructed to current DDOT standards and dedicated to DDOT as public streets.

As discussed above, an extension of Burke Street, C Street, and Massachusetts Avenue to the edge of the subject parcels and the creation of a portion of 20th Street is proposed in coordination with the subject action. A new approximately 30-foot wide private drive will run north-south along the eastern edge of the proposed buildings and will connect Burke Street with 20th Street. Vehicle and loading site access for both buildings will occur via the private drive as shown in Figure 1. Of note, the applicant proposes to grant an easement for public use of half the alley (approximately 10-15 feet in width). The easement lays the groundwork for the creation of a private alley system to allow future developments adjacent to the subject site to provide vehicular site access from the private alley, which is DDOT’s preferred option for site access. Additional specificity is needed to more precisely identify the extent of the easement.

The new street network has the potential to disperse site traffic throughout the site in a way that minimizes the action’s impact on the road network in the vicinity. The new roads serve as vehicle, bicycle, and pedestrian access points for the site.



Loading

DDOT's practice is to accommodate vehicle loading in a safe and efficient manner, while at the same time preserving safety across non-vehicle modes and limiting any hindrance to traffic operations. For new developments, DDOT requires that loading take place in private space and that no back-up maneuvers occur in the public realm. This often results in loading being accessed through an alley network.

Loading for both buildings is proposed via the private alley. Loading areas are proposed on the surface of the private alley as shown in Figure 2 rather than within the footprint of each building. The Applicant proposes a series of freight elevators and service corridors to connect the loading facilities with each retail bay and residential unit.

