Government of the District of Columbia
Department of Transportation

d. Planning and Sustainability Division

MEMORANDUM

TO: Sara Bardin
Director, Office of Zoning

FROM: Jim Sebastian
Associate Director

DATE: December 26, 2019

SUBJECT: ZC Case No. 19-23 – 80 M Street SE

PROJECT SUMMARY

Wells REIT II 80 M Street, LLC (the "Applicant") seeks approval of a Design Review in order to add three (3) stories of office and habitable penthouse space to an existing 7-story office building. The site is located on the north side of M Street SE, west of 1st Street, east of Cushing Place, and south of L Street (Square 699, Lot 28) in the D-5 zone. The Applicant proposes the following development program:

- Add 105,552 SF office and habitable penthouse space to an existing 290,760 SF office building;
- Reduce vehicle parking from 295 spaces to 288 spaces;
- Add four (4) showers and 25 lockers (0 of both existing);
- Add 43 long- and six (6) short-term bicycle parking spaces (0 long- and 6 short-term existing).

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 review of the case materials submitted by the Applicant, DDOT finds:

- Primary vehicle and delivery truck access is via one (1) large existing curb cut at the rear of the building on L Street SE. The Applicant is not proposing any changes to the site access but is

proposing a Loading Management Plan (LMP) to address the existing back-in loading condition that is not consistent with DDOT standards;

- The Navy Yard-Ballpark Metrorail Station and DC Circulator stops (one in each direction) are within one (1) block;
- DDOT strongly supports the Applicant's proposal to reduce on-site vehicle parking by seven (7) spaces and replace them with long-term bicycle parking;
- The site does not currently provide short- and long-term bicycle racks or showers and lockers for commuters. The Applicant is proposing to bring all of these up to ZR16 requirements;
- The Applicant is proposing a Transportation Demand Management (TDM) Plan for the entire building that is sufficiently robust to encourage use of non-automotive modes of travel; and
- Between the site's proximity to high-quality transit, reduced vehicle parking, and robust TDM plan, the proposed project will have a minimal impact on the transportation network.

RECOMMENDATION

DDOT has no objection to the approval of this Design Review application with the following conditions:

- Implement the Transportation Demand Management (TDM) Plan, as proposed in the Applicant's Updated Transportation Statement (Exhibit 9C); and
- Implement the Loading Management Plan (LMP), as proposed in the Applicant's Updated Transportation Statement (Exhibit 9C).

TRANSPORTATION ANALYSIS

DDOT requires applicants requesting an action from the Zoning Commission complete a Comprehensive Transportation Review (CTR) study or Transportation Statement to determine the action's impact on the overall transportation network. As such, the Applicant and DDOT coordinated on an agreed-upon scope for a CTR that is consistent with the scale of the action.

The following review provided by DDOT evaluates the Applicant's December 20, 2019 Updated Transportation Statement, prepared by Wells & Associates, to determine their 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.

