

Comments on the Comprehensive Transportation Review (CTR) PUD Exhibit 22A

Summary and introduction: The applicant's CTR makes clear that the proposed PUD at 501 I St. SW would have unacceptable negative impacts on traffic and transportation in the neighborhood. It provides facts and figures that show the PUD would worsen an already dire parking situation, that sufficient parking spaces have not been provided for the anticipated needs of Shakespeare Theatre Company (STC), that at least five nearby intersections already operate under unacceptable conditions that will be made worse by the development, that pedestrian access is not fully adequate, and that numerous pedestrian accidents are already occurring at nearby intersections which are heavily used by school children. The PUD proposes to reduce the number of existing on-street public parking spaces, while acknowledging that they are already 100% occupied. The points below are quotes from the CTR, followed by commentary which appears in bold lettering. **End summary and introduction.**

1. "The site provides sufficient parking and loading facilities to accommodate demand... On-street parking is highly utilized surrounding the site and expected to be negligibly impacted by the proposed development." (p. 11)
This is internally inconsistent. If on-street parking is already highly utilized and more cars will be added by residents in and visitors to the development, how can the CTR conclude that on-street parking will be negligibly impacted?
2. "As shown in the tables, parking is heavily occupied during the midday and evening peaks for both the summer and non-summer days. RPP parking is at least 88% occupied during all scenarios outlined in the tables; however, block faces directly surrounding the site have some availability during the day. Alternatively, many block faces that provide non-RPP, public parking are observed to have an occupancy of over 100% - indicating that illegal parking may occur within the on-street parking study area. Overall, the parking occupancy study shows that on-street parking is heavily utilized surrounding the site." (p.12-13)
The CTR acknowledges that parking in the area is heavily occupied or over-occupied, but fails to acknowledge that the additional cars to be added by the project will worsen the problem.
3. "Adequate pick-up/drop-off space is proposed along I Street to serve STC's summer camp." (p. 11) "The site is expected to generate pick-up/drop-off activity for summer classes and camps.... The proposed curbside management plan allows for approximately 140 feet (or approximately 7 car lengths) to be designated as pick-up/drop-off space for STC's summer camps." (p. 14)
The pick-up space is proposed; it does not actually exist. The proposal would require removing 140 feet of public parking, or 7 parking spaces, from a block that the CTR acknowledges already has "an occupancy of over 100%."
4. "The site is designed to accommodate head-in/head-out maneuvers into the proposed loading area, which includes a 30' loading berth and a 20' service/delivery space. Truck turning diagrams are included in the Technical Attachments." (p. 12)

No “technical attachments” were filed with the Zoning Commission as part of the CTR.

The head-in/head-out truck maneuvers described in the PUD would require extensive backing up for trucks, with the accompanying loud beeping, right up to the property line next to a row of townhouses. The Office of Planning set-down report of January 19, 2018 explicitly said the transportation report should address these turning movements, but the CTR has not done so and has not suggested any improvements or mitigations to the plans in the PUD proposal.

5. “Limited performances will be held on the site.” (p. 11)
The CTR makes no provision for extra parking requirements during these performances, nor even an estimate of how many people/cars are likely to attend.
6. A curb cut along 6th St. will be shifted slightly to the south. (p. 11)
The CTR does not say if this will reduce the number of existing parking spaces.
7. “Vehicular access along I Street could result in increased conflicts with pedestrians and bicycles, particularly given the presence of bike lanes along I Street.” (p. 12)
The CTR gives this as an explanation for why the vehicle entrance has been placed on 6th St. The clear implication, however, is that vehicular access along 6th St. would result in increased conflicts with pedestrians and bicycles along 6th St.
8. “The Project will [supply] a total 55 parking spaces. Of these, 25 spaces will be dedicated residential uses and 30 spaces will be dedicated to STC uses, including 15 off-site spaces.” (p.13)
The CTR does not address the STC written commitment in the SWNA Agreement, a legal contract, that “a minimum of 70 off street parking spaces shall be provided on the property for use by STC and residents of the Development.” (Exhibit 34, para 5(b).)
9. “Summary of daily activity” (Tables 4 and 5 on pp. 18-19)
This section appears to show that the proposed 30 parking spaces for STC uses (15 on site and 15 off site) will not be nearly enough for STC’s anticipated needs. Table 4 indicates that 28-32 spaces will be needed for STC staff’s regular daily activity (80 full time staff x 30% = 24 spaces; 3-7 part time staff x 50% = 2 to 4 spaces; and 2-7 volunteers x 60% = 2-4 spaces). However, Table 5 lists many more cars that will be coming for regular activities (16 home school x 80% = 13 spaces; 20 workshop and training x 25% = 4 spaces; 10-40 MAC and 1-4 instructors x 70% = 8-31 spaces; 10 summer camp instructors x 68% = 7 spaces; 20-50 actors x 10% = 2-5 spaces; Ford Theater rehearsals 25 spaces x 20% = 5 spaces; ACA rehearsals 20 spaces x 10% = 2 spaces). Even by the CTR’s own listing, therefore, 69-99 spaces will be needed for regular STC daily activities for much of every year, while only 30 are provided.
10. “The Applicant will include a provision for all residential unit purchases restricting the residents from obtaining Residential Parking Permits.” (p. 15)

This is in the CTR – and also in the SWNA Agreement – but not in the PUD application.

