

# Government of the District of Columbia

## Department of Transportation



### **d. Planning and Sustainability Division**

#### **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** Meredith Soniat *MS*  
Acting Associate Director

**DATE:** January 3, 2025

**SUBJECT:** ZC Case No. 24-06 – 4650 Benning Road SE (DMPED Fletcher-Johnson School Site)

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#### **PROJECT SUMMARY**

The District of Columbia and Fletcher-Johnson Community Partners LLC (collectively, the “Applicant”) seeks approval of a Map Amendment to rezone a 664,839-square-foot property from RA-1 to MU-8B. The subject property is located at 4650 Benning Road SE (Square 5344, Lot 802) and is bounded by Benning Road to the west, C Street SE to the north, St Louis Street SE to the east, and apartment buildings to the south. The site is currently improved with the former Fletcher-Johnson school and the adjacent athletic field which have been vacant since 2011.

#### **SUMMARY OF DDOT REVIEW**

The District Department of Transportation (DDOT) is committed to achieving an exceptional quality of life by encouraging sustainable travel practices, safer streets, and outstanding access to goods and services. To achieve this vision, DDOT works through the Map Amendment process to evaluate the requested zoning change and to inform the Zoning Commission on the order of magnitude impacts to the transportation network. After an extensive review of the case materials submitted by the Applicant, DDOT finds:

- The site is less than ½ mile from the Benning Road Metrorail Station;
- The proposed MU-8B (Mixed-Use – Medium Density) zone would allow for approximately 2,900 more residential units and 665,000 square feet more retail on the property than the maximum allowed in the existing RA-1 zoning;
- The increased density is expected to generate a significant increase in the amount of vehicle, transit, biking, and walking trips;
- Any future development proposals must analyze the potential impact of the additional vehicle trips generated by the additional density on the roadway network in accordance with DDOT’s most recent *Guidance for Comprehensive Transportation Review*;

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**ZONING COMMISSION**

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CASE NO.24-06  
EXHIBIT NO.22

- DDOT encourages the Applicant to minimize the amount of off-street parking provided with any future redevelopment proposals. Per DDOT’s January 2022 *Guidance for Comprehensive Transportation Review*, ideally the development would provide no more than 0.35 vehicle spaces per unit (1 per 3 multi-family residential units);
- Any development proposals for the site will need to account for long-term bicycle parking storage rooms, either below- or at-grade in easily accessible locations from building lobbies, as well as short-term bicycle parking, as required by Title 11 of the *District of Columbia Municipal Regulations (DCMR)* Subtitle C, § 801 and Title 18 of the *DCMR* § 1214;
- DDOT will not support any new curb cuts to the property from Benning Road. The Applicant will be required to either close the existing curb cut to Benning Road and restore the sidewalk and tree box or to build a DDOT-compliant roadway connection between 46<sup>th</sup> Street SE and D Street SE through the existing parking lot; and
- The proposed rezoning would support nearby transit and generate additional foot traffic to support nearby businesses. This is consistent with DDOT’s approach to infill sites which should be dense, compact, transit-oriented, and improve the public realm.

## RECOMMENDATION

DDOT has no objection to the approval of the requested Map Amendment.

## CONTINUED COORDINATION

Given the achievable matter-of-right density possible on the subject property if the rezoning is granted, it is expected that the Applicant will coordinate with DDOT through the permitting process on the following actions to minimize impacts of a future development proposal on the transportation network:

- Depending on the final development program and if any future relief is requested from the Board of Zoning Adjustment (BZA) or Public Space Committee (PSC), a Comprehensive Transportation Review (CTR) study or some other transportation analysis may be required;
- A Transportation Demand Management (TDM) Plan may be required if a curb cut is requested, the contents of which will be commensurate with the land use, parking supply, and scale of future development, in accordance with the most recent *Guidance for Comprehensive Transportation Review*;
- When the property ultimately develops, the site should be designed so that loading occurs without trucks performing backing maneuvers through sidewalk space. Also, coordinate with DDOT on an appropriate Loading Management Plan (LMP), if necessary;
- Submit a detailed curbside management and signage plan to DDOT, consistent with current DDOT policies. If meter installation is required, they will be at the Applicant’s expense;
- Coordinate with DDOT’s Urban Forestry Division (UFD) and the Ward 7 Arborist regarding the preservation of any existing Heritage Trees or Special Trees on the property. According to the District’s [Tree Size Estimator map](#), the property has several Heritage Trees and many Special Trees; and
- Continue coordination with DDOT on the public space design elements noted in the Streetscape and Public Realm section of this report.

## TRANSPORTATION ANALYSIS

### Mode Split and Trip Generation Comparison

DDOT conducted a trip generation analysis for the site to compare the transportation impacts of residential development scenarios under the existing RA-1 with the proposed MU-8B zones. To complete the analysis, DDOT first assessed the theoretical maximum development potential of the site based on current and proposed zoning.