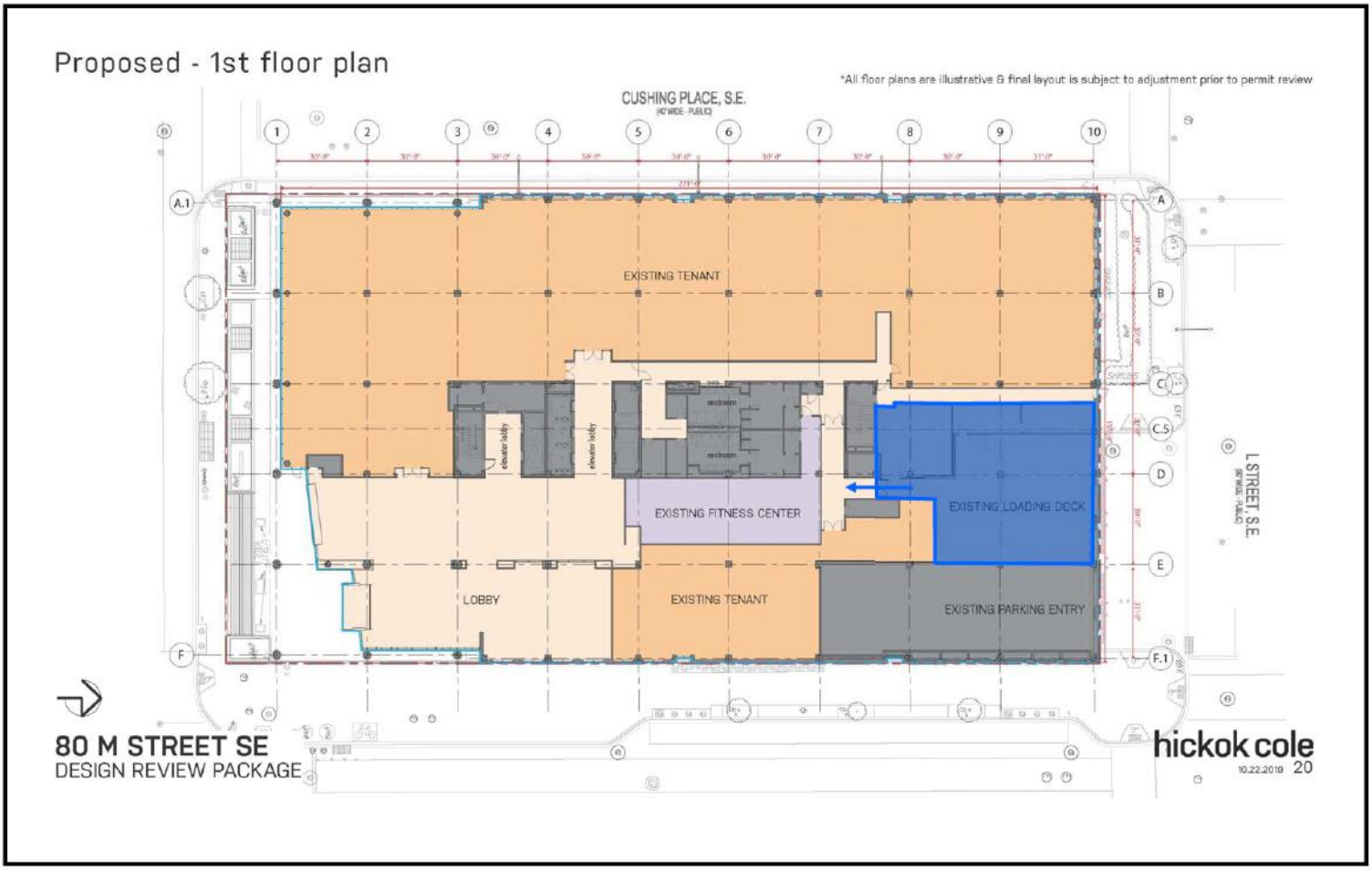
Site Design

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

Vehicular access is provided via an existing large curb cut at the rear of the building on L Street SE. The curb cut also provides access to the loading dock. There is currently a gate installed at each of the entrance and exit lanes to the underground parking garage. The arm controlling the entrance to the garage is set back about one (1) car length internal to the building to minimize queueing back into public space. Primary pedestrian access will be modified but will remain in the southeast corner of the building at the corner of M Street and 1st Street SE. Figure 1 below shows the proposed site layout.

Figure 1 | Site Plan (Source: Wells & Associates 12/20/19 Transportation Statement, Figure 5)



Vehicle Parking

The overall parking demand created by the development is primarily a function of land use, development square footage, 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, proximity to transit, connectivity of bicycle and pedestrian facilities within the vicinity of the development, and the demographic composition and other characteristics of the potential residents.

The 2016 Zoning Regulations (ZR16) Subtitle C § 701.5 and § 702.3b state that there is no minimum parking requirement for sites within a Downtown (D) zone. The site currently contains 295 off-street

parking spaces which were approved under the 1958 zoning regulations (ZR58) prior to ZR16 taking effect. DDOT strongly supports the reduction of seven (7) vehicle parking spaces to 288 total spaces in order to provide long-term bicycle parking but notes that the amount of vehicle parking to remain is still quite high given the proximity to high quality transit. Excess parking has the potential to induce additional driving to and from the site. If the entire building were proposed new today, DDOT would expect the parking supply to be approximately half of what was originally built (160-175 spaces).

Bicycle Facilities

The District is committed to enhancing bicycle access by ensuring consistent investment in bicycle 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 bicycling trips. Cycling is expected to be an important mode of transportation for the site, most notably for connecting the site to nearby Metro stations. While the Metro stations are located outside of the typical walkshed of rail transit stations, the distance is ideal for bicycling.

The Applicant is proposing to provide 43 long-term bicycle parking spaces in the first level of the parking garage, and a total of 12 short-term spaces (6 inverted U-racks). There are currently zero (0) long-term and six (6) short-term spaces (3 inverted U-racks on 1st Street SE) at the existing building. Both of these amounts of bicycle parking meet ZR16 requirements. The short-term racks should be located close to building entrances and meet other design and location requirements of ZR16. The site currently has no showers or lockers for employees that commute by bicycle. The Applicant is proposing to meet the current zoning requirements by installing four (4) showers and 25 lockers.