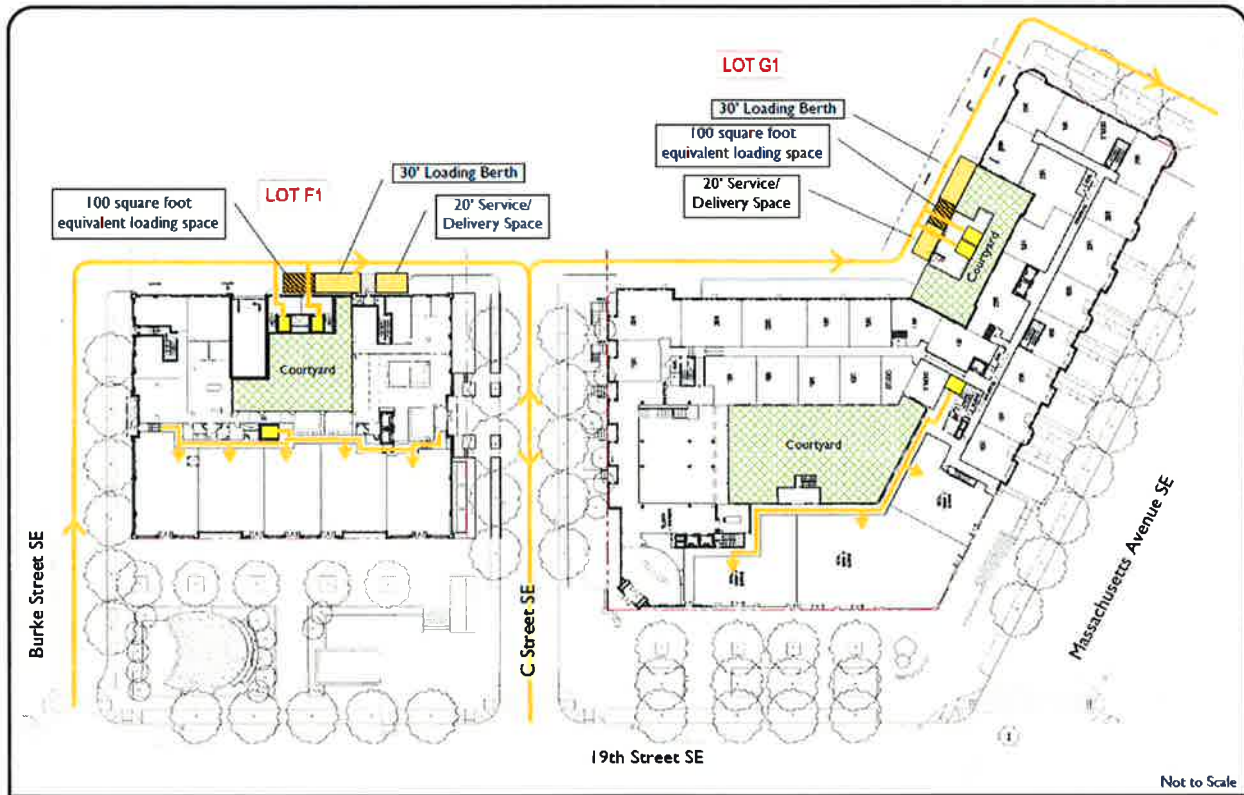


Figure 7A
Loading, Service, and Trash Circulation and Access - Ground Floor

Figure 2 Loading Facilities and Circulation (Source: Wells + Associates)

Table 1 compares the required versus proposed loading facilities. A loading management plan, discussed in the Mitigations section, is proposed to mitigate impacts caused by the loading relief.

Table 1 Required and a Proposed Loading Facilities

Component	Required Loading	
	Lot F1	Lot G1
Residential	1 berth @ 55'	1 berth @ 55'
	1 platform @ 200 SF	1 platform @ 200 SF
	1 service/delivery @ 20'	1 service/delivery @ 20'
Retail	1 berth @ 30'	1 berth @ 30'
	1 platform @ 100 SF	1 platform @ 100 SF
	Proposed Loading	
	Lot F1	Lot G1
Total	1 berth @ 50' ²	1 berth @ 50' ¹
	1 service/delivery @ 20'	1 service/delivery @ 20'

¹ Per DCMR §2201.3, the 30' loading berth will be increased in depth resulting in an enlarged loading berth of 50', which will be equal in area to the combined loading berth and platform requirements.

Of note, the proposed loading facilities for each building – a 30-foot loading berth and a 20-foot service delivery space – can be combined to create a 50-foot loading berth to accommodate a larger truck, if the need to serve a larger truck arises. However, as discussed in the Loading Management Plan, the Applicant proposes to limit access to the loading berths to trucks larger than 30 feet.

Curbside Management

The construction of new streets to serve the site will create new curbside management opportunities. The Applicant will be required to work with DDOT to develop a curbside management and signage plan during the public space permitting and potential right-of-way dedication and DDOT acceptance processes to allocate the use of this curbside space in a manner consistent with DDOT standards and policies.

Streetscape and Public Realm

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 and gutters, 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 the Office of Planning (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. Proposed public space dimensions should be consistent with the guidelines established in the *Reservation 13 Hill East Waterfront Design Guidelines*. In conjunction with the District of Columbia Municipal Regulations, DDOT's *Design and Engineering 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.

A Preliminary Design Review Meeting (PDRM) was held on February 9, 2016 with DDOT and OP staff to discuss conceptual public space designs. Several proposed elements in public space were identified as needing further refinement and coordination including the elements of the proposed 19th Street plaza in public space, a treatment to soften the grade change on Massachusetts Avenue and accommodate retaining walls closer to the property line so as to maintain a 10-foot wide sidewalk on Massachusetts Avenue, and the use of special paving at the Massachusetts Avenue/19th Street intersection. In addition, DDOT expects utility vaults to be accommodated on private property. DDOT recommends another PDRM to discuss more refined public space plans.

Travel Assumptions

The purpose of the CTR is to inform DDOT's review of a proposed action's impacts on the District's transportation network. To that end, selecting reasonable and defensible travel assumptions is critical to developing a realistic analysis. The Applicant did not scope the travel assumptions with DDOT. While scoping did not occur, the proposed developments are generally consistent with the underlying zoning for Reservation 13. This section evaluates the assumptions used in the Applicant's analysis.

Background Developments and Regional Growth

As part of the analysis of future conditions, DDOT typically requires applicants account for future growth in traffic on the network or what is referred to as background growth. Background growth is impacted by background developments in the study area as well as regional growth rates. The Applicant assumed a 0.5% annual compounding growth rate based on historical travel volumes in the vicinity. No background developments were identified in the study area.

