

Holland & Knight

800 17th Street N.W., Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564
Holland & Knight LLP | www.hklaw.com

Norman M Glasgow, Jr.
(202) 419-2460
norman.glasgowjr@hklaw.com

November 29, 2018

VIA IZIS

Zoning Commission of the
District of Columbia
441 4th Street, N.W., Suite 210S
Washington, D.C. 20001

Re: **Z.C. Case No. 16-23**
Valor Development, LLC – Voluntary Design Review
Supplemental Transportation Memorandum

Dear Members of the Zoning Commission:


On behalf of Valor Development, LLC (the “Applicant”), and pursuant to 11-Z DCMR § 401.8, we hereby submit the attached supplemental transportation memorandum. The attached memorandum and supporting documentation supplement the previously submitted Comprehensive Transportation Review (“CTR”), and specifically includes an evaluation of the revised plans that were submitted to the Commission on October 16, 2018, including trip generation, circulation, parking, loading, and Transportation Demand Management. Attached hereto are the following documents:

- Supplemental transportation memorandum
- Detailed trip generation calculations
- Updated parking management plan

We look forward to the public hearing scheduled for January 7, 2019.

Respectfully Submitted,

HOLLAND & KNIGHT LLP


Norman M. Glasgow, Jr.

Enclosures

cc: Jennifer Steingasser, Office of Planning (via email)
Joel Lawson, Office of Planning (via email)
Elisa Vitale, Office of Planning (via hand delivery and email)
Anna Chamberlin, District Department of Transportation (via email)
Aaron Zimmerman, District Department of Transportation (via email)
Advisory Neighborhood Commission 3E (via email)
Advisory Neighborhood Commission 3D (via email)
Edward L. Donohue, Donohue & Stearns, PLC, representing Citizens for
Responsible Development (via email)
Barbara & Sheldon Repp, Citizens for Responsible Development
(via email)
Jeff Kraskin, Spring Valley Opponents (via email)
William Clarkson, Spring Valley Neighborhood Association
(via email)
John H. Wheeler, Ward 3 Vision (via email)

CERTIFICATE OF SERVICE
Z.C. Case No. 16-23

I HEREBY CERTIFY that on November 29, 2018, a copy of the attached supplemental transportation memorandum and supporting documentation was served by email on the following:

Advisory Neighborhood Commission 3E

anc3e02@gmail.com
jmchugh40@mac.com
jonbender@gmail.com
tomquinn71@gmail.com
sherryacohen@gmail.com
3E01@anc.dc.gov

Advisory Neighborhood Commission 3D

3d@anc.dc.gov
3d01@anc.dc.gov
3d02@anc.dc.gov
3D03@anc.dc.gov
3d04@anc.dc.gov
3d05@anc.dc.gov
3d06@anc.dc.gov
3d08@anc.dc.gov
3d09@anc.dc.gov
3d10@anc.dc.gov
3D07@anc.dc.gov

Edward L. Donohue, Donohue & Stearns,
PLC, representative for Citizens for
Responsible Development

edonohue@donohuestearns.com

Citizens for Responsible Development

repper3@aol.com

Spring Valley Opponents

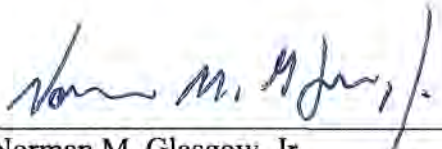
jlkraskin@rcn.com

Spring Valley Neighborhood Association

WClarkson@KSLAW.com

Ward 3 Vision

johnwheeler.dc@gmail.com


Norman M. Glasgow, Jr.

TECHNICAL MEMORANDUM

To: Aaron Zimmerman DDOT-PSD
 Cc: Josh Posnick Mill Creek Residential Trust
 Will Lansing Valor Development
 Shane Dettman Holland & Knight
 From: Daniel Solomon
 Erwin Andres
 Date: November 23, 2018
 Subject: The Ladybird CTR
 Supplemental Transportation Information

This memorandum serves as a supplement to the Comprehensive Transportation Report (CTR) and supports the latest revised site plan (dated 10.16.2018) for the Ladybird development based on comments provided by DDOT in a meeting on September 13, 2018. This memorandum provides additional information based on the previously submitted CTR (dated 11.22.2017) and previously submitted supplemental memorandums (dated 11.27.2017 and 1.10.2018) relating to:

- Trip Generation
- Circulation
- Parking
- Loading
- Transportation Demand Management

Figure 1, 2, and 3 show an overview of the revised development program and site plan elements.

Trip Generation

The following table compares the development program from the 11.22.2017 CTR to the revised development program:

Table 1: Comparison of Development Programs

Land Use	Development Program		
	Program in 11.22.2017 CTR	Revised Program	Change
Multifamily Residential	219 units	214 units	- 5 units
Residential Townhomes	--	5 townhomes	+ 5 townhomes
Grocery/Retail*	16,000 square feet	17,992 square feet	+ 1,992 square feet

* analyzed as all grocery for conservative analysis

The revised trip generation calculations use the same modal splits that were utilized as part of the 11.22.2017 CTR. Table 2 compares the auto trip generation of the November 2017 CTR and the revised trip generation of the development. The revised development program will result in a relatively minor increase of seven (7) additional trips in the AM peak hour and 17 additional trips in the PM peak hour, as compared to the previous development program. Detailed calculations are attached to this memorandum.

