

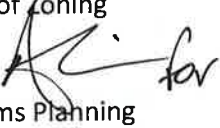
**GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF TRANSPORTATION**



d. Policy, Planning and Sustainability Administration

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

FROM: Jamie Henson 
Manager, Systems Planning

DATE: November 25, 2016

SUBJECT: ZC Case No. 16-11 – Bruce Monroe PUD

PROJECT SUMMARY

Park View Community and the District of Columbia (the “Applicant”) proposes a Planned Unit Development (“PUD”) and related map amendment from R-4 and C-2-A to R-5-B and C-2-B to construct a mixed-use development. The site is roughly bounded by Georgia Avenue, Columbia Road, and Irving Street NW (Square 2890, Lot 849). The development proposal includes:

- 189 general multi-family residential units in “Building A”
- 76 senior multi-family residential units in “Building B”
- 8 townhomes
- 5,000 square feet of retail
- 99 below-grade vehicle parking spaces

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

- A proposed private north-south street provides multimodal connectivity through the site;
- Vehicle and loading access to the multifamily residential building is proposed from the north-south street;
- The site design 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;
- Loading is accommodated with front-in/front-out movements through public space, consistent with DDOT standards; and
- The private north-south street features 16 curbside vehicle parking spaces, 8 of which are proposed to be dedicated to the townhouses.

Travel Assumptions

- 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 Applicant utilized sound methodology to perform the analysis.

Analysis

- The action is projected to minimally increase travel delay and queuing in the area. Two intersections – Georgia Avenue & Irving Street and Georgia Avenue & Morton Street – are projected to operate at failing levels under background conditions and remain at failing levels with only minor increases in vehicle delay as a result of the action;
- The site is well-served by rail and bus services, as well as a robust network of bicycle facilities;
- The proposed Transportation Demand Management (TDM) plan is generally strong but requires some enhancements to achieve the desired non-auto mode split and provide best-practices for managing auto travel demand; and
- The Applicant proposes to provide 90 long-term bicycle parking spaces in a bicycle storage room and 16 short-term bicycle parking spaces in public space, which meets or exceeds the amount of parking required by District code.

Mitigations

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

- Enhance the TDM plan to include the following elements:
 - Offer each general apartment unit and townhome an annual carsharing membership or an annual Capital Bikeshare membership for a period of three years;
 - Provide 6 shopping carts for multi-family residential tenants to run daily errands and grocery shopping; and
 - Install a transit screen in each of the lobbies for the general and senior apartments.
- As proposed, install pavement marking enhancements to a stop bar on Georgia Avenue at Hobart Place to better delineate stopping locations as a means to manage queue lengths.
- Commit to install pavement markings (i.e. "puppy tracks") at the study area intersections along Georgia Avenue, subject to DDOT approval at permitting.

Continued Coordination

Given the complexity and size of the action, the Applicant is expected to continue 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, curb ramps, and other features within the public rights of way, are expected to be designed and built to DDOT standards;
- Placement of two electric vehicle (EV) charging stations within the parking garage;
- Utility vault locations and treatments, which are expected to be located on private space;
- A curbside management and signage plan consistent with current DDOT policies;
- Short-term bicycle parking locations and treatment; and
- Pavement marking improvements at study area intersections along Georgia Avenue that would improve safety at intersections with an elevated crash rate and more clearly delineate stop bars for managing vehicle queues.

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 Applicant and DDOT coordinated on an agreed-upon scope for the CTR that is consistent with the scale of the action.

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

A 60-foot wide private street is proposed to run north-south through the site connecting to Irving Street and Columbia Road. The distribution of the street is as follows:

- A 22-foot drive aisle accommodating one lane each of northbound and southbound vehicle travel;
- Two seven foot parking lanes on both side of the street (parking on the east side of the street is proposed only for the southern portion of the street adjacent to the townhomes);
- 6-foot sidewalks on both sides of the street; and
- 6-foot tree box/furnishing zones on both sides of the street.

The new street 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 and improve connectivity to the adjacent neighborhoods.

DDOT recommends that the private street be designed in accordance with DDOT construction standards in order to ensure adequate, safe, and durable facilities for all users. As a private facility, the Applicant is responsible for parking enforcement, maintenance, and snow removal.

As shown in Figure 1, vehicle site access for the multifamily building is proposed from a curb cut on the north-south street. A second curb cut is proposed immediately adjacent to provide access to loading. These curb cuts do not meet DDOT standards for separation between commercial curb cuts. However, the curb cuts are located on a private street not subject to DDOT standards.