11. “Parking management plan” (p. 15)
The CTR does not include a provision for any day-to-day visitor parking at the site or how this will be handled. In a building with 80 office employees and 100 housing units, it’s hard to imagine there won’t be a lot visitors, many arriving by car.
12. “A loading facility manager will be designated by property management. The loading facility manager will schedule deliveries.... Trucks using the loading facility will not be allowed to idle...” (p. 15)
Neither the PUD nor the CTR indicates or pledges that the loading facility manager will be on site. If not, how will all these provisions be enforced on a day-to-day basis?
13. “Parking occupancy” (Figures 7-10 on pp. 21-24). The charts claim that parking on the west side of 6th St. between G St. and I St. is as low as 25-50%.
Anyone who lives in the neighborhood knows there is far less parking available on these blocks than claimed in the CTR. It’s usually impossible to find a single open space. The discrepancy is probably because the CTR figures are based on surveys taken on Thursdays, which is a street sweeping day for those blocks.
14. “Future areas of concern for roadway capacity, are primarily focused along commuter routes such as I Street.” (p.29)
The CTR states that I St. capacity is a future area of concern, but does not address how this will be managed.
15. “The intersection of G Street and 4th Street met the thresholds for requiring mitigations as a result of the proposed development.” (p. 29)
**The CTR assumes but does not give assurances that DDOT has agreed to its proposed mitigation.
Moreover, Table 13 (p. 51) seems to show this intersection will get an “F,” or “unacceptable,” score even with mitigations.**
16. Intersection capacity analysis and queuing analysis (pp. 32-33) “LOS D is typically used as the acceptable LOS threshold in the District.” (p. 32)
After making this statement, the CTR lists five nearby intersections that “operate under unacceptable conditions during one or more peak hour” and five that “have one or more lane group that exceeds the given storage length during at least one peak hour.” Table 11 (pp. 44-45) lists five nearby intersections with a LOS score of E or F. Table 12 (pp. 46-47) seems to list five intersections that have queuing problems.
17. “A review of pedestrian facilities surrounding the planned development shows that many facilities meet DDOT standards and provide a quality walking environment.” But, “there are some areas which have inadequate sidewalks or no sidewalks at all;” and “The sidewalks that

do not meet DDOT standards have either unacceptable sidewalk width or unacceptable buffer width. Some of these issues will be remedied as part of this project or other background developments;” and “under existing conditions there are some issues with crosswalks and curb ramps near the site.” (p. 56)

The CTR points out problems and says some will be remedied, but does not explain which ones, how, or when they will be remedied.

CTR does not say how wide sidewalks will be at the site and whether the developers plan to sacrifice city green space (tree strip) for wider sidewalks.

18. “Pedestrian facilities.” “The 501 Eye Street SW project will include sidewalks along the perimeter of the site that meet DDOT design requirements.” (p. 57)

This suggests that the sidewalks provided will be the absolute minimum required.

The pedestrian section of the CTR says nothing about how the increased traffic, cars and trucks will affect pedestrians or safety, including of children at the school next door to the development.

19. “Bicycle facilities” (p. 60)

The CTR touts dockless bikeshares and scooters as a transportation option for the site, but does not address how the project will handle the problem of dockless bikes and scooters that will be left at the building, blocking sidewalks.

20. “16 short-term bicycle racks will be provided around the perimeter of the site on 6th Street and Eye Street. The Applicant is willing to work with DDOT to determine the locations of bicycle racks within public space.” (p.61)

Why does the CTR assume these must be in public space instead of planning to accommodate them within the project? Since the main building would occupy the site up to the property line on I St. and beyond the property line on 6th Street, the only space available on the building’s perimeter would be either on the sidewalks (which already may be the minimum width required) or by further reducing green space by infringing on the tree strip between the sidewalk and the street.

21. “Crash data analysis” (p. 63) “According to the Institute of Transportation Engineer’s Transportation Impact Analysis for Site Development, a crash rate of 1.0 or higher is an indication that further study is required. One intersection in this study area met this criterion.”

Table 17 shows two nearby intersections that each had five pedestrian crashes from 2015-2017 (and this was before the greatly increased traffic resulting from the opening of the Wharf and several other new developments in the area). This reinforces our concern about safety and the dangers of increased traffic, especially to children from the neighboring and nearby schools.

22. “The proposed development will directly contribute to the goals of [the Southwest Neighborhood Plan] by providing the community access to the arts.” (p. 6)

There’s nothing in the CTR to justify this statement. The CTR did not study, assess, or provide evidence whether the community will have more access to the arts as a result of the project. The CTR makes no reference at all to the transportation

aspects of how the community would access the site, nor does it provide any estimates of how many community members – if any – would be likely to visit the site.

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