Table 2: Comparison of Auto Trips

Program	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Revised Program Auto Trips	54 veh/hr	101 veh/hr	155 veh/hr	182 veh/hr	140 veh/hr	322 veh/hr
CTR (11.22.2017) Auto Trips	50 veh/hr	98 veh/hr	148 veh/hr	174 veh/hr	131 veh/hr	305 veh/hr
Net New Auto Trips	4 veh/hr	3 veh/hr	7 veh/hr	8 veh/hr	9 veh/hr	17 veh/hr

Circulation

This section reviews site access and circulation for the revised site plan.

Pedestrian Access and Circulation

Primary pedestrian access to the residential component of the development is provided along Yuma Street for the multifamily residential building, and along 48th Street for the five (5) residential townhomes. Pedestrian access for the grocery component is expected to occur along Yuma Street.

The previous site plan included Windom Walk, a publicly accessible linear park between Buildings 1 and 2. The revised site plan replaces Windom Walk with Windom Park (a pocket park). A circulation plan showing expected pedestrian routes is shown in Figure 4.

Bicycle Access and Circulation

Bicycle access to the secure long-term bicycle parking will be from the alley abutting the western portion of the site. Short-term bicycle parking will be located around the perimeter of the site, along Yuma Street, 48th Street, and the public alleys along the western and southern portions of the site. Bicycle access to the site is primarily expected to occur via Yuma Street and 48th Street, and along the alleys to the south and west of the site. A circulation plan showing expected bicycle routes is shown in Figure 4.

Vehicular Access and Circulation

All of the vehicular access to the site will be via 48th Street, Yuma Street, and Massachusetts Avenue, all of which provide access to the public alley that connects to the below-grade parking garage. A circulation plan showing expected vehicular routes is shown in Figure 4.