The eight townhomes are proposed to front the north-south street. Eight of the 16 proposed curbside vehicle parking spaces on the west side of the north-south street are dedicated to the townhomes.

Primary pedestrian access points for the residential and retail uses are proposed from Irving Street and Georgia Avenue.

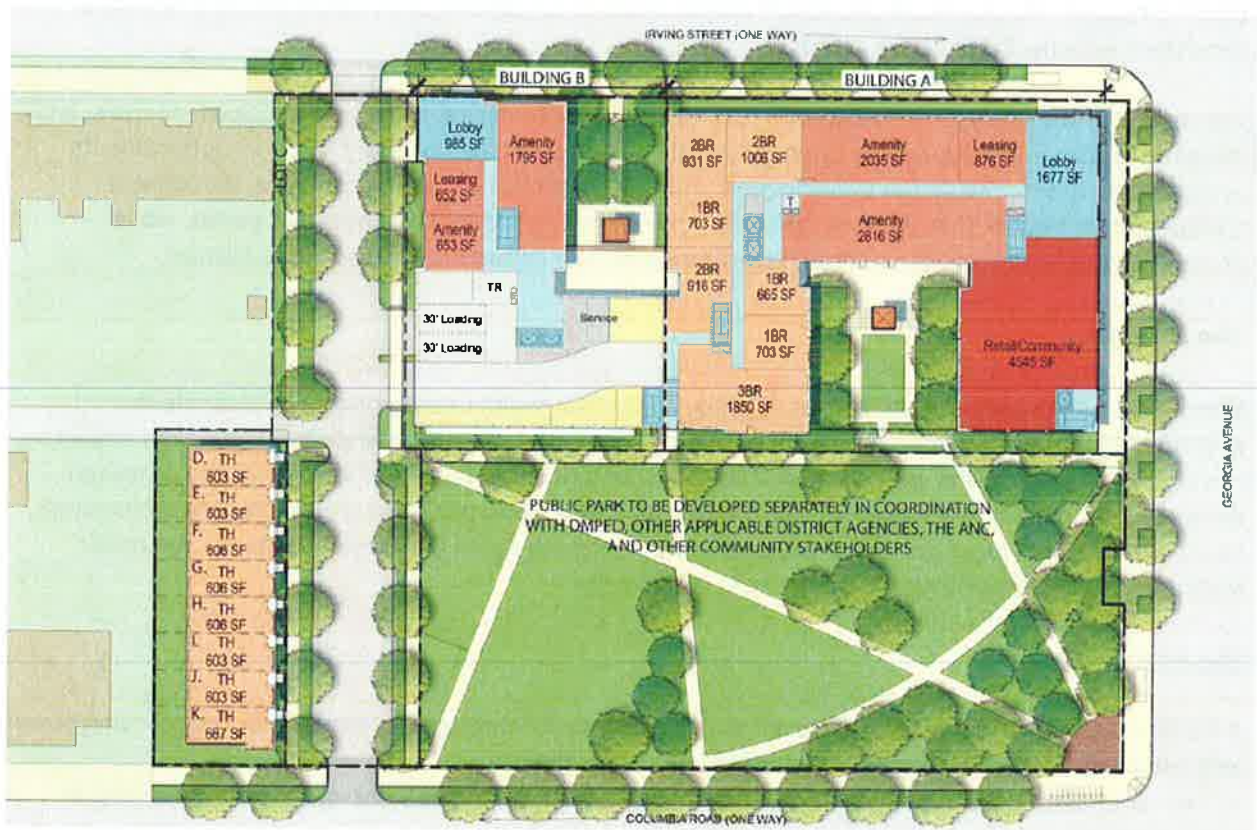


Figure 1 Site Plan

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.

The Applicant proposes two 30-foot berths and a 20-foot service space in and seeks relief from two 55-foot berths. The two proposed loading berths require back-in/front-out movements from the north-south street. Although the street is a private street and therefore not subject to DDOT standards that prohibit backing movements through public space, DDOT’s preference would to provide loading access with head-in/head-out movements in order to minimize multimodal conflicts.