Study Area and Data Collection

The Applicant identified three intersections where detailed vehicle counts would be conducted and a level of service analysis would be performed. These intersections are immediately adjacent to the site. DDOT acknowledges that not all affected intersections are included in the study area and there will be intersections outside of the study area which realize new trips.

The Applicant collected weekday intersection data in February 2016. DDOT agrees with the time frame and collection dates. The collection date was not during a Congressional recess or outside of the DC Public School calendar.

Vehicle 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 high quality transit, frequency of transit service, and proximity to transit.

156 off-street parking spaces are proposed for the site, of which 111 spaces are for residential units and 45 spaces are for retail uses. This equates to a parking ratio of 0.32 parking spaces per residential unit. Generally, this is a reasonable supply of parking for the land use and location, given its close proximity to the Metro station. The proposed parking ratio is likely to generate a relatively low rate of vehicle trip generation.

The new streets also create opportunities for new curbside vehicle parking spaces to serve retail patrons, residential visitors, and other users. The signage and management of the curbside space has not yet been determined, and will be further developed as part of the development of the new streets and the public space permitting process. As noted above, the Applicant will be required to work with DDOT to develop a curbside management and signage plan during the public space permitting and potential right-of-way dedication and DDOT acceptance processes to allocate the use of this curbside space in a manner consistent with DDOT standards and policies. In addition, the Applicant may be required to install parking meters.

Trip Generation

The Applicant provided trip generation estimates utilizing the Institute of Traffic Engineers (ITE) Trip Generation Manual to estimate the total number of trips generated by the site. The following Land Use Codes (LUC) were used:

- LUC 220 – Apartment
- LUC 820 –Shopping Center

Each trip a person makes is made by a certain means of travel, such as vehicle, bicycle, walking, and transit. 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. Mode split assumptions used in the subject analysis were informed by WMATA's 2005 *Development-Related Ridership Survey*, the Census, and the proposed parking provision.

The Applicant assumed 34% and 17% pass-by trip reduction for the retail in the morning and evening peak periods, respectively. DDOT does not agree with the percent reduction factor. A high pass-by reduction may be applicable for suburban locations, where parking lots are free and visible by passing motorists. Additionally, the high non-auto mode split likely accounts for the site's context and parking availability, and pass-by trips are likely to double count vehicle trip reductions already assumed in the proposed mode split.

Based on the trip generation and mode split assumptions discussed above, the Applicant predicted the following level of weekday peak hour trip generation. While this methodology was not scoped with DDOT, DDOT generally finds the approach to be appropriate with the exception of the pass-by rates.

	AM Peak Hour			PM Peak Hour			ADT
	In	Out	Total	In	Out	Total	
Residential - 344 Dwelling Units (LUC 220)							
Total Trips	34	138	172	135	72	207	2,208
Non-auto Trips	22	90	112	88	47	135	1,435
Transit	20	80	100	78	42	120	1,281
Bicycle	1	6	7	6	3	9	88
Pedestrian	1	4	5	4	2	6	66
Vehicle Trips	12	48	60	47	25	72	773
Retail - 33,517 SF (LUC 820)							
Total Trips	50	30	80	138	150	288	11,408
Non-auto Trips	30	18	48	83	90	173	6,845
Transit	21	13	34	58	63	121	4,791
Bicycle	5	3	8	15	16	31	1,255
Pedestrian	4	2	6	10	11	21	799
Vehicle Trips	20	12	32	55	60	115	4,563
Pass-by Vehicle Trips	2	1	3	14	15	29	456
New Vehicle Trips	18	11	29	41	45	86	4,107
Total Proposed Development							
Total Trips	84	168	252	273	222	495	13,616
Non-auto Trips	52	108	160	171	137	308	8,280
Transit	41	93	134	136	105	241	6,072
Bicycle	6	9	15	21	19	40	1,343
Pedestrian	5	6	11	14	13	27	865
Vehicle Trips	32	60	92	102	85	187	5,336
Pass-by Vehicle Trips	2	1	3	14	15	29	456
New Vehicle Trips	30	59	89	88	70	158	4,880
Note: Before the development plan was finalized, the analysis in this study assumed 344 apartment units and 33,517 square feet of retail. The small increase in trips is de minimis and would not have any effect on the results of the study.							