There is currently a 19-dock Capital Bikeshare (CaB) station located along the 1st Street SE side of the building in public space. If there are any future changes to this side of the building (i.e., installing a new entrance), ensure that the existing CaBi station is designed into the site plan to stay in place or only be shifted a minimal distance from its current location.

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.

The site currently has three (3) loading docks that are access from the large curb cut at the rear of the property (see Figure 1 above). No changes are proposed to the existing loading configuration, but the Applicant is proposing to implement a Loading Management Plan (LMP) to address the existing back-in loading condition that does not meet modern DDOT standards. DDOT concurs with the following proposed LMP and requests it be included as a condition of approval in the Zoning Order:

- A loading dock manager will be designated by the building management who will be on duty during delivery hours. The dock manager will be responsible for coordinating with vendors and tenants to schedule deliveries and will work with the community and neighbors to resolve any conflicts should they arise;

- A lease provision will require all tenants to use only the loading area for all deliveries and move-in and move-out activities;
- All tenants will be required to schedule deliveries that utilize the loading area (any loading operation conducted using a truck 20-feet in length or larger);
- The dock manager will schedule deliveries using the berths 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 compromise safety or impede functionality;
- The dock manager will monitor inbound and outbound truck maneuvers and will ensure that trucks accessing the loading dock do not block vehicular, bike, or pedestrian traffic along L Street except during those times when a truck is actively entering or exiting a loading berth;
- Service vehicle/truck traffic interfacing with L Street traffic will be monitored during peak periods and management measures will be taken, if necessary, to reduce conflicts between truck and vehicular movements;
- 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 goDCgo Motorcoach Operators Guide, and the primary access routes shown on the DDOT Truck and Bus Route Map (godcgo.com/freight); and
- The dock manager will be responsible for disseminating suggested truck routing maps to the building's tenants and to drivers from delivery services that frequently utilize the development's loading dock as well as notifying all drivers of any access or egress restrictions. The dock manager will also distribute flyer materials, such as the MWCOG Turn Your Engine Off brochure, to drivers as needed to encourage compliance with idling laws. The dock manager will also post these materials and other relevant notices in a prominent location within the loading area.

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, landscaping, street lights, sidewalks, and other appropriate features within the public Right-of-Way (ROW) bordering the site.

The Applicant must work closely with DDOT and 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. In conjunction with Titles 11, 12A, and 24 of the *District of Columbia's Municipal Regulations (DCMR),* DDOT's *Design and Engineering Manual (DEM)* and DDOT's *Public Realm Design Manual* will serve as the main references for the Applicant. DDOT staff will be available to provide additional guidance during the Public Space permitting process.

The Applicant is proposing a few minor features (short-term bicycle racks, street trees, and a bikeshare station expansion) in public space as part of this Design Review application that will require a public space permit. The Applicant should continue to work with DDOT to find opportunities for widening the sidewalk along the M Street frontage to 10. The 80 M Street property is unique in that the property line is at the sidewalk, not the building face, so any future sidewalk widening would require either DDOT to

move the curb and treeboxes away from the building or the property owner alter the locations of the stairs and planters.

Travel Assumptions

The purpose of the Applicant's 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.

Mode Split and Trip Generation

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, proximity to transit options, availability and cost of vehicle parking, among many others.

The Applicant developed trip generation assumptions for the additional three (3) floors of office space based on a combination of existing vehicle and pedestrian counts at the site driveways and building entrances. This data was collected on November 13, 2019. The automobile mode share assumptions were based on the proportion of observed vehicle person trips to the overall number of person trips in the data collected. The transit, walking, and biking mode splits applied to the pedestrians counted at the building entrances were based on the 2005 WMATA Development Related Ridership Survey. Figures 2 and 3 below present summaries of mode split and trip generation assumptions for the proposed project.

Figure 2 | Mode Split Summary **(Source: Wells & Associates 12/20/19 Transportation Statement, Table 3)**

Component	Mode Split	
	AM	PM
Auto Person-Trips	29%	37%
Metrorail Person-Trips	52%	47%
Metrobus + Other Transit Person-Trips	11%	10%
Walk/Bike Person-Trips	7%	7%

Figure 3 | Anticipated New Trips **(Source: Wells & Associates 12/20/19 Transportation Statement, Table 6)**

Component	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
Person Trips	**84**	**19**	**103**	**18**	**77**	**95**
Auto Person Trips	28	2	30	11	24	35
Metrorail Person Trips	56	17	73	7	53	60
Metrobus + Other Transit Person Trips	9	3	12	1	9	10
Walk/Bike Person Trips	6	2	8	1	5	6

As shown above, the office building addition is expected to generate a moderate number of additional transit trips (70-85) and automobile trips (30-35) on the transportation network during the weekday commuter peak hours.