To mitigate potential impacts of backing movements and the requested relief from zoning-required loading facilities, the Applicant proposes the following loading management plan, which is appropriate:

Topic	Plan Elements
Site Access and Circulation	<ul style="list-style-type: none"> • Passenger vehicles, delivery vans and trucks will access the Site via the proposed two-way 22' private street between Columbia Road and Irving Street.
Loading/Service Area	<ul style="list-style-type: none"> • All loading activities for both apartment buildings and the retail/community space will occur within the building at the shared loading facility. Some parcel deliveries (mail and UPS) may occur on-street. • Apartment/ Senior Apartment and Retail/Community – Deliveries and trash removal will occur within the building at one of the shared 30' loading berths and may also occur along the private street. • Townhomes- Deliveries will occur along the two-way private street. Trash receptacles will be maintained in the front of each townhome. Trash trucks will pick-up trash along the private street fronting the townhomes.
Truck Size Limitations	<ul style="list-style-type: none"> • Commercial deliveries will be made primarily by single unit trucks. • Deliveries made by vehicles larger than 30 feet will likely be infrequent and will need to be scheduled in advance.
Delivery Schedules	<ul style="list-style-type: none"> • Residential deliveries are anticipated between the hours of 7:00 AM to 7:00 PM.
Delivery Demand	<ul style="list-style-type: none"> • Deliveries <ul style="list-style-type: none"> ○ 2 to 6 per day • Mail/Parcel Deliveries <ul style="list-style-type: none"> ○ 5 to 8 per day • Site Trash and Recycle Pick-up <ul style="list-style-type: none"> ○ 2 trash pick-ups per week including recycle
Loading Operations	<ul style="list-style-type: none"> • Trucks on-site will not be allowed to idle and must follow all District guidelines for heavy vehicle operation including but not limited to DCMR 20 – Chapter 9, Section 900 (engine idling)
Residential Move-ins	<ul style="list-style-type: none"> • Residents will be required to schedule move-ins.
Trash removal	<ul style="list-style-type: none"> • Trash and recycle will occur in rear-loaded vehicles. All trash pick-up will occur on the site premises or along the private street.
Enforcement	<ul style="list-style-type: none"> • It shall be the responsibility of building management to inform all building tenants of this LMP and its conditions.

Figure 2 Loading Management Plan

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 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. 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. Specifically, DDOT suggests that the Applicant participate in a Preliminary Design Review Meeting (PDRM) to address design related issues prior to the submission of public space permit applications.

Preliminary site plans show 8-foot wide sidewalks on Irving Street, 12-foot sidewalks on Georgia Avenue, and 6-foot wide sidewalks on the private north-south street, in keeping with DDOT standards for sidewalk width. While preliminary plans show two existing utility vaults on Irving Street remaining, a location utility vaults to support the proposed development has not determined. DDOT's approach to utility vaults is to allow vaults in public space only when they cannot be located on private property. If in public space, vaults must be surrounded by three feet of landscaping on at least three sides or solid-cover vaults must be used. If vaults are proposed as shown in the site plan, the Applicant will be required to install solid-cover vaults. The Applicant will need to coordinate with DDOT on the vault location and treatment during the public space permitting process.

Sustainable Transportation Elements

Sustainable transportation measures target to promote environmentally responsible types of transportation in addition to the transportation mode shift efforts of TDM programs. These measures can range anywhere from practical implementations that would promote use of vehicles powered by alternative fuels to more comprehensive concepts such as improving pedestrian access to transit in order to increase potential use of alternative modes of transportation. Within the context of DDOT's development review process, the objective to encourage incorporation of sustainable transportation elements into the development proposals is to introduce opportunities for improved environmental quality (air, noise, health, etc.) by targeting emission-based impacts.

Based on the size of the proposed development and the number of vehicular parking spaces, DDOT recommends that the Applicant provide two 240-volt electric car charging stations in the parking garage.

Heritage Trees

Heritage Trees are defined as a tree with a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. A preliminary assessment by DDOT's Urban Forestry Administration (UFA) identified zero Heritage Trees on site. The Applicant should confirm the lack of Heritage Trees to ensure there are no conflicts between these protected trees and the proposed project. In the event that conflicts exist, the Applicant may be required to redesign the site plan in order to preserve the Heritage Trees. With approval by the Mayor and the Urban Forestry Advisory Council, Heritage Trees *may* be permitted to be relocated.

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.

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 coordinated with DDOT on the appropriate background developments to include in the analysis. Only projects that were both approved and included an origin or destination within the study area were included in the analysis. Two projects – 3321 Georgia Avenue and 3112 Georgia Avenue – were included as background developments.