Figure 3 Proposed Trip Generation by Mode (Source: Wells + Associates)

The proposed action is expected to generate a significant number of transit trips and a moderate number of auto, walk, and bicycle trips.

Analysis

To determine the action's impacts on the transportation network, a CTR includes an extensive multi-modal analysis of the existing baseline conditions, future conditions without the proposed action, and future conditions with the proposed development. The Applicant completed their analysis based on the assumptions described above.

Roadway Capacity and Operations

DDOT aims to provide a safe and efficient roadway network that provides for the timely movement of people, goods and services. As part of the evaluation of travel demand generated by the site, DDOT requests analysis of traffic conditions for the study intersections for the current year and after the facility opens both with and without the site development or any transportation changes. The road network and intersection configurations will change as a result of the construction of the new streets associated with the subject development as shown in Figure 1. The Applicant's future year analysis with the site development included several roadway changes. The changes are:

- The extension of Burke Street, C Street, and Massachusetts Avenue and the construction of a segment of 20th Street. All streets are to carry two-way traffic; and
- Resulting changes to existing intersections from the new street network were also assumed.

Analysis provided by the Applicant shows that vehicle traffic impacts from the action will minimally impact the operations of intersections in the study area as measured by Level of Service (LOS). All intersections and approaches were found to operate at acceptable levels in both the future background and total future scenarios. Queuing analysis was not performed but no problems are expected due to the LOS for the study area intersections.

Transit Service

The District and Washington Metropolitan Area Transit 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 Applicant did not perform an inventory of available transit options in the vicinity. However, a DDOT inventory of transit options in the vicinity identified high-quality transit options.

The site is immediately adjacent to the Stadium Armory Metro Station, which serves the Blue, Orange, and Silver lines.

The site is well-served by two bus routes. These routes are adjacent to the site and stop at the Metro Station. Bus routes include:

- 96 – East Capitol Street-Cardozo Line
- B2 – Bladensburg Road-Anacostia Line

In addition, the D6 and 97 operate within the vicinity.

The 96 provides peak hour headways of approximately 25-30 minutes and the B2 provides peak hour headways of approximately 10 minutes.

Pedestrian Facilities

The District is committed to enhance pedestrian accessibility by ensuring consistent investment in pedestrian 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 trips. Walking is expected to be an important mode of transportation for this development.

The Applicant did not perform an inventory of the pedestrian infrastructure in the vicinity. However, the new streets associated with the subject development will be designed with DDOT-standard sidewalks, crosswalks, curb ramps, and other pedestrian facilities, thus creating a high-quality pedestrian environment and connections between the site and adjacent transit services. Specifically, 10-foot sidewalks are proposed on Massachusetts Avenue and 19th Street and 8-foot sidewalks are proposed on 20th Street, Burke Street, and C Street. The pedestrian facilities will be further refined during the ROW improvement and public space permitting processes.

Bicycle Facilities

The District of Columbia is committed to enhance bicycle access by ensuring consistent investment in bicycle infrastructure by both the public and private sectors. DDOT expects new developments to serve the needs of all trips they generate, including bicycling trips.

The Applicant did not perform an inventory of the bicycle infrastructure in the vicinity. However, the new streets associated with the subject development will be designed with a combination of bicycle lanes, paths, and cycle tracks that create a high-quality bicycle network and connect to adjacent bicycle facilities such as the Anacostia Riverwalk Trail. At present time, the following bicycle facilities are anticipated, but will be further refined during the ROW improvement process:

- Massachusetts Avenue – one-way cycletracks on both sides of the street
- C Street - one-way cycletracks on both sides of the street
- 19th Street – potential bicycle path or cycle track on the east side of the street
- Water Street – two-way cycletrack on the east side of the street
- Massachusetts Avenue Circle – bicycle trail connection to the Anacostia Riverwalk Trail

The facilities listed above will be constructed as the broader transportation network is built in coordination with future phases of development. Bicycle facilities will be built on all new roadway segments being constructed to support the subject development.