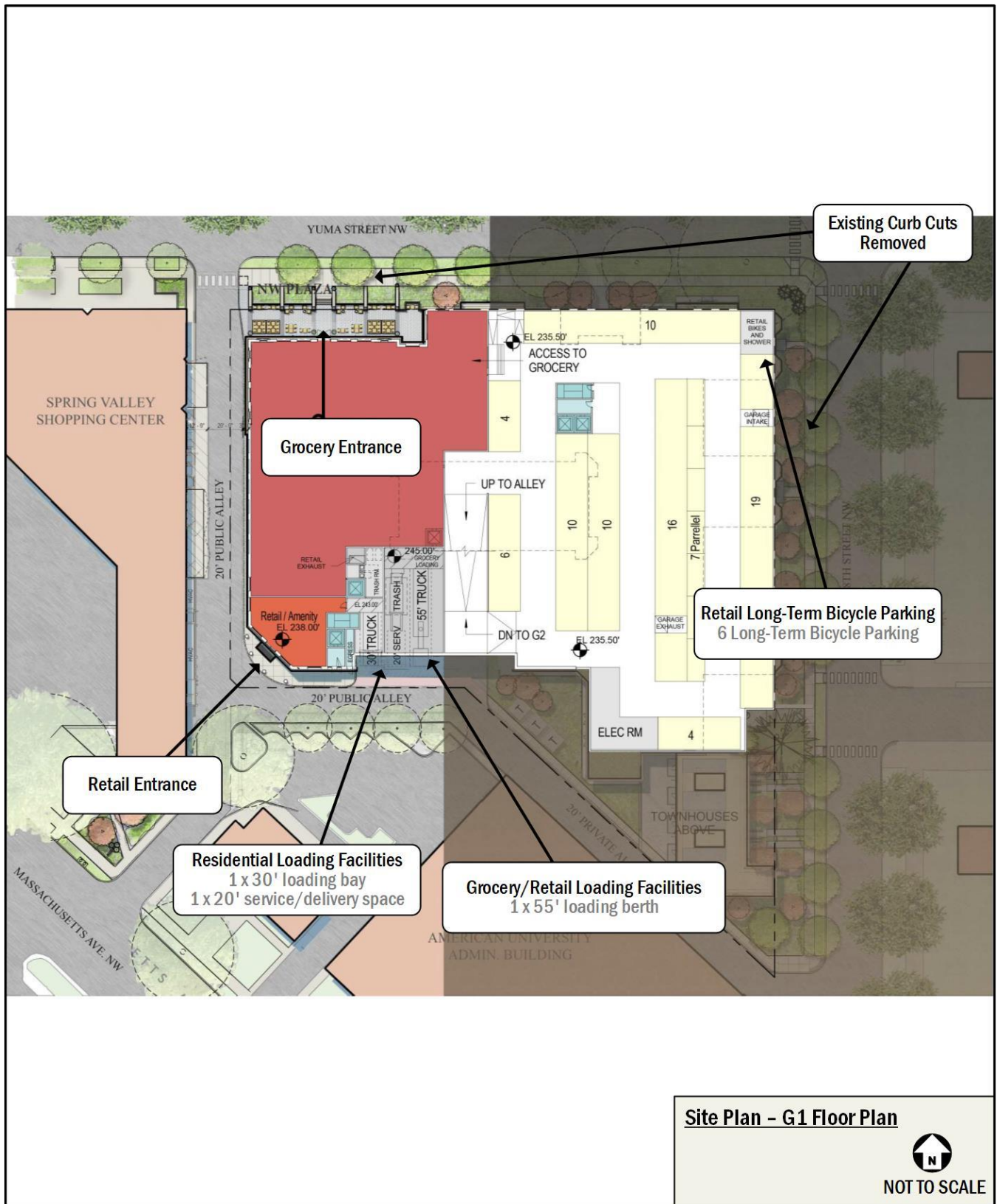


Figure 1: Site Plan – G1 Floor Plan



Figure 2: Site Plan – Lower Level Floor Plan



Figure 3: Site Plan – First Floor Plan

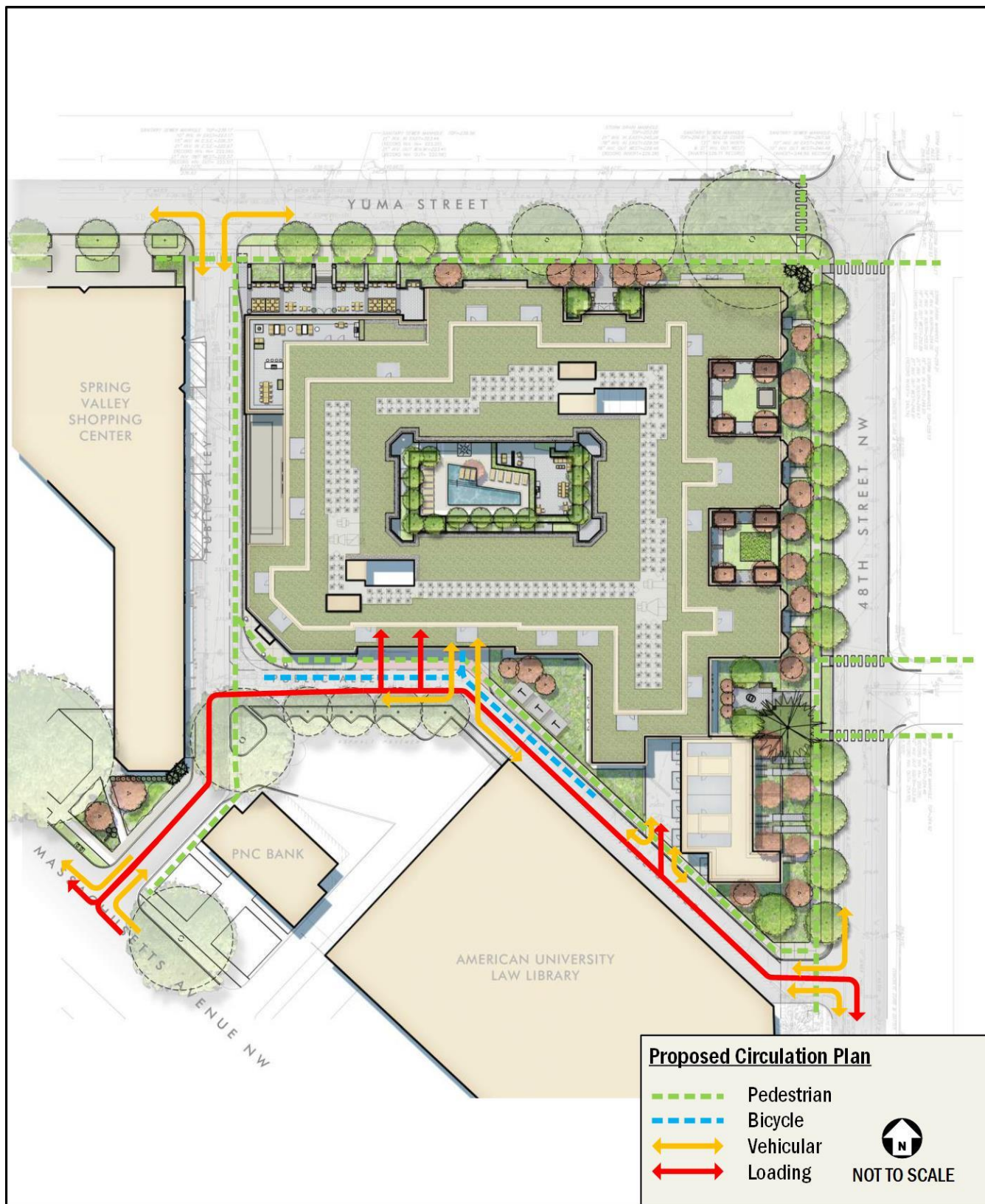


Figure 4: Proposed Circulation Plan

Parking

A Parking Management Plan (PMP) was prepared by the Applicant in order to provide greater detail regarding layout of the garage, parking access and controls, car-share parking, the American University Administrative Building overflow parking agreement considerations, parking rates, bicycle parking, and enforcement. A PMP was submitted alongside 11.22.2017 CTR. An updated PMP that incorporates changes due to the revised development program and site plan is attached to this memorandum.