The existing RA-1 zone allows for the site to be developed with low- to moderate-density development, including detached dwellings, rowhouses, and low-rise apartments. If rezoned to MU-8B, the site could potentially achieve a 6.0 floor-area ratio (FAR) for a mixed-use development assuming an Inclusionary Zoning (IZ) bonus. It is estimated that a maximum of approximately 3,700 residential units and 665,000 square feet of retail could be constructed on-site if the rezoning to MU-8B is granted, as compared to approximately 800 dwellings with no first-floor retail under RA-1 (with a Special Exception granted by the BZA under the New Residential Developments provision of Subtitle U, § 421).

It is important to note that a specific development has not been proposed and that these are just estimates of a potential development based on lot size, lot coverage, FAR, by-right uses, and building heights allowed by zoning, which DDOT obtained from the OP Setdown Report. Granting the rezoning would not lock in the development program estimated in this report since the MU-8B allows for a wider range of uses and the site may include additional constraints that will affect the amount of developable space.

To determine the number of trips generated by each scenario, DDOT utilized the rates published in the *ITE Trip Generation Manual, 11<sup>th</sup> Edition*, webtool. Non-auto mode shares of 60% and 75% were assumed for residential and retail uses, respectively, based on the site's proximity to Metrorail. Table 1 below presents a summary of DDOT's estimate of vehicle and person trips for each development scenario.

As shown below, development of the site with the maximum number of allowable units (estimated 3,694 multi-family units and 664,839 square feet of retail) will generate approximately 686 vehicle trips in the weekday morning commuter peak hour, 1,141 vehicle trips in the weekday evening commuter peak hour, and 1,308 vehicle trips in the Saturday peak hour, as compared to the approximately 128 vehicle trips in the weekday morning commuter peak hour, 163 vehicle trips in the weekday evening commuter peak hour, and 131 vehicle trips in the Saturday peak hour that could be generated under max build-out under existing zoning. This represents a significant increase in vehicle trips on the transportation network.

**Table 1 | Trip Generation Comparison**

Development Scenario	Estimated Development Program	AM Peak Person Trips	PM Peak Person Trips	SAT Peak Person Trips	AM Peak Vehicle Trips	PM Peak Vehicle Trips	SAT Peak Vehicle Trips
Existing Conditions	664,839 SF Empty Lot	0	0	0	0	0	0
Maximum Current Matter-of-Right in RA-1 Zone	798 Multi-Family Dwellings (with Special Exception)	377	480	386	128	163	131
Maximum Future Matter-of-Right in MU-8B Zone	3,694 Multi-Family Dwellings 664,839 SF Retail	2,629	5,814	7,024	686	1,141	1,308
Net Change Max RA-1 to Max MU-8B	+2,896 Multi-Family Dwellings +664,839 SF Retail	+2,252	+5,334	+6,638	+559	+979	+1,177

#### Vehicle Parking, Bicycle Parking, and Loading Requirements

Since the site is located within ½ mile of the Benning Road Metrorail Station, DDOT encourages the Applicant to take advantage of the allowable 50% reduction in the parking minimum, per Title 11 of *DCMR*, Subtitle C, § 702.1(a), when the site redevelops.

According to DDOT's January 2022 *Guidance for Comprehensive Transportation Review*, a site this proximate to Metrorail should provide no more than 0.35 spaces per multi-family residential unit (1 space per 3 units). The presence of surplus parking has the potential to induce demand for additional driving on the roadway network. During public space permitting, the Applicant will be required to commit to a TDM plan if the project has 20 or more residential units and a curb cut, the contents of which will be determined at that time and will be influenced by the amount of off-street parking provided. The Applicant will need to meet the requirements for electric vehicle (EV) charging infrastructure in accordance with the Comprehensive Electric Vehicle Infrastructure Access, Readiness, and Sustainability Amendment Act of 2024, which goes into effect in 2027.

The project must meet all bicycle parking requirements. DDOT encourages the Applicant to meet or exceed the bicycle parking, showers, and lockers requirements of Title 11 of the *DCMR* Subtitle C § 800 and Title 18 of *DCMR* § 1214. Long- and short-term bicycle parking should be designed in accordance with the 2018 DDOT *Bike Parking Design Guide*. As required by zoning, at least 50% of long-term bicycle parking spaces must be located horizontally on the floor or easily accessible on the bottom level of a two-tier rack system. Additionally, DDOT requires at least 5% of spaces be designed for cargo and larger bikes (10 feet by 3 feet rather than 6 feet by 2 feet) and 10% of spaces be served by electrical outlets for e-bikes and scooters.

If the redevelopment proposal triggers loading requirements, the Applicant must ensure that there is no backing of trucks across the sidewalk and that all movements through sidewalk space are head-in/head-out with turns occurring on private property or an alley. If an alley is constructed as part of the redevelopment, access must be provided via the alley. If the project has more than three (3) residential units, the Applicant must contract a private trash collection service. Trash must be stored on private property out of the view of the sidewalk and collected from an alley or parking lot. Move-ins and move-

outs should occur from a loading berth, off-street parking space, alley, or parking lot, if provided. Future residents may also obtain “emergency no parking” signs through DDOT’s Transportation Online Permitting System (TOPS) to reserve an on-street parking space for move-ins and move-outs.