The closest Capital Bikeshare station is a 14-dock station located approximately 0.3 miles north of the site at the 19th Street/Independence Avenue intersection. The Applicant proposes to reserve a space in either the plaza or public space adjacent to the Metro Station entrance. The Applicant should continue to coordinate with DDOT through the public space permitting process on the location of the future station.

The Applicant proposes a total of 119 long-term bicycle parking spaces, including 87 for Lot G1 and 31 for Lot F1, which meets current District requirements. The bicycle parking spaces are located in the

parking garage. In addition, the Applicant proposes 28 short-term bicycle spaces. The location of these spaces will be determined during the public space permitting process.

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 sight distance analysis along the public space where there is expected to be conflicts between competing modes (e.g. crosswalks, driveway entrances, etc.)

The Applicant's analysis of DDOT crash data reveals that the Massachusetts Avenue/19th Street intersection experiences a crash rate of 1.0 Million Entering Vehicles (MEV) or higher. A significant portion of the crashes are designated as "left turn hit vehicle," "back hit parked vehicle," or "side swipe" crashes.

This intersection will be changed as a result of the extension of Massachusetts Avenue, which will convert the intersection to a four leg intersection. Safety improvements including geometric and signal changes will be made to this intersection. Such changes would be designed to improve safety at this intersection.

Mitigations

As part of all major development review cases, DDOT requires the Applicant to mitigate the impacts of the development in order to positively contribute to the District's transportation network. The mitigations must sufficiently diminish the action's vehicle impact and promote non-auto travel modes. This can be done through Transportation Demand Management (TDM), physical improvements, operations, and performance monitoring.

DDOT preference is to mitigate vehicle traffic impacts first through establishing an optimal site design and operations to support efficient site circulation. When these efforts alone cannot properly mitigate an action's impact, TDM measures may be necessary to manage travel behavior to minimize impact. Only when these other options are exhausted will DDOT consider capacity-increasing changes to the transportation network because such changes often have detrimental impacts on non-auto travel and are often contrary to the District's multi-modal transportation goals.

The following analysis is a review of the Applicant's proposed mitigations and a description of DDOT's suggested conditions for inclusion in the PUD.

Transportation Demand Management

As part of all major development review cases, DDOT requires the Applicant to produce a comprehensive TDM plan to help mitigate an action's transportation impacts. 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's proposed TDM measures play a role in achieving the desired and expected mode split.

The specific elements within the TDM plan vary depending on the land uses, site context, proximity to transit, scale of the development, and other factors. The TDM plan must help achieve the assumed trip generation rates to ensure that an action's impacts will be properly mitigated. Failure to provide a robust TDM plan could lead to unanticipated additional vehicle trips that could negatively impact the District's transportation network.

The Applicant proposed the following TDM strategies:

- Designate a TDM coordinator responsible for disseminating information to tenants;
- Provide information and/or links to transportation programs and services on the property management website;
- Install an electronic display in both residential lobbies to display real-time transportation alternative information;
- Provide 119 long-term bicycle parking spaces.

DDOT finds the proposed TDM elements to be a strong basis to encourage non-auto travel, but the plan should be strengthened by adding the following elements:

- Offer each unit's incoming residents an annual carsharing membership or an annual Capital Bikeshare membership for a period of three years;
- Unbundle parking costs from the price of lease or purchase, and price parking no less than charges of the lowest fee garage within three-quarters of a mile;; and
- Dedicate two parking spaces in each garage for car sharing services to use with right of first refusal.

Loading

The Applicant proposes a loading management plan to mitigate potential impacts caused by the loading relief. The loading management plan includes the following elements:

- Assign an on-site loading dock manager;
- Require tenants using a truck 30-feet long or shorter to use the on-site loading facilities for move-in/move-out;
- In the event that larger trucks are needed, require tenants to secure Emergency No Parking permits from DDOT;
- Schedule deliveries such that the docks' capacities are not exceeded;
- Schedule residential loading activities so as not to conflict with retail deliveries;

DDOT finds the loading management plan sufficient to mitigate potential loading impacts.

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