Transportation Demand Management (TDM)

DDOT requires Applicants of large developments to implement 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, amount of vehicle parking, 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.

In the December 20, 2019 Updated Transportation Statement, prepared by Wells & Associates, the Applicant proposed the following TDM Plan:

- Transportation Management Coordinators (TMC) will be designated for the planning, construction, and operations phases of the development. Contact information for the TMC will be provided to goDCgo. The TMC will receive TDM training from goDCgo to learn about the TDM conditions for this project and available options for implementing the TDM Plan. The TMC will act as a liaison with DDOT, goDCgo, and Zoning Enforcement. The position may be part of other duties assigned to the individual;
- The TMC will develop, distribute, and market information regarding transportation options to tenants of the building and will promote transportation events, such as Bike to Work Day, National Walking Day, and Car Free Day;
- The TMC will notify goDCgo each time a new tenant moves into the building and will provide TDM information to each tenant when they move in;
- Following certificate of occupancy, the TMC will conduct an annual commuter survey of employees on-site, and report TDM activities and data collection efforts to goDCgo once per year. All employer tenants must survey their employees and report back to the Transportation Coordinator;
- The TMC will demonstrate to goDCgo that tenants with 20 or more employees are in compliance with the DC Commuter Benefits Law by participating in at least one of the three transportation benefits outlined in the law (employee-paid pre-tax benefit, employer-paid direct benefit, or shuttle service), as well as any other commuter benefits related laws that may be implemented in the future;
- The property management website will include information on and/or links to current transportation programs and services, such as: Capital Bikeshare, Car-sharing services, Ride-hailing services (e.g. Lyft or Uber), Transportation Apps (e.g. Metro, Citymapper, Spotcycle, Transit), goDCgo.com Commuter Connections Rideshare Program, Commuter Connections Guaranteed Ride Home, and Commuter Connections Pools Program;

- The TMC will provide 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) or other comparable service if MWCOG does not offer this in the future;
- Forty-three long-term secure bicycle spaces will be provided on the P1 level of the garage. Six additional short-term bicycle spaces (in addition to the six existing spaces) will be provided in public space on First Street;
- A bicycle repair facility will be provided on the P1 level of the garage;
- Shower and changing facilities will be provided in the building for employees who bike, walk, or jog to work. In accordance with ZR16, four showers and 25 lockers will be provided;
- Two electric vehicle charging stations will be provided in the garage;
- A minimum of two parking spaces located in convenient locations in the garage near the elevator lobby will be designated for carpools and/or vanpools;
- The cost of parking spaces for tenants will be unbundled from leases;
- A free SmarTrip card and one complimentary Capital Bikeshare coupon good for a free ride to each new employee;
- Applicant will not lease unused parking spaces to anyone aside from tenants of the building (e.g., will not lease to other nearby office employees, single-family home residents, or sporting events). Hourly and daily public parking is still permitted;
- The Applicant will install missing street trees along the property's 1st Street SE frontage as long as no utility conflicts are present. Notwithstanding the fact that DDOT's preferred minimum tree box size is four-feet, and they have indicated three-foot treeboxes could be installed if there are constraints with WMATA vaults, if any utilities conflict with the installation of three- or four-foot tree boxes, the Applicant will not install the missing trees;
- Include a CaBi expansion plate for the adjacent Capital Bikeshare station up to an amount of $8,100;
- Following the issuance of a certificate of occupancy for the Project, the Transportation Coordinator shall submit documentation used to summarize compliance with the transportation and TDM conditions of the Order (including, if made available, any written confirmation from the Office of the Zoning Administrator) to the Office of Zoning for inclusion in the IZIS case record of the case; and
- Following the issuance of a certificate of occupancy for the Project, the Transportation Coordinator will submit a letter to the Zoning Administrator, DDOT, and goDCgo every five (5) years (as measured from the final certificate of occupancy for the Project) summarizing compliance with the transportation and TDM conditions in the Order.

DDOT finds the proposed TDM Plan, in conjunction with numerous nearby transit options and a reduction in the amount of vehicle parking, to be sufficiently robust to encourage usage of non-automotive modes and reduce automotive travel to and from the site.

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