DDOT also requires applicants account for regional growth. This can be done by assuming a general growth rate or by evaluating growth patterns forecast in MWCOG's regional travel demand model. The Applicant coordinated with DDOT on an appropriate measure to account for regional growth.

Off-Street Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, and price and 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.

A total of 99 off-street parking spaces are proposed for the site compared to 79 spaces required by zoning. Of these 99 spaces, 82 are for the residential uses, 13 for senior apartments, and 4 for the retail use. An additional 16 curbside parking spaces are proposed for the north-south street, of which 8 are reserved for the townhomes.

The residential parking provision of about one space per three multi-family units is generally consistent with other recent projects in similar walkable, transit-friendly neighborhoods.

Trip Generation

The Applicant provided trip generation estimates utilizing the Institute of Traffic Engineers (ITE) Trip Generation Manual, the Census, and the assumed mode split to convert base vehicular trips to base person trips using average auto occupancy data and then back to vehicular trips. DDOT finds this method appropriate.

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 the Census and WMATA's 2005 Development-Related Readership Survey.

The proposed action is expected to generate a moderate number of new vehicle and transit trips and a small number of pedestrian trips and bicycle trips.

Based on the trip generation and mode split assumptions discussed above, the Applicant predicted the following level of peak hour person trip generation:

Residential (Apartments)		AM Peak Hour			PM Peak Hour		
		IN	OUT	TOTAL	IN	OUT	TOTAL
Auto	32%	8	31	39	32	19	50
Metrarail	28%	8	27	35	28	16	44
Metrobus	24%	7	24	31	25	14	39
Walk	5%	1	5	6	5	3	9
Bike	8%	2	8	10	8	5	13
Other	3%	1	3	4	3	2	5
Total	100%	27	98	125	101	59	160
Residential (Townhomes)		AM Peak Hour			PM Peak Hour		
		IN	OUT	TOTAL	IN	OUT	TOTAL
Auto	50%	1	3	4	3	2	5
Metrarail	32%	0	2	2	1	1	2
Metrobus	4%	0	0	0	1	0	1
Walk	7%	0	1	1	1	0	1
Bike	5%	0	0	0	0	0	0
Other	2%	0	0	0	0	0	0
Total	100%	1	6	7	6	3	9
Retail		AM Peak Hour			PM Peak Hour		
		IN	OUT	TOTAL	IN	OUT	TOTAL
Auto	51%	2	2	4	6	7	13
Metrarail	0%	0	0	0	0	0	0
Metrobus	11%	1	0	1	1	2	3
Walk	30%	1	1	2	3	4	7
Bike	8%	0	1	1	1	1	2
Other	0%	0	0	0	0	0	0
Total Retail	100%	4	4	8	11	14	25

Figure 3 Residential and Retail Person Trips by Mode

When accounting for average auto occupancy, the action is expected to generate 40 and 57 vehicle trips in the AM and PM peak periods, respectively.

Study Area and Data Collection

The Applicant in conjunction with DDOT identified 15 intersections where detailed vehicle, bicycle, and pedestrian counts would be conducted and a level of service analysis would be performed. These

intersections are immediately adjacent to the site and include 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 will 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 action.

The Applicant collected weekday intersection data in April and September 2016. DDOT agrees with the time frame and collection dates.

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 agreed upon study intersections for the current year and after the facility opens both with and without the site development or any transportation changes.

Analysis provided by the Applicant shows that intersections in the study area are expected to be minimally impacted by the action as measured by LOS. Approaches at two intersections within the study area – Georgia Avenue & Irving Street and Georgia Avenue & Morton Street – are projected to operate at failing levels under background conditions and remain at failing levels with only minor increases in vehicle delay. In addition, vehicle queue lengths along Georgia Avenue are expected to exceed available queue space under background conditions with minor increases in queue lengths as a result of the action. As discussed in the Mitigations section, the Applicant identified enhancements to a stop bar at Hobart Place to better delineate stopping locations as one means to manage queue lengths.

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 site is well-served by public transit. The site is located approximately 0.5 miles, roughly a 10-12 minute walk from the Columbia Heights Metro station and 0.6 miles, roughly a 12-14 minute walk, from the Georgia Avenue-Petworth Metro station. Both stations are served by the Green Line.

In addition, several high-frequency WMATA bus routes have stops near the site, with headways ranging from about 7-8 minutes during the peak to 30 minutes in the off-peak. In particular, WMATA's 79 Georgia Avenue Limited Line offers express service between Silver Spring and downtown DC with 10 minute headways.