Note that the exact zoning requirements for vehicle parking, bicycle parking, and loading will be determined by the Department of Buildings (DOB) and will be based on the specific development ultimately proposed.

## **HERITAGE AND SPECIAL TREES**

According to the District’s [Tree Size Estimator map](#), the property has several Heritage and many Special trees. DDOT expects the Applicant to coordinate with the Ward 7 Arborist regarding the preservation and protection of existing Heritage, Special, and small street trees, as well as the planting of new street trees, in bioretention facilities or a typical expanded tree planting space, if proposed.

Heritage Trees have a circumference of 100 inches or more and are protected by the Tree Canopy Protection Amendment Act of 2016. With approval by the Mayor and DDOT’s Urban Forestry Division (UFD), Heritage Trees might be permitted to be relocated. As such, the Applicant may be required to redesign the site plan to preserve the Non-Hazardous Heritage Trees. Special Trees are between 44 inches and 99.99 inches in circumference. Special Trees may be removed with a permit. However, if a Special Tree is designated to remain by UFD, a Tree Protection Plan (TPP) will be required.

## **STREETSCAPE AND PUBLIC REALM**

If the site develops or there are any substantial renovations to future buildings, the property owner will be expected to rehabilitate streetscape infrastructure between the curb and the property lines, in line with District policy and practice. This includes curb and gutters, street trees and landscaping, streetlights, sidewalks, and other appropriate features within the public rights of way bordering the site.

Specifically, there are potential access and public space issues that the Applicant should be aware of and continue to coordinate with DDOT on, when the site develops:

- DDOT typically requires “mega-blocks” of more than 600 feet in length (such as the site’s western boundary from C Street to 46<sup>th</sup> Street) to be broken up through the creation of new local streets and alleys that result in smaller blocks in the 300-400-foot range; however, the site’s significant topography likely limits the feasibility of new streets or alleys from Benning Road except through the existing Benning Road curb cut. This driveway effectively serves as the fourth leg of the signalized intersection of 46<sup>th</sup> Street and Benning Road where it continues through the site’s surface parking lot and connects to the intersection of St Louis Street and D Street. Any future development proposals should consider building this connection as a DDOT-compliant roadway that must either be dedicated to the public right-of-way or include a public access easement to provide access through the site to the general public;
- Though breaking up the Benning Road “mega-block” may not be feasible, any future development proposal should provide, at a minimum, an ADA- and DDOT-compliant pedestrian connection through the site between E Street SE and Call Place SE and consider other connections to provide additional porosity through the site for pedestrians;
- All vehicular site access to the site, as well as loading facilities and trash pick-up, should be via St Louis Street or a DDOT-compliant roadway connection between 46<sup>th</sup> Street and D Street through the existing parking lot. Any future development proposals should also consider a

private alley network either from St Louis Street or a potential roadway connection through the site to consolidate vehicle and loading access to the maximum extent possible;

- Depending on the final site design of the proposed development and the status of existing or potential Heritage Trees, DDOT may require the *paper street* segment of St Louis Street between Call Place and D Street along the eastern property line be constructed to provide additional access;
- No new curb cuts to the property from Benning Road should be proposed. The Applicant will be required to either close the existing curb cut to Benning Road and restore the sidewalk and tree box or to build the roadway connection through the site;
- If the redevelopment proposal triggers loading requirements, ensure there is no backing of trucks across the sidewalk and all movements through sidewalk space are head-in and head-out;
- The existing sidewalk along the site's St Louis Street frontage does not meet DDOT standards and should be constructed with a sidewalk clear path of at least 6 feet in width and tree boxes of at least 4 feet in width. Depending on the density of any future development proposal, a wider sidewalk clear path may be required;
- At any corners surrounding the site where an on-street parking lane exists (such as C Street between Benning Road and St Louis Street), install concrete curb extensions and ensure all curb ramps and crosswalks are up to modern standards;
- Ensure any pedestrian entrances to future multi-family buildings are at-grade with the public sidewalk so that no stairs or ramps are required in public space;
- Provide a plan showing the detailed design of the long-term bike storage room so the Planning and Sustainability Division can confirm it meets the requirements of Title 11 of *DCMR* Subtitle C, § 800, Title 18 of *DCMR* § 1214, and DDOT *Bike Parking Guide* best practices;
- In accordance with the District's policy prohibiting right-turn on red movements at signalized intersections, install or update No Right Turn on Red signage at each signalized intersection surrounding the site;
- During permitting, submit a Curbside Management Plan for all public streets surrounding the site showing existing and proposed signage and curbside designations;
- All overhead power lines should be moved to underground at the time of redevelopment so that poles and wires do not clutter DDOT public space; and
- Any existing Cobra Head-style streetlights along the site perimeter should be replaced with either Washington Globe or Decorative Tear Drop-style streetlights. Exact style to be installed will be determined at the time of permitting.

DDOT encourages the Applicant to participate in a Preliminary Design Review Meeting (PDRM) with the Office of Planning and DDOT to discuss the public space design when a future development is proposed.

In conjunction with the *DCMR*, DDOT's *Design and Engineering Manual* and the *Public Realm Design 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.