Loading

Improvements to the Alley

The Applicant has **agreed** to implement the proposed improvements to the alley that were included in the 11.22.2017 CTR and the 12.27.2017 supplemental memorandum. The Applicant has proposed to improve the North-South portion of the alley by widening it to a total width of 35 feet, as shown in Figure 10 of the November 22, 2017 CTR. The 35 feet of alley will include a 12-foot trash enclosure, a 20-foot drive-aisle, and a three (3) foot delineated pedestrian path. The widening of the alley will be made possible by the Applicant dedicating 10 feet (3 feet for the sidewalk and 7 feet for the paved alley) within the site to public use. The East-West portion of the alley is proposed to be improved by maintaining the 20-foot drive-aisle with the Applicant constructing a six (6) foot delineated footpath for pedestrian use.

Loading Facilities

As part of the revised site plan, the loading facilities were modified to provide two (2) 30-foot berths (one of which will contain a trash compactor), one (1) 55-foot berth, and one (1) 20-foot delivery space. The proposed loading facilities are in compliance with the minimum loading requirements of 11-C DCMR § 901.1 and accommodate all delivery demand.

The five (5) townhomes do not have a minimum loading requirement. However, to minimize the potential for impacts to the existing alleys, street network and surrounding neighborhood, loading activities for the townhomes will take place in the paved area behind the townhomes, which is adjacent to the 20-foot private alley along the north side of the American University Administrative Building.

Truck Routes

Truck routing to and from the site will be focused on designated primary truck routes, such as Massachusetts Avenue. The majority of truck restricted routes are to the east of the site on Yuma Street east of 48th Street, on 48th Street north of Yuma Street, on Windom Place, and on Warren Street. Of note, the segment of 49th Street to the west of the site that lies between Massachusetts Avenue and Yuma Street is restricted to trucks. As such, any outbound trucks from the development will exit onto 48th Street or Massachusetts Avenue via the alley. Turning maneuvers into and out of the site for are shown in Figure 5, Figure 6, and Figure 7.

Loading Management Plan

The Applicant has **agreed** to implement the Loading Management Plan (LMP) that was included in the 11.22.2017 CTR and the 1.10.2018 supplemental memorandum. The Applicant will implement the LMP as proposed for the life of the project unless otherwise noted:

- A loading dock manager will be designated by the building management. The dock manager will coordinate with vendors and tenants to schedule deliveries and will be on duty during delivery hours.

- All tenants will be required to schedule deliveries that utilize the loading docks – defined here as any loading operation conducted using a truck 20' in length or larger.
- Commercial deliveries will be scheduled between 7 AM – 7 PM (7 days a week), and discouraged from making deliveries after 4PM on weekdays
- Waste collection (both commercial & residential) allowed 7 AM – 4 PM (7 days a week)
- Residential move-ins/outs allowed 9 AM – 4 PM (7 days a week)
- The dock manager(s) will schedule deliveries such that the dock's capacity is not exceeded. In the event that an unscheduled delivery vehicle arrives while the dock is full, that driver will be directed to return at a later time when a berth will be available so as to not impede the drive aisle that passes in front of the loading dock.
- The dock manager(s) will monitor inbound and outbound truck maneuvers and will ensure that trucks accessing the loading dock do not block vehicular traffic except during those times when a truck is actively entering or exiting the alley.
- The loading manager(s) will monitor the alley to keep the designated loading areas clear for deliveries, keep the alley from being blocked due to vehicle loading/unloading activity, and enforce the no parking restrictions.
- Trucks using the loading dock 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), the regulations set forth in DDOT's Freight Management and Commercial Vehicle Operations document, and the primary access routes listed in the DDOT Truck and Bus Route System.
- The Applicant has agreed to continue coordination with DDOT and Spring Valley Shopping Center (Lot 802 and 803) regarding loading operations for the Spring Valley Shopping Center site.
- All trash bins and dumpsters belonging to Spring Valley Shopping Center (Lot 802 and 803) currently located along Yuma Street NW will be relocated to the alley and placed in the proposed enclosures.
- Trucks traveling to the Spring Valley Shopping Center will be directed not to pick-up or drop-off on Yuma Street NW and will be directed to use the rear alley network.

Transportation Demand Management (TDM)

The Applicant has **agreed** to offer the same TDM elements as presented in the 11.22.2017 CTR and the 1.10.2018 supplemental memorandum. Please note that the residential TDM elements only apply to the multifamily portion of the project. The following table summarizes the Applicant’s TDM as they relate to the overall site and individual land-uses found within:

Land Use	Proposed TDM Element
Overall Site (excluding townhomes)	The Applicant will fund and construct the installation of a High-intensity Activated crossWalk (HAWK) signal on Massachusetts Avenue NW between 48th and 49th Street NW, subject to DDOT approval.
	The Applicant will fund and construct pedestrian network improvements in the immediate vicinity of the site to encourage walking and offset the impacts of being over-parked. Specifically, upgrade substandard curb ramps, stripe missing crosswalks, and install curb extensions, subject to DDOT approval, at the following intersections: a. 49th Street and Yuma Street NW b. 49th Street and Yuma Street NW c. 48th Street and Windom Place NW d. 48th Street and Warren Street NW
	The Applicant will exceed Zoning requirements to provide bicycle parking/storage facilities at the proposed development. This includes secure parking located on-site and short-term bicycle parking around the perimeter of the site.
	The Applicant will provide bike repair stations in each of the two long-term bike storage facilities.
	The Applicant will dedicate four (4) parking spaces in the below-grade parking garage for car-sharing services to use with right of first refusal. If an agreement has not been reached with a car sharing service to occupy the four (4) dedicated car sharing spaces in the garage, then the Applicant will provide an additional year of Capital Bikeshare memberships to new residents;
	No free parking shall be offered to any resident, employee, student, or otherwise. Only daily, weekly, and monthly rates will be made available for purchase.

Multifamily Residential	The Applicant will identify TDM Leaders (for planning, construction, and operations). The TDM Leaders will work with residents in the development to distribute and market various transportation alternatives and options.
	The Applicant will provide TDM materials to new residents in the Residential Welcome Package materials.
	The Applicant will install a Transportation Information Center Display (electronic screen) within the residential lobbies containing information related to local transportation alternatives.
	The Applicant will offer either a one-year membership to Capital Bikeshare or a one-year membership to a car-sharing service to each residential unit for the initial lease up of each unit.
	The Applicant will restrict residents of the building from obtaining a Residential Parking Permit ("RPP"), with penalty of lease termination.
	The Applicant will provide one (1) shopping cart for grocery shopping and running errands for every 30 residential dwelling units.
	The Applicant will unbundle the cost of residential parking from the cost of lease or purchase of each unit. Unbundled cost of parking will be based at a minimum on the average market rate within a quarter mile (per the 12/27/17 PMP)
Retail	The Applicant will identify TDM Leaders (for planning, construction, and operations). The TDM Leaders will work with grocery/retail employees in the development to distribute and market various transportation alternatives and options.
	The Applicant will provide grocery/retail employees who wish to carpool with detailed carpooling information and will be referred to other carpool matching services sponsored by the Metropolitan Washington Council of Governments (MWCOG).

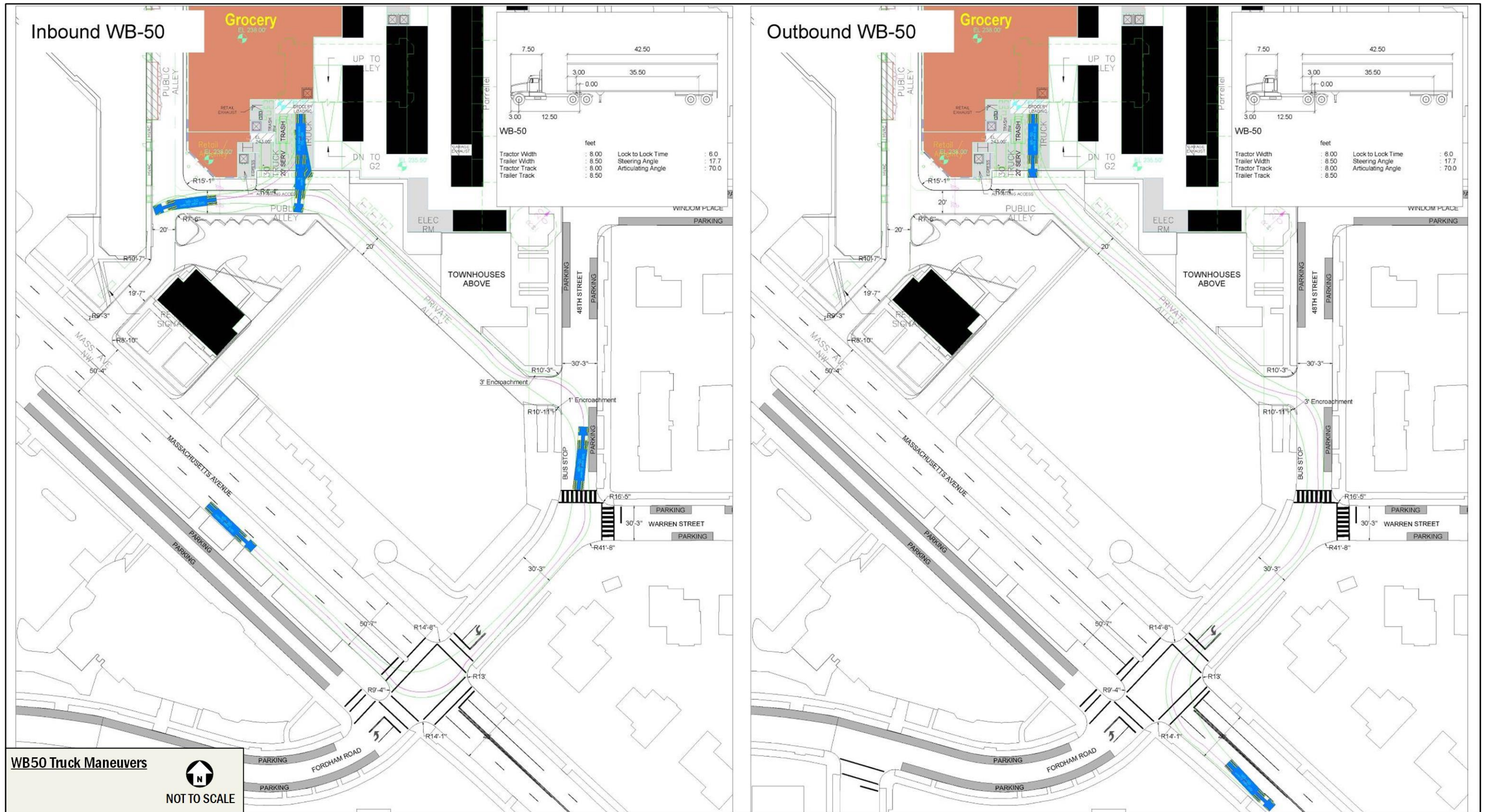


Figure 5: WB50 Truck Maneuvers



Figure 6: 35-foot Truck Maneuvers

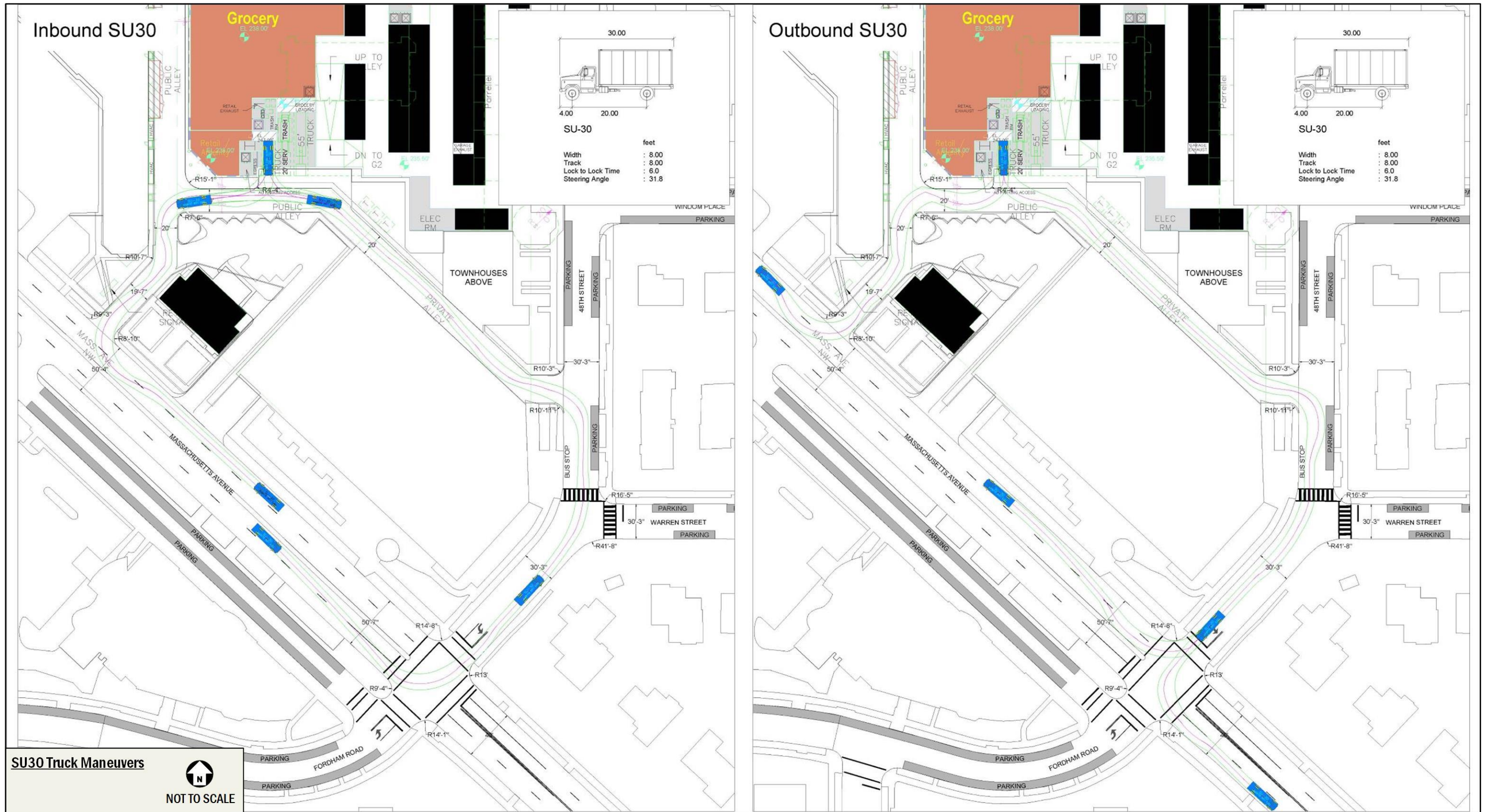


Figure 7: SU30 Truck Maneuvers

Table 1 - Residential Trip Generation

Note: Approximately 219 dwelling units

Step 1: Base trip generation using ITEs' *Trip Generation*

Land Use	Land Use Code	Quantity (x)	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Apartment	220	214 du	22 veh/hr	87 veh/hr	109 veh/hr	88 veh/hr	47 veh/hr	135 veh/hr
<i>Calculation Details:</i>			20%	80%	=0.49(x)+3.73	65%	35%	=0.55(x)+17.65
Townhome	230	5 du	0 veh/hr	2 veh/hr	2 veh/hr	2 veh/hr	1 veh/hr	3 veh/hr
<i>Calculation Details:</i>			17%	83%	=0.44(x)	67%	33%	=0.52(x)

Step 2: Convert to people per hour, before applying mode splits

Land Use	People/Car (from 2009 NHTS, Table 16)	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Apartment	1.13 ppl/veh	25 ppl/hr	98 ppl/hr	123 ppl/hr	99 ppl/hr	54 ppl/hr	153 ppl/hr
Townhome	1.13 ppl/veh	0 ppl/hr	2 ppl/hr	2 ppl/hr	2 ppl/hr	1 ppl/hr	3 ppl/hr

Step 3: Split between modes, per assumed Mode Splits

Land Use	Mode	Split	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Apartment	Auto	90%	23 ppl/hr	88 ppl/hr	111 ppl/hr	89 ppl/hr	49 ppl/hr	138 ppl/hr
Apartment	Transit	5%	1 ppl/hr	5 ppl/hr	6 ppl/hr	5 ppl/hr	3 ppl/hr	8 ppl/hr
Apartment	Bike	2%	1 ppl/hr	1 ppl/hr	2 ppl/hr	2 ppl/hr	1 ppl/hr	3 ppl/hr
Apartment	Walk	3%	1 ppl/hr	3 ppl/hr	4 ppl/hr	3 ppl/hr	2 ppl/hr	5 ppl/hr
Townhome	Auto	90%	0 ppl/hr	2 ppl/hr	2 ppl/hr	2 ppl/hr	1 ppl/hr	3 ppl/hr
Townhome	Transit	5%	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr
Townhome	Bike	2%	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr
Townhome	Walk	3%	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr

Step 4: Convert auto trips back to vehicles/hour

Land Use	People/Car (from 2009 NHTS, Table 16)	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Residential	1.13 ppl/veh	20 veh/hr	78 veh/hr	98 veh/hr	79 veh/hr	43 veh/hr	122 veh/hr
Townhome	1.13 ppl/veh	0 veh/hr	2 veh/hr	2 veh/hr	2 veh/hr	1 veh/hr	3 veh/hr

Trip Gen Summary for Residential (219 du)

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Auto	20 veh/hr	80 veh/hr	100 veh/hr	81 veh/hr	44 veh/hr	125 veh/hr
Transit	1 ppl/hr	5 ppl/hr	6 ppl/hr	5 ppl/hr	3 ppl/hr	8 ppl/hr
Bike	1 ppl/hr	1 ppl/hr	2 ppl/hr	2 ppl/hr	1 ppl/hr	3 ppl/hr
Walk	1 ppl/hr	3 ppl/hr	4 ppl/hr	3 ppl/hr	2 ppl/hr	5 ppl/hr

Table 2 - Grocery and Retail Trip Generation

Note: Grocery/Retail (17,992 square feet) - All assumed grocery for conservative analysis

Step 1: Base trip generation using ITEs' Trip Generation

Land Use	Land Use Code	Quantity (x)	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Grocery	850	17,992 sf	38 veh/hr	23 veh/hr	61 veh/hr	112 veh/hr	107 veh/hr	219 veh/hr
Calculation Details:			62%	38%	=3.40(x/1000)	51%	49%	=0.74(x/1000)+3.25

Step 2: Convert to people per hour, before applying mode splits

Land Use	People/Car (from 2009 NHTS, Table 16)	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Grocery	1.84 ppl/veh	70 ppl/hr	42 ppl/hr	112 ppl/hr	206 ppl/hr	197 ppl/hr	403 ppl/hr

Step 3: Split between modes, per assumed Mode Splits

Land Use	Mode	Split	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Grocery	Auto	90%	63 ppl/hr	38 ppl/hr	101 ppl/hr	185 ppl/hr	178 ppl/hr	363 ppl/hr
Grocery	Transit	0%	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr
Grocery	Bike	2%	1 ppl/hr	1 ppl/hr	2 ppl/hr	4 ppl/hr	4 ppl/hr	8 ppl/hr
Grocery	Walk	8%	6 ppl/hr	3 ppl/hr	9 ppl/hr	16 ppl/hr	16 ppl/hr	32 ppl/hr

Step 4: Convert auto trips back to vehicles/hour

Land Use	People/Car (from 2009 NHTS, Table 16)	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Grocery	1.84 ppl/veh	34 veh/hr	21 veh/hr	55 veh/hr	101 veh/hr	96 veh/hr	197 veh/hr

Trip Gen Summary for Grocer (16 ksf)

Mode	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Auto	34 veh/hr	21 veh/hr	55 veh/hr	101 veh/hr	96 veh/hr	197 veh/hr
Transit	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr	0 ppl/hr
Bike	1 ppl/hr	1 ppl/hr	2 ppl/hr	4 ppl/hr	4 ppl/hr	8 ppl/hr
Walk	6 ppl/hr	3 ppl/hr	9 ppl/hr	16 ppl/hr	16 ppl/hr	32 ppl/hr

TECHNICAL MEMORANDUM

To: Aaron Zimmerman
 DDOT-PSD
 Cc: Josh Posnick
 Will Lansing
 Mill Creek Residential Trust
 Valor Development
 From: Daniel Solomon
 Erwin Andres
 Date: November 23, 2018
 Subject: The Ladybird
 Parking Management Plan

This Parking Management Plan (PMP) supplements the Comprehensive Transportation Report (CTR) for the Ladybird Design Review Application., by providing specific details regarding layout of the garage, parking access and controls, car-share parking, the American University parking covenant, parking rates, bicycle parking, and enforcement.

Garage Layout

The proposed Ladybird parking garage will be divided into three (3) levels as follows:

Level	Parking Spaces	User Group(s)
G1	86	Grocery/Retail
G2	123	Residential
	56	American University Parking*
G3	105	Residential
Total	370	

**parking for monthly pass holders from American University*

Access and Garage Controls

Vehicular access to the parking garage will be from the east-west alley along the southern side of the Ladybird development. A rolling garage door will control access from the alley to the G1 Level of the below-grade parking garage. The door will be open during the grocer/retail hours of operation and closed outside of those hours, with access still possible to those in possession of a transponder.

G1 Level – Access to the grocer/retail parking, located on the G1 Level and containing 86 parking spaces, will be controlled via a fare gate with entry station/terminal (ticket dispenser) at the bottom of the ramp leading to the G1 Level. Up to four (4) of the parking spaces on the G1 Level will be dedicated for car-sharing services to use.

G2 Level – Access to the G2 Level will be controlled by a gate arm using a transponder which will be provided to each resident that chooses to lease a parking space or those that hold a monthly parking pass from American University. The G2 Level of parking will contain 179 parking spaces, 123 parking spaces of which will be for residential use and 56 parking spaces for

monthly parking pass holders from American University. The transponder used to access the G2 Level will allow vehicles to pass through the G1 Level fare gates without payment.

G3 Level – Access to the G3 Level will be controlled via a transponder and gate system similar to the one on the G2 Level. Only those that have leased a residential parking space will have access to the 105 parking spaces on the G3 Level. The transponder used to access the G3 Level will allow vehicles to pass through the G1 Level fare gates without payment.

American University Parking Covenant Considerations

An existing covenant between American University and the site lot requires the Ladybird development to carry forth 236 non-exclusive parking spaces for the use of American University. American University has agreed to lease 180 parking spaces back to the Applicant, reducing the number of spaces available to American University pass holders to 56 parking spaces.

The 56 parking spaces will be available to parking pass holders of American University, in addition to the 269 parking spaces already available in the below-grade parking garage belonging to the AU Administrative Building. As of November 2018, a monthly parking pass at American University costs \$126. Table 1 reflects this arrangement where American University has access to only 56 parking spaces.

Parking Rates

The parking rate structure for the parking garage will be determined and reviewed regularly by the developer. Parking is planned to be priced at the market-rate (within 0.25 miles of the development).

Reserved residential parking will be available to residents of the development wishing to lease a monthly parking space. The cost of a reserved residential parking space will be unbundled from the cost of lease or purchase of each unit.

Allocation of Parking Spaces

The allocation of parking spaces to the various user groups (retail/residential/AU pass holders) within the below-grade garage will be reviewed regularly by the building owner and/or property management company to ensure that the parking demand of each user group is met, and impact to on-street parking is minimized.

Enforcement

The building owner and/or property management company will have a contract with a towing company to remove improperly parked vehicles from the site, such as unauthorized vehicle parking in an ADA or improper parking space.

Bicycle Parking

A total of 83 long-term bicycle spaces will be located in the below-grade parking garage, with at least 50% of the long-term bicycle parking spaces being located in the G1 Level or ground floor of the development.