Pedestrian Facilities

The District is committed to enhance the 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 performed an inventory of the pedestrian infrastructure in the vicinity and noted any substandard conditions (Figure 4).



Figure 4 Existing Pedestrian Facilities Inventory

An extensive network of pedestrian facilities exists in the vicinity. Narrow ROWs in the vicinity result in a majority of the sidewalks not meeting current DDOT standards for width. A Sidewalk link is missing on the north side Hobart Place between Georgia Avenue and 5th Street. The Applicant's analysis incorrectly identifies missing sidewalks on of Harvard Street and between Georgia Avenue and 5th Street. A sidewalk exists on this block, however it is narrow and does not meet DDOT standards.

As discussed in the Site Access section, the Applicant proposes to reconstruct sidewalks adjacent to the site to current DDOT standards. In addition, the Applicant is expected to work with DDOT through the public space permitting process to ensure that curb ramps and crosswalks adjacent to the site meet current standards.

Bicycle Facilities

The District 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.

Bicycle facilities on 11th Street, Sherman Avenue, 4th Street, and Park Place/5th Street provide excellent north-south connectivity. Signed routes along Kenyon Street and Irving Street provide east-west bicycle connections.

An 18-dock Capital Bikeshare station is located adjacent to the site at the corner of Columbia Road & Georgia Avenue. This station is located adjacent to a future park proposed as a separate action by the Applicant. DDOT expects the station to remain as part of the park redesign. An additional 27-dock station is located approximately 0.2 miles from the site at the 11th Street & Kenyon Street intersection.

The Applicant proposes 90 long-term bicycle parking spaces in a bicycle room within the garage, which meets relevant District code, and an additional 16 short-term bicycle parking spaces adjacent to the site, which is the amount required by the 2016 Zoning Regulations.

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 five intersections within the study area that have a crash rate of 1.0 Million Entering Vehicles (MEV) or higher. A significant portion of the crashes are designated as "rear end" or "side swipe" crashes.

- Georgia Avenue and Columbia Road – Crash rate: 1.08
- Georgia Avenue and Irving Street – Crash rate: 1.19
- Sherman Avenue and Irving Street – Crash rate: 1.16
- Georgia Avenue and Kenyon Street - Crash rate: 1.23
- Georgia Avenue and Harvard Street - Crash rate: 1.13

The high crash intersections on Georgia Avenue feature significant offsets on either side of Georgia Avenue. As a result, vehicles do not have a direct path when crossing Georgia Avenue and must veer slightly to reach the opposite side. Pavement marking improvements to improve safety are discussed in the Mitigations section.

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's 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.

Pavement Marking Improvements

Enhancements to a stop bar on Georgia Avenue at Hobart Place are proposed to better delineate stopping locations as a means to manage queue lengths. DDOT agrees with this mitigation. In addition, the high crash intersections on Georgia Avenue feature significant offsets on either side of Georgia Avenue. As a result, vehicles do not have a direct path when crossing Georgia Avenue and must veer slightly to reach the opposite side. The Applicant should commit to installing pavement markings (i.e. "puppy tracks") at the study area intersections along Georgia Avenue, subject to DDOT approval at permitting. The Applicant is expected to coordinate with DDOT through the public space permitting process on these pavement marking improvements.

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 proposes the following TDM strategies:

- Offer each general apartment unit and townhome an annual carsharing membership or an annual Capital Bikeshare membership for a period of one year;
- Provide a maximum of 189 helmets for the general apartment building occupants and 8 helmets for the townhome occupants as a one-time incentive;
- Offer a preloaded \$10 SmarTrip card for each unit residential unit (senior apartment, general apartment, and townhome);
- Unbundle parking costs for market rate units from the cost of lease or purchase for apartments;
- Provide two on-street carsharing spaces along the new private street;
- Provide a bicycle repair station in the apartment building;
- Consider the installation of a transit screen in the lobby of the general and senior apartments;
- Post all TDM commitments online;
- Designate a TDM leader; and
- Provide 90 long-term and 16 short-term bicycle parking spaces.

DDOT finds the TDM plan needs to be strengthened to further encourage non-auto travel and support the requested parking relief. Accordingly, the following elements or adjustments are needed:

- Offer each general apartment unit and townhome an annual carsharing membership or an annual Capital Bikeshare membership for a period of three years;
- Provide 6 shopping carts for multi-family residential tenants to run daily errands and grocery shopping; and
- Install a transit screen in each of the lobbies for the general and senior apartments.

